



Alliance for Water Stewardship Conformity Assessment Report

Prepared for Nestlé Waters UK

(AWS-000111)

Prepared by: SGS

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REPORT DETAILS



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| REFERENCE | AWS-000111 | |
| CLIENT REFERENCE | Nestlé Waters UK | |
| REPORT TITLE | ALLIANCE FOR WATER STEWARDSHIP CONFORMITY ASSESSMENT REPORT | |
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| STATUS | FINAL | |
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1 EXECUTIVE SUMMARY

The scope of services covers the conformity assessment of water use in compliance with the AWS International Water Stewardship Standard (Version 2.0) for Nestlé Waters UK Ltd Buxton factory (hereinafter referred to as “Nestlé Waters” or “the site”) located at Waterswallows Lane, Green Fairfield, Buxton, SK17 7JD, United Kingdom. The assessment has been completed in compliance with the AWS Certification requirements, Version 2.0 dated in December, 2019.

Nestlé Waters has had a presence in Buxton since 1992, and relocated to a modern production site at Waterswallows to the North of Buxton in 2012. Natural Mineral Water and Spring Water are sourced from two unique sources. St. Ann's (the source of Buxton Natural Mineral Water) is an ancient artesian, thermal spring rising in the centre of Buxton, and Lightwood (the source of Nestlé Pure Life Spring Water) is a well protected catchment to the north-west of the town, with water coming from boreholes drilled deep within the folded geology. A third source under development, known as Rockhead, is an artesian spring issuing naturally from the limestone of the Wye Valley.

On November 24-25, 2020, SGS United Kingdom Limited (hereinafter referred to as “SGS”) conducted a virtual conformity assessment for the site’s facilities and activities regarding certification to the AWS Standard (Version 2.0).

No Non-conformities were raised during the audit process. Given the review of evidences provided and the virtual site visit performed, SGS recommends that the site be awarded a provisional AWS Platinum Certified status, pending a site visit, and a surveillance audit interval of annual frequency.

2 SCOPE OF ASSESSMENT

The scope of services covers the conformity assessment of water use in compliance with the AWS International Water Stewardship Standard (Version 2.0) for the site. The assessment has been completed in compliance with the AWS Certification requirements, Version 2.0 dated in December, 2019.

No pre-assessment for the site has been conducted.

Instead, a preliminary review for the site's documentation regarding certification to the AWS Standard (Version 2.0) was performed by Elisabeth Gomez, the AWS certified auditor from SGS UK (hereinafter referred to as "SGS") in November, 2020. During the preliminary review, SGS conducted an offline desk review of evidence made available via SharePoint . A total of 29 observations were raised during the preliminary review process. The site responded that appropriate actions will be taken in the future to address the observations raised at that stage despite it being voluntary.

On Nov 24-25, 2020, SGS conducted the conformity assessment via a virtual site visit of the site's facilities and activities. Table 2.1 includes details on SGS audit team. The audit plan is attached as a separate document.

Table 2.1 SGS Audit Team

| Audit Team | | Qualifications/Experience |
|-------------------|--------------------|--------------------------------------------------------------------------------------------|
| Elisabeth Gomez | Team Leader | AWS certified auditor, with more than 10 years' experience in audits, including ISO 14001. |
| Francesca Cerchia | Technical Reviewer | AWS certified auditor and Accreditation Manager. |

During the conformity assessment, both the CORE and ADVANCED indicators were assessed as part of this audit.

SGS auditor spent:

- 1 day on preliminary review of documentation provided for each indicator
- 1.5 days inspecting the CORE site's installations (virtually), reviewing activities, and documents and carrying out interviews to
 - o AWS related personnel
 - o external stakeholder
 - o site's employees outside the team in charge of the AWS related duties
- 0.5 days assessing the ADVANCED criteria

SGS provided initial feedback on the preliminary review conducted.

Following the action taken on such preliminary stage, the audit meetings took place. At the end of this stage, during the closing meeting on the 25th November 2020, SGS informed the actions to be taken on the site's current management and the requirements established by the standard to achieve certification.

Considering the current circumstances due to COVID the site provided videos and photos to simulate to the extent possible, the site tour. Below are a sample of the relevant photos taken during the virtual site tour.



Buxton premises

3 STAKEHOLDER ANNOUNCEMENT AND CONSULTATION

Following the AWS Certification Requirements, before the virtual site conformity assessment, the site published on 3 different channels their intention to pursue AWS certification and opened the project for comments:

- Announcement at the AWS website – Posted 26 October
<https://a4ws.org/certification/certification-consultations/>
- Announcement at the Nestlé UK Website –Posted 27th October
<https://www.nestle.co.uk/en-gb/buxtonawsVision>
- Announcement on Vision Buxton Website (local community) –Initial request made on 26/10/2020, Published 02/11/2020 Nov
<https://www.visionbuxton.co.uk/nestle-waters-uk-seeks-aws-certification/>

No feedback was received.

During the conformity assessment, SGS held a stakeholder consultation meeting:

The stakeholder consulting meeting was held virtually during 24-25 November 2020 due to COVID restrictions. The table below shows the interests of each stakeholder interviewed during the audit:

Table 3.1 Stakeholders Interviewed during stakeholder consultation meetings

| Organization | Role | Stakeholders Interviewed |
|----------------------------------------------|-----------------------------------------|--------------------------|
| AWS related staff on site | | |
| Nestle Water UK – AWS related staff | Environment & Sustainability Officer | Scott Reid |
| Nestle Water UK – AWS related staff | Water Resource Manager - UK | Matthew Ryan |
| Nestle Water UK – AWS related staff | Water Resources and Environment Manager | Lydia Yates |
| Non-AWS related staff on site (minimum of 2) | | |

| | | |
|-----------------------------------------|-----------------------------------------------------------------------------------|----------------|
| Nestle Water UK – non-AWS related staff | Long Term Production Planner | Rachael Goy |
| Nestle Water UK – non-AWS related staff | Engineer | Simon Elson |
| External stakeholders (minimum of 2) | | |
| Village district | Local farmer and neighbour, member of the voluntary organisation Buxton Town Team | Tina Heathcote |
| Rivers Trust | Head of Water Stewardship | Alex Adam |
| Severn Trent Water | Senior Catchment Management Scientist | Laura Flower |

All interviewees gave a high appraisal to the site's efforts for its water stewardship:

Rachael Goy, Long Term Production Planner at Nestlé Waters, assured that she is not aware of complaints or concerns from the local community. She is looking to be more involved in the activities in the short term to join the efforts of the AWS team from her role.

Simon Elson, engineer at Nestlé Waters, has been approached by the AWS team to liaise on their efforts towards compliance and best practices. He is also part of the local community so is aware of the progressive change of opinion from the people along the years. He believes at first there was a general scepticism that has evolved into a positive attitude towards the company.

Laura Flower, Senior Catchment Management Scientist at Severn Trent Water, operates in the same catchment as the Buxton site. Her interaction is mainly through meetings with the AWS team and believes the main challenges remain on the company's resilience to water availability and sustainability. Laura is not aware of any complaint or concerns from other stakeholders.

Tina Heathcote, Local farmer and neighbour, member of the voluntary organisation Buxton Town Team, had meetings with Nestlé Waters to have a better insight of the boundaries, farming practices and other issues. She is under the impression Nestlé Waters are very active and well organised. Has a positive opinion in general and over the last years have become very active, improved their involvement locally and are now a key party to the area.

