

AWS Conformity Assessment

Report for:

COCA-COLA HBC BULGARIA AD PRODUCTION PLANT BANKIA

PIR0362403/ 3066760
AWS-000282
14-16/09/2020
162, Stefan Stambolov Str., Bankia 1320, Bulgaria
AWS Standard Version 2, 22/03/2019
Artemis Papadopoulou
Initial assessment
Single
Piraeus



Contents

1.	Executive report	3
2.	Introduction	4
3.	AWS Standard Requirements Checklist - Detailed	6
4.	Stakeholder interviews	32
5.	Conformity Assessment Findings Log – AWS standard	33
6.	Next visit details	35
7.	Audit Programme/Plan	36
8.	Certificate details	37
9.	Report explanation	38

Attachments

This report was prepared by:		This report was presented to and accepted by:	
Name:	Artemis Papadopoulou	Name:	Ventsislav Kachovski
Job title:	AWS Lead Auditor	Job title:	County Environmental Manager



1. Executive report

Assessment outcome & AWS certification level:

Choose from one of the following options:

- 1) Recommendation for issuance of the certificate
- 2) Recommendation for continuation of the certificate

Choose from one of the following options:

- 1) AWS Core
- 2) AWS Gold
- 3) AWS Platinum Certified

Areas of weaknesses/ opportunities for improvement:

The plant is advised to focus on obtaining information about its stakeholders' water challenges and opinion about the water management and performance of the company.

Re-evaluation of AWS certification level (if applicable):

Choose from one of the following options:

- 1) recommendation for an 'upgrade' in certification level
- 2) recommendation for a 'downgrade' in certification level



2. Introduction

AWS responsible person:

Ventsislav Kachovski, Country Environmental Manager

AWS responsible person contact details:

Office telephone:	+359890415622
Mobile telephone:	
Email:	ventsislav.kachovski@cchellenic.com

Scope of the assessment (including all locations & facilities visited):

CCH Bankia plant (no site visit, due to COVID-19 restriction measures)

NOTE: The site has been visited in previous occasions, in the framework of EWS assessment. The company's well has been visited during these audits.

Description of the catchment:





The plant and its well, as the only water abstraction point, are located in the valley of the Bankyanska (Kakach) river, which forms part of the Iskar sub-basin. The well extracts water from a Cretaceous fractured andesite aquifer. This deep aquifer is overlain by an aquiclude of Neogene sediments and a shallow Quaternary aquifer. Through an intensive fault system, a hydraulic connection between the shallow and the deep aquifer system is given.

Summary of shared water challenges:

- Over extraction of water resources
- Water/ wastewater quality
- > Increasing risk of drought and water scarcity including climate change

General information about the site's operations:

- The plant was acquired by CCH in 2005
- A new high-speed KRONES line was installed in 2016 (last big change at the plant)
- Products: mineral water (10 product SKU)
- Production Centre Bankia is located in the river basin of Danube. This is the largest river basin throughout Europe and covers an area of 817 000 square kilometres. The nearest open water course is Creek Bankiska (Kakach).
- Water supply: municipal (Veolia) and 1 well (TK-1 N Ivanyane). Characteristics of the well: 740 depth, Temperature of the water: 28-29 °C. The well was visited during the site tour at the initial EWS audit.
- Bankia wastewater is disposed of to the Municipal Wastewater Treatment Kubratovo. Sofia's wastewater treatment plant is designed to treat the city's mixed wastewater (domestic, industrial and storm water) to an extent which allows for it to be discharged into the Iskar River, which is a major contributor of river Danube.

Name	Job title	Company
Ventsislav Kachovski	Country Environmental Manager	CCHBC Bulgaria
Shterio Spasov	Quality Assurance Supervisor	CCHBC Bulgaria Bankia plant
Boriana Rangelova	Technical Sustainability Manager	CCHBC Bulgaria
Vyara Dineva	Country Health & Safety Manager	CCHBC Bulgaria
Adelina Petrova	Production Manager	CCHBC Bulgaria Bankia plant
Emil Kolev	Plant Manager	CCHBC Bulgaria Bankia plant
Eva Hristova	System Implementation & Audits Manager	CCHBC Bulgaria
Dayana Nikolova	HS&E Specialist	CCHBC Bulgaria Bankia plant

Audit attendees:



3. AWS Standard Requirements Checklist - Detailed

Criterion #	Indicator #	Conformance (YES/NO)	Level of non conformance (OBS, Minor, Major)	Audit trails/ objective evidence	Scoring (delete if NA)
STEP 1 GATHER & UN	IDERSTAND				
1.1 Gather information to define the site's physical scope for water stewardship purposes, including: its operational boundaries; the water sources from which the site draws; the locations to which the site returns its discharges; and the catchment(s) that the site affect(s) and upon which it is reliant.	 1.1.1 The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including: Site boundaries; Water-related infrastructure, including piping network, owned or managed by the site or its parent organization; Any water sources providing water to the site that are owned or managed by the site or its parent organization; Water service provider (if applicable) and its ultimate water source; Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies; Catchment(s) that the site affect(s) and is reliant upon for water 	YES		 Map of the plant Bankia water supply Catchment area (Iskar river basin) Iskar source (municipal water comes mainly from Iskar lake) Water pipeline map of municipal water (reservoirs, pump stations, water pipe for water supply, water for production water) Map with the sewage system in Bankia plant (rain water, process and sanitary wastewater), July 2015 	
1.2 Understand relevant stakeholders, their waterrelated challenges, and the	1.2.1 Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall:	YES	Minor NC 0920APP01	 Stakeholders and their water-related challenges (Ministry of Environment, Basin Directorate, Regional Inspection Agency of Water, municipal Water and 	



