

Alliance for Water Stewardship Assessment Report Prepared for Nestlé Polska S.A.

Prepared by: SGS SGS Ref.: 20011769 Version: 1 Date: 7th January 2021

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REPORT DETAILS

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Table of content

REP	PORT DETAILS
1	EXECUTIVE SUMMARY4
2	SCOPE OF ASSESSMENT
3	DESCRIPTION OF CATCHMENT
4	SUMMARY OF SHARED WATER CHALLENGES8
5	INDICATORS CHECKLIST10
6	AUDIT FINDINGS
6.1	MAJOR NONCONFORMANCES
6.2	MINOR NONCONFORMANCES
6.3	OBSERVATIONS
7	SUMMARY
8	OPPORTUNITIES FOR IMPROVEMENT
9	CONCLUSIONS AND RECOMMENDATIONS 36

1 EXECUTIVE SUMMARY

The scope of services covers the conformity assessment in compliance with the AWS International Water Stewardship Standard Version 2.0 for Nestlé Polska S.A. Oddział Nestlé Waters (hereinafter referred to as Nestlé Waters Poland or Nestlé) located in Nałęczów, Poland. The assessment has been completed in compliance with AWS Certification requirements, Version 2.0, December 2019.

The history of mineral water from Nałęczów started in 1817 after the discovery of unusual chemical properties of the water by a professor at the University of Warsaw, Peter Celiński. The result of his research was the creation of the famous spa town Nałęczów and historic Old Baths that appear on the packaging of Nałęczowianka.

Drawing from extensive experience in the production of branded waters and the know-how of the Nestlé Group, Nałęczowianka LLC created a modern, eco-friendly manufacturing facility, where the global quality standards are met throughout the process of bottling. Since December of 2006. company "Nałęczowianka LLC" continues to operate under the name Nestlé Waters Poland.

From 17th till 18th December 2020, SGS Poland (hereinafter referred to as "SGS") conducted the conformity assessment for site's facilities and activities with regard to certification to the AWS Standard on-site (SGS Poland). A total of three findings were raised during the course of the audit process, and they were all categorized as observations.

Given the document review undertaken, verification of evidence and site visit inspections performed by Lead Auditor, SGS recommends that Nestlé Waters Poland is continued AWS Core Certified status with a surveillance audit interval of 18 months' frequency.

2 SCOPE OF ASSESSMENT

The scope of services covers the surveillance assessment and upgrade to the AWS International Water Stewardship Standard Version 2.0 for Nestlé Waters Poland in Nałęczów. The assessment has been completed in compliance with AWS Certification requirements, Version 2, December 2019.

The assessment was conducted for 2 days on-site, from 17th December till 18th December 2020, with a team of a Lead Auditor AWS from SGS Poland (Gabriela Procyk) and 1 day off-site (preliminary review and local expert review). The geographical scope has been only the Nestlé Waters Poland, located in Kolonia Bochotnica 5, 24-150, Nałęczów in Poland. The Nestlé Waters Poland catchment area includes catchment of Bystra River with near groundwater catchment area.

The audit interviews were held at Nestlé Waters Poland over two days presentially, following the safety rules due to the COVID-19 outbreak and performing a visit to the factory. Nestlé Waters Poland provided the requested supporting documentation as evidence whilst on site and remotely. SGS provided feedback on observations and findings raised during the closing meeting of the audit on the 18th December 2020 at Nałęczowianka Factory.



Figure 1: Diagram of the Nałęczowianka Factory

3 DESCRIPTION OF CATCHMENT

The Nestlé Waters Poland identified Bystra River catchment as AWS catchment according to Factory location and main area of influence of wells and downstream impact (water discharged to the environment and WWTP).

The Bystra River is supplied by several tributaries from Nałęczów, Sadurki, Drzewce, Wojciechów, Czerka, and Wąwolnica. These rivers have maintained their natural and meandering character. Under natural groundwater circulation, these rivers are draining the groundwater from the Cretaceous aquifer. In the valleys of Bystra and Czerka there are numerous springs flowing out of fractured carbonate rocks and feeding the surface water. The existing factory is located in the Bochotniczanka river valley near the confluence of two tributaries, the Sadurek from the south-east and the Nałęczowa from the north-east. In the vicinity of the factory, water from the Sadurki tributary infiltrates into the aquifer.

In terms of potable water, the Nestlé Waters Poland extracts it mainly from groundwater (2 existing wells – Dąb i Nałęczowianka). There is also one new well (BH7) which was not used yet. Small amount of water is supplied by MZWiK in Nałęczów for which the source of water are also 2 groundwater wells.

In terms of waste waters, they discharges stormwater and clean water from technology line directly to a local river, and the wastewater to the municipal sewage network and ultimate receiving water body is Bystra River.



Figure 2: Nestlé Waters Poland catchment area

4 SUMMARY OF SHARED WATER CHALLENGES

The Nestlé Waters Poland identified shared water challenges which are listed below.