Alex Adam, Head of Water Stewardship at The Rivers Trust, is an accredited expert adviser for AWS. About 2.5 years ago, he started interacting with Nestlé Waters by providing guidance and UK stakeholder landscape, legal framework, etc... He has a very good opinion on their pro-active

role, understanding who the key stakeholders are, how to work with them in the long-term, and taking it seriously not as a tick box but part of their business development. He sees an opportunity for Nestlé Waters to explain what they are doing more widely outside the key stakeholders and so to act as a pioneer of this and hopefully other companies will follow. Additionally, he sees room to have more clarity on the criteria to choose the stakeholder and why in order to gain efficiency on the progress and outcomes.

4 DESCRIPTION OF CATCHMENT

Surrounded by the Peak District National Park, Buxton is a spa town situated near the headwaters of the River Wye and renowned for its thermal waters, impressive architecture, and ornamental gardens. The town's name is synonymous with its rich spa history and mineral water production. Nestlé Waters has had the privilege of continuing this legacy since 1992. Natural Mineral Water and Spring Water are sourced from two unique sources. St. Ann's (the source of Buxton Natural Mineral Water) is an ancient, artesian thermal spring rising in the centre of Buxton. Lightwood (the source of Nestlé Pure Life Spring Water) is a well-protected catchment to the north west of the town, with water coming from boreholes drilled deep within the folded geology. A third source under development, known as Rockhead, is an artesian spring issuing naturally from the limestone of the Wye Valley.

Water withdrawals

In terms of water withdrawal, the site is supplied by 2 local sources (Lightwood and St Ann's spring) and 1 under development that is expected to be operational in August 2021 (Rockhead spring).

Water discharge

Surface water run-off and excess water is discharged to the infiltration pond on site. Prior to discharge, surface water run-off passes through an oil-water separator. Water discharged to the pond will infiltrate the ground, evaporate or discharge via a positive outfall to an ordinary watercourse. All other wastewater discharges including trade effluent and foul water are sent to foul sewer. Trade effluent passes through a pH balancing tank before discharging to sewer.

Wastewater is monitored at the discharge points in line with company and regulatory compliance standards.

5 SUMMARY OF SHARED WATER CHALLENGES

Large sections of the River Wye Valley downstream of Buxton are protected by UK and EU environmental legislation, and water quality thresholds have been assigned to safeguard the habitats of endangered species. A robust local planning policy is in place, which aims to promote sustainable new development whilst minimising the impacts of pollution on the catchment. A large Source Protection Zone is in place to the south of Buxton, ensuring that proposed development within the area is subject to stringent controls to protect the Natural Mineral Water resources of the area. Nestlé Waters is actively engaged with local stakeholders on the long-term preservation of water and the environment in the Buxton area.

The site has identified shared challenges in the catchment. These are listed here.

Priority 1: Nutrient Load in the River Wye from wastewater and diffuse sources

Priority 2: Abstraction Licensing Strategy

Priority 3: Climate Change / Extreme Weather Events

Priority 4: Dewatering activities of the extractive industry

Priority 5: Loss of Native Species / spread of Invasive Species

Priority 6: Metaldehyde in Surface Water Catchment

6 INDICATORS CHECKLIST

6.1 CORE AND ADVANCED AWS INDICATORS

As per the requirement set out in the Section 2.11.3.1 of the AWS Certification Requirements, the following table presents all the AWS indicators. The list of the relevant evidence reviewed is provided in Appendix 5.

Table 6.1.1 Justification of AWS Indicators

| Indicator | Details & Score | How the requirement is satisfied |
|-----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | GATHER AND UNDERSTAND | |
| 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; | Maps showing the physical scope of the site are available, including: <ul style="list-style-type: none"> • 1) Water sources and their boundaries: St Ann's and Lightwood. A third source is being currently commissioned called Rockhead. • 2) Water pipes from sources to site. • 3) Map of site boundaries with: <ul style="list-style-type: none"> 3.1) entry point of water supply |

| Indicator | Details & Score | How the requirement is satisfied |
|-----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | <ul style="list-style-type: none"> - 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. | <ul style="list-style-type: none"> 3.2) discharge points of wastewater and rainwater • 4) Map of water-related infrastructures at the site such as wastewater treatment station, sprinkler tank. • 5) Map of water service provider and its ultimate water source, and waste water service provider and its ultimate receiving water body: <ul style="list-style-type: none"> • 5.1) Ladybower reservoir is the ultimate water source for the water service provider for this site. OBSERVATION: Could be labelled as “public supply water resource” in Google Earth Tour. • 5.2) From there it goes into the regular distribution network. OBSERVATION: Could be labelled in Google Earth Tour. • 5.3) Pipe from the network into the site, Blue pipeline in the map. • 5.4) Part of it then to the industrial water storage tanks. • 5.5) And the rest goes directly to the utilities. • 6) Map of catchment that the site is reliant upon for water. |
| 1.2 | Understand relevant stakeholders, their water-related challenges, and the site’s ability to influence beyond its boundaries. | |

| Indicator | Details & Score | How the requirement is satisfied |
|-----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1.2.1 | <p>Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified.</p> <p>This process shall:</p> <ul style="list-style-type: none"> - Inclusively cover all relevant stakeholder 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; | <p>A document has been elaborated to reflect the process used for stakeholder identification, stakeholder sampling and the assessment of the communication channels to be appropriate to each stakeholder type.</p> <p>All stakeholders identified are within the catchment area.</p> <p>Channels include:</p> <ol style="list-style-type: none"> 1) Letters and phone calls to those with no digital means. 2) Emails 3) Physical meetings <p>OBSERVATION: A very relevant local channel has been chosen for the local community to publicly announce the project is open for comments but it does not offer a means of communication to announce for those with no digital means. An alternative and/or additional channel including this aspect should be considered.</p> <p>The process has taken into consideration the identification of the following stakeholders:</p> <ul style="list-style-type: none"> • Stakeholders that have influence on the site’s economic, environmental and social performance; • Stakeholders located in the site’s physical scope and the catchment that the site’s affects and is reliant upon for water; |

| Indicator | Details & Score | How the requirement is satisfied |
|-----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | <ul style="list-style-type: none"> - 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. | <p>These have been identified and classified, they include the following typologies:</p> <ul style="list-style-type: none"> • Vulnerable people; (not vulnerable due to public water and wastewater resources available in the catchment.) • Employees; • Shareholders; they are not relevant within the catchment • Communities; • Customers; • Suppliers; (in Severn Trent water supply is from outside the catchment area) • Government authorities; and • Media and NGOs, etc. <p>OBSERVATION: formally define in the Community Relations Process document the methods for communication management including internal and external communication.</p> <p>Through stakeholder consultation, the site analysed water-related interests and challenges presented by different stakeholders. The degree of stakeholder engagement was also identified.</p> <p>The degree of input/feedback received from the community has been tracked. It shows a progressive increase of positive opinions along the years. A very small number of negative responses was found from stakeholders that progressively increased to positive up to date.</p> |

| Indicator | Details & Score | How the requirement is satisfied |
|-----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 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 site has identified the current and potential degrees of influence between site and the 4 categories of stakeholders and a number of certain sub-categories, and scales are defined based on their importance and interests. |
| 1.3 | Gather water-related data for the site, including: water balance; water quality, Important Water-Related Areas, water governance, WASH; water-related costs, revenues, and shared value creation. | |
| 1.3.1 | Existing water-related incident response plans shall be identified. | <p>The site has developed a series of water-related incident response plans. They include the following aspects:</p> <ul style="list-style-type: none"> • Leakage/spillage accidents, • Non-compliance of wastewater discharge because of failure of wastewater treatment station, • Banned discharges by local municipal wastewater treatment plant; • Process for natural disaster emergency preparedness and response covering the potential scenarios relevant to the local area.; • Process for preparedness and response of EHS emergency covering fire, chemical leakage, etc.; • Emergency response for abnormal or suspension of Water Supply; and • Emergency response for St. Ann's Spring coordinated by High Peak Borough Council (HPBC). |