influence beyond its boundaries.	 Inclusively cover an relevant stateholder groups including vulnerable, women, minority, and Indigenous people; Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies; Provide evidence of stakeholder consultation on water-related interests and challenges; Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups; Identify the degree of stakeholder engagement based on their level of interest and influence. 		 wastewater provider, laboratories, Barikia municipality, Denkstatt, certification bodies)-potential to influence, level of interest, degree of engagement, water concerns, etc. List of stakeholders in the catchment area (neighbours with wells) Overview map with stakeholders' location CSR Maturity matrix Annual meetings with the Danube River Basin Directorate (last meeting was held on 9/12/2019)-topics discussed: presentation of the RBM committee initiatives in international level, report of RBMP overview of the activities of the Basin management- Shared water challenge: wastewater quality (see 1.5.1 indicator) Document with contact persons' details (e-mail, telephone) Danube Day, 2 July 2020 (presentation of 2025 sustainability targets, wastewater treatment, usage of chemicals, water saving measures and achievements, etc. to students and teachers)
	between site and stakeholder shall be identified,	YES	See above.



	within the catchment and considering the site's ultimate water source and ultimate receiving water body for wastewater.			
1.3 Gather water- related data for the site, including: water balance; water	1.3.1 Existing water-related incident response plans shall be identified.	YES		
quality, Important Water-Related Areas, water governance, WASH: water-related			 National risk assessment plan according to IMCR manual (natural disasters like flood and earthquakes have been included)-last update: 2019 	
costs, revenues, and shared			 Local risk assessment plan (leakage from the WWTP, fire, flood and earthquake)-12/9/2019 	
value creation.			 Emergency responsibility plan (last review: 12/9/2019)-contact persons and telephones, scenarios and mitigation actions: fire, earthquake, explosion, reporting of incidents, flood, leakages of chemicals, etc.) 	
			 Instructions for chemical usage 	
			 Program for management of hazardous materials 	
			Emergency drills are performed at regular intervals for checking the performance of the control measures in place (the last spill drill was performed on 1 st of November 2019 with participants: operators, contractors, employees from Warehouse, maintenance, Administration and Lab)	
	1.3.2 Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped	YES	 Flowmeters 2019. xls (Daily monitoring of water abstracted, water for citizen tap) 	
			 Monitoring 2019 (total water use, municipal, drained municipal, mineral to production, well water, to the citizens, drained mineral water, wastewater, WUR) 	
			 Losses of mineral water (Bottled water, city water, 	



		abstracted water)
		 Water map Bankia 2019 (water uses including water to citizens, wastewater)
1.3.3 Site water balance, inflows, losses, storage, and outflows, including indication of annual variance in water usage rates, shall be quantified. Where there is a water-related challenge that would be a threat to good water balance for people or environment, an indication of annual high and low variances shall be quantified.	YES	 Water map Bankia 2019 (monthly quantities of incoming water, process and sanitary wastewater discharged, water in production, tap water to the citizens) Water map Bankia 2020
1.3.4 Water quality of the site's water source(s), provided waters, effluent and receiving water bodies shall be quantified. Where there is a water- related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be quantified.	YES	 Annual physico-chemical analysis of mineral water (TK-1) by Fresenius Lab (9.7.2019) Annual analysis of mineral water (TK-1) by Fresenius Lab (11.6.2019)-micro Annual analysis of municipal water by Fresenius Lab (12.7.2019)-issues with DBP Annual analysis of municipal water (TK-1) by Fresenius Lab (11.6.2019)-micro (total coliforms not compliant) Annual analysis of municipal water by Fresenius Lab (23.9.2019)-all parameters were within limits Protocol of radiology inspection (2017)-within limits (a sample was sent in August-no results yet) Quarterly analysis of raw mineral water by external lab - micro and physicochemical analysis (19.1.2020) Quarterly Inspection by the Regional Health institute (last inspection: 20.5.2020)-no issues Register of daily/ weekly of municipal water monitoring (appearance, taste, odour, turbidity, free chlorine, weekly: total hardness and TDS). E.g. 17.7.2019 Register of daily/ weekly mineral water from the well (level, temperature, turbidity, conductivity, pH, TDS, F, Cl, SO4, CO3, HCO3, Ca, Nh4, Fe, Mn, NO3.



		NO3, flow)	
		 Table with Bankeska rivers' parameters 4 times per year (March, June September, December 2020)- COD, BOD, Temperature, pH, TDS, dissolved oxygen, TN, TP) 	
		According to the permit: Twice per year, monitoring of pH, COD, oils and TSS, for rainwater	
		 Analysis of rainwater by Alimenti Lab on 23.10.2019 and on 16.4.2020 (2 points of monitoring)-no issues 	
		 The results of the analysis are sent to the Authorities. 	
		 Wastewater monitoring.xls 	
		 In-house analysis of the effluent (in daily basis: pH, temperature and once per week: COD, BOD, TSS, TN, TP) e.g. for 1st week of August 2020 	
1.3.5 Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site	YES		



		Final destination of rainwater is the nearby Bankiska River (or Kakach river). Plant's effluent is discharged to the municipal WWTP. The final destination is Iskar river (contributor to the Danube river).	
1.3.6 On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.	YES	No on-site IWRA.	
1.3.7 Annual water-related costs, revenues, and a description or quantification of the social, cultural, environmental, or economic water-related value generated by the site shall be identified and used to inform the evaluation of the plan in 4.1.2.	YES	 WUR EUR OPEX CAPEX 2018-2019 BP OPEX 2019: costs for training, audits, water analysis, water monitoring program, sustainability activities, etc. Sustainability Department Budget (e.g. sustainability activities in a country level) 	



