

Client Name: Diageo
Site: Cameronbridge Distillery
AWS Registration Number: AWS-000247
Client Representative: Lee Oliver, Environmental Manager (Distillation and Maturation)
 Calum Paget, Environment Coordinator
Auditor Team: Steve Brown, Lead Auditor
 Rae Mindock, Team Auditor
Audit Dates: December 14, 2021
Site Location: Leven, KY8 5RL, Scotland, United Kingdom
Report Date: 14th December 2021
Standard: AWS International Water Stewardship Standard - Version 2.0, March 22, 2019

Audit Type	<input type="checkbox"/> Gap Analysis <input type="checkbox"/> Pre-assessment	<input checked="" type="checkbox"/> Initial Certification	<input type="checkbox"/> Surveillance <input type="checkbox"/> Recertification
Site Type	<input checked="" type="checkbox"/> Single	<input type="checkbox"/> Multi	<input type="checkbox"/> Group
Level of Certification	<input checked="" type="checkbox"/> Core	<input type="checkbox"/> Gold	<input type="checkbox"/> Platinum

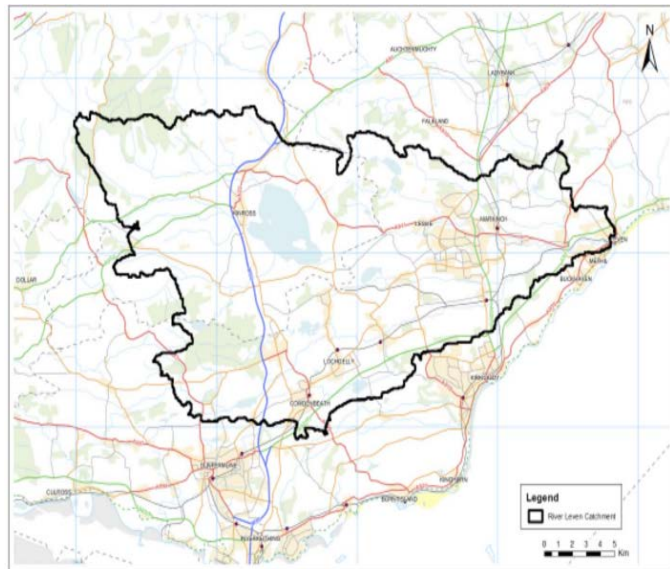
Site Information

Site Description

The Diageo Cameronbridge Distillery produces scotch whiskey, vodka, and gin along the River Leven in Scotland. Water for the distillery comes from multiple sources, including surface water, groundwater and public supplies (municipality). There are also several discharges including process effluent at the bioplant or wet handling plant, then forwarded to the Firth of Forth. Cooling water is discharged to the River Leven. Wastewater is discharged to Levenmouth Waste Water Treatment Works.

Catchment Description

The site is in the Leven catchment which begins at Loch Leven and flows to the Firth of Forth. It is situated in the Mid-Fife area. The Leven Catchment is approximately 142 km² and includes the primary water sources (groundwater, surface water), distillery operations, and the discharge recipients. The good water quality in the catchment promotes the River Leven use for the site, fisheries, and farming. The primary source of water for the catchment is precipitation and surface water with the ultimate discharge into the Firth of Forth.



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. A prioritized list of shared water challenges with potential resolutions and associated stakeholders was provided.

Audit Attendees

Participant/Title	Opening Meeting	Document Review	Site Inspection	Closing Meeting
Diageo Environment Coordinator Diageo	X	X	X	X
Diageo Environment Manager	X	X	X	X
Diageo Technical and Bioenergy Manager	X			
Diageo Global Head of Water, Environment, Agriculture				X
<p>Internal Stakeholders: Diageo Process Improvement Engineer, Environmental Manager (Distillation and Maturation), Diageo Global Head of Water, Environment, Agriculture.</p> <p>External Stakeholders: SEPA Senior Manager Partnership and Places, Fife countryside, SIEC Programme, Innovation and Enterprise.</p>				
<p>Supporting Documentation: Diageo provided documentation on the Leven Catchment using OneNote to share to support conformity with the AWS Standard v2.0 including: Stakeholder Mapping and Engagement Spreadsheets, Water Map, Catchment Water Balance, and Leven Catchment Action Plan (WSP). The Water Stewardship Plan is a working document which is continually updated. Other supporting documentation were also provided as evidence.</p>				