| Indicator | Details & Score | How the requirement is satisfied |
|-----------|------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | | <ul style="list-style-type: none"> Management of change process on site, which assesses any risk from changes, such as a change in chemical products used at the site, before any changes are implemented. <p>The site has been training their direct employees to ensure the appropriate implementation of the above scenarios.</p> <p>OBSERVATION: add to the pack of evidences extracts from the file named “2019 BIA_Buxton.xls”. Sections 6, 7,8 & 9 from the SHE processes area are relevant for this indicator. → closed.</p> |
| 1.3.2 | Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped. | <p>A volumetric balance of water input and output is identified by the site on a monthly basis, and mapped the water balance report annually.</p> <p>SGS reviewed the site’s water balance maps formulas.</p> <p>OBSERVATION: Please provide auditable mathematical flows within your evidences. For example, there are no formulas to verify the correctness of resulting values on each data flow in the document. → closed.</p> |
| 1.3.3 | Site water balance, inflows, losses, storage, and outflows, including | The site has established a large database for water balance, and monthly variance in water usage is identified, mapped and monitored. |

| Indicator | Details & Score | How the requirement is satisfied |
|-----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | <p>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.</p> | <p>OBSERVATION: Summarise in the evidence the water balance showing the total inflows, losses, storage, and outflows for a better understanding at a first glance. → closed.</p> |
| 1.3.4 | <p>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.</p> | <p>The site has developed a water supply and wastewater monitoring program, which specifies:</p> <ul style="list-style-type: none"> • Monitoring points mapped within the catchment. • Tests conducted by the internal lab in the company. • Tests conducted by external labs for the company. • Tests conducted by third parties, i.e., Severn Trent and Environment Agency • Water supply (groundwater) and wastewater are tested,. Surface water discharge not . No soil is tested <p>SGS randomly checked the monitoring records during site visit, and all testing results fully complied with relevant national or local standards.</p> |

| Indicator | Details & Score | How the requirement is satisfied |
|-----------|----------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | | <p>OBSERVATION: Slides 2 and 3 could include a brief description to clarify the difference between each other. → closed.</p> <p>OBSERVATION: Please inform who commissioned the analysis shown in the slides have been conducted (i.e. the site or an independent third party). → closed.</p> <p>OBSERVATION: Effluent Quality Data, River Source, Water Quality Data files: could highlight in a summarised/clear way the results shown in those files relevant to the activity/catchment. → closed.</p> |
| 1.3.5 | <p>Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.</p> | <p>The site has identified potential sources of pollution, these are:</p> <ul style="list-style-type: none"> 1) Chemical storage and usage, this is classed as hazardous. <p>Trade effluent and foul go to sewer.</p> <p>Relevant measures to prevent and control contamination have been identified including their management and emergency response.</p> <p>In addition, the site has mapped the identified potential sources of pollution.</p> |

| Indicator | Details & Score | How the requirement is satisfied |
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| 1.3.6 | On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values. | <p>The site has identified the main source protection zones.</p> <p>For the Lightwood site, the ecological evaluation of an on-site water-related area was conducted by local experts in 2017.</p> <p>OBSERVATION: No analysis has been conducted regarding cultural heritage.</p> |
| 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. | <p>During the audit, SGS reviewed the cost analysis of the site's water stewardship for 2019 because is the last full year available.</p> <p>The breakdown is divided into three categories including:</p> <ul style="list-style-type: none"> 1) Water costs 2) Water revenues 3) Water shared value creation <p>OBSERVATION: No evidence provided that the report is the latest/final version available. → closed. Confidential information. The auditor has seen the document live on the screen during the audit.</p> |
| 1.3.8 | Levels of access and adequacy of WASH at the site shall be identified. | Indicator satisfied by default because WASH is the common practice according to the country standards. |
| 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. | |

| Indicator | Details & Score | How the requirement is satisfied |
|-----------|-------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 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. | <p>Primary inputs are all sourced from outside the catchment.</p> <p>Please note that the site's analysis concludes that no embedded water is used by them because primary inputs are outside the catchment. Therefore, this indicator is not applicable for the site.</p> |
| 1.4.2 | The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified. | <p>A list of outsourced services within the site's catchment has been established by the site. The site has identified only 2 suppliers:</p> <ul style="list-style-type: none"> - Electrical contractor - Civil services contractor <p>The intensity of water consumption and usage has been analysed based on the communications conducted with these suppliers.</p> <p>All suppliers need to adhere to the company's Responsible Sourcing Standard, so in that way the site ensures that all suppliers have a good management in place.</p> <p>OBSERVATION: Follow up with the silent supplier identified to understand the reasons behind the lack of response regarding water usage.</p> |

| Indicator | Details & Score | How the requirement is satisfied |
|-----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1.4.3 | <p>ADVANCED INDICATOR: 7</p> <p>The embedded water use of primary inputs in catchment(s) of origin shall be quantified.</p> | <p>All primary Inputs suppliers are outside of the catchment.</p> <p>All suppliers for outside services need to adhere to the company's Responsible Sourcing Standard, so in that way the site ensures that all suppliers have a good management in place.</p> |
| 1.5 | <p>Gather water-related data for the catchment, including: water governance, water balance, water quality, Important Water-Related Areas, infrastructure, and WASH</p> | |
| 1.5.1 | <p>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.</p> | <p>Water Governance structure and overview for England is provided and is applicable at catchment level.</p> <p>The classification of waterbodies in the catchment by governing bodies is identified.</p> <p>Links are provided to important water related plans and policies specific to the catchment and the company's operations are provided. These plans and policies detail the goals relevant to the catchment and are used to assist in identifying shared water challenges and opportunities.</p> <p>Company reports and standards are presented which document the company's commitment to water stewardship and adherence to company principles and creating shared value.</p> |
| 1.5.2 | <p>Applicable water-related legal and regulatory requirements shall be identified, including legally-defined</p> | <p>Summary of the abstraction licence quantities and conditions provided and water sharing agreement in place with 3rd parties.</p> |

| Indicator | Details & Score | How the requirement is satisfied |
|-----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | and/or stakeholder-verified customary water rights. | <p>Copies of abstractions licences and waste water discharge consents are provided.</p> <p>Overview of water-related and regulatory legislation applicable to site operations provided.</p> |
| 1.5.3 | The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance. | <p>3D catchment block diagram provided shows the annual water balance for the catchment in 2019 and includes the sites abstractions and information from 3rd parties relating to other abstractions and discharges in the catchment.</p> <p>Source specific reports analysing the long-term sustainability of the Lightwood source for preserving the overall water balance in the catchment and assessment for Rockhead are provided.</p> |
| 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. | <p>Water quality data for site water sources, effluent and catchment are provided and locations of sampling points are provided on the Google Earth files. Additionally, spreadsheets provided to the auditor explain further this indicator.</p> |

| Indicator | Details & Score | How the requirement is satisfied |
|-----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 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. | The site has identified the Important Water-Related Areas within the catchment and a study has assessed the threats to people and the natural environment. |
| 1.5.6 | Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events. | <p>The site and most of the water users within the catchment are connected to municipal water supply and waste services. The water supplier for the whole catchment provides information relating to their long term and short term plans for maintaining water and waste infrastructure and provision of water supply.</p> <p>It includes the 25-year water resources management plan and drought plan case of drought, climate change events, and the 5-year infrastructure investment plan. Based on the available information, the water-related infrastructure in the catchment is relatively well managed.</p> |
| 1.5.7 | The adequacy of available WASH services within the catchment shall be identified. | Indicator satisfied by default because WASH is the common practice according to the country standards. |