Table 1 Shared water challenges

Water Topic	Action	Priority	Shared Water Challenges
Water Quality / Catchment	Close the gaps of the last AWS audit	1	Improve the catchment water quality
Water Use Efficiency	Activities according to low requirements	1	Water management excellence
Water Quality / Catchment	Cooperation with MZWiK & co-funding of sewage system in Cynków - near the Bochotniczanka river (flow to Bystra)	1	Improve the catchment water quality
Water quantity	Water level monitoring	3	Water management excellence
Water quantity	Old flowmeter change for new one	2	Water management excellence
Water quantity &	E-Water tool	3	Water management excellence
Water losses	Water mapping	3	Water management excellence
Water losses	100 m ³ tank	3	Water management excellence
Water Quality / Aquifer / Water Quantity	Close the gaps of the last internal WRR audit	1	Water management excellence
Water Quality / Aquifer	Elimination of old fuel tank in Antopol area; In case the soil contamination – remediation	1	Improve the catchment water quality
Water Quality / Quantity/ Aquifer	Stakeholder mapping – update; Set up the action plan	2	Water resources safety increase
Water Protection Zone Safety	Agriculture advisory institution cooperation	2	Water resources safety increase
Public consumers / Education about water	Water balance poster update and installation in the public area	2	Water resources safety increase
Public consumers / Education about water	Acceptability index Poll survey	3	Water resources safety increase
Public consumers / Education about water	WWD organisation - schools + stakeholders meetings+ educational meeting with employees = discussion/feedbacks	3	Water resources safety increase

Water Topic	Action	Priority	Shared Water Challenges
Water Quality / Catchment	Identifying IWRA potential area compare to ANTEA analysis	2	Improve the catchment water quality
Water Quality / Catchment	River and Springs water laboratory analysis - test	2	Improve the catchment water quality
Water quantity	E-learning for the employees	3	Water management excellence

According to above water challenges, Nestlé Waters Poland has also prepared a Water Stewardship Plan.

5 INDICATORS CHECKLIST

As per the requirement set out in the AWS certification requirements it was prepared a checklist of all the CORE AWS indicators with the relevant reviewed evidence provided by Nestlé Waters Poland and the indicator with which it is associated. The checklist was aligned to the clauses / indicators of the AWS standard Version 2.0.

Table 2 Evidence reviewed by SGS against each CORE AWS indicator

Clause	Details	Yes	No	Comments/Evidence
1	GATHER AND UNDERSTAND			
1.1	Gather information to define the site's physic which the site draws; the locations to which	cal sco the site	pe for e returr	water stewardship purposes, including: its operational boundaries; the water sources from ns 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:			Within the framework the AWS Policy, the company defined as the scope of the public commitment to respect AWS "the area under its control/influence". Nestlé Waters Poland's boundaries delimitate the entire area over which the site has control and includes the built area as well as the green lands associated to the facility. The site boundary map is presented below.
	- Site boundaries;			Netecoverante factor It number
	- Water-related infrastructure, including piping network, owned or managed by the site or its parent organization;			Nail C (ONLDING (st 3) Naile coverants Naile coverants Will scharge to Envt. Will scharge to WVTP
	 Any water sources providing water to the site that are owned or managed by the site or its parent organization; 			Part Part Part Part Part Part Part Part
	 Water service provider (if applicable) and its ultimate water source; 			
	- Discharge points and wastewater service provider (if applicable) and ultimate receiving water body or bodies:			Water related infrastructure as piping potwork is mapped in the file "News maps zel
	- Catchment(s) that the site affect(s) and is reliant upon for water.			Nestlé Waters Poland extracts potable water mainly from groundwater (2 existing wells – BH1 Dąb and BH3 Nałęczowianka). There is also one new well (BH7) which was not used

Clause	Details	Yes	No	Comments/Evidence
				yet. Small amount of water is supplied by MZWiK in Nałęczów for which the source of water are also 2 groundwater wells. Nestlé Waters Poland discharges stormwater and clean water from technology line directly to a local river, and the wastewater to the municipal sewage network and ultimate receiving water body is Bystra River. Nestlé Waters Poland identified Bystra River catchment as AWS catchment according to Factory location and main area of influence of wells and downstream impact (water discharged to the environment and WWTP).
1.2	Understand relevant stakeholders, their wa	ter-rela	ted ch	allenges, and the site's ability to influence beyond its boundaries.
1.2.1	Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall: - Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people; - Consider the physical scope identified, including stakeholders,			 According to AWS, the company has defined the following groups of stakeholders: local authorities local businesses local influencers The stakeholder map is a part of internal software – CRP 3.0 (Community Relations Process 3.0) and all actions related to stakeholders are reported in this software. There are also entered stakeholder's attitude, their power on catchment level, their interest on water related topics and also their water challenges and water concerns. OBS01. In the group of the local businesses was only one stakeholder – MZWiK in Nałęczów. Other companies which have business on the catchment area should be considered as stakeholders and included by Nestlé Waters Poland into the stakeholders list.