Summary of Findings



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

Audit Non-Conformities and Observations

Non-Conformity (Major or Minor) or Observation	Citation	Criteria/ Indicator	Due Date	Detail and Corrective Action
Non-Conformity	Minor 2021.01	1.3.7	NR	<p>The site provided comprehensive evidence of their understanding of the financial cost of water. However, the criteria require the social, cultural, environmental and economic value of water is identified. The site at the time of audit has started this process but requires further development which was actioned during the audit and evidence provided in advance of the close-out meeting. NCR included here for reference only, no further action needed.</p> <p>Root Cause Analysis and Corrective Action Not Required. The Minor was closed.</p>
Observation	OBS 2021.01	2.3.2	NR	<p>The water stewardship plan has been informed by stakeholder input focused on their shared water challenges and there is clear evidence of engagement. It was discussed that it could provide beneficial for future iterations of the water stewardship plan to link actions in the water stewardship plan to the rationale of their inclusion, such as stakeholder group x on x date identified a shared challenge which can be addressed by 'this' action in our water stewardship plan</p> <p>Root Cause Analysis and Corrective Action Not Required for Observation</p>

Observation	OBS 2021.02	3.9.2	NR	<p>The site identifies best practice guidance via a number of sources, such as Best Available Technology. In addition, the site utilizes tacit knowledge to inform best practice knowledge, for example attending a professional conference on wastewater technology. The site explained that they have ‘project hoppers’ to capture ideas on innovation. However, it was not clear who or how that ideas could be submitted to a project hopper. Accordingly, the observation relates to making this process more user friendly to help capture tacit knowledge on best practice. Diageo subsequently was able to provide a more detailed account of this process. In future audits, it would be informative to see examples of this process.</p> <p>Root Cause Analysis and Corrective Action Not Required for Observation</p>
Observation	OBS 2021.03	4.3.1	NR	<p>Provide a system to record contact with stakeholders who have contacted the site to alert them to a water-related concern. In addition, the mechanism could enable the stakeholder to update with any actions undertaken.</p> <p>Root Cause Analysis and Corrective Action Not Required for Observation</p>
Observations	OBS 2021.04	4.4.1	NR	<p>The Water Stewardship Plan is regularly reviewed and discussed during the ongoing AWS site meetings. However, it may prove useful to agree when the plan is formally reviewed and the plan updated to the next version of the plan. It was suggested, by Diageo, that going forward this occur on a quarterly basis with the plan version updated accordingly.</p> <p>Root Cause Analysis and Corrective Action Not Required for Observation</p>

Certification Decision

<i>Auditor's recommendation for initial, continued or re-certification based on compliance with requirements:</i>	X	Recommended
		Not Recommended
<i>Level of Certification recommended</i>	X	AWS Core
		AWS Gold
		AWS Platinum
<i>SCS Certification Decision:</i>	X	Approved
		Denied
<i>Certification Decision by:</i>		 Shana Golden
<i>Technical Review by:</i>		 Shana Golden
<i>Date of Decision:</i>		February 1, 2022
<i>Surveillance Schedule:</i>		Next audit is scheduled for: December 2022 12 Month Surveillance per AWS

