2000 Powell Street, Suite 600
Emeryville, CA 94608
www.scsglobalservices.com

Client Name:	Nestlé Waters North America, Inc. – Cabazon, CA
AWS Registration Number:	AWS-000145
Client Representative:	Brandon Kienenberger, NWNA Sustainability Analyst
Audit Team:	Rae Mindock, Lead Auditor Isabella Polenghi-Gross, Technical Auditor Shana Golden, Team Auditor
Audit Dates:	November 16, 2020
Stakeholder Notification:	AWS, SCS and Local Newspaper
Site Location:	14020 Elm Street, Cabazon, CA 92230
Report Date:	February 15, 2021

Standard: AWS International Water Stewardship Standard - Version 2.0, March 22, 2019

Audit Type	☐ Gap Analysis ☐ Pre-assessment	☐ Initial Certification	☐ Surveillance ☒ Recertification

Level of Certification	☐ Core	☐ Gold	☒ Platinum

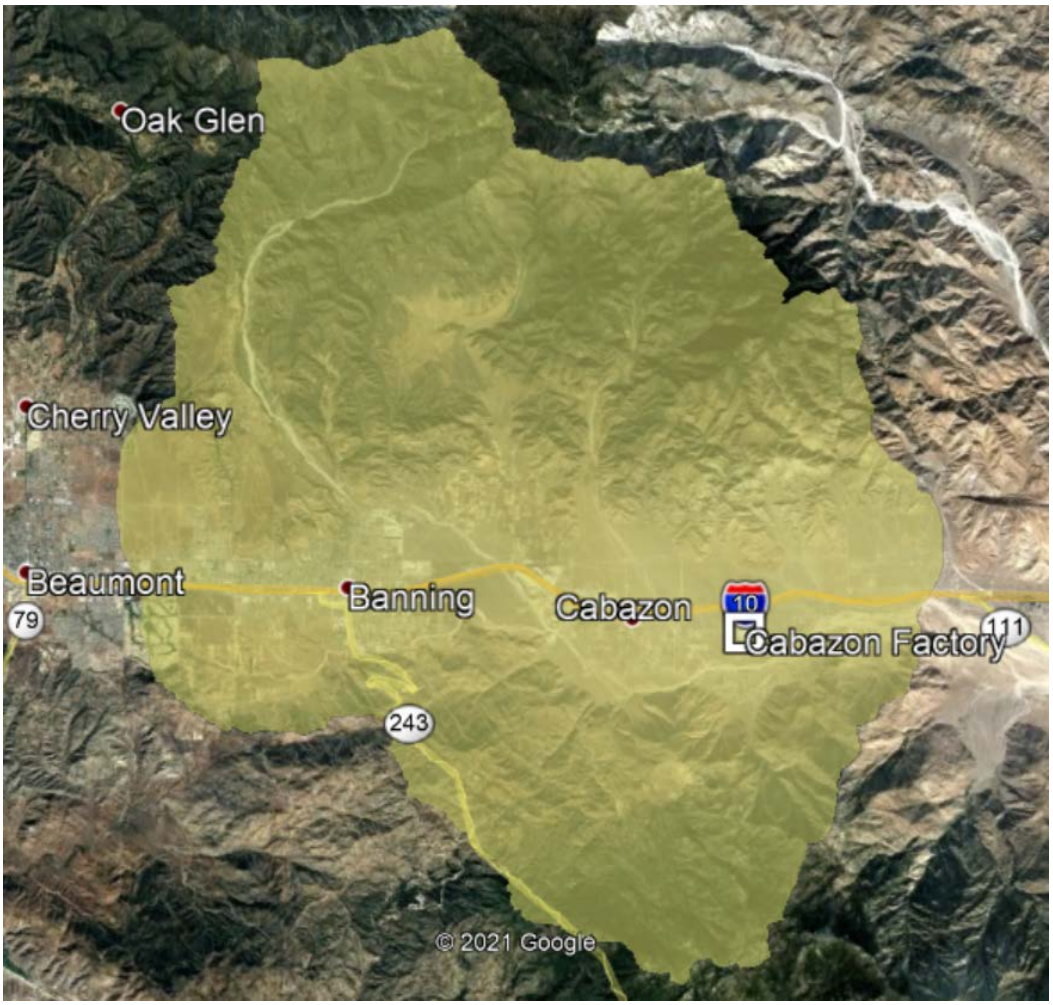
Site Information

Site Description

The NWNA Cabazon Factory is a water bottling facility, producing bottled water products under the brand names of Arrowhead Mountain Spring Water, and Nestlé Pure Life. The factory produces a variety of different bottle types ranging from 8 oz to 1 gallon across several bottling lines. The geographic scope of the site is limited to the property boundary of the factory which is located in a rural setting, part of the Morongo Band of Mission Indians tribal land. Water for the bottling facility comes from several sources, including a groundwater well to produce bottled purified water and water for sanitary services, and the primary source of spring water delivered by pipe (SP Spring) or tanker from one of several regional springs: Deer Canyon Springs, Arrowhead Springs, Palomar Mountain Granite Springs and/or Long Point Ranch Springs. Wastewater services are provided by Morongo Wastewater Treatment Plant and recharge basins (Factory effluent).

Catchment Description

The Cabazon Factory is located in the Upper San Gorgonio River Subbasin (HUC 181002010104). The Cabazon catchment (103,827 acres) is located within the Salton Sea watershed, and includes the Cabazon Factory bottling operations, the primary water sources (South Well and SP Spring), the discharge recipient (Morongo WWTP and recharge basin), and the ultimate receiving water body (San Gorgonio Pass Groundwater Sub-basin). The primary source of water for the catchment is precipitation within the Whitewater River Watershed, with the ultimate discharge of treated wastewater to the San Gorgonio Pass Groundwater Sub-basin.



The AWS Cabazon Catchment which includes the spring water source, purified water source, and effluent recipient.

Shared Water Challenges

Shared water challenges are catchment water-related issues shared by the site and stakeholders. Stakeholder engagement was documented, and auditor interviews confirmed the topics of engagement. Water quantity has been identified as the primary water shared water challenge in the catchment, with other shared water challenges including public education surrounding water use, water quality, and efficiency. A prioritized list of shared water challenges addressing the outcomes was provided.