Clause	Details	Yes	No	Comments/Evidence
	representative of the site's ultimate water source and ultimate receiving water body or bodies;			The Nestlé Waters Poland also provided the report on opinion polls of public institutions from Nałęczów and the surrounding area and the report on opinion polls of Nałęczów inhabitants.
	 Provide evidence of stakeholder consultation on water-related interests and challenges; 			100
	 Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups; 			Opinie instytucji publicznych z Nałęczowa i okolic
	 Identify the degree of stakeholder engagement based on their level of interest and influence. 			o fabryce Nałęczowianki Raport opracowany dla:
				Marzec 2020
				Opinie mieszkańców Nałęczowa o fabryce Nałęczowianki
				Raport opracowany dla: Marzec 2020

Clause	Details	Yes	No	Comments/Evidence
1.2.2	Current and potential degree of influence between site and stakeholder shall be identified, within the catchment and considering the site's ultimate water source and ultimate receiving water body for wastewater.			The current and potential degree of influence between Nestlé Waters Poland and the various stakeholders has also been identified in CRP 3.0.
1.3	Gather water-related data for the site, inclue related costs, revenues, and shared value of	ding wa creation	ter bal	ance; water quality, Important Water-Related Areas, water governance, WASH; water-
1.3.1	Existing water-related incident response plans shall be identified.			Nestlé Waters Poland has internal list of potential emergency situation for the catchment area and they also the register for emergency situations from 2010 till 2020. In the register two emergency situations were reported and both had occurred in 2020.
1.3.2	Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped.			Nestlé Waters Poland provides daily monitoring of water balance on their site, based on the records of the data from the internal metering. All data from 2014 till 2020 are available in excel file "Mapowanie wody" which includes water extractions, water consumption for technological and production purposes and allows to detect any water anomalies (i.e. leakage).
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.			In above file "Mapowanie wody" site water balance is quantified. Nestlé Waters Poland provides also file "WR Historical Data NAL 2009 – 2021" where were entered records of daily withdrawal and instantaneous discharge for both wells and graphs to show daily withdrawals. The total water on-site balance is positive. In 2019 Nestlé Waters Poland's water consumption was 785 548 m ³ . In 2020 the consumption was decreased to 621 141 m ³ (excluding December).
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.			The physical, chemical and biological status of Nestlé Waters Poland's water sources (underground water from both wells), mixed stormwater and clean water from technology line discharged to the river, wastewater discharged to the municipal sewage network and also receiving water bodies are determined by Nestlé Waters Poland as well as MZWiK. The underground water quality is very good. No tresholds were exceeded for mixed stormwater and clean water from technology line discharged to the river.

Clause	Details	Yes	No	Comments/Evidence
Clause 1.3.5	Details Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.	Yes	No	Comments/Evidence Nestlé Waters Poland has released a map with potential sources of pollution and also has provided document prepared by Antea Group "Groundwater Vulnerability Study of Nałęczowianka factory" where are showed potential contamination sources in the vicinity of the factory.



Clause	Details	Yes	No	Comments/Evidence			
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.			 OBS02. IWRA was meant as protected areas which have environmental value. After detailed assement which will be prepared in cooperation with ANTEA other values of IWRAS may be considered such as cultural or social. This assessment may help to understand why an area is important. Nestlé Waters Poland has summarized annual water-related costs for 2019 in the file "Water-Related finance 2019" which includes: Total amount spent to procure water Total amount spent to perform secondary or tertiary treatment (either inflows or outflows) Total amount spent on energy for the heating and cooling of water Cash payments made outside the organisation for water related materials, product components, facilities and services purchased Total amount spent on water-related staff Payments to providers of capital for water-related projects (e.g. infrastructure) Total amount spent on water-related matters (e.g. permits or water-related property taxes) Community investment costs (i.e. voluntary donations and investments in the catchment where the target beneficiaries are external to the site; e.g. charities, community infrastructure, social programmes) Water-related fees or penalties Other 			
1.3.8	Levels of access and adequacy of WASH at the site shall be identified.			Nestlé Waters Poland ensures access and adequacy of WASH: - Workers on-site have access to safe drinking water - Employees have been periodically trained regarding hygiene best practices			
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.			No primary input supplier is located in Nestlé Waters Poland's catchment area.			
1.4.2	The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.			Nestlé Waters Poland has identified main service providers, their water consumption in 2019 and other water-related data. All received data are available in file "Zestawienie dostawców".			

Clause	Details	Yes	No	Comments/Evidence
				OBS03. Nestlé Waters Poland conducts periodically audits of their suppliers and should consider add some water-related questions to the audit checklist.
1.5	Gather water-related data for the catchmen infrastructure, and WASH	it, incluc	ding wa	ater governance, water balance, water quality, Important Water-Related Areas,
1.5.1	Water governance initiatives shall be identified, including catchment plan(s), water-related public policies, major publicly-led initiatives under way, and relevant goals to help inform site of possible opportunities for water stewardship collective action.			 Nestlé Waters Poland has identified catchment program which includes also relevant water-related goals: Environmental Protection Program for Nałęczów Municipality for 2018-2021 with the perspective for the years 2022-2025
1.5.2	Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.			Nestlé Waters Poland has identified water-related regulatory requirements and they are available in file "LROR Nałęczowianka_Fabryka OŚ 2019_WODNE.
1.5.3	The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.			<text></text>