	1.3.8 Levels of access and adequacy of WASH at the site shall be identified.	YES		 Declaration of HR signed the Director of HR, 18.3.2020 (number of employees) WASH Bankia plant 2020 (map with location of showers, sinks, toilets) Instructions for hands' cleaning Process for good hygiene practices, 2011 (control measures for buildings e.g. floors, walls, production areas, equipment, hygiene of personnel, etc.) Provision of bottled water to all employees in the canteen and at the entrance, at the production and at the warehouse 	
1.4 Gather data on the site's indirect water use, including: its primary inputs; the water use embedded in the production of those primary inputs the status of the waters at the origin of the inputs (where they can be identified); and water used in out-sourced water-related services.	1.4.1 The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be identified.	YES		 AWS supplier evaluation Bankia (service/ product, supplier, contact, overall water risk, physical risk quantity and quality, regulatory & reputational risk) Manufacturing Bankia, August 2020 (results of primary inputs' yields vs respective targets presented in the monthly production meetings) QSE Targets 2021_Sept 2020 (water used by the contractors during specific projects) 	
	1.4.2 The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.	YES	OBS 0920APP01	See above.	
	1.4.3 Advanced Indicator The embedded water use of primary inputs in catchment(s) of origin shall be quantified	NO			
1.5 Gather water- related data for the	1.5.1 Water governance initiatives shall be identified, including catchment plan(s), water-	YES		 River Basin management plan of Danube, 2016-2021 	



catchment, including: water governance, water balance, water quality, Important Water- Related Areas, infrastructure, and WASH	related public policies, major publicly-led initiatives under way, and relevant goals to help inform site of possible opportunities for water stewardship collective action.		 (monitoring plan of surface and underground water, evaluation of ecological and chemical condition of Iskar region, protected areas, municipal projects: e.g. modernization of municipal wastewater network in Sofia/ Bankia, which started in 2019, monitoring of the condition of underground and surface water in Iskar region, etc.) Flood protection measures by the Ministry of Environment Map with the flooding risk in the Danube area (no risk in Bankia area)
	1.5.2 Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.	YES	 Concession with Ministry of Environment and Water for the well TK-1 N Ivanyane, (last update:13.08.2013) valid for 25 years License of the well TK-1 N Ivanyane-28.8.2017 (valid for 5 years) Ordinance (4.7.2013)-sanitary protection zones around the well Permit for discharge of rainwater to the river (10.5.2016)-validity indefinite
	1.5.3 The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal,	YES	 Analysis of the operation, assessment of the regulation, capacity and management principles of Iskar reservoir for period 1961-2011 (the results of



variance.			 the maximum water volumes apply for the next 20 years with 95% probability (inflows, outflows, capacity) Iskar cascade scheme
			 Water balance of Vitosha mountain for period 1961- 2010 (origin of Bankeska river): data taken from an EU environmental program
1.5.4 Water quality, including physical, chemical, and biological status, of the catchment shall be identified, and where possible, quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be identified.	YES		 Register of underground and surface water protection zones Map with lakes in Bulgaria (Iskar reservoir is artificial) Table with Bankeska rivers' parameters 4 times per year (March, June September, December 2020)-COD, BOD, Temperature, pH, TDS, dissolved oxygen, TN, TP) Monitoring of the surface water quantity in Danube
1.5.5 Important Water-Related Areas shall be			region 2020
identified, and where appropriate, mapped, and their status assessed including any threats to people or the natural environment, using scientific information and through stakeholder engagement.	YES	OBS 0920APP02	 Bankia HCV.xls (map with rivers' flow and with HCV areas around plant, abstraction wells and discharge point, protection goals, location, type of impact, parameters to control, HCV TEEB) Map with Natura 2000 areas
			 Map with IWRA for drinking water (information from



		the RBMP)	
		See also indicator 1.5.4.	
1.5.6 Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.	YES	 Website of VIK Sofia Water WWTP (volume of treated water, which is 8 times bigger than the volume of Iskar reservoir, discharge to Iskar river, information about the pipeline network, the treatment of wastewater and the sludge) 	
		The VIK Sofia Water covers the water and wastewater treatment needs of the households in the area of Sofia.	
		 Investment program of VIK Sofia Water in 2009-2013 	
		 Investment plan of VIK Sofia Water for 2017-2021 (costs have been included for the maintenance of the canalization, compensation in case of leakage from infrastructure's failure, etc.) 	
		The area of Bankia isn't prone to flooding.	
1.5.7 The adequacy of available WASH services within the catchment shall be identified.	YES	 Website of Commission of Energy and Water regulation in Bulgaria (monitoring of the complaints of the people regarding water/ wastewater and energy) 	
		 Website of Sofia Water/ Analysis of municipal water in Bankia 	
		 Information by the National Statistic institution for period 2010-2018 (In Bulgaria the percentage of households connected with municipal supply of water is 99.5% and the percentage of households connected with WWTP is 49.4%. In the area of Sofia, where Bankia is included, the percentage is 99.4 % and 77.2%, equivalently) 	
		 National law regarding quality of drinking water for domestic use, no 9, last update:16.1.2018 	
		 See also above.	
1.5.8 Advanced Indicator Efforts by the site to support and undertake catchment level water-related data collection shall	YES	 Monitoring of the quality of the river Bankeska (recipient of the storm water from the premises of the 	5