To better understand catchment issues and opportunities, NWNA regularly meets with catchment authorities. The Factory has conducted tours of operations, provided local presentations on water stewardship through AWS, and made and donated over 50,000 bottles for hand sanitizer use in response to COVID-19. The Factory received the 2020 American Red Cross Corporate Hero Award for

volunteer efforts. Water efficiency projects in 2020 included fill refinement on several lines and continuing refinement of the factory water map.

Audit Attendees

Participant/Title	Opening Meeting	Document Review	Site Inspection	Closing Meeting
Sustainability Analyst	x	x	x	x
Natural Resources Manager	x	x	x	x
Factory Manager	x			x
Springs Resource	x		x	x
Factory Engineering Manager	x		x	x

Supporting Documentation:

The NWNA Cabazon Factory provided documentation to support conformity with the AWS Standard v2.0 including: Stakeholder Outreach Log, Community Relations Program (CRP) Summary, Factory AWS Presentation 2020, NWNA Water Map, Catchment Water Balance, and Water Stewardship Plan. The Water Stewardship Plan is a working document which is continually updated with information regarding how shared water challenges are being addressed including progress, performance evaluation and stakeholder feedback. Other supporting documentation were also provided as evidence.

Summary of Findings

Step	Major	Minor	Observations	Advanced Criteria Total Points
1. Gather & Understand				21
2. Commit & Plan				21
3. Implement				68
4. Evaluate				6
5. Communicate & Disclose				0
TOTAL				116

Audit Non-conformities and Observations

Non-Conformity (Major or Minor) or Observation	Citation	Criteria/ Indicator	Due Date	Detail and Corrective Action
				Root Cause Analysis and Corrective Action
				Root Cause Analysis and Corrective Action

Certification Decision

Auditor's recommendation for initial, continued or re-certification based on compliance with requirements:	X	Recommended
		Not Recommended
Level of Certification recommended		AWS Core
		AWS Gold
	X	AWS Platinum
SCS Certification Decision:	X	Approved
		Denied
Certification Decision by:		 Nicole Munoz, February 24, 2021
Technical Review by:		 Nicole Munoz, February 24, 2021
Surveillance Schedule:		Next audit is scheduled for: February 2022 to August 2022 SCS will request 18 month surveillance.

AWS International Water Stewardship Standard, Version 2.0, March 22, 2019

Surveillance audits shall cover at a minimum those requirements highlighted in light green.

STEP 1: Gather and Understand

Criteria	Indicator	Yes	No	NA	Objective Evidence/Finding	Points
1.1 Gather information to define the site's physical scope for water stewardship purposes, including: its operational boundaries; the water sources from which the site draws; the locations to which the site returns its discharges; and the catchment(s) that the site affect(s) and upon which it is reliant.	1.1.1 The physical scope of the site shall be ***mapped***, considering the regulatory landscape and zone of stakeholder interests, including: - Site boundaries; - Water-related infrastructure, including piping network, owned or managed by the site or its parent organization; - Any water sources providing water to the site that are owned or managed by the site or its parent organization; - Water service provider (if applicable) and its ultimate water source; - Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies; - Catchment(s) that the site affect(s) and is reliant upon for water.	Yes			The NWNA Cabazon Facility is located in southern California, east of Los Angeles. The Cabazon site covers an area of approximately 48 acres. A map of the site was provided. The map includes the property boundaries of the factory, the Southern Pacific (SP) springs pipeline, the groundwater well pipeline, the wastewater discharge point and the off-site septic tank and stormwater retention basin adjacent and to the south of the facility. The Cabazon facility can receive water from five springs and from an offsite groundwater well that draws from the San Gorgonio Pass Groundwater Sub-basin within the Salton Sea Watershed. A map with the names and locations of water sources was reviewed. Spring sources are: Southern Pacific Spring (the primary spring source, located within the site catchment), Arrowhead Springs, Long Point Ranch Springs, Deer Canyon Spring, and Palomar Mountain Granite Springs. Spring water outside the catchment is delivered by tanker and the spring within the catchment is piped to the facility. Storm water discharge is directed offsite to a storm water retention basin. Industrial discharges are sent to the Morongo Wastewater Treatment Plant. Both storm water and treated wastewater are recharged via percolation basins to the Cabazon Groundwater Storage Unit of the San Gorgonio Pass Groundwater Sub-basin. Sanitary waste is sent to the septic system adjacent and to the south of the site. The Cabazon catchment (103,827 acres) is located within the Salton Sea watershed, and includes the Cabazon factory, South Well, SP Spring, the Morongo WWTP and recharge basin, and the San Gorgonio Pass Groundwater Sub-basin which is the ultimate receiving water body.	
1.2 Understand relevant stakeholders, their water	1.2.1 Stakeholders and their water-related challenges shall be ***identified***. The process	Yes			The stakeholder map created during the Nestlé Community Relations Process (CRP) was reviewed. The CRP includes identification of local population,	

related challenges, and the site's ability to influence beyond its boundaries.	used for stakeholder identification shall be ***identified***. This process shall: - Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people; - Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies; - Provide evidence of stakeholder consultation on water-related interests and challenges; - Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups; - Identify the degree of stakeholder engagement based on their level of interest and influence.				authorities (municipalities), businesses (economic neighbors), and NGOs. Stakeholders identified include Morongo Band of Mission Indians (MBMI) water, fire, police, local school, community outreach programs, and regional and state representatives. The Outreach log included individuals and organizations consulted since 2016, including notes on conversations which provided information on water-related interests/challenges. The summary includes actions, follow-up and feedback. The CRP includes ranking of stakeholder influence and interest with levels of influence and interest defined.	
	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.	Yes			Stakeholders are related to the site's catchment and identifies the stakeholders' ability to influence or be influenced. Influence/Interest is characterized (low to critical) and further describe opinions towards NWNA.	
1.3 Gather water-related data for the site, including: water balance; water quality, Important Water-Related Areas, water governance, WASH; water-	1.3.1 Existing water-related incident response plans shall be ***identified***.	Yes			The Water Stewardship Plan, Spill Prevention Control Countermeasure Plan (SPCC) and Storm Water Pollution Prevention Plan (SWPPP) were reviewed. Incident response was addressed in the plans.	
	1.3.2 Site water balance, including inflows, losses, storage, and outflows shall be ***identified*** and ***mapped***.	Yes			NWNA prepared and provided water maps containing inputs and outputs of water at this facility. Data showing monthly water inflows, outflows, and losses were reviewed. The map indicates water sources, water treatment, process units, wastewater treatment, water effluents, and production.	