Clause	Details	Yes	No	Comments/Evidence		
				The above file describes that the supply of underground water resources is 6.98 million m ³ /year, of which the Nestlé plant takes only 0.77 million m ³ /year.		
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.			About 73.5% of water resources remain in nature. So there is no risk of scarcity. Nestlé Waters Poland conducts measurement of groundwater in both wells and also surface water from Bystra River in 3 monitoring points and from Bochotniczanka River (which inflow to Bystra River) in 2 monitoring points.		
				Nestlé Waters Poland also provided document "Synteza informacji środowiskowych dla zlewni rzeki Bystra na postawie Raportów o stanie środowiska województwa lubelskiego z lat 2000 – 2016 opracowanych przez Wojewódzki Inspektorat Ochrony Środowiska w Lublinie" which shows that the general water quality for the catchment area remains generally bad, based on data from 2013 and 2016.		
				The water quality of a river is determined by many different factors. Nestlé Waters Poland works to improve the quality of the river, including cooperation with MZWiK in building of new sewage system for Cynków village with Nestlé participation in cost.		
1.5.5	Important Water-Related Areas shall be 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.			Nestlé Waters Poland has identified, mapped and assessed the status of the IWRAs (as is shown in point 1.3.6). OBS02. The same as in point 1.3.6.		
1.5.6	Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.			Nestlé Waters Poland has identified water-related infrastructure (natural and anthropogenic) of whole catchment area and described in presentation "WATER INFRASTRUCTURE OF THE CATCHMENT OF THE BYSTRA RIVER".		
1.5.7	The adequacy of available WASH services within the catchment shall be identified.			Nestlé Waters Poland voluntary donated bottled water to those in need during COVID- 19 emergency period e.g. hospitals and regulary support local institutions, such as orphanage and hospice for children by water donations.		
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.			Nestlé Waters Poland has identified and prioritized shared water challenges and reported them (as shown in chapter 4).		

Clause	Details	Yes	No	Comments/Evidence		
1.6.2	Initiatives to address shared water challenges shall be identified.			Nestlé Waters Poland has identified, reported and realizes inititiatives addressed to shared water challenges (as shown in chapter 4).		
1.7	Understand the site's water risks and oppor of the site, existing risk management plans	tunities and/or t	: Asse the iss	ss and prioritize the water risks and opportunities affecting the site based upon the status ues and future risk trends identified in 1.6.		
1.7.1	Water risks faced by the site shall be identified, and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.			Nestlé Waters Poland has identified water risks faced by the site and showed them in a file "Site Water Risks_2019_2020". In this file all risks are prioritized including likelihood and severity of impact as well as future trends and rationale for prioritization. Actions related to water risks are also monitored in CRP tool.		
1.7.2	Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.			Nestlé Waters Poland has identified the water-related opportunities and for each also identified social, cultural and health, economic and environmental value as well as their priority.		
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.			Nestlé Waters Poland has identified relevant catchment best practices for water government which are listed below:		
				a) CRP Plan - a water management plan, which is routinely reviewed and updated,		
				b) Defining of the water management processes structure,		
				 c) Direct contacts with stakeholders in the area of shared water challenges, e.g. Managing Director with the Mayor of Nałęczów (co-financing of the sewage water system in Cynków), 		
				d) Training of employees and stakeholders in the area of water resources - communication (World Water Day, educational boards in the park, visits of children in the factory - learning through play, leaflets, joint initiative of cleaning of the river).		
1.8.2	Relevant sector and/or catchment best practice for water balance (either			Nestlé Waters Poland has identified best practices for water balance which are listed below.		
	through water efficiency or less total water use) shall be identified.			1) On the catchment area:		
				a) Replenishment Project, Nestlé's commitment to proper water management that will keep their water natural by 2025,		

Clause	Details	Yes	No	Comments/Evidence
				b) Preparation of the water balance - information boards in the Plant and Nałęczów, animation of the water balance made available to employees and stakeholders.
				2) On-site area:
				a) Measurement of the WLR indicator - further improvements in this area - e-water tool project,
				b) Information campaign, water saving initiative - Workplace - World Water Week - 7 rules (reduce water consumption in the bathroom / dishwasher - save water in the kitchen / responsibility for water use in the garden / repair leaking taps),
				c) Water recovery project - water diverted to generate TH0 and RO. Tagging routine introduced in the Factory,
				 d) Meeting with employees - presentation from the World Water Day meeting - what does it mean to take care of water resources,
				e) On-site monitors - presentation about AWS.
1.8.3	Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.			Nestlé Waters Poland has identified best practices for water quality which are listed below.
				a) NER Assessment report and meeting the legal requirements (Water Law Permit, LROR),
				b) Preparation of washing schedules, production planning with optimization and proper sequence,
				c) Studies by HPC (POLGEOL) and ANTEA specialists,
				d) Research of water, rivers, sewage – for the purpose of monitoring and taking the necessary actions,
				e) Indirect protection's zone designation before it was required by law
1.8.4	Relevant catchment best practice for site maintenance of Important Water-			Nestlé Waters Poland has identified best practices for site maintenance of IWRA, which are listed below.
	Related Areas shall be identified.			a) Studies by HPC (POLGEOL) and ANTEA specialists,
				b) Analysis of the existing environmental protection programs for the municipality and the poviat, monitoring the legal requirements and the requirements for the protection of the IWRA (Kazimierski Park Krajobrazowy and SPA Nałęczów),
				c) Indirect protection's zone designation before it was required by law