	he identified		nlant) Cas indicator 4 5 4	
	be identified.		planty-See indicator 1.5.4.	
			 Annual disclosure of water consumption data to the Ministry of Environment and to the Statistical Institution. 	
	1.5.9 Advanced Indicator The adequacy of WASH provision within the catchments of origin of primary inputs shall be identified.	NO		
1.6 Understand current and future shared water challenges in the catchment, by linking the water challenges identified by stakeholders with the site's water challenges.	1.6.1 Shared water challenges shall be identified and prioritized from the information gathered.	YES	See indicator 1.2.1.	
	1.6.2 Initiatives to address shared water challenges shall be identified.	YES	See indicator 1.2.1	
	1.6.3 Advanced Indicator Future water issues shall be identified, including anticipated impacts and trends	YES	 CCH_SVA_SWPP Bankya 2019 (current and future vulnerabilities/ risks and respective mitigation plan) 	3
	1.6.4 Advanced Indicator Potential water-related social impacts from the site shall be identified, resulting in a social impact assessment with a particular focus on water.	YES	See below.	4
1.7 Potential water- related social impacts from the site shall be identified, resulting in a social impact assessment with a particular focus on water.	1.7.1 Water risks by the site shall be identified and prioritized, including likelihood and severity of impact within and given timeframe, potential costs and business impact.	YES	 CCH_SVA_SWPP Bankya 2019 Socio-economic aspects for abstraction and discharge have been included. 	
	1.7.2 Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.	YES	CCH_SVA_SWPP Bankya 2019 (current and future vulnerabilities/ risks and respective mitigation plan) See also indicator 4.1.1.	



1.8 Understand best practice towards achieving AWS outcomes: Determining sectoral best practices having a local/catchment, regional,or national relevance.	1.8.1 Relevant catchment best practice for water governance shall be identified.	YES	 Specific training for involved employees in water related issues e.g. for the EHS Specialist Ivelina Georgieva, participation in "water minimization training" held in Schimatari in 2015, for the Country Environmental Manager and System Implementation Coordinator, participation in the "water minimization & reuse training" held in Timisoara in 2014, participation of the Country Environmental Coordinator at the training for wastewater discharge organised by the Ministry of Environment and Water, February 2018, etc. 	
			 Training of the Country Project Engineer in Vienna, regarding EWS implementation (July 2019) 	
			 Group training regarding water management, in May 2020 (Country Environmental Manager, Quality Manager, HSE Coordinator) 	
			Training in environmental topics is performed once per year.	
			 Environmental training (about hazardous materials, near losses' identification, water/ energy use and respective targets, etc.) for all the employees including contractors (e.g. on 1.11.2019). The employees are evaluated after the completion of the training. 	
			 Billboards with improvement memos, KPI performance, etc. 	
			 Near losses process 	
			 Open day in October 2018-visit of employees' families and relatives to the CCH Bankia plant, presentation of water topics 	
	1.8.2 Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.	YES	 CCH Top 10 water savers implementation_ FY 2018 (59.3 % implementation rate) e.g. repair leaks, re-use from the final step of the bottle washers, dry lubrication in PET lines, bottle washer optimization): 3 are not applicable and the rest are implemented. 	



		BP 2018-2019 Capex/ Opex (further optimization of	
		ultratiltration, focus on preventive maintenance,	
		for the identification of water/ air leaks, etc.)	
		· · · · · · · · · · · · · · · · · · ·	
		 SAP/ Near misses and near losses 2017-2018- 2010 (data reported by description type of loss 	
		corrective action, implementation date, status)	
		HSE report_December 2019 (2019: 139 reported and	
		85% of them are closed)	
		HSE report_August 2020 (YTD 2020: 93 reported, 92%	
		of them are closed)	
		 Weknow/ Successful Practices-Quick Wins- lease lease of Quick 	
		Wins (description situation action tangible and	
		non-tangible benefits, speed to benefit, complexity,	
		budget)	
		• BG SP Hot water boiler (description, situation,	
		actions, benefits)	
		• BG QW Mineral water consumption reduction	
		(description, situation, actions, benefits)	
		 Improvement memos (operators inform the shift 	
		leaders, who then upload the information to the	
		system, or they report the information themselves)	
1.8.3 Relevant sector and/or catchment best	VES		
practice for water quality shall be identified,	125		



	1.8.4 Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.	YES	 Collaboration with the Bulgarian Society for Birds' Protection, the ECOPACK and the National Park Vitosha (My Green City) My Green City is an initiative that started 11 years ago. It's about the cleaning of the river and trenches and about planting trees in Vitosha and in Bankia by CCH employees and/ or contractors. In 2017, the 'adaption' of a new forest in Vitosha and planting of 2000 young trees near the village of Klicura took place. In 2018, cleaning activities took place in 15 cities (e.g. at Pancharevo lake in Kostinbrod, in Targovitche, etc.). In total, 1500 employees with their families participated and 1400 bags of waste were collected. Installation of waste containers in the beach for the prevention of marine pollution, in cooperation with ECOPACK (10.6.2019). 	
	1.8.5 Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.	YES	See indicator 1.3.8	
STEP 2 COMMIT AND	PLAN	1		
2.1 Commit to water stewardship by having the senior-most manager in charge of water at the site, or if necessary, a suitable individual within the organization head office, sign and publicly disclose a commitment to water stewardship, the implementation of the AWS Standard and achieving its five outcomes, and the allocation of	 2.1.1 A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments: That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes That the site implementation will be aligned to and in support of existing catchment sustainability plans That the site's stakeholders will be engaged in an open and transparent way That the site will allocate resources to implement the Standard. 	YES	 CCHBC water stewardship policy signed by the CEO of the Coca Cola Hellenic (available at the website) Environmental policy of CCH Bulgaria signed by the General manager and by one of the members of the Board of Directors, 21/8/2020 (available at the website and also posted in the plant and in the Central offices) 	