related costs, revenues, and shared value creation.	1.3.3 Site water balance, inflows, losses, storage, and outflows, including indication of annual variance in water usage rates, shall be ***quantified***. Where there is a water-related challenge that would be a threat to good water balance for people or environment, an indication of annual high and low variances shall be ***quantified***.	Yes			NWNA provided water maps containing inputs and outputs of water at this facility. Cabazon utilizes a Water Withdrawal Ratio (WWR) to evaluate efficiency, measuring Liters of water used to produce a Liter of product. The Factory provided WWR on a monthly basis for 2019 and 2020 with high and low variance. The comparison of previous years shows an overall increase in water efficiency over the course of several years. Water losses were identified and recent upgrades to optimize water efficiency were discussed, including fill valve replacements on some production lines.	
	1.3.4 Water quality of the site's water source(s), provided waters, effluent and receiving water bodies shall be ***quantified***. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be ***quantified***.	Yes			A summary of water quality tests conducted at the site on incoming source water and finished product was provided. To verify the internal water quality results, samples get sent to an external accredited laboratory. NWNA water quality protocol includes pH, T, DO, TDS and other constituents. Water quality data is regularly compared to NWNA and MCL available screening criteria. The records reviewed showed that no parameters exceeded any regulatory standards. Analytical reports of waste water effluent were reviewed. The system is automated so that if a value is out of limits, the system shuts down. NWNA is notified and must respond if the effluent quality is out of required limits (e.g. if pH exceeds certain amount).	
	1.3.5 Potential sources of pollution shall be ***identified*** and if applicable, ***mapped***, including chemicals used or stored on site.	Yes			A list of all onsite chemicals stored at the site was provided. Chemical storage was inspected during audit of the facility.	
	1.3.6 On-site Important Water-Related Areas shall be ***identified*** and ***mapped***, including a description of their status including Indigenous cultural values.	Yes			No on-site IWRAs were identified.	
	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	Yes			Site level costs were presented including costs to implement water stewardship actions and factory-related costs were provided and reviewed. Finances are prepared by NWNA corporate headquarters with revenues compiled at a company level. Annual revenue for NWNA is publicly available on the NWNA website. The shared value generated included examples such as donations to local food banks and during emergency situations, preserving	

	be ***identified*** and used to inform the evaluation of the plan in 4.1.2.				and improvement catchment quality through IWRA management, education provided to inform public, improved IWRA health, etc.	
	1.3.8 Levels of access and adequacy of WASH at the site shall be ***identified.***	Yes			WASH is available on-site with potable water and toilets for employees and visitors. The Factory utilized "Self-Assessment Tool for Evaluating Access to Water, Sanitation and Hygiene (WASH) at the Workplace".	
1.4 Gather data on the site's indirect water use, including: its primary inputs; the water use embedded in the production of those primary inputs the status of the waters at the origin of the inputs (where they can be ***identified***); and water used in out-sourced water-related services.	1.4.1 The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be ***identified.***	Yes			A list of primary inputs for outsourced services was provided for the Cabazon site with annual water consumption values, and origin for each input. Water use includes industrial, agricultural, and municipal and is associated with packaging, transportation, cooling, end of life, and level of water stress. It contained a detailed footprint analysis of the water embedded in all the products used. This analysis showed that there is a clear decreasing trend in greenhouse effects, water consumption and non-renewable energy use from 2010 to 2015.	
	1.4.2 The embedded water use of outsourced services shall be ***identified***, and where those services originate within the site's catchment, ***quantified***.	Yes			Documentation on embedded water use provided, shows values of water consumptions and availability. Calculations conducted indicate the Blue Water Scarcity Value and provides the score of the water stress. Only services outside the Catchment are used at the NWNA Cabazon facility.	
	1.4.3 **Advanced Indicator** The embedded water use of primary inputs in catchment(s) of origin shall be ***quantified***.	Yes			Available vendors' water use information was provided and reviewed, which included annual water volumes consumed to supply the Cabazon factory. Vendors were selected if accounting for over 5 % of the total weight of goods produced or representing over 5 % of the costs.	7
1.5 Gather water-related data for the catchment, including: water governance, water balance, water quality, Important Water-Related Areas, infrastructure, and WASH	1.5.1 Water governance initiatives shall be ***identified***, including catchment plan(s), water-related public policies, major publicly-led initiatives under way, and relevant goals to help inform site of possible opportunities for water stewardship collective action.	Yes			A list of significant publicly led initiatives and water related public policy goals for the catchment was provided at the state, regional, county, city, and district level. A description of the purpose and relevance of the water-related legal and regulatory requirements is included in the catchment plan review summary was provided and discussed.	
	1.5.2 Applicable water-related legal and regulatory requirements shall be ***identified***, including legally-defined	Yes			A list of federal, state, local permits and regulatory requirements was provided. List of relevant and applicable legal and other requirements were also provided.	

	and/or stakeholder-verified customary water rights.					
	1.5.3 The catchment water-balance, and where applicable, scarcity, shall be ***quantified***, including indication of annual, and where appropriate, seasonal, variance.	Yes			The catchment water balance with precipitation, point source flows, subsurface flow, surface runoff, stream flows, and ET data were provided for the Cabazon Factory catchment (from Model My Watershed Multi-Year Model). Data is presented as an average from a 30-year period and indicates seasonal fluctuations. In addition, catchment water balance information for the San Gorgonio Region were provided, which included current and projected annual water demand and water supply data and considerations regarding plans under dry years. A description of the Cabazon Storage Unit hydrologic budget was also provided indicating that additional groundwater productions can be developed due to occurring positive changes in storage.	
	1.5.4 Water quality, including physical, chemical, and biological status, of the catchment shall be ***identified***, and where possible, ***quantified***. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be ***identified***.	Yes			Publicly-available water quality information were provided for the site catchment. Specific qualitative and quantitative information was provided for groundwater, surface water within the catchment and imported water used in the catchment. Spring water undergoes the standard State required annual water quality testing performed by third party, accredited laboratories. Additionally, NWNA performs quarterly, monthly, and weekly water quality testing on additional constituents and parameters. Trending of both water quality sources is evaluated annually and compared to historical data and water quality goals.	
	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.	Yes			IWRAs have been identified by NWNA, along with a description of their water-related issues. IWRAs include: Colorado River Aqueduct, South Well (groundwater borehole), SP Spring, Millard Spring, and Potrero Canyon Spring.	