Clause	Details	Yes	No	Comments/Evidence					
1.8.5	Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be			Nestlé Waters Poland has adequate WASH services, a) Workers on-site have ad	identified best practices for site prov , which are listed below. ccess to safe drinking water	ision of equitable and			
	identified.			b) Employees have been p	periodically trained regarding hygiene	e best practices			
				c) Voluntary donation of be period e.g. hospitals and re hospice for children by wa	ottled water to those in need during C egulary support local institutions, suc ter donations.	OVID-19 emergency h as orphanage and			
2	COMMIT AND PLAN								
2.1	Commit to water stewardship by having the organization head office, sign and publicly of five outcomes, and the allocation of require	senior- disclose d resou	most r a con rces.	manager in charge of water a nmitment to water stewardsh	at the site, or if necessary, a suitable nip, the implementation of the AWS S	individual within the tandard and achieving its			
2.1.1	.1 A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:			Nestlé Waters Poland has the operational director.	ten place the AWS Commitment. The	document is signed by			
	- That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes				Przyjęcie przez lokalne Kierownictwo zobowiązania do zrównoważonego zarządzania zasobami wodnymi Fabryka: Nesile Polak 3.A. żaład Produkcjery Nesile Waters Kolecia Bochotnica 5, 24-150 Nałęcołe				
	- That the site implementation will be aligned to and in support of existing catchment sustainability plans				Dialadoam, ize uzprzie dpowiednika przydawane przedawaneje w pod wraktacze uzprzedawie o pod w pod przedawie na: e dobr zarządzenia przedawi, e dobr jakowa owiej. e dobr jakowa owiej. e dobr jakowa owiej. e dobr jakowa owiej. e dobr jakowa owiej. zawarowa, je na przecowanej dop innie doprawieleki dostąp do bezpiecznej wody przed, wielicknych waruchow szakterych i legiene. Będziene wyodyszczecki rzakteriowanejmi strokami wyrozemi arzych zawaru w wiejszączecki rzakteriowanejmi strokami wyrozemi arzych zawaru w zawaru konami wyrozemi arzych zawaru w zawaru kona wyrozemi arzych zawaru w zawaru kona				
	- That the site's stakeholders will be engaged in an open and transparent way								mojego stanovista, ak y spenniť si, je kalida spenia viczystke odposlečne vyrnagi pravani i reglacytor na u protruky odovistický pravinskoj i raza rutupacija ta vodu, w tym tratatoriu kojovych i międzynanodowych, tak konie obdovistuje od ok i pravljubili i oddytki prakol jednosti za vistova obdovi za pravljubili oddyta i stakuto, które opranica rystyko zakajano z vodu, o dytakat, zakrarozovaným stronom tudne informacje dotrzape wody.
	- That the site will allocate resources to implement the Standard.				1427 THE TRANSPORT & LA. 1427 THE TRANSPORT OF THE TRANS				
				The statements of Nestlé available on their website:	Waters Poland as well as their wa	ater-related initiatives are			

Clause	Details	Yes	No	Comments/Evidence
				 <u>https://www.nestle.pl/stories/woda-kluczowe-dobro-naleczowa</u> <u>https://www.nestle.pl/stories/nestle-waters-dla-naleczowa</u> <u>https://www.nestle.pl/media/nestle-waters-z-prestizowym-certyfikatem</u>
2.2	Develop and document a process to achiev	e and n	naintai	n legal and regulatory compliance.
2.2.1	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.			Nestlé Waters Poland has implemented the system to maintain compliance obligations for water and wastewater management. The positions of those accountable to maintain and manage water and wastewater
				Conformities is available in the presentation Struktura zarządzania zasobami wodnymi – Nestlé Waters Polska 1.8.1" The legal requirements are monitored in file LROR Nałęczowianka_Fabryka Ś 2019 where all pecessary, legally required actions are reported
				No. 2010 Prescherty Operation Operation Operation Operation Operation Operation Operation Nameleda 34.0 M 25.9 M Ameleda Am
				Paragraph $\frac{1}{28}$ and $\frac{1}{29}$ $\frac{1}{29}$ (19)
				Assuradia Dia 22 (1) Dia 23 (1) Dia 23 (1) Dia 24 (1) Dia 24 (1) <thdia 24<br="">(1) Dia 24 (1) <thdia 24<br="">(1) Dia 24 (1) Dia 24 (1)</thdia></thdia>
2.3	Create a water stewardship strategy and pla opportunities.	an inclu	iding a	Image:
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.			Nestlé Waters Poland has declared in their Water Stewardship Strategy that their ambition is to be the responsible water steward in order to protect the water quality and quantity in the area where Nestlé Waters Factory operates and their vision is to maintain good surface and groundwater resources condition and what is more to improve it, both by our actions and stakeholders engagement. Nestlé Waters Factory is located in the area where groundwater resources and Surface water resources are rich. For upcoming years there is no threat to the water quantity. However, the concern in the area is water quality because of big share of agricultural land use and low awareness of water management topics among the local community.