required resources.				
	2.1.2 Advanced Indicator A statement that explicitly covers all requirements set out in Indicator 2.1.1 and is signed by the organization's senior-most executive or governance body and publicly disclosed shall be identified.	YES	See above.	1
2.2. Develop and document a process to achieve and maintain legal and regulatory compliance.	 2.2.1 The system to maintain compliance obligations for water and wastewater management shall be identified, including: Identification of responsible persons/positions within facility organizational structure Process for submissions to regulatory agencies. 	YES	 In Country level, the Country Environmental Manager is responsible to check about new Bulgarian legislation while the System Implementation Coordinator checks the laws that are applicable in local level. Environmental LEGAL (last review: 26.6.2020) Quarterly reviews by the Country Environmental Manager for identification of new legislation and legal compliance checks) EN-R-321.4, Legal compliance procedure The evaluation of compliance is conducted by the System Implementation Coordinator in a quarterly basis. 	
2.3 Create a water stewardship strategy and plan including addressing risks (to and from the site), shared catchment water challenges, and opportunities.	2.3.1 A water stewardship strategy shall be identified that defines the overarching mission, vision, and goals of the organization towards good water stewardship in line with this AWS Standard.	YES	See indicator 2.1.1.	
	 2.3.2 A water stewardship plan shall be identified, including for each target: How it will be measured and monitored Actions to achieve and maintain (or exceed) it Planned timeframes to achieve it Financial budgets allocated for actions Positions of persons responsible for actions and achieving targets Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the 	YES		



2.3.3 Advanced Indicator The site's partnership/water stewardship activities with other sites within the same catchment (which may or may not be under the same organisational ownership) shall be identified and	4
described.	4
2.3.4 Advanced Indicator YES • My Green city The site's partnership/water stewardship activities with other sites in another catchment(s) (either • My Green city under same corporate structure or with another corporate site) shall be identified. • My Green city	
2.3.5 Advanced Indicator NO Stakeholder consensus shall be sought on the site's water stewardship plan. Consensus should be achieved on at least one target. A list of targets that have consensus and in which stakeholders are involved shall be identified. NO	
 2.4 Demonstrate the site's responsiveness and resilience to respond to water risks 2.4.1 A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified. YES Danube Day in cooperation with Basin Directorate for increasing the water management awareness of children in 2019 My Green City 	
2.4.2 Advanced Indicator A plan to mitigate or adapt to water risks associated with climate change projections developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified. NO STEP 3 IMPLEMENT STEP 3 IMPLEMENT	



3.1 Implement plan to participate positively in catchment governance.	3.1.1 Evidence that the site has supported good catchment governance shall be identified.	YES	See indicator 1.8.1.	
	3.1.2 Measures identified to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be implemented.	YES	See indicators 1.3.8 and 3.3.3.	
	3.1.3 Advanced Indicator Evidence of improvements in water governance capacity from a site-selected baseline date shall be identified.	NO		
	3.1.4 Advanced Indicator Evidence from a representative range of stakeholders showing consensus that the site is seen as positively contributing to the good water governance of the catchment shall be identified.	NO		
3.2 Implement system to comply with water- related legal and regulatory requirements and respect water rights.	3.2.1 A process to verify full legal and regulatory compliance shall be implemented.	YES	See indicator 2.2.1.	
	3.2.2 Where water rights are part of legal and regulatory requirements, measures identified to respect the water rights of others including Indigenous peoples, shall be implemented.	YES	See indicator 1.3.8 and 1.5.2.	
3.3 Implement plan to achieve site water balance targets.	3.3.1 Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.	YES	See indicator 2.3.2.	
	3.3.2 Where water scarcity is a shared water challenge, annual targets to improve the site's water use efficiency, or if practical and applicable, reduce volumetric total use shall be implemented.	YES	See indicator 2.3.2.	
	3.3.3 Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.	YES	Fountain at the entrance of the plant for the provision of water to citizens (obligation of the plant as stated in the concession no D-30-103/13.08.2013)	
	3.3.4 Advanced Indicator	YES	Provision, via the Bulgarian Red Cross, of 27480 It of	6



	The total volume of water voluntarily re-allocated (from site water savings) for social, cultural and environmental needs shall be quantified.		bottled water to the citizens of Pernik, who face water scarcity issues due to extensive droughts in the area.	
3.4 Implement plan to achieve site water quality targets.	3.4.1 Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.	YES	CCH quality targets Quarterly and annual analysis by external labs	
	3.4.2 Where water quality is a shared water challenge, continual improvement to achieve best practice for the site's effluent shall be identified and where applicable, quantified.	YES	See above.	
3.5 Implement plan to maintain or improve the site's and/or catchment's Important Water- Related Areas.	3.5.1 Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.	YES	No on-site IWRA.	
	3.5.2 Advanced Indicator Evidence of completed restoration of non- functioning or severely degraded Important Water-Related Areas including where appropriate cultural values from a site-selected baseline date shall be identified. Restored areas may be outside of the site, but within the catchment.	NO		