	1.5.6 Existing and planned water-related infrastructure shall be ***identified***, including condition and potential exposure to extreme events.	Yes			A list of publicly available reports/data of water-related infrastructure with a description, exposure scenarios and opportunities were provided. Infrastructure includes municipal wells, Colorado River Aqueduct, and ponds.	
	1.5.7 The adequacy of available WASH services within the catchment shall be ***identified***.	Yes			California State Water Resources Control Board map providing Exceedance/Compliance Status of Public Water Systems was reviewed. WASH for the catchment is adequate based on demographic information. NWNA Cabazon supports local food banks and disaster relief organizations. Local agencies work to meet the needs of populations who do not have access to WASH. The site made and donated over 50,000 bottles for hand sanitizer use in response to COVID-19.	
	1.5.8 **Advanced Indicator** Efforts by the site to support and undertake catchment level water-related data collection shall be ***identified***.	Yes			Documentation was shown as evidence of the continual efforts undertaken by the Cabazon site to monitor groundwater and surface water levels at the water sources as well as in the adjacent environment. This work is part of their collaborative efforts on water governance, tracking and planning within the catchment.	7
	1.5.9 **Advanced Indicator** The adequacy of WASH provision within the catchments of origin of primary inputs shall be ***identified***.	Yes			Documents from the Water Board database were provided and reviewed showing the status of public water systems within the catchments of origin of identified primary inputs that are outside the site catchment.	4
1.6 Understand current and future shared water challenges in the catchment, by linking the water challenges ***identified*** by stakeholders with the site's water challenges.	1.6.1 Shared water challenges shall be ***identified*** and prioritized from the information gathered.	Yes			A prioritized list with rationale of shared water challenges was provided and reviewed. Drivers and public-sector agency efforts are noted as well. Water quantity is prioritized as first, on a scale of 1-4. NWNA Cabazon challenges were prioritized based on stakeholder feedback and corporate initiatives.	
	1.6.2 Initiatives to address shared water challenges shall be ***identified***.	Yes			A list of existing initiatives was provided and reviewed.	
	1.6.3 **Advanced Indicator** Future water issues shall be ***identified***, including anticipated impacts and trends	Yes			Future water issues within the Cabazon factory catchment were identified and linked to shared water challenges (i.e.: water quality and quantity). An assessment of existing trends and anticipated impacts was performed and summarized, and the water stewardship plan actions updated accordingly.	3
	1.6.4 **Advanced Indicator** Potential water-related social impacts from the site shall be ***identified***, resulting				Advanced Indicator not considered.	

	in a social impact assessment with a particular focus on water.					
1.7 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.	1.7.1 Water risks faced by the site shall be ***identified***, and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.	Yes			A prioritized list of water risks was provided and reviewed. Water risks matched shared water challenges. Water quantity is prioritized first, on a scale of 1-4.	
	1.7.2 Water-related opportunities shall be ***identified***, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.	Yes			A prioritized list of water-related opportunities for the site and match the shared water challenges and water risks lists. First priority is based on water quantity and the risk of impaired access to water. A prioritized list of projects, savings and value creation were submitted and reviewed. Value creation was quantified, as applicable.	
1.8 Understand best practice towards achieving AWS outcomes: Determining sectoral best practices having a local/catchment, regional, or national relevance.	1.8.1 Relevant catchment best practice for water governance shall be ***identified***.	Yes			NWNA has identified multiple best practices toward achieving AWS outcomes at the site and in the catchment. The following best practices are examples for Indicators 1.8.1 - 1.8.5. NWNA identified the Pacific Institute/CEO Water Mandate, Setting Site Water Targets informed by Catchment Context, Case Study: Santa Ana River Watershed, CA. The study which references AWS, was supported by companies endorsing CEO Mandate, including NWNA. NWNA engages with catchment authorities and other stakeholders to share information, practices and drive water stewardship practices.	
	1.8.2 Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be ***identified***.	Yes			NWNA identified The Beverage Industry Continues to Drive Improvement in Water, Energy, and Emissions Efficiency, 2108 Benchmarking Study. NWNA uses the sector specific efficiency metric of water use ratio (liters of water used in the process/liter of bottled water) to track onsite efficiency and established a target to monitor continual improvement.	
	1.8.3 Relevant sector and/or catchment best practice for water quality shall be ***identified***, including rationale for data source.	Yes			NWNA identified sector best practice for Processing and Bottling of Bottled Drinking Water is established in CFR Title 21, Part 129. NWNA exceeds requirements outlined with sampling frequency, parameters analyzed and consistency across the business unit.	

	1.8.4 Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be ***identified***.	Yes			NWNA identified 1) Assessment, management and monitoring of High Conservation Value Forest (HCVF) A practical guide for forest managers and 2) Good practice guidelines for High Conservation Value assessments, A practical guide for practitioners and auditors, both by ProForest. NWNA follows practices described by ProForest by assigning Natural Resource Manager for each site who focuses on maintenance of springs and other IWRAs.	
	1.8.5 Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be ***identified***.	Yes			NWNA identified the Water Aid Corporate engagement on water supply, sanitation and hygiene: Driving progress on Sustainable Development Goal 6 (SDG6) through supply-chains and voluntary standards. NWNA established the Nestlé Guidelines on Respecting the Human Rights to Water and Sanitation, which is extended to suppliers.	
					Advanced Points Step 1	**21**

STEP 2: Commit and Plan

Criteria	Indicator	Yes	No	NA	Objective Evidence/Findings	Points
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 statement or document shall include the following commitments: - That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes - That the site implementation will be aligned to and in support of existing catchment sustainability plans - That the site's stakeholders will be engaged in an open and transparent way - That the site will allocate resources to implement the Standard.	Yes			A pledge was reviewed, signed by the site factory manager, containing all elements described in this criterion.	