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: <ul style="list-style-type: none"> - 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			Site water conducted via recently recorded videos of the operational aspects of site. Water intake and discharge for cooling towers seen and appear to be in good order with no obvious signs of adverse environment impact. The water supply and discharge points were observed in video, photographs and drawings. Site boundary clearly identified and catchment maps. The site is in the Leven catchment begins at the Loch Leven and flows to the Firth of Forth. It is situated in the Mid-Fife area.	
1.2 Understand relevant stakeholders, their water related challenges, and the site’s ability to influence beyond its boundaries.	1.2.1 Stakeholders and their water-related challenges shall be identified . The process used for stakeholder identification shall be identified . This process shall: <ul style="list-style-type: none"> - Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people; 	Yes			The stakeholder engagement and shared water challenges were identified. Various community groups were identified. Frequency, quality and type of engagement was noted as available. The site provided examples of agendas, meeting minutes and project statements that demonstrated the extent of support by Diageo for the wider catchment on environmental and societal issues.	

	<ul style="list-style-type: none"> - 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. 				<p>The stakeholder groups included representatives of potentially vulnerable groups, as the catchment is in a very deprived area. There are no indigenous stakeholder groups identified.</p>	
	<p>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.</p>	Yes			<p>The current level of influences between Diageo and stakeholders were identified.</p>	
<p>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.</p>	<p>1.3.1 Existing water-related incident response plans shall be identified.</p>	Yes			<p>Site provided evidence of safe working process seen of chemical unloading process in standard operating procedure. Also seen the incident report sheet for chemical unloading. Enablon data management system logs incident reports. Seen example of ‘super grain’ leached to local river and caused. The site provided evidence of alerting SEPA to incident who responded. Reviewed fish bone analysis of incident which showed the need for cleaning drainage systems and klargester. The site provided evidence of the 4 hour inspection regime looking for leaks, spills and housekeeping. Overall, the site demonstrated a robust and comprehensive response to a water related incident.</p> <p>The Crisis & Emergency Plan was provided and seen during audit.</p>	

	1.3.2 Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped .	Yes			The water balance for Cameronbridge Distillery was provided via strata system which provided a highly granular live and actual report of water use at the site.	
	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			Strata system seen with examples shown of borehole 1-5. Also seen examples of total water use including embedded water. Very comprehensive metering and monitoring regime. Seen Strata export to weekly KPI review, AOB review (site weekly meeting) one hour review of data to check for Green or Red to summarize actions and reflect on tier one or two meetings. Also seen copy of Tier 4 (CMB T4 slide). There is no evidence of water stress and given they do not draw from a river the high and low variance is not applicable.	
	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			Evidence of in-house and external lab results of effluent were provided (example from Socotec 9/11/21 provided) and all data appeared acceptable. In addition, the regular tier 1 meetings report and action any concerns regarding water quality.	
	1.3.5 Potential sources of pollution shall be identified and if applicable, mapped , including chemicals used or stored on site.	Yes			Potential sources of pollution including the Distillery Hazard Substances, Draining Map, River Leven Release points and the Outfall were identified and mapped.	
	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			The sole IWRA is the River Leven running through sites. No indigenous or cultural value was 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			The site provided evidence of their comprehensive understanding of the financial cost of water as seen on an Excel spreadsheet. However, the value of water has not been fully addressed.	

	be identified and used to inform the evaluation of the plan in 4.1.2.				Minor 2021.01 was issued and closed. The site provided comprehensive evidence of their understanding of the financial cost of water. However, the criteria require the social, cultural, environmental and economic value of water is identified. The site addresses the finding and the Minor was closed.	
	1.3.8 Levels of access and adequacy of WASH at the site shall be identified .	Yes			Seen WASH assessment for site with Summary output.	
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			Primary inputs in the Leven Catchment were identified with quantity, quality and risk.	
	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			The outsourced services were identified including the catchment of origin. Outsourced services within the catchment were quantified.	
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			Documents describing the River Basin Management Plan for Scotland (2015 – 2027) were provided which provide policies and initiatives. The Leven Programme with opportunities for collective actions was also provided.	
	1.5.2 Applicable water-related legal and regulatory requirements shall be identified , including legally-defined and/or stakeholder-verified customary water rights.	Yes			Licenses, Deeds and Registration were provided.	