	3.5.3 Advanced Indicator Evidence from a representative range of stakeholders showing consensus that the site is seen as positively contributing to the healthy status of Important Water-Related Areas in the catchment shall be identified.	NO		
3.6 Implement plan to provide access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers at all premises under the site's control.	3.6.1 Evidence of the site's provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers onsite shall be identified and where applicable, quantified.	YES	See indicator 1.3.8.	
	3.6.2 Evidence that the site is not impinging on the human right to safe water and sanitation of communities through their operations, and that traditional access rights for Indigenous and local communities are being respected, and that remedial actions are in place where this is not the case, and that these are effective.	YES	See indicator 1.3.8 and 1.5.7.	
	3.6.3 Advanced Indicator A list of actions taken to support the provision to stakeholders in the catchment of access to safe drinking water, adequate sanitation and hygiene awareness shall be identified.	NO		
	3.6.4 Advanced Indicator In catchments where WASH has been identified as a shared water challenge, evidence of efforts taken with relevant public-sector agencies to share information and to advocate for change to address access to safe drinking water and sanitation shall be identified.	NO		
3.7 Implement plan to maintain or improve indirect water use within the catchment.	3.7.1 Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.	YES	See indicator 1.4.1.	



	3.7.2 Evidence of engagement with suppliers and service providers, as well as, when applicable, actions they have taken in the catchment as a result of the site's engagement related to indirect water use, shall be identified.	YES	 On-site audit to water and wastewater provider on 19.5.2020 Image: State of the sta	
	3.7.3 Advanced Indicator Actions taken to address water related risks and challenges related to indirect water use outside the catchment shall be documented and evaluated.	NO		
3.8 Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have.	3.8.1 Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.	YES	See indicator 3.7.2.	
3.9 Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.	3.9.1 Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.	YES	The activities mentioned in indicator 1.8.1 are implemented.	



3.9.2 Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.			The activities/ projects mentioned in indicator 1.8.1 are implemented.		
3.9.3 Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.	YES		The processes mentioned in indicator 1.8.3 are implemented.		
3.9.4 Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.	YES				
3.9.5 Actions towards achieving best practice related to targets in terms of WASH shall be implemented.	YES		The good practices mentioned in indicator 1.3.8 are implemented.		
3.9.6 Advanced Indicator Achievement of identified best practice related to targets in terms of good water governance shall be quantified.	NO				
3.9.7 Advanced Indicator Achievement of identified best practice related to targets in terms of sustainable water balance shall be quantified.	YES		KPI and targets are connected with respective projects.	8	
3.9.8 Advanced Indicator Achievement of identified best practices related to targets in terms of water quality shall be quantified.	NO				
3.9.9 Advanced Indicator Achievement of identified best practices related to targets in terms of the site's maintenance of Important Water-Related Areas have been implemented.	YES		See indicator 1.8.4	8	
3.9.10 Advanced Indicator Achievement of identified best practice related to targets in terms of WASH shall be quantified.	NO				
3.9.11 Advanced Indicator A list of efforts to spread best practices shall be identified.	YES		 WeKnow Database/ SP/QW/LL Toolbox talks/ environmental training Danube Day, 2 July 2020 My Green City' initiative (see indicator 1.8.4) 	3	



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	3.9.12 Advanced Indicator A list of collective action efforts, including the organizations involved, positions of responsible persons of other entities involved, and a description of the role played by the site shall be identified.	YES	 ∘ 'My Green City' initiative (see indicator 1.8.4) 	10
	3.9.13 Advanced Indicator Evidence of the quantified improvement that has resulted from the collective action relative to a site-selected baseline date shall be identified and evidence from an appropriate range of stakeholders linked to the collective action (including both those implementing the action and those affected by the action) that the site is materially and positively contributing to the achievement of the collective action shall be identified.	YES	 'My Green City' initiative (see indicator 1.8.4) Website of municipality of Burgas/ Positive feedback from the Mayor of Burgas regarding the 'My Green City' initiative, speech from the PAC Department of the CCH Bulgaria regarding the event 	6
STEP 4 EVALUATE				
4.1 Evaluate the site's performance in light of its actions and targets from its water stewardship plan and demonstrate its contribution to achieving water stewardship outcomes.	4.1.1 Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.	YES	 Monthly meetings of Production team for water use and challenges e.g. on 29.8.2020 Minutes WUR (review of KPI performance and gap analysis, in case the targets aren't achieved) CAPEX-OPEX 2021 (projects, description, budget, project Manager, status, estimated and actual water saving)-Reuse of the rinsing in RGB line, minimisation of the effluent water, optimisation of near losses process (in cooperation with Kostinbrod plant) CAP template August 2020 (presentation of actions for addressing water issues in group level) Audits for identification of areas of improvement→ proposed projects to be budgeted 	
	4.1.2 Value creation resulting from the water stewardship plan shall be evaluated.	YES	See indicators 1.3.7 and 4.1.1.	
	4.1.3 The shared value benefits in the catchment shall be identified and where applicable,	YES	See indicator 1.3.7.	



	quantified.			
	4.1.4 Advanced Indicator A governance or executive-level review, including discussion of shared water challenges, water risks, and opportunities, and any water-related cost savings or benefits realized, and any relevant incidents shall be identified.	YES	See indicator 4.1.1.	3
4.2 Evaluate the impacts of water- related emergency incidents (including extreme events), if any occurred, and determine the effectiveness of corrective and preventative measures.	4.2.1 A written annual review and (where appropriate) root-cause analysis of the year's emergency incident(s) shall be prepared and the site's response to the incident(s) shall be evaluated and proposed preventative and corrective actions and mitigations against future incidents shall be identified.	YES	Not any violation in 2020.	
4.3 Evaluate stakeholders' consultation feedback regarding the site's water stewardship performance, including the effectiveness of the site's engagement process.	4.3.1 Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.	YES	 Event on 13.12.2019 of the Danube Basin Directorate with presentation of CC Bulgaria contribution to their projects ECOWORLD show on 2.7.2020, positive feedback by one of the teachers who participated in the Danube Day Website of municipality of Burgas/ Positive feedback from the Mayor of Burgas regarding the 'My Green City' initiative B2B Award for the greenest company in Bulgaria granted by public communities and Red Cross in 2019 See also indicator 2.1.1. 	
	4.3.2 Advanced Indicator The site's efforts to address shared water challenges shall be evaluated by stakeholders. This shall include stakeholder reviewing of the site's efforts across all five outcome areas, and their suggestions for continual improvement.	NO		
4.4. Evaluate and update the site's water	4.4.1 The site's water stewardship plan shall be modified and adapted to incorporate any relevant	YES	See indicator 4.1.1.	