| Indicator | Details & Score | How the requirement is satisfied |
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| 1.5.8 | <p>ADVANCED INDICATOR: 7</p> <p>Efforts by the site to support and undertake catchment level water-related data collection shall be identified.</p> | <p>The site has provided evidence of where data, including water quality and hydrological data collected at the sources and catchment and has been shared with 3rd parties.</p> |
| 1.5.9 | <p>ADVANCED INDICATOR: 4</p> <p>The adequacy of WASH provision within the catchments of origin of primary inputs shall be identified.</p> | <p>Most of the catchment is on municipal water supply and mains waste water services.</p> <p>Score awarded by default because WASH is the common practice according to the country standards.</p> |
| 1.6 | <p>Understand current and future shared water challenges in the catchment, by linking the water challenges identified by stakeholders with the site's water challenges.</p> | |
| 1.6.1 | <p>Shared water challenges shall be identified and prioritized from the information gathered.</p> | <p>Six shared challenges in the catchment have been identified with the first three being the highest priority. All challenges are listed below:</p> |

| Indicator | Details & Score | How the requirement is satisfied |
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| | | <p>1. Nutrient Loading in the River Wye (phosphates) – high priority due to the conservation value of the river downstream of Buxton</p> <p>2. Abstraction Licencing Strategy High priority as the strategy requires abstractors within the catchment to use water efficiently to ensure there is adequate supply for the environment and other water users further downstream, particularly during dry periods when natural flows in the river are low.</p> <p>3. Climate change/Extreme Weather – high priority can impact those that live in the catchment being impacted through flooding</p> <p>4 Dewatering activities of extractive industries</p> <p>5 Loss of native species</p> <p>6 Metaldehyde in Surface Water Catchments</p> |
| 1.6.2 | Initiatives to address shared water challenges shall be identified. | Initiatives to address shared water challenges have been identified and evidence provided to demonstrate engagement as well as opportunities in the future relevant to each initiative. |

| Indicator | Details & Score | How the requirement is satisfied |
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| 1.6.3 | <p>ADVANCED INDICATOR: 3</p> <p>Future water issues shall be identified, including anticipated impacts and trends</p> | <p>Evidence provided, it details potential future water issues in the catchment including phosphate and the impact of further development in the area could have and other future contaminants of concern such as PFOS, nitrate and hydrocarbons.</p> <p>Provided to the auditor evidence of engagement with the local council on future issues related to the planning process.</p> |
| 1.6.4 | <p>ADVANCED INDICATOR: 4</p> <p>Potential water-related social impacts from the site shall be identified, resulting in a social impact assessment with a particular focus on water.</p> <p>Examples of water-related social impacts, which may be positive or negative, include:</p> | <p>The site's responsibility is demonstrated through evidence in the Lightwood management plan which shows the important community value associated with the site and how the management plan in place for the site incorporates actions to ensure this community and social value is maintained and enhanced.</p> <p>Evidence also provided to show that site's potential impact on any neighbouring sites is mitigated proactively. Example referring of the expansion and operation of the infiltration pond which was modified to mitigate potential flooding of a neighbouring site.</p> <p>OBSERVATION: please update the reference provided to demonstrate the social impacts from the site. → closed.</p> |

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| | <ul style="list-style-type: none"> • The site's water use is restricting the availability of water to local communities and/or small farmers • The site's wastewater discharge presents a water quality risk to downstream water users • The site's irrigation activities have a positive impact on nearby farmers, whereby excess water is helping to wet their soils and recharge aquifers • The site's proactive programmes on data collection and addressing shared challenges are providing a net benefit to the community | |

| Indicator | Details & Score | How the requirement is satisfied |
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| | <ul style="list-style-type: none"> • Impacting cultural or community value <p>The site should undertake an assessment of its impacts</p> | |
| 1.7 | <p>Understand the site’s water risks and opportunities: Assess and prioritize the water risks and opportunities affecting the site based upon the status of the site, existing risk management plans and/or the issues and future risk trends identified in 1.6.</p> | |
| 1.7.1 | <p>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.</p> | <p>The site has prioritized its water risks according to potential impact and likelihood within a given time. Evidence of the assessment was provided in the form of relevant extracts for water -related risks from the impact assessment documents.</p> <p>Evidence in the form of extracts has been provided from the Nestle Management System (NMS) document which details the Risks and Opportunities and the Emergency Preparedness and Response procedure.</p> <p>The site implements a combined management arrangement for the implementation of the relevant ISO standards.</p> <p>OBSERVATION: please provide the extract of the evidence discussed during the audit. → closed.</p> <p>OBSERVATION: Evidence book to be updated – NMS sections in Key Documents, NMS Management System Extracts. → closed.</p> |

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| 1.7.2 | Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities. | Based on the analysis of water risks faced by the site, the site has also identified its water-related opportunities including potential saving/value creation, priority and strategy. |
| 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. | <p>The site has identified relevant catchment best practice for water governance including: Company Reports and Standards relating to Water Stewardship, Business Principles, Caring for Water and Creating Shared Value strategies.</p> <p>Evidence for catchment best practice was provide in the Water Stewardship Plan, demonstration of water efficient through the water ratio and water mapping and meeting minutes from the Water Stewardship Forum.</p> |
| 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. | <p>The site has identified relevant sector and/or catchment best practice for water balance including:</p> <ul style="list-style-type: none"> • Tree planting for water retention • New global Regenerate commitments – evidenced by two tangible schemes. |

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| | | <p>This is in line with the site’s commitment to comply with an internationally recognised voluntary program Volumetric Water Benefit Accounting developed by the Water Resources Institute as part of the company’s aim to regenerate their catchments by 2025 globally.</p> <ul style="list-style-type: none"> • Water Efficiency – one of the top performing Nestlé Waters sites in the Europe and the Middle East zone. • Commitment to training and coaching employees on Health, Safety and Environment for improved water efficiency • Planned implementation of e-water efficiency tool which will enable real-time management of water use and decision making through incorporation of catchment, source, factory and waste monitoring points under one platform. |
| 1.8.3 | <p>Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.</p> | <p>The site has identified relevant sector and/or catchment best practice for water quality, those are:</p> <p>Local and national sector best practices to water quality</p> <p>Monitoring of Water Quality (water quality data provided as evidence)</p> <p>Land Management plans for Lightwood and proposed management plan for Cowdale at the Rockhead source.</p> |

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| 1.8.4 | Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified. | <p>The site has identified relevant sector and/or catchment best practice for maintenance of IWRAs:</p> <p>Evidence of engagement with local community regarding the Lightwood Ponds and the Lightwood Management Plan for the ongoing management of the ponds.</p> <p>Supplementary Planning Document meeting agenda with relevant stakeholders relating to the Source Protection Zone, SSSI and SAC.</p> |
| 1.8.5 | Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified. | Indicator satisfied by default because WASH is the common practice according to the country standards. |
| 2 | COMMIT AND PLAN | |
| 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 required resources. | |
| 2.1.1 | A signed and publicly disclosed site statement OR organizational document shall be identified. The | The site provided evidence of their public commitment to the Alliance for Water Stewardship, including signed statements from the former factory manager (Charlie Roberts) and new factory manager (Jez McInerney – in role since 1 November). |

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| | <p>statement or document shall include the following commitments:</p> <ul style="list-style-type: none"> - 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. | <p>Additionally, corporate level evidence of Nestlé Waters' commitment to certify all sites to the AWS standard by 2025 was also provided.</p> |