			Nestlé Waters Poland has also declared that they implements the Water Stewardship Strategy by defining Shared Water Challenges of the region and then by managing them with the Water Stewardship Plan.
A water stewardship plan shall be identified, including for each target:			Nestlé Waters Poland has appointed the Water Stewardship Plan and it is available in part in Chapter 4 and also showed in the file "Water Stewardship plan 2020_12".
- How it will be measured and monitored			All actions mentioned in the plan are also monitored in CRP.
- 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 AWS outcomes.			
Demonstrate the site's responsiveness and	resilien	ce to r	espond to water risks
A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.			Nestlé Waters Poland has prepared the file "Zakładowa lista potencjalnych sytuacji awaryjnych_2019_2020 ZLEWNIA" where are identyfied potential risks for the catchment area. In this file are also identified instructions indicating the procedure to be followed in the event of an emergency situation and information what to do to prevent an emergency / risks.
			Nestlé Waters Poland in cooperation with MZWIK has also envolved in modernisation of sewage system loop Naleczowianka.
	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 AWS outcomes. Demonstrate the site's responsiveness and A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.	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 AWS outcomes. □ Demonstrate the site's responsiveness and resilien A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified. □	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 AWS outcomes. Demonstrate the site's responsiveness and resilience to r A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.

Clause	Details	Yes	No	Comments/Evidence
3	IMPLEMENT			
3.1	Implement plan to participate positively in c	atchme	nt gov	ernance.
3.1.1	Evidence that the site has supported good catchment governance shall be identified.			Nestlé Waters Poland has supported many actions included in Water Stewardship Plan for good water governance and management and also cooperate with stakeholders in this area. One of examples is initiative which is mentioned above. The other examples are listed below:
				a) Donation for farmers regarding rainwater usage,
				b) Meeting with LODR (Lublin Agricultural Advisory Center) to educate local farmers about best farming practices, protecting water resources,
				c) Cooperation with local Fishermen Association caring for the condition of local rivers and water reservoirs,
				d) Draining overfill water to fishing ponds,
		-	ç	e) Bystra catchment study preparation - forwarding to the Water authorities. Cooperation with authorities due to Bystra environmental protection plan,
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.			N/A
3.2	Implement system to comply with water-rela	ated leg	al and	regulatory requirements and respect water rights.
3.2.1	A process to verify full legal and regulatory compliance shall be implemented.			Nestlé Waters Poland has implemented a process to verify full legal and regulatory compliance (as shown in point 2.2.1). The legal compliance is confirmed and no legal compliance deviations have been detected.
				Nestlé Waters Poland has reported two emergency situation between 2011 – 2020 and both had occurred in 2020.
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.			N/A
3.3	Implement plan to achieve site water balan	ce targe	ets.	

Clause	Details	Yes	No	Comments/Evidence
3.3.1	Status of progress towards meeting water balance targets set in the water			Nestlé Waters Poland has implemented many actions included in Water Stewardship Plan for water balance. Examples of these actions are listed below:
	stewardship plan shall be identified.			a) Water balance poster update and instalation in the public area,
				b) Water level monitoring,
				c) Old flowmeter change for new one,
				d) E-Water tool,
				e) Water mapping – updated every month,
				f) Instalation of 100 m ³ tank for water saving.
				All targets listed above has status "Done" or "Ongoing".
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.			Nestlé Waters Poland has identified no risk of water scarsity but has prepared the file for water loss ratio monitoring. All values, till October 2020, are under the target.
				They are also implemented action in cooperation with Agriculture advisory institution for protection of cathcment from farming activities to reduce the risk of future effects of drought.
3.3.3	Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.			N/A
3.4	Implement plan to achieve site water quality	/ targets	5.	
3.4.1	Status of progress towards meeting water quality targets set in the water			Nestlé Waters Poland has implemented many actions included in Water Stewardship Plan for water quality. Examples of these actions are listed below:
	stewardship plan shall be identified.			a) Cooperation with MZWIK & co-funding of sewage system in Cynków - near the Bochotniczanka river (flow to Bystra)
				b) River and Springs water labolatory analysis – test
				c) Elimination of old fuel tank localised near the factory. In case the soil contamination – remediation.
				Nestlé Waters Poland conducts the following measurements in order to guarantee and monitor water quality parameters in accordance to limits and targets:

Clause	Details	Yes	No	Comments/Evidence
				a) Municipal waste water analysis discharged to the WWTP belonging to MZWiK are carried out as per plan
				b) Treated industrial waste water analysis discharged to the WWTP belonging to MZWiK are carried out as per plan
				c) River water analysis from 5 monitoring points – from Bystra River in 3 monitoring points and from Bochotniczanka River (which inflow to Bystra River) in 2 monitoring points - are carried out as per plan
				d) Spring water analisis from 2 wells are carried out as per plan
				Any threshold exceedance was noted.
				Nestlé Waters Poland has also conducted microbiological analysis of water from Bystra River in November 2020.
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.			Nestlé Waters Poland conducts regular water quality analysis in order to verify chemical status. Quality of water from underground springs is crucial for the continuity of production and is covered by detailed monitoring.
3.5	Implement plan to maintain or improve the	site's ar	nd/or c	atchment's Important Water-Related Areas.
3.5.1	Practices set in the water stewardship plan to maintain and/or enhance the			Nestlé Waters Poland in cooperation with Antea Group want to conduct analysis and identify more Important Water Areas.
	site's Important Water-Related Areas shall be implemented.			They has implemented action in cooperation with LODR (Lublin Agricultural Advisory Center) for protection of catchment from farming activities, to educate local farmers about best farming practices, protecting water resources and also for water protection zone safety.
				Nestlé Waters Poland cooperate with local Fishermen Association caring for the condition of local rivers and water reservoirs,
				They has also conducted join action to clean the river and other clean-up activities in the catchment area.
3.6	Implement plan to provide access to safe d the site's control.	rinking	water,	effective sanitation, and protective hygiene (WASH) for all workers at all premises under
3.6.1	Evidence of the site's provision of adequate access to safe drinking water, effective sanitation, and protective			Nestlé Waters Poland has implemented the following WASH-related actions: a) Workers on-site have access to safe drinking water b) Employees have been periodically trained regarding hygiene best practices

Clause	Details	Yes	No	Comments/Evidence
	hygiene (WASH) for all workers onsite shall be identified and where applicable, quantified.			c) Voluntary donation of bottled water to those in need during COVID-19 emergency period e.g. hospitals and regulary support local institutions, such as orphanage and hospice for children by water donations.
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.			In accordance to legal and regulatory requirements Nestlé Waters Poland has not violated human rights to safe water and sanitation.
3.7	Implement plan to maintain or improve indir	ect wat	er 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.			Nestlé Waters Poland has identified main service providers, their water consumption in 2019 and other water-related data. All received data are available in file "Zestawienie dostawców". This file also includes water-related innitiatives carried out by suppliers.
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.			
3.8	Implement plan to engage with and notify th	ne owne	ers of a	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.			Nestlé Waters Poland cooperates with MZWiK which is the owner of the water related infrastructures – waste water system. They also cooperate in several water-related initiatives i.e. building of new sewage system for Cynków village.
3.9	Implement actions to achieve best practice local/catchment, regional, or national relevant	towards ance.	s AWS	outcomes: continually improve towards achieving sectoral best practice having a
3.9.1	Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.			Nestlé Waters Poland's actions and projects related to the achievement of AWS outcomes have been described, explained and evaluated in the Water Stewardship Plan.
3.9.2	Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.			

Clause	Details	Yes	No	Comments/Evidence			
3.9.3	Actions towards achieving best practice, related to targets in terms of water quality shall be 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.						
3.9.5	Actions towards achieving best practice related to targets in terms of WASH shall be implemented.						
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.			Nestlé Waters Poland has evaluated their Water Stewardship Plan and the value/benefits generated from its performance are included in it. This document also reports how the plan has contributed to achieving AWS Outcomes.			
4.1.2	Value creation resulting from the water stewardship plan shall be evaluated.						
4.1.3	The shared value benefits in the catchment shall be identified and where applicable, quantified.						
4.2	Evaluate the impacts of water-related emerge corrective and preventative measures.	gency i	nciden	ts (including extreme events), if any occurred, and determine the effectiveness of			
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.			Nestlé Waters Poland has prepared the file "Zakładowa lista potencjalnych sytuacji awaryjnych_2019_2020 ZLEWNIA" where are identyfied potential risks for the catchment area. In this file are also identified instructions indicating the procedure to be followed in the event of an emergency situation and information what to do to prevent an emergency / risks. Nestlé Waters Poland has reported two emergency situation between 2011 – 2020 and both had occurred in 2020.			

Clause	Details	Yes	No	Comments/Evidence				
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			The stakeholder map is a part of internal software – CRP 3.0 (Community Relations Process 3.0) and all actions related to stakeholders are reported in this software.				
	performance shall be identified.			Nestlé Waters Poland also provided the report on opinion polls of public institutions from Nałęczów and the surrounding area and the report on opinion polls of Nałęczów inhabitants.				
4.4	Evaluate and update the site's water stewa continual improvement.	rdship p	olan, in	corporating the information obtained from the evaluation process in the context of				
4.4.1	The site's water stewardship plan shall be modified and adapted to incorporate any relevant information and lessons learned from the evaluations in this			Nestlé Waters Poland has declared that their Water Stewardship Plan will be subjected to continual improvements and integrations, due to a regular data collection, progressive monitoring, evaluation and periodical update. This will ensure a positive progress in Nestlé Waters Poland's water stewardship.				
	step and these changes shall be identified.			So far, the evaluated outcome can be summarized as follows:				
				- All AWS outcomes have been fulfilled,				
				- Water stewardship actions and efforts are being effective in mitigating water risks and creating beneficial values for the local territory,				
				- Best practices have been implemented,				
				- Stakeholder engagement efforts have been well-received				
				 MZWiK, main stakeholder and water/ waste water service provider will cooperate in project of building of new sewage system for Cynków, 				
				- Efforts have are being effective and efficient in terms of costs/benefits (financially, socially, economically and environmentally to the site and the catchment),				
				- Many actions/projects are still ongoing and will be evaluated in 2021.				
5	COMMUNICATE & DISCLOSE							
5.1	Disclose water-related internal governance related local laws and regulations.	of the s	site's n	nanagement, including the positions of those accountable for legal compliance with water-				
5.1.1	The site's water-related internal governance, including positions of those accountable for compliance with			Nestlé Waters Poland's water-related internal governance has been disclosed both internally and externally in the organizational chart.				