stewardship plan, incorporating the information obtained from the evaluation process in the context of continual improvement.	information and lessons learned from the evaluations in this step and these changes shall be identified.			
STEP 5 COMMUNICAT	E & DISCLOSE	I		
5.1 Disclose water- related internal governance of the site's management, including the positions of those accountable for legal compliance with water-related local laws and regulations.	5.1.1 The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.	YES	 Active involvement of specific employees for the AWS implementation (The HSE Specialist, the Country Environmental Manager, the System and Audit Manager, the Quality Supervisor, the Production Analyst and the Engineering Project Manager). The Public Affairs & Communication Department is responsible for communication of Authorities. The country Environmental Manager is the company's representative to meetings with Authorities. EN-R-321.4, Program for responsibilities related to environmental management 	
5.2 Communicate the water stewardship plan with relevant stakeholders.	5.2.1 The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.			
5.3 Disclose annual site water stewardship summary, including the relevant information about the site's annual water stewardship performance and results against the site's targets.	5.3.1 A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.		 Annual report for 2018 to the Ministry of Environment and Waters (27.1.2019)-complete report of water management 2 times per year, analysis of the storm water, which is discharged to river, is sent to the Authorities, (last report: 9.6.2020) CCH Bulgaria CSR report 2018 (trend of water usage and goals, amount of reused water, effluent quality, EWS certification, initiatives and achievements in relation to water, incidents) 	



			 CSR report presentation-May 2019 	
			A CSR report is elaborated every year and is communicated via the company's website.	
	5.3.2 Advanced Indicator The site's efforts to implement the AWS Standard shall be disclosed in the organization's annual report.	NO		
	5.3.3 Advanced Indicator Benefits to the site and stakeholders from implementation of the AWS Standard shall be quantified in the organization's annual report.	NO		
5.4 Disclose efforts to collectively address shared water challenges, including: associated efforts to address the challenges; engagement with stakeholders; and co- ordination with public- sector agencies.	5.4.1 The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.	YES	 Press releases for the initiative of 'My Green City' e.g. for cleaning of Pantsarevo lake and planting of 20 trees near Iskar reservoir (14.9.2019)- employees, citizens, EKOPAK and the municipal Authorities of Pantsarevo, the event was covered by media (part of CC initiative and target for 100% of collection and recycle of bottles produced till 2030) Website of the Ministry of environment/ press release of the Danube Day event 	
	5.4.2 Efforts made by the site to engage stakeholders and coordinate and support public- sector agencies shall be identified.	YES	See indicator 1.2.1.	
5.5. Communicate transparency in water- related compliance: make any site water-related compliance violations available upon request as well as any corrective actions the site has taken to prevent future occurrences.	5.5.1 Any site water-related compliance violations and associated corrections shall be disclosed.	YES		



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5.5.2 Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.	YES	See above.	
5.5.3 Any site water-related violation that may pose significant risk and threat to human or ecosystem health shall be immediately communicated to relevant public agencies and disclosed.	YES	See above.	



4. Stakeholder interviews

An announcement was made by LR 30 days before the audit but no request has been submitted to the audit team.



5. Conformity Assessment Findings Log – AWS standard

	LIST OF MAJOR NON CONFORMITIES										
Status	Description of the Finding	Proposed corrective action & root cause analysis & timeframe	CAP review	Reference Number & Date of Issue	AWS Indicator						
(NEW, OPEN, CLOSED)											

	LIST OF MINOR NON CONFORMITIES									
Status	Description of the Finding	Proposed corrective action & root cause analysis & timeframe	CAP review	Reference Number & Date of Issue	AWS Indicator					
NEW	 The evidence regarding the water-related challenges of the stakeholders has been determined, in most cases, based on company's assumptions rather than through a consultation process. Water related challenges haven't been identified for all the stakeholders. 			0920APP01, Sept 2020	1.2.1					



	LIST OF OBSERVATIONS								
Status	Description of the Finding	Proposed corrective action & root cause analysis & timeframe	CAP review	Reference Number & Date of Issue	AWS Indicator				
NEW	The company should seek for more accurate data regarding the water footprint of the suppliers/ service providers in the catchment.			0920APP01, Sept 2020	1.4.2				
NEW	 A note, regarding the status of the IWRA identified, as stated in the relevant documentation (e.g. RBMP of Danube) should be added in the relevant file. Information about the status of protected and Natura 2000 areas could be more precise. Additional info, through stakeholder engagement, should also be requested. 			0920APP02, Sept 2020	1.5.5				



6. Next visit details

Visit type	SV1								
Audit days	1.5	Due date	9/2021	Visit start / end dates					
Locations	162, Ste	162, Stefan Stambolov Str., Bankia 1320, Bulgaria							
Team	TBD								
Remarks and ins	structions	5							



7. Audit Programme/Plan

Visit Type	IA		SV1		Sv2			CR
Due Date								
Start Date								
End Date								
Audit Days								
Any changes that may								
impact visit duration (if yes	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N
add new number)								
Process / aspect / location								
Final selection will	be determir	ned after rev	iew of man	agement ele	ements and	actual perfo	rmance	
Site visit								
Sample of source water								
locations visit								
Sample of water discharge								
locations visit								
Stakeholder interviews								
STEP 1								
STEP 2								
STEP 3								
STEP 4								
STEP 5								

Visit start time (approximate)	09:30	Visit end time (approximate)	16:00	The exact start and finish times for the visit will be agreed at the pre-visit contact with the assessor and recorded in the report introduction.
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See attached agenda.