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| 2.1.2 | <p>ADVANCED INDICATOR: 1</p> <p>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.</p> | <p>The site showed a statement signed by the site’s senior-most director (factory manager) committing the business to water stewardship.</p> <p>Corporate level commitments were also demonstrated through a number of documents presented, including the Nestlé Commitment on Water Stewardship, Nestlé Creating Shared Value Report and Nestlé Corporate Business Principles.</p> <p>OBSERVATION: Provide evidence to satisfy the latest item in the list within the indicator 2.1.1: “That the site will allocate resources to implement the Standard.”</p> |
| 2.2 | Develop and document a process to achieve and maintain legal and regulatory compliance. | |
| 2.2.1 | <p>The system to maintain compliance obligations for water and wastewater management shall be identified, including:</p> | <p>The site provided evidence of processes in place (both procedural and in automation programmes) that ensure compliance with water and wastewater related licenses and consents.</p> |

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| | <ul style="list-style-type: none"> - Identification of responsible persons/positions within facility organizational structure - Process for submissions to regulatory agencies. | <p>Evidence of the site’s previous compliance audits was made available, as was a flow chart outlining the process for making water and wastewater compliance data available to the authorities.</p> <p>Excerpts of the NMS (Nestlé Waters Management System Manual) were made available, which detail methods by which legal regulations and other requirements relevant to the sites operation are accessed and maintained. This also references LROR (Legal Regulations and Other Requirements), and this system is verified by an external ISO Combined Management System Audit (relevant certificate provided as evidence).</p> <p>An organisational chart, signed by the factory manager (Jez McInerney) outlined roles and responsibilities in respect of this.</p> |
| 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 | <p>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.</p> | <p>The site has developed a water stewardship strategy covering the purpose at the local level and how that aligns to the global corporate goals.</p> <p>A total of 6 goals will be achieved towards good water stewardship in line with this AWS Standard, including:</p> <ul style="list-style-type: none"> • Responsibly manage overall water usage • Advance and understand good water governance through collective action • Establish collective actions with key water related stakeholders on agreed shared water challenges • Monitoring water quantity related to our activities |

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| | | <ul style="list-style-type: none"> • Monitoring water quality related to our activities • Preparedness on extreme and emergency events <p>That is in line with the local targets of:</p> <ol style="list-style-type: none"> 1) Reduce water consumption ratio, such ratio renews annually. 2) Regenerate our catchments by 2025 <p>The strategy presented is in alignment with the Nestlé Waters global water stewardship programme, which is built around three closely interconnected components: transparency, collective action and certification.</p> <p>And, similarly, this is in line with the site’s achievements to comply with internationally recognised voluntary programs like for example:</p> <ul style="list-style-type: none"> - Volumetric Water Benefit Accounting developed by the Water Resources Institute as part of the company's aim to regenerate their catchments by 2025 - https://ceowatermandate.org/about/endorsing-companies/ - https://www.2030wrg.org/about-us/partners/ |

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| 2.3.2 | <p>water stewardship plan shall be identified, including for each target:</p> <ul style="list-style-type: none"> - 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 | <p>The link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes is demonstrated.</p> <p>OBSERVATION: clarify in the table the coding system used in the “best practices” column to link that with other relevant information in the database. → closed.</p> <p>OBSERVATION: Avoid empty cells, i.e., use N/A or zero or relevant content instead of empty cells to avoid confusion. → closed.</p> <p>OBSERVATION: The document could be more explicit about the challenges, actions towards (i.e. phosphates). → closed.</p> |

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| | address shared water challenges and the AWS outcomes. | |
| 2.3.3 | <p>ADVANCED INDICATOR: 4 (please note that these projects are now on hold due to the COVID restrictions. Therefore, the overall performance in regard this indicator has been reduced due to external causes. this has been assumed not to affect the scoring of this indicator)</p> <p>The site's partnership/water stewardship activities with other sites within the same catchment (which may or may not be under</p> | <p>The site provided many examples of collaboration with local groups on water related topics, including initiatives with groups such as Derbyshire Wildlife Trust (called Get Better with Nature), World Water Day and World Ocean Day activities with NGOs and educational engagements with local schools on water related topics.</p> <p>The site also provided evidence of supporting another major local business with technical support and advice with respect to optimising their water use efficiency, and this saw the local team seek further technical advice from experts at their central R&D facility in Vittel, France.</p> <p>These projects are now on hold due to the COVID restrictions. and will be reinstated when safe to resume under Government guidance.</p> |

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| | the same organisational ownership) shall be identified and described. | |
| 2.3.4 | <p>ADVANCED INDICATOR: 4</p> <p>The site's partnership/water stewardship activities with other sites in another catchment(s) (either under same corporate structure or with another corporate site) shall be identified.</p> | <p>Evidence of water stewardship activities undertaken by key NWUK staff in other catchments was provided, including improvements to a private water supply nearby to the Princes Gate Water factory in South Wales.</p> <p>An overview of the Landscape Enterprise Networks (LENS) programme was provided on the day, which is an initiative co-developed by Nestlé to address shared environmental challenges within a landscape.</p> <p>Additional evidence of Nestlé's global commitment to water stewardship was provided through links to the Caring for Water Initiative which focuses on efforts to improve water management at operational sites and within the agricultural value chain of the company.</p> |
| 2.3.5 | <p>ADVANCED INDICATOR: 7</p> | <p>Evidence of positive feedback from stakeholders in relation to public engagement on the Lightwood Management Plan was provided.</p> |

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| | <p>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.</p> | <p>Additionally, consensus was reached with local stakeholders with respect to the key shared water challenges in the catchment in a dedicated Forum organised by Nestlé Waters to identify and work to address common issues in the catchment.</p> <p>Numerous examples of presentations to a range of key stakeholder groups on a range of topics covered by the Water Stewardship Plan were provided by the site.</p> |
| <p>2.4</p> | <p>Demonstrate the site’s responsiveness and resilience to respond to water risks.</p> | |
| <p>2.4.1</p> | <p>A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.</p> | <p>Each risk (=challenge) is linked to a mitigation plan in the site’s Business Continuity risk assessment.</p> <p>The site has co-developed a series of documents to formally establish responsibilities on water sharing with the local Crescent hotel in order to address potential risks with those parties.</p> <p>Another example is the coordination with the public agency when facing water supply issues.</p> <p>OBSERVATION: The link between each risk and the specific mitigation measure could be more clearly established in the documentation.</p> |

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| | | OBSERVATION: Provide an extract of the business continuity plan (“2019 BIA_Buxton.xls”). The auditor has seen the evidence, confidential document not included in the evidence pack. → closed. |
| 2.4.2 | <p>ADVANCED INDICATOR: 6</p> <p>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.</p> | <p>At a global level, Nestlé has committed to neutrality with respect to carbon emissions by 2050 and evidence of this commitment was provided during the audit.</p> <p>At a local level, evidence of the site considering climate change and extreme weather evidence in its new developments was provided in the form of Flood Risk assessments performed for a new building located close to a water course.</p> <p>The site also showed a working knowledge of other over-arching documents and plans related to long-term water risks in the catchment. Particular examples available about the Severn Trent Water Drought Plan and the Environment Agency’s Restoring Sustainable Abstraction programme.</p> |
| 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. | Evidence that Nestlé Waters UK and Nestlé are signatories of the University of Cambridge Institute for Sustainability Leadership ‘Catchment Management Declaration’. |

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| | | <p>There are several items of evidence showing the sites support for a collaborative Natural Flood Mitigation project, alongside organisations such as the Environment Agency and University of Derby, this work is linked to the Lightwood site.</p> <p>In addition, evidence is demonstrated of sites engagement with Natural England Catchment Sensitive Farming, seeking opportunities for engagement.</p> <p>Evidence is also available demonstrating sites involvement in local authority Source Protection Zone meetings.</p> <p>Site recently hosted a Shared Water Challenges Meeting, with attendees from various local agencies to discuss locally important shared water challenges and opportunities.</p> |
| 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. | See 1.5.2 – water rights for the abstraction and discharge into surface are covered under legal and regulatory mechanisms |
| 3.1.3 | <p>ADVANCED INDICATOR: 2</p> <p>Evidence of improvements in water governance capacity from a site-</p> | Site has demonstrated through its water ratio measure baseline an improvement in water efficiency against a 2012 baseline, and over time. This criteria links to 1.3.3 |