Clause	Details	Yes	No	Comments/Evidence
	water-related laws and regulations shall be disclosed.			The AWS Commitment has also been disclosed externally and internally.
				The AWS team members as well as their roles and responsibilities have been defined and AWS team organizational chart has been disclosed.
5.2	Communicate the water stewardship plan v	vith rele	vant si	akeholders.
5.2.1 The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.			Nestlé Waters Poland's actions, projects and best-practices, illustrated in the Water Stewardship Plan have been shared with relevant stakeholders. Example mail is showed below.	
				<text><text><text><list-item><list-item><list-item><list-item><list-item></list-item></list-item></list-item></list-item></list-item></text></text></text>

Clause	Details	Yes	No	Comments/Evidence		
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				Nałęczowski zakład Nestlé Waters z certyfikatem Alliance for Water Stewardship To jerwsza łakłych w Pólsce, kłód wród cie zostanie odznaczona tym prestłżowym międzyna dowym standardem. • zo usejeni Zostr. Jiczel & Jawani tennel – Upostcene - yweit		
				Example Control Contro Control Control Control Control Control Control Control Control		
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.			Nestlé Waters Poland has disclosed its water stewardship performance, targets and implemented best practice actions. This is shared with relevant stakeholders and employees.		
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.			Nestlé Waters Poland's water-related challenges have been shared with relevant stakeholders. Joint projects, campaigns and engagements have been executed with catchment stakeholders in order to mitigate shared water risks and implement best		

Clause	ause Details		No	Comments/Evidence	
				practices in the catchment territory. Projects, actions and related efforts to address challenges with fellow stakeholders are showed in the Water Stewardship Plan.	
5.4.2	Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.		The stakeholder map is a part of internal software – CRP 3.0 (Commu Process 3.0) and all actions related to stakeholders are reported in this		
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.			This criteria is not applicable: no water related violations have ever been detected by Nestlé Waters Poland.	
5.5.2	Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.				
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.				

6 AUDIT FINDINGS

6.1 MAJOR NONCONFORMANCES

During the course of the audit non major non-conformances were raised.

6.2 MINOR NONCONFORMANCES

Non minor non-conformances were raised during the audit process.

6.3 OBSERVATIONS

Three observations were raised during the audit which are only to be considered as improvement opportunities. No action is necessary during this audit period but these issues would most likely come under scrutiny during a surveillance audit scenario.

Table 3: Observations identified durin	g the AWS surveillance audit process
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No.	Туре	Ref.	Details
OBS01	Observation	1.2.1	In the group of the local businesses was only one stakeholder – MZWiK in Nałęczów. Other companies which have business on the catchment area should be considered as stakeholders and included by Nestlé Waters Poland into the stakeholders list.
OBS02	Observation	1.3.6, 1.5.5	IWRA was meant as protected areas which have environmental value. After detailed assement which will be prepared in cooperation with ANTEA other values of IWRAS may be considered such as cultural or social. This assessment may help to understand why an area is important.
OBS03	Observation	1.4.2	Nestlé Waters Poland conducts periodically audits of their suppliers and should consider add some water-related questions to the audit checklist.

7 SUMMARY

In reviewing the body of evidence presented by Nestlé Polska S.A. Oddział Nestlé Waters in Nałęczów it is apparent that a considerable quantity of effort and work has been put into the preparation for the audit for Alliance for Water Stewardship Certification. Non major and minor non-conformances has been identified.

8 **OPPORTUNITIES FOR IMPROVEMENT**

During this audit for Nestlé Polska S.A. Oddział Nestlé Waters in Nałęczów against the AWS Standard V2.0, three observations were raised.

According to OBS03 Nestlé Waters Poland may consider to cooperate with other companies which have business on the catchment area in water-related innitiatives and to show them their good approach to water management.

These join innitiatives may be also related to IWRA, about which was mentioned in OBS02.

9 CONCLUSIONS AND RECOMMENDATIONS

Given the evidence review and the site visit inspections performed, SGS recommends that Nestlé Polska S.A. Oddział Nestlé Waters in Nałęczów is upgraded to the AWS Core Certification, version 2.0. with a surveillance audit interval of 18 months' frequency.