	2.1.2 **Advanced Indicator** A statement that explicitly covers all requirements set out in Indicator 2.1.1 and is signed by the organization's senior-most executive or governance body and publicly ***disclosed*** shall be ***identified***.				Advanced Indicator not considered.	
2.2 Develop and document a process to achieve and maintain legal and regulatory compliance.	2.2.1 The system to maintain compliance obligations for water and wastewater management shall be ***identified***, including: - Identification of responsible persons/positions within facility organizational structure - Process for submissions to regulatory agencies.	Yes			The NWNA Compliance Matrix was provided and reviewed. Included in the matrix are the listed permits and responsible staff to ensure maintenance of compliance. A third-party is contracted to confirm compliance is maintained. In addition, the facility is ISO 14001 Certified (documentation for this certification were reviewed).	
2.3 Create a water stewardship strategy and plan including addressing risks (to and from the site), shared catchment water challenges, and opportunities.	2.3.1 A water stewardship strategy shall be ***identified*** that defines the overarching mission, vision, and goals of the organization towards good water stewardship in line with this AWS Standard.	Yes			A water stewardship strategy statement signed by the factory manager was provided and reviewed. NWNA Cabazon strategy is a high-level document stating the overall strategy is in alignment with the AWS requirements	
	2.3.2 A water stewardship plan shall be ***identified,*** including for each target: - How it will be measured and monitored - Actions to achieve and maintain (or exceed) it - Planned timeframes to achieve it - Financial budgets allocated for actions - Positions of persons responsible for actions and achieving targets - Where available, note the link between each target and the achievement of best	Yes			A detailed water stewardship plan was created as part of the AWS process. The plan is broken into objectives, targets, and actions. There are different actions corresponding to different targets, each with their own metrics, budget, responsible person, status, and other criteria. Public Consumer/Education, Water Efficiency, Water Quality, and Water Quantity are the water topics identified in this plan.	

	practice to help address shared water challenges and the AWS outcomes.					
	2.3.3 **Advanced Indicator** The site's partnership/water stewardship activities with other sites within the same catchment (which may or may not be under the same organizational ownership) shall be ***identified*** and described.	Yes			The site partnered with others, provided technical and financial support to address water related issues including water quality related to wildfires and WASH support.	4
	2.3.4 **Advanced Indicator** 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***.	Yes			The site partnered with others, provided technical and financial support to address water related issues associated with IWRA preservation and water governance. NWNA is an active member of the California Water Action Collaborative, which is committed to advancing water security in CA.	4
	2.3.5 **Advanced Indicator** 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***.	Yes			The Stakeholder Outreach Log documented stakeholder consensus on a catchment project that can be considered best practice for water quantity.	7
2.4 Demonstrate the site's responsiveness and resilience to respond to water risks	2.4.1 A plan to mitigate or adapt to ***identified*** water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be ***identified***.	Yes			NWNA Cabazon provided their current Spill Prevention Control (SPCC) Plan, Wastewater Management Plan, and other emergency response plans, which included a description of their required responses and resilience operations to water-related issues and risks. Modifications to the plans are captured through revision/amendment comments and an annual review is part of standard procedures to evaluate the plan's effectiveness. In addition, the Water Stewardship Plan is a working document which documents identification of water risks through performance, evaluation, and stakeholder consultation. Stakeholders include the relevant agencies responsible for infrastructure. The WSP documents site efforts in initiatives to increase regional supply reliability and resiliency.	
	2.4.2 **Advanced Indicator** A plan to mitigate or adapt to water risks associated	Yes			Water risks associated with climate change projections within the catchment were identified by the site. A plan to mitigate or adapt to these water risks	6

	with climate change projections developed in co-ordination with relevant public-sector and infrastructure agencies shall be ***identified***.				was developed (and is continually updated) by the site in co-ordination with the relevant water-related catchment authority and was incorporated into the water stewardship plan, which includes continuous monitoring of groundwater levels to support data sharing efforts and engage in water governance and other identified actions in line with the related Integrated Regional Water Management Plan goals. Data shared during the audit, showed evidence of the efforts conducted by the site to conduct detailed evaluations of the surface water and groundwater conditions in the vicinity of the site's main spring source. Based on this information, the flow data collected shows the site manages their sources sustainably through proactive monitoring and responsible use.	
					Advanced Points Step 2	**21**

STEP 3: Implement

Criteria	Indicator	Yes	No	NA	Objective Evidence/Findings	Points
3.1 Implement plan to participate positively in catchment governance.	3.1.1 Evidence that the site has supported good catchment governance shall be ***identified***.	Yes			The Factory provided documentation of their efforts to support good catchment governance through participation with the local governing agencies, sharing information with agencies and through continuing to expand education on AWS and outcomes toward good water governance.	
	3.1.2 Measures ***identified*** to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be ***implemented***.	Yes			Nestlé developed and abides by *Nestlé Guidelines on Respecting the Human Rights to Water and Sanitation* as one tool to access the impact of Nestle operations on communities to access water (water rights) and sanitation. Additional Nestlé tools and efforts complementing the Guidelines include the Community Relations Process and water-related outreach. Excluded water rights have not been identified through stakeholder engagements, including with key water agencies. As part of a continued dialog with the community, NWNA pursue feedback on this topic.	
	3.1.3 **Advanced Indicator** Evidence of improvements in water governance capacity from a site-selected baseline date shall be ***identified*****.**			NA	Advanced Indicator not considered.	
	3.1.4 **Advanced Indicator**			NA	Advanced Indicator not considered.	