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| | selected baseline date shall be identified. | |
| 3.1.4 | <p>ADVANCED INDICATOR: 2</p> <p><i>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.</i></p> | <p>In 1.2.1 site proved evidence of consultation with a range of local stakeholders through specific meetings, and through a public survey. The OBSERVATIONS of the public survey demonstrate a reduction in no opinions and an increasing in positive opinions over 3 surveys from 2016 until 2019 when asked 'Opinion on the way the factory manages water resources'</p> |
| 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. | <p>In 2.2.1 the site demonstrated a system to maintain compliance obligations and demonstrated evidence of ISO 14001:2015 certification of an environmental management system. 2.2.1 also demonstrated compliance in previous audits and the process used to submit data to regulatory agencies. 5.1.1 evidences the positions of responsible persons.</p> <p>In 1.5.2 site demonstrated an overview of the regulatory context.</p> |

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| 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. | <p>In 1.5.2 the site demonstrates within evidence 'Regulatory Context.ppt' on slide 2, details of a water sharing agreement with the local Crescent Hotel.</p> <p>2.4.1 MC47 Data transfer and storage – details the process in place to store and transfer data in relation to the sharing of water with The Crescent Hotel.</p> |
| 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. | The site water stewardship plan demonstrates actions relating to water balance e.g., the implementation of an e-water efficiency package, or separate action on water ratio targets. A progress column is available showing current progress |
| 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. | The site has previously demonstrated evidence of a water ratio target and tracking. This target seeks to increase the efficiency of water use. |

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| 3.3.3 | Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified. | In 1.8.2 the site shared evidence of a proposed regenerate project local to site. This links to a global commitment Nestlé Waters has made regarding replenishment. The replenishment commitment was discussed at the Shared water challenges meeting the site recently hosted – evidenced in 1.2.1. Additionally, in 1.5.2 the site demonstrates within evidence 'Regulatory Context.ppt' on slide 2, details of a water sharing agreement with the local Crescent Hotel |
| 3.3.4 | ADVANCED INDICATOR: 0 The total volume of water voluntarily re-allocated (from site water savings) for social, cultural and environmental needs shall be quantified. | In 3.3.3 the site provided evidence of tangible proposals for regenerate projects and relevant discussions with key stakeholders / authorities regarding this linked to a wider Nestlé Waters commitment OBSERVATION: No historical data yet on this aspect. However, the site is already taking action and this will be implemented from 2021. |
| 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. | The site water stewardship plan saved in Key docs, demonstrates several actions relating to water quality – these are defined as a water quality action in the first column. A progress column is available showing current progress. |
| 3.4.2 | Where water quality is a shared water challenge, continual improvement to achieve best practice for the site's | The site provided effluent and water quality data from 2012 through to 2020, there is a clear improvement in the quality of effluent from 2014 onwards. Within the catchment phosphate is considered a shared water challenge and phosphate concentrations of effluent decreased substantially as a result of operational changes. |

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| | effluent shall be identified and where applicable, quantified. | |
| 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. | The site water stewardship plan demonstrates actions relating to the previously identified water related areas. Specific actions are available relating to the ongoing management and enhancement of the Lightwood site. |
| 3.5.2 | <p>ADVANCED INDICATOR: 4</p> <p>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.</p> | <p>The Lightwood Management Plan demonstrates a long-term management plan with prescribed management actions to improve biodiversity, retaining and promoting ecological value and improving community links to the Lightwood site. Ecological evaluations have been completed and are scheduled for the future to demonstrate improvement on baseline.</p> <p>Evidence is available via a web link demonstrating historical photos of the Lightwood site and more recent photos, following a previous restoration of the site and decommissioning of a reservoir – note this work was not completed by Nestlé Waters, however it demonstrates through the current Nestlé Waters management plan for Lightwood, a continued improvement in the site.</p> <p>OBSERVATION: The photos provided compare 2008 versus 2016. The site acquired the land in 2016, therefore the effort reflected is previous to the site's activities. It is recommended to update the evidence and take photos annually in the future.</p> |

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| 3.5.3 | <p>ADVANCED INDICATOR: 2</p> <p>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.</p> | <p>Evidence is saved demonstrating positive feedback from a member of the local community following a Lightwood Community roundtable meeting where the site shared plans and progress at the Lightwood site alongside Derbyshire Wildlife Trust who have been selected by site to implement the Lightwood management plan. Evidence is also available for these criteria demonstrating positive feedback and engagement from the University of Derby related to a site owned by the University that neighbours the Lightwood site. The site has engaged with the university and sits on a steering group for a long-term ecological monitoring project at the Cuckoo Tors site neighbouring Lightwood</p> |
| 3.6 | <p>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.</p> | |
| 3.6.1 | <p>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.</p> | <p>The site has shared evidence demonstrating the additional availability and provision of sanitisation for employees during the COVID pandemic, this includes the provision of hand sanitisers and masks.</p> <p>The site demonstrates a site facilities map showing where hand wash and WC facilities are located on site.</p> |
| 3.6.2 | <p>Evidence that the site is not impinging on the human right to safe water and</p> | <p>The site does comply with all local and national legal framework.</p> |

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| | 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. | Indicator satisfied by default because it is the common practice according to the country standards. |
| 3.6.3 | <p>ADVANCED INDICATOR: 5</p> <p>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.</p> | <p>During project work installing a new pipeline from the newly acquired Rockhead Source, additional pipework was laid to improve municipal water supply to a number of properties along the pipe route</p> <p>OBSERVATION: Please provide evidence. → closed.</p> |
| 3.6.4 | <p>ADVANCED INDICATOR: 4</p> <p>In catchments where WASH has been identified as a shared water</p> | Indicator satisfied by default because WASH is the common practice according to the country standards. |

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| | <p>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.</p> | |
| 3.7 | Implement plan to maintain or improve indirect water use within the catchment. | |
| 3.7.1 | <p>Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.</p> | <p>The site stated 1.4.1 to be not applicable regarding indirect water use of primary inputs.</p> <p>Within the site water stewardship plan an action is present with the objective of seeking continued engagement and understanding for the water use of outsourced services</p> |
| 3.7.2 | <p>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</p> | <p>An email response is evidenced from Beresfords Contracting Ltd, site had approached Beresfords in 1.4.2 to understand indirect water use of service providers. Beresfords responded with details of their water use.</p> |

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| | to indirect water use, shall be identified. | |
| 3.7.3 | <p>ADVANCED INDICATOR: 7</p> <p>Actions taken to address water related risks and challenges related to indirect water use outside the catchment shall be documented and evaluated.</p> | <p>An overview of the Landscape Enterprise Networks (LENS) programme was provided on the day, which is an initiative co-developed by Nestlé to address shared environmental challenges within a landscape.</p> <p>An initial scoping document related to a new LENS project in proximity to the Buxton site was provided as evidence.</p> <p>Additional evidence of Nestlé's global commitment to water stewardship was provided through links to the Caring for Water Initiative, Commitment to Water Stewardship and Creating Shared Value Report - which focuses on efforts to improve water management at operational sites and within the agricultural value chain of the company.</p> <p>Evidence of water stewardship activities undertaken by key NWUK staff in other catchments was provided, including improvements to a private water supply nearby to the Princes Gate Water factory in South Wales.</p> |
| 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. | Evidence detailed in emails related to agreement with local authority on infrastructure sharing with the specifically referenced local hotel. |
| 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. | |