8. Certificate details

CERTIFICATE No.: AWS REFERENCE No.: AWS 000282

GOLD AWS LOGO TO BE INSERTED HERE

Issued to

COCA COLA HBC Bulgaria Bankia plant: 162, Stefan Stambolov Str., Bankia 1320, Bulgaria

Standard

Alliance for Water Stewardship Standard Version 2.0/ 22.03.2019

Date of certification: 11/2020 (TR date)

This certificate covers the following processing unit which meets the criteria of the Alliance for Water Stewardship Standard:

Certificate scope Catchment & Industry sector		Process
Single site	Iskar river catchment/ food sector	Bottling of natural mineral water

This certificate remains property of HELLENIC LLOYD'S S.A. and can be withdrawn in case of terminations as mentioned in the client contract, or in case changes or deviations of the above mentioned data occur. The client is obliged to inform HELLENIC LLOYD'S S.A. immediately of any changes in the above mentioned data. Only an original and signed certificate is valid. HELLENIC LLOYD'S S.A. declares to have inspected the processing unit of the above-mentioned client, and have found them in accordance with the standards mentioned above.

The AWS Gold Certification Level demonstrates that the operator complies with all core indicators and additional points have been awarded for performance against the advanced criteria (AWS Gold: 40 or more points).

This certificate is in force until further notice, provided that the above-mentioned client continues meeting the conditions as laid down in the client contract with HELLENIC LLOYD'S S.A. Based on the annual inspections that HELLENIC LLOYD'S S.A. performs, this certificate is updated and kept in force. This certificate cannot be used as a guarantee certificate for delivered products.

Expires on: 11/2023 Period of validity: 3 years Issued by: HELLENIC LLOYD'S S.A. Place and date of issue: 11/2020 [TR date]



9. Report explanation

LR Findings Log definitions and information

Definitions of Grade Findings

Observations are defined as an area of concern regarding a process, document, or activity where there is opportunity for improvement.

Major non-conformity is raised if the issue represents a systematic problem of substantial consequence; the issue is a known and recurring problem that the client has failed to resolve; the issue fundamentally undermines the intent of the AWS Standard; or the nature of the problem may jeopardize the credibility of AWS.

Applicants must close major NCR within Ninety (90) days of the NCR issue date. Failure to meet this deadline will require another conformity assessment (check note 1)

Certificate Holders must close* major NCR within Thirty (30) days of the NCR issue date. If the Major NCR is not addressed within 30 days LR shall suspend or withdraw the certificate and reinstatement shall not occur before another conformity assessment has been successfully completed.

Minor non-conformity: Where the audit team has evaluated an audit finding and determines that the seriousness of the issue does not meet the any of the criteria for Major non-compliance the audit team shall grade the finding as a minor non-conformity.

Applicants must submit an acceptable corrective action plan (check note2) to address all minor nonconformities to be recommended for certification.

Certificate Holders must close minor NCR within Ninety (90) days of the NCR issue date. LR may agree to an alternative time frame with the client as long as this can be justified and is documented in the NCR report. If corrective actions are inadequate to resolve a minor non-conformity by the time of the next scheduled audit, LR shall upgrade the audit finding to a major non- conformity. If an unusually large number of minor non-conformities are detected during the course of a single audit, the audit team may at their discretion raise a major non-conformity to reflect a systematic failure of the client's management system to deliver conformity with the AWS Standard.

NOTE 1 - closed = actioned by the client, corrections & corrective actions verified and closed by the auditor.

NOTE 2 - The corrective action plan shall include an analysis of the root cause of the minor nonconformity; the specific corrective action(s) to address the minor non-conformity; and an appropriate time frame to implement corrective action(s).

Additional information

Confidentiality

We will treat the contents of this report, together with any notes made during the visit, in the strictest confidence and will not disclose them to any third party without written client consent, except as required by the accreditation authorities.

Sampling

The assessment process relies on taking a sample of the activities of the business. This is not statistically based but uses representative examples. Not all of the detailed nature of a business may be sampled so, if no issues are raised in a particular process, it does not necessarily mean that there are no issues, and if issues are raised, it does not necessarily mean that these are the only issues.

Terms and conditions

Please note that, as detailed in the Terms and Conditions clause of the contract (insert appropriate clause number here), clients have an obligation to advise LR of any breach of legal, regulatory, or statutory requirements and any pending prosecution. Although proportionality and scale of the situation should be considered, you are required to advise LR of any serious potential risks to our certification but



not, for example, isolated cases of a minor nature.

"The Client is required to inform LR as soon as it becomes aware of any breach or pending prosecutions for the breach of any regulatory requirements relevant to the Certified Management System. LR will review the details of any breaches brought to its attention and may elect to perform additional verification activities chargeable to the client to ensure compliance with specified requirements. LR reserves the right to suspend or withdraw certificates of approval / verification statements and opinions for both failure to inform LR and the appropriate regulator of such breaches".