	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*.**					
3.2 Implement system to comply with water-related legal and regulatory requirements and respect water rights.	3.2.1 A process to verify full legal and regulatory compliance shall be ***implemented***.	Yes			The NWNA Compliance Matrix was provided and reviewed. Included in the matrix are the listed permits and responsible staff to ensure maintenance of compliance. A third-party is contracted to confirm compliance is maintained. In addition, the facility is ISO 14001 Certified (documentation for this certification were reviewed).	
	3.2.2 Where water rights are part of legal and regulatory requirements, measures ***identified*** to respect the water rights of others including Indigenous peoples, shall be ***implemented***.	Yes			The Factory's water use is within identified water rights. The State of California Private Water Source Operator License (PWSOL) have been issued for the SP Spring. Excluded water rights have not been identified.	
3.3 Implement plan to achieve site water balance targets.	3.3.1 Status of progress towards meeting water balance targets set in the water stewardship plan shall be ***identified***.	Yes			Water withdrawal, water withdrawal rates, energy consumption and production volume are tracked monthly and compared to previous years monthly values. The site has worked to improve its water efficiency as per its targets, by implementing the fill line overfill reductions.	
	3.3.2 Where water scarcity is a shared water challenge, annual targets to improve the site's water use efficiency, or if practical and applicable, reduce volumetric total use shall be ***implemented***.	Yes			NWNA establishes site targets annually to improve water balance towards improving efficiency and strives to reduce volumetric total.	
	3.3.3 Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be ***identified***.	Yes			The site is not re-allocating water savings.	
	3.3.4 **Advanced Indicator** The total volume of water voluntarily re-allocated (from site water savings) for			NA	Advanced Indicator not considered.	

	social, cultural and environmental needs shall be ***quantified***.					
3.4 Implement plan to achieve site water quality targets.	3.4.1 Status of progress towards meeting water quality targets set in the water stewardship plan shall be ***identified***.	Yes			Measurement system is in place for water quality targets throughout the site, data from previous monitoring reports were reviewed. Annual review of data was found to be within historic values and regulatory limits. Wastewater results are within permitted values. Water quality is a shared water challenge and an AWS Outcome. Improvements to water quality are achieved through monitoring, and management.	
	3.4.2 Where water quality is a shared water challenge, continual improvement to achieve best practice for the site's effluent shall be ***identified*** and where applicable, ***quantified***.	Yes			Water quality is a shared water challenge and an AWS Outcome. Improvements to water quality are achieved through monitoring, and management.	
3.5 Implement plan to maintain or improve the site's and/or catchment's Important Water-Related Areas.	3.5.1 Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be ***implemented***.	Yes			The Factory has established targets and goals associated with water withdrawal management. Progress is documented in the Water Stewardship Plan. Catchment IWRAs have been identified together with their current status, future trends and site status. IWRAs are discussed in their AWS presentations to stakeholders.	
	3.5.2 **Advanced Indicator** Evidence of completed restoration of non-functioning or severely degraded Important Water-Related Areas including where appropriate cultural values from a site-selected baseline date shall be ***identified***. Restored areas may be outside of the site, but within the catchment.			NA	Advanced Indicator not considered.	
	3.5.3 **Advanced Indicator** Evidence from a representative range of stakeholders showing consensus that the site is seen as positively contributing to the healthy status of Important Water-Related Areas in the catchment shall be ***identified***.			NA	Advanced Indicator not considered.	

3.6 Implement plan to provide access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers at all premises under the site's control.	3.6.1 Evidence of the site's provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers onsite shall be ***identified*** and where applicable, ***quantified***.	Yes			NWNA uses a self-assessment tool at each site to review access to drinking water, sanitation and hygiene awareness (WASH). The nature of the product made at the facility requires strict adherence to these principals. Pledged compliance was achieved within the Cabazon facility.	
	3.6.2 Evidence that the site is not impinging on the human right to safe water and sanitation of communities through their operations, and that traditional access rights for Indigenous and local communities are being respected, and that remedial actions are in place where this is not the case, and that these are effective.	Yes			NWNA uses a self-assessment tool at each site to review access to drinking water, sanitation and hygiene awareness (WASH). The Factory is not impinging on the WASH of communities. NWNA discussions with stakeholders did not indicate actual or perceived concern that site was impinging on human right to safe water and sanitation in catchment.	
	3.6.3 **Advanced Indicator** A list of actions taken to support the provision to stakeholders in the catchment of access to safe drinking water, adequate sanitation and hygiene awareness shall be ***identified***.	Yes			NWNA uses a self-assessment tool at each site to review access to drinking water, sanitation, and hygiene awareness (WASH). The Factory is not impinging of the WASH of communities. NWNA discussions with stakeholders did not indicate actual or perceived concern that site was impinging on human right to safe water and sanitation in catchment. NWNA Cabazon site also provided documentation with evidence of site initiatives to support and improve WASH access and of donations of bottles of waters to different organizations (~900,000 bottles of water in 2020). Stakeholder feedback indicated that organizations receiving donations were grateful for continued support and increase efforts in relation to COVID-19 (over 50,000 bottles for hand sanitizer use). NWNA received the 2020 American Red Cross' Corporate Hero Award which explicitly referenced the significant donation efforts undertaken by the Cabazon factory.	5
	3.6.4 **Advanced Indicator** In catchments where WASH has been ***identified*** as a shared water challenge, evidence of efforts taken with relevant public-sector agencies to share			NA	Advanced Indicator not considered.	

	information and to advocate for change to address access to safe drinking water and sanitation shall be ***identified***.					
3.7 Implement plan to maintain or improve indirect water use within the catchment.	3.7.1 Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be ***quantified***.	Yes			Indirect water use targets in the Water Stewardship Plan include engaging with vendors in catchment. As there are no vendors in the AWS catchment, NWNA has reached out to vendors located outside the catchment to provide information on AWS and request water use data.	
	3.7.2 Evidence of engagement with suppliers and service providers, as well as, when applicable, actions they have taken in the catchment as a result of the site's engagement related to indirect water use, shall be ***identified.***	Yes			Communication requesting details from vendors were provided. Water usage data have been compiled for the majority of the Primary Input Providers and the top Outsourced Services based on Blue Water Scarcity.	
	3.7.3 **Advanced Indicator** Actions taken to address water related risks and challenges related to indirect water use outside the catchment shall be documented and ***evaluated***.			NA	Advanced Indicator not considered.	
3.8 Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have.	3.8.1 Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be ***identified.***	Yes			Evidence indicated there are no concerns with any shared water related infrastructure. NWNA regularly shares aquifer and surface water information with stakeholders.	
3.9 Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a	3.9.1 Actions towards achieving best practice, related to water governance, as applicable, shall be ***implemented***.	Yes			NWNA team engages with catchment authorities and other stakeholders to share information, best practices and drive water stewardship efforts, one example is the data sharing and collaborative efforts of CWAC.	
	3.9.2 Actions towards achieving best practice, related to targets in terms of water balance shall be ***implemented***.	Yes			Sector specific efficiency metric of water use ratio (liters of water used in the process/liter of bottled water) are used to track onsite efficiency and established a target to monitor continual improvement.	