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| 3.9.1 | Actions towards achieving best practice, related to water governance, as applicable, shall be implemented. | Within the Water Stewardship Plan the site identifies key water related projects and where these meet best practice. The Water Stewardship Plan specifically references AWS outcomes. In 3.1.1 the site evidenced the University of Cambridge Institute for Sustainability Leadership Catchment Declaration signed by Nestlé Waters. |
| 3.9.2 | Actions towards achieving best practice, related to targets in terms of water balance shall be implemented. | Within the Water Stewardship Plan the site identifies key water related projects and where these meet best practice. The Water Stewardship Plan specifically references AWS outcomes. In addition, the site has provided evidence of best practice management with respect to water quantity and water balance, by proactively managing water use in response to daily water demand / availability and sustainability requirements. |
| 3.9.3 | Actions towards achieving best practice, related to targets in terms of water quality shall be implemented. | Within the Water Stewardship Plan the site identifies key water related projects and where these meet best practice. The Water Stewardship Plan specifically references AWS outcomes. Additionally, in 1.2.1 the site shared minutes from the Shared Water Challenges Forum the site hosted, where the shared water challenge regarding phosphates was discussed. Site has demonstrated that it is proactively seeking consensus on future input opportunities with public / private / NGO stakeholders |
| 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. | Within the Water Stewardship Plan the site identifies key water related projects and where these meet best practice. The Water Stewardship Plan specifically references AWS outcomes. Additionally, site has provided evidence of a long-term management plan for the Lightwood site, including positive feedback from the community regarding the Lightwood Management Plan. |

| Indicator | Details & Score | How the requirement is satisfied |
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| | | Additionally, in 1.2.1 the site shared minutes from the Shared Water Challenges Forum the site hosted, where the shared water challenge regarding phosphates was discussed. |
| 3.9.5 | Actions towards achieving best practice related to targets in terms of WASH shall be implemented. | <p>Within the Water Stewardship Plan the site identifies key water related projects and where these meet best practice. The Water Stewardship Plan specifically references AWS outcomes.</p> <p>Additional evidence is provided in 1.8.5 showing evidence of water donations locally through the COVID pandemic.</p> |
| 3.9.6 | <p>ADVANCED INDICATOR: 0</p> <p>Achievement of identified best practice related to targets in terms of good water governance shall be quantified.</p> | <p>Within the Water Stewardship Plan the site identifies key water related projects and where these meet best practice. The Water Stewardship Plan specifically references AWS outcomes. In 3.1.1 the site evidenced the University of Cambridge Institute for Sustainability Leadership Catchment Declaration signed by Nestlé Waters.</p> <p>The site has shared evidence throughout this process of engagement with both catchment and national stakeholders to understand, develop and share best practices contributing to good water stewardship.</p> <p>The site can also evidence Natural Flood Mitigation collaboration (1.2.1, 1.6.1) with the Environment Agency. In addition, in the Lightwood Management Plan (5.2.1) the site has shared evidence of a recent Caring for Water Live Session with internal employees across the Nestlé UK & I business.</p> |

| Indicator | Details & Score | How the requirement is satisfied |
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| | | <p>Additionally, in 1.2.1 the site shared minutes from the Shared Water Challenges Forum the site hosted, where the shared water challenge regarding phosphates was discussed. Site has demonstrated that it is proactively seeking consensus on future input opportunities with public / private / NGO stakeholders</p> <p>Evidence is shared showing a 'Water College' training and information module launched to internal employees</p> <p>OBSERVATION: no evidence provided in regards to quantification of achievement.</p> |
| | <p>ADVANCED INDICATOR: 8</p> <p>Achievement of identified best practice related to targets in terms of sustainable water balance shall be quantified.</p> | <p>In previous criteria the site has shared evidence through a Water Ratio PPT of continued improvements of a water ratio target against a 2012 baseline. Site has shared in previous criteria evidence (1.8.2) of a Zone Nestlé Waters ranking, demonstrating high performance regarding water ratio for the Buxton site.</p> <p>Additionally, in 3.9.2 the site has provided evidence of best practice management with respect to water quantity and water balance, by proactively managing water use in response to daily water demand / availability and sustainability requirements.</p> |
| 3.9.8 | <p>ADVANCED INDICATOR: 8</p> | <p>The site provided effluent and water quality data from 2012 through to 2020, there is a clear improvement in the quality of effluent from 2014 onwards.</p> |

| Indicator | Details & Score | How the requirement is satisfied |
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| | Achievement of identified best practices related to targets in terms of water quality shall be quantified. | <p>In 1.2.1 the site evidenced engagement with Natural England Catchment Sensitive Farming Programme and the potential link with the Severn Trent Water STEPS programme in relation to future land management within the Rockhead Spring catchment and Natural England's enthusiasm to collaborate on this topic.</p> <p>In 3.4.2 the site provided evidence of dialogue with Severn Trent Water confirming the receiving waste water sewage works at Peak Dale conform to parameters outlined in the Nestlé Environmental Requirements</p> |
| 3.9.9 | <p>ADVANCED INDICATOR: 8</p> <p>Achievement of identified best practices related to targets in terms of the site's maintenance of Important Water-Related Areas have been implemented.</p> | <p>Site has provided evidence of a long-term management plan for the Lightwood site, including positive feedback from the community regarding the Lightwood Management Plan.</p> <p>In 5.2.1 Lightwood Update Meeting with local community attendees, ppt references the current and potential future state of the Lightwood site. The Lightwood Management Plan seeks to increase biodiversity and enhance / protect ecological value at the Lightwood site.</p> |
| 3.9.10 | <p>ADVANCED INDICATOR: 4</p> | <p>The site can demonstrate water donations to the emergency services when they have been requested, including proactive outreach. Evidence of this includes water donations to the Fire Service during the Whalley Bridge Dam Emergency Incident, the Fire Service during a fire at Saddleworth moor and the Ambulance service during the COVID Pandemic. See 3.6.3 reference to mains water pipeline</p> |

| Indicator | Details & Score | How the requirement is satisfied |
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| | Achievement of identified best practice related to targets in terms of WASH shall be quantified. | |
| 3.9.11 | <p>ADVANCED INDICATOR: 3</p> <p>A list of efforts to spread best practices shall be identified.</p> | <p>Evidence of discussions with tenant farmer at Cowdale related to best practice land management and inclusion of recommendations from Derbyshire Wildlife Trust in Grazing Agreement.</p> <p>The site also provided evidence of dialogue with the Environment Agency in relation to identifying / addressing shared water challenges within the catchment as a key priority</p> |
| 3.9.12 | <p>ADVANCED INDICATOR: 14</p> <p>A list of collective action efforts, including the organizations involved, positions of responsible persons of other entities involved, and a</p> | <p>Site has evidenced collective action efforts throughout various criteria including but not limited to 1.2.1 correspondence, 1.8.1, delivered content in 5.2.1 and others.</p> <p>Examples of collective action efforts provided include:</p> <ul style="list-style-type: none"> • Shared Water Challenges Forum • Natural Flood Mitigation Collaboration • Get Better With Nature Project |

| Indicator | Details & Score | How the requirement is satisfied |
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| | description of the role played by the site shall be identified. | <ul style="list-style-type: none"> • Lightwood Management Plan • Wye Valley Diffuse Pollution Project |
| 3.9.13 | <p>ADVANCED INDICATOR: 3</p> <p>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.</p> | <p>Site has provided evidence regarding the implementation of the Lightwood management plan – section 6.1 and 6.2 reference previous and future management. In criteria 5.2.1 a slide demonstrates current and future management.</p> <p>3.5.2 evidences a web page showing previous state of Lightwood site.</p> <p>Evidence has been provided throughout various criteria regarding Lightwood management.</p> <p>Additionally, provided to the auditor evidence of engagement with the local council on future issues related to the planning process.</p> <p>OBSERVATION: no evidence of the quantification of the improvement that has resulted from the collective action relative to a baseline.</p> |