local/catchment, regional, or national relevance.	3.9.3 Actions towards achieving best practice, related to targets in terms of water quality shall be ***implemented***.	Yes			NWNA exceeds requirements outlined with sampling frequency, parameters analyzed and consistency across the business unit. Water quality data provided meets and exceeds regulatory requirements. Effluent is managed appropriately and in accordance with permit limits.	
	3.9.4 Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be ***implemented***.	Yes			NWNA follows practices described by ProForest by assigning Natural Resource Manager for each site who focuses on maintenance of springs and other IWRAs. NWNA follows good practice guidelines for High Conservation Value assessments *A practical guide for practitioners and auditors* and Assessment, management and monitoring of High Conservation Value Forest *A practical guide for forest managers*, as set by ProForest.	
	3.9.5 Actions towards achieving best practice related to targets in terms of WASH shall be ***implemented***.	Yes			There is adequate WASH in the catchment. Additionally, NWNA provides bottled water donations to the community on a recurring and emergency relief basis.	
	3.9.6 **Advanced Indicator** Achievement of ***identified*** best practice related to targets in terms of good water governance shall be ***quantified***.	Yes		8	NWNA team engages with catchment authorities and other stakeholders to share information, best practices, and drive water stewardship efforts. This is well documented in the outreach log provided by the site, which shows evidence of water stewardship education events, including factory open houses and meeting with stakeholders to achieve a better understanding of their issues and opportunities. Another example is the sustainable management plan developed by the site in collaboration with the local authorities with the goal to evaluate the conditions required to maintain sustainable use.	8
	3.9.7 **Advanced Indicator** Achievement of ***identified*** best practice related to targets in terms of sustainable water balance shall be ***quantified***.	Yes			NWNA Cabazon site provided documentation to support evidence that stormwater and treated wastewater from the Cabazon site are recharged via percolation basins to the Cabazon Groundwater Storage Unit of the San Gorgonio Pass Groundwater Sub-basin. Cabazon's Water Stewardship Plan was also provided showing evidence of best practice full implementation (improvements in the WWR, GHG emission rates, and energy consumption). The water savings initiatives undertaken by the site (i.e., water conservation, reuse and recycling, fill refinement, CIP optimization, etc.) represent best practice.	8
	3.9.8 **Advanced Indicator**	Yes			Monthly spring monitoring data were shown for the main spring source used by the Cabazon factory, including flow data and evidence of water samples	8

	Achievement of ***identified*** best practices related to targets in terms of water quality shall be ***quantified***.				and monitoring efforts conducted regularly and frequently at the water source as well as in the adjacent environment. These data, all in compliance with local and federal screening criteria, are reported on a monthly basis. Other examples of best practices include: - Valid wastewater permits and effluent water quality results showing compliance with applicable criteria. - Annual review of incoming data to be within historic trends and values - good CIP effluent management from the site to the receiving WWTP	
	3.9.9 **Advanced Indicator** Achievement of ***identified*** best practices related to targets in terms of the site's maintenance of Important Water-Related Areas have been ***implemented***.	Yes			Several documents were reviewed with evidence of best practices achieved related to the Cabazon site maintenance of IWRA. Examples include: - Preservation and improvement of IWRA health through continued monitoring and evaluation of water data on a daily, weekly, monthly, and annual basis and comparison with values against precipitation measurements, and site-specific environmental conditions. Wildfire Monitoring Plan: to evaluate the potential impacts related to the presence of fire retardant in Millard Canyon. Continued monitoring at the spring area with the goal of preserving and improving IWRA health. Active management of effluent discharge constituent concentrations to keep effluent sample results below permit limits	8
	3.9.10 **Advanced Indicator** Achievement of ***identified*** best practice related to targets in terms of WASH shall be ***quantified***.	Yes			NWNA donations of bottled water to the community is documented and quantified (890,000 bottles), summarized by organization and purpose for 2020.	4
	3.9.11 **Advanced Indicator** A list of efforts to spread best practices shall be ***identified***.	Yes			NWNA works closely with catchment authorities on catchment best practice projects. The Factory hosted World Water Day at the local elementary school educating on topics including water quality and protection of natural resources.	3
	3.9.12 **Advanced Indicator** A list of collective action efforts, including the organizations involved, positions of responsible persons of other entities involved, and a description of the role played by the site shall be ***identified***.	Yes			A list of several collective actions was provided and reviewed. The list contains information on parties and individuals involved, roles played by the NWNA Cabazon site, and references to the evidence of the change obtained through effective implementation of the actions. During the audit, additional information was provided regarding the multiple projects to improve water balance, quality, and/or governance within and	14

					outside the catchment. The common denominator of all their successful collaborations with different agencies and companies is the site's willingness to share their water stewardship experience, technology, contacts, hydrogeologic understanding, and ability to access funding.	
	3.9.13 **Advanced Indicator** Evidence of the ***quantified*** improvement that has resulted from the collective action relative to a site-selected baseline date shall be ***identified*** and evidence from an appropriate range of stakeholders linked to the collective action (including both those implementing the action and those affected by the action) that the site is materially and positively contributing to the achievement of the collective action shall be ***identified***.	Yes			Documentation was provided on evidence of the positive impact of collaborative efforts towards more efficient governmental policies, increased education and outreach, technical assistance, increased project opportunities. The documentation also includes explicit acknowledgement from different stakeholders that the NWNA Cabazon site contributed to the positive outcome. Collaboration includes FIND Food Bank, American Red Cross including 2020 Corporate Hero Award and World Water Day participation.	10
					Advanced Points Step 3	**68**

STEP 4: Evaluate

Criteria	Indicator	Yes	No	NA	Objective Evidence/Findings	Points
4.1 Evaluate the site's performance in light of its actions and targets from its water stewardship plan and demonstrate its contribution to achieving water stewardship outcomes.	4.1.1 Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be ***evaluated.***	Yes			NWNA has evaluated performance of the Stewardship Plan which is aligned with realizing the AWS Outcomes. Targets established in the Plan are tracked based on multiple actions with measurable metrics, documentation of stakeholder engagement, and evaluation of changes in water risk for each target. The evaluation also includes a cost/benefits review and describes shared value benefits for each target. Further evaluation will be conducted during the surveillance and renewal audits.	
	4.1.2 Value creation resulting from the water stewardship plan shall be ***evaluated.***	Yes			NWNA has created value related to multiple efforts including WASH access in the catchment through water donations. The benefits evaluations conducted were reviewed.	