| Indicator | Details & Score | How the requirement is satisfied |
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| 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. | The site has evidenced the Water Stewardship Plan that contains relevant targets and associated progress columns with responsible persons identified. Within 4.1.1 the site has evidenced future team meetings to evaluate the progress of the plan and its actions. The site intends to use the plan as a live document that can contribute to the company operational master plan. |
| 4.1.2 | Value creation resulting from the water stewardship plan shall be evaluated. | The site provided evidence related to an improvement in water use efficiency |
| 4.1.3 | The shared value benefits in the catchment shall be identified and where applicable, quantified. | The site has evidenced through the Lightwood Management Plan 2018-2027 on page 10, the Recreation and Community Value of the Lightwood site, on page 36 the plans for Community Engagement and involvement and on page 38 the aims to review the plan into the future In addition, in 3.3.3 the site provided evidence of tangible proposals for future regenerate projects and relevant discussions with key stakeholders / authorities regarding this linked to a wider Nestlé Waters commitment. |

| Indicator | Details & Score | How the requirement is satisfied |
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| 4.1.4 | <p>ADVANCED INDICATOR: 3</p> <p>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.</p> | <p>The site has evidenced company reports and standards detailing high level commitments to the Alliance for Water Stewardship, the Nestlé Commitment on Water Stewardship and the Caring for Water Playbook. Please see 2.1.2 in addition.</p> |
| 4.2 | <p>Evaluate the impacts of water-related emergency incidents (including extreme events), if any occurred, and determine the effectiveness of corrective and preventative measures.</p> | |
| 4.2.1 | <p>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</p> | <p>Within the Water Stewardship Plan the site has evidenced an action regarding an annual review session to be scheduled to complete / review root cause analysis of any emergency incidents if occurred, identifying corrective action and identifying general risk levels.</p> <p>No emergency incidents have occurred to date associated with these criteria</p> |

| Indicator | Details & Score | How the requirement is satisfied |
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| | against future incidents shall be identified. | |
| 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. | <p>The Community Relations Process tool was shown live during audit for earlier criteria. Evidence 4.3 demonstrating consultation efforts. In addition, in 3.1.4 evidence demonstrates stakeholder consultation evidence through local survey – a water related question is shown.</p> <p>Evidence is included of the Nestlé Waters Caring for Water Playbook</p> |
| 4.3.2 | <p>ADVANCED INDICATOR: 6</p> <p>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.</p> | As above in 4.3.1 – Community Relations Process toolkit and evidence of stakeholder consultation. |

| Indicator | Details & Score | How the requirement is satisfied |
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| 4.4 | Evaluate and update the site's water stewardship plan, incorporating the information obtained from the evaluation process in the context of continual improvement. | |
| 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 step and these changes shall be identified. | Not applicable. This is the initial assessment. Site can evidence through 4.1.1 planned reviews of the water stewardship plan. The Water Stewardship Plan is a live document. |
| 5 | COMMUNICATE & DISCLOSE | |
| 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. | The site provided a clear overview of roles and responsibilities with respect to water-related internal governance, including an organisational chart identifying key positions that has been signed by the factory manager. |
| 5.2 | Communicate the water stewardship plan with relevant stakeholders. | |

| Indicator | Details & Score | How the requirement is satisfied |
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| 5.2.1 | The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders. | The site has provided evidence of numerous disclosures of key elements of the water stewardship plan, including slides for 16 separate events during which AWS and aspects of the water stewardship plan specific to each audience were presented. |
| 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. | Although only recently developed, the Water Stewardship Plan of the site is a live document and monthly review meetings are schedule for key WS stakeholders at the site to review the plan. There is provision within the plan to report on progress of each specific objective listed. |
| 5.3.2 | ADVANCED INDICATOR: 1 The site's efforts to implement the AWS Standard shall be disclosed in the organization's annual report. | Evidence of Nestlé's global commitment to certify its sites to the Alliance for Water Stewardship standard is provided in the Creating Shared Value Report. Nestlé's Annual Report (2019) also discloses that all bottled water production sites will be certified to the AWS standard by 2025. |

| Indicator | Details & Score | How the requirement is satisfied |
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| 5.3.3 | <p>ADVANCED INDICATOR: 1</p> <p>Benefits to the site and stakeholders from implementation of the AWS Standard shall be quantified in the organization's annual report.</p> | <p>The Nestlé Annual report in 2019 documented the number of AWS certified sites as 27. Quantified figures provided in the report showed that in 2019 there was an overall reduction of water withdrawal per tonne of product of 31% since 2010, with a total withdrawal of 121 million m3.</p> |
| 5.4 | <p>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.</p> | |
| 5.4.1 | <p>The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.</p> | <p>In 1.2.1 / 5.2.1 the site has evidenced engagement with stakeholders in respect to phosphates and diffuse pollution in the River Wye catchment.</p> <p>Evidence is included of the Nestlé Waters Caring for Water Playbook</p> |
| 5.4.2 | <p>Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.</p> | <p>The site works in collaboration with multiple public-sector agencies through the following points, as previously documented:</p> <ul style="list-style-type: none"> 1 – regulatory reporting 2 – efforts to better understand and quantify water availability 3 – ongoing efforts to support the EA and Natural England in relation to the Wye Valley Diffuse Pollution Project |

| Indicator | Details & Score | How the requirement is satisfied |
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| 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. | No water-related compliance violations occurred at the site to date. Please see 2.2.1 for 2020 and 2019 compliance audits. |
| 5.5.2 | Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable. | As in 5.5.1 no water related compliance violations – evidence provided for proactive approach to managing artesian flow from the Portobello compensation pumping station borehole is shared. |
| 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. | Refer to the Criterion 5.5.1. No water-related compliance violations occurred at the site to date. |

7 AUDIT FINDINGS

All indicators were considered meeting the AWS Core criterion requirement, and only some small adjustments were requested to make to the documentation in order to be considered fully coherent.

Considering that, a total of 29 findings were raised during the audit process and they all were categorized as observations.

Despite observations are not required to be closed, the site has provided further information to SGS and, at the closure of this audit process, only 12 opportunities for improvement remain open. The site responded that appropriate actions will be taken in the future to address the observations raised at that stage despite it being voluntary.

SGS's review confirmed that the unsolved observations will be reviewed again to the AWS Standard when performing the surveillance assessment in 2021 during the next audit.

All findings and their status at the closure of this audit are informed in Section 6 of this report.

8 SCORING

Based on the review of documents presented, the interview with stakeholders, and the site reconnaissance, the site has paid great attention to its water stewardship. A considerable quantity of effort and work has been put into the preparation for the audit of AWS certification.

In addition, according to the conformity assessment of the site's performance against the AWS advanced-level criteria, the total of cumulative advanced-level criteria scores is 132, which is up to the AWS Platinum level.

9 OPPORTUNITIES FOR IMPROVEMENT

This is the initial conformity assessment for the site against the AWS Standard, and a great attention is clearly paid to the documented plan and implementation to date to the extent that the evaluation of the site's performance against the indicators at the first year of operation has led to a score within the upper limit of the AWS Standard. Therefore, the site can focus on excelling at the areas with unsolved observations.

Future audits will evaluate more in depth the site's performance against the AWS Standard indicators for Steps 4 and 5, and how this is monitored and presented as compliance. Thus, SGS recommends also that the site's focus on developing these areas following the AWS Standard indicators, and documents them in anticipation of future audits.

10 CONCLUSIONS AND RECOMMENDATIONS

Given the review of evidence presented and the site reconnaissance performed, SGS recommends the site to be awarded the AWS Platinum Certified status with a surveillance audit interval of annual frequency.