	4.1.3 The shared value benefits in the catchment shall be ***identified*** and where applicable, ***quantified.***	Yes			Refer to 4.1.1	
	4.1.4 **Advanced Indicator** A governance or executive-level review, including discussion of shared water challenges, water risks, and opportunities, and any water-related cost savings or benefits realized, and any relevant incidents shall be ***identified***.			NA	Advanced Indicator not considered.	
4.2 Evaluate the impacts of water-related emergency incidents (including extreme events), if any occurred, and determine the effectiveness of corrective and preventative measures.	4.2.1 A written annual review and (where appropriate) root-cause analysis of the year's emergency incident(s) shall be prepared and the site's response to the incident(s) shall be ***evaluated*** and proposed preventative and corrective actions and mitigations against future incidents shall be ***identified.***	Yes			No water-related emergency events occurred since the last Surveillance Audit. No shutdown occurred that was water related. The annual environmental reviews would document these emergency events, if any. The facility has a current SWPPP and SPCC.	
4.3 Evaluate stakeholders' consultation feedback regarding the site's water stewardship performance, including the effectiveness of the site's engagement process.	4.3.1 Consultation efforts with stakeholders on the site's water stewardship performance shall be ***identified***.	Yes			Internal and external stakeholder outreach conducted and documented in the Stakeholder Outreach Log. Responses covered the main topics of catchment areas, WASH, IWRAs, water efficiency, water savings projects.	
	4.3.2 **Advanced Indicator** The site's efforts to address shared water challenges shall be ***evaluated*** by stakeholders. This shall include stakeholder reviewing of the site's efforts across all five outcome areas, and their suggestions for continual improvement.	Yes			Communication with stakeholders were provided containing a presentation describing NWNA Cabazon's site's efforts contributing to address shared water challenges, through positive participation in good water governance and supporting sustainable water balance, good water quality, public education, healthy status of IWRA, and WASH. The correspondence also requested feedback and additional stakeholders' suggestions to contact. Feedback was reviewed in the Outreach Log and Water Stewardship Plan.	6
4.4 Evaluate and update the site's water stewardship plan, incorporating the	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	Yes			The Water Stewardship Plan is a working document updated annually to reflect on-going actions and completed projects. The Plan tracks targets and actions tied to best practice and AWS outcomes addressed. Performance and stakeholder consultation with respect to the projects are included.	

information obtained from the evaluation process in the context of continual improvement.	this step and these changes shall be ***identified.***				Stakeholder consultation has led to sharing projects and adapting to stakeholder projects as requested.	
					Advanced Points Step 4	**6**

STEP 5: Communicate and Disclose

Criteria	Indicator	Yes	No	NA	Objective Evidence/Findings	Points
5.1 Disclose water-related internal governance of the site's management, including the positions of those accountable for legal compliance with water-related local laws and regulations.	5.1.1 The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be ***disclosed***.	Yes			NWNA Cabazon facility posts the factory organization chart in the entry of the factory floor where it will be observed by staff and during factory open houses with operational tours. The organization chart includes the staff and relevant responsible personnel for water-related laws and regulations. Factory open houses also include presentations on the site's water stewardship projects and implementation of the AWS International Water Stewardship Standard.	
5.2 Communicate the water stewardship plan with relevant stakeholders.	5.2.1 The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.	Yes			NWNA Cabazon provided the outreach log and communication with catchment authorities about the AWS process. The AWS Presentation summarizes the water stewardship plan and outcomes. The Presentation was shared with visitors of the Factory tours and other stakeholders. Communication and outreach confirmed through stakeholder interviews.	
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.	Yes			The stakeholder presentation was reviewed, the presentation includes the site's water stewardship performance results. NWNA Cabazon conducted public/consumer education outreach through tours; distribution of stakeholder presentations and providing stakeholders presentations that reviewed the sites water challenges, stakeholder feedback, targets, with implementation outcomes.	
	5.3.2 Advanced Indicator The site's efforts to ***implement*** the AWS Standard shall be ***disclosed*** in the organization's annual report.				Advanced Indicator not considered.	
	5.3.3 Advanced Indicator				Advanced Indicator not considered.	

	Benefits to the site and stakeholders from implementation of the AWS Standard shall be ***quantified*** in the organization's annual report.					
5.4 Disclose efforts to collectively address shared water challenges, including: associated efforts to address the challenges; engagement with stakeholders; and co-ordination with public-sector agencies.	5.4.1 The site's shared water-related challenges and efforts made to address these challenges shall be ***disclosed***.	Yes			The stakeholder presentation was reviewed. Presentation includes the site's water stewardship performance results. The presentation was provided to stakeholders prior to the onsite audit. List of attendees reviewed at the facility. NWNA Cabazon conducted public/consumer education outreach through tours; and providing stakeholders presentations that reviewed the sites water challenges, stakeholder feedback, targets, with implementation outcomes.	
	5.4.2 Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be ***identified.***	Yes			See 5.4.1	
5.5 Communicate transparency in water-related compliance: make any site water-related compliance violations available upon request as well as any corrective actions the site has taken to prevent future occurrences.	5.5.1 Any site water-related compliance violations and associated corrections shall be ***disclosed.***				Violations are publicly available through state and federal reporting (ECHO/US EPA). There were no violations reported via ECHO.	
	5.5.2 Necessary corrective actions taken by the site to prevent future occurrences shall be ***disclosed*** if applicable.	Yes			See 5.5.1	
	5.5.3 Any site water-related violation that may pose significant risk and threat to human or ecosystem health shall be immediately communicated to relevant public agencies and ***disclosed.***	Yes			Violations are publicly available through state and federal reporting (ECHO/US EPA). There were no violations reported via ECHO. The ECHO reporting system would include violations that pose a significant risk and threat to human or ecosystem health.	
					Advanced Points Step 5	