	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 Loch Leven Water Balance and SEPA Plan was provided.	
	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			The SEPA Leven Catchment data for groundwater and surface water was provided. In addition, the site has commissioned a groundwater study.	
	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 within 10km were identified and mapped, with an analysis of the IWRAs.	
	1.5.6 Existing and planned water-related infrastructure shall be identified , including condition and potential exposure to extreme events.	Yes			Maps of existing and planned infrastructure were provided and reviewed.	
	1.5.7 The adequacy of available WASH services within the catchment shall be identified .	Yes			The WBCSD WASH Tool was completed for the site.	
1.6 Understand current and future shared water challenges in the catchment, by linking the water challenges identified	1.6.1 Shared water challenges shall be identified and prioritized from the information gathered.	Yes			SWCs are identified and prioritized with potential resolution and stakeholders.	
	1.6.2 Initiatives to address shared water challenges shall be identified .	Yes			SWCs initiatives are identified with corresponding resolution and priority.	

by stakeholders with the site's water challenges.						
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 <i>identified</i> in 1.6.	1.7.1 Water risks faced by the site shall be <i>identified</i> , and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.	Yes			Risks were identified with rationale and owners were identified and prioritized.	
	1.7.2 Water-related opportunities shall be <i>identified</i> , including how the site may participate, assessment and prioritization of potential savings, and business opportunities.	Yes			Opportunities were identified with task, descriptions and responsible managers and potential savings.	
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 <i>identified</i> .	Yes			The Leven Programme at the Fife River and SWA Environmental Strategy.	
	1.8.2 Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be <i>identified</i> .	Yes			Scotch Whiskey Water Balance Tool developed by Diageo and shared with the Scotch Whisky Association.	
	1.8.3 Relevant sector and/or catchment best practice for water quality shall be <i>identified</i> , including rationale for data source.	Yes			River Basin Management Plan for Scotland 2015-2027.	
	1.8.4 Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be <i>identified</i> .	Yes			SEPA's River Basin Management Plan.	
	1.8.5 Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be <i>identified</i> .	Yes			The World Business Council for Sustainable Development WASH Pledge.	

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: <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. 	Yes			The Water Blueprint document (2018), p.12 and overall ethos of Diageo confirmed the required statement.	
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: <ul style="list-style-type: none"> - Identification of responsible persons/positions within facility organizational structure - Process for submissions to regulatory agencies. 	Yes			A compliance matrix was provided with task, frequency, owner and responsible individual.	
2.3 Create a water stewardship strategy and plan including addressing	2.3.1 A water stewardship strategy shall be identified that defines the overarching mission, vision, and goals of the	Yes			The Diageo Water Blueprint strategy document was provided.	

risks (to and from the site), shared catchment water challenges, and opportunities.	organization towards good water stewardship in line with this AWS Standard.				
	<p>2.3.2 A 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 address shared water challenges and the AWS outcomes. 	Yes			<p>The Leven Water Action Plan was provided for review for the Group actions. Actions in the Plan are SMART (Specific, Measurable, Achievable, Realistic, and Time-based). The financial budgets should be provided in the plan or describe during the audit. Financial budget can be expressed as man-hours etc. Also, for tasks that will be conducted annually, indicating on-going process, should be indicated as Annual or with an extended end date.</p> <p>Diageo identified opportunities to improve the engagement process to generate a higher level of, or more in depth response.</p> <p>The WSP is detailed and provides clear direction of the tasks and people responsible. Budgets are not included as it is assumed that the project will be funded if available. Overall, the Water Stewardship Plan meets the standards requirements.</p> <p>OBS 2021.01 was issued. The water stewardship plan has been informed by stakeholder input focused on their shared water challenges and there is clear evidence of engagement. It was discussed that it could provide beneficial for future iterations of the water stewardship plan to link actions in the water stewardship plan to the rationale of their inclusion, such as stakeholder group x on x date identified a shared challenge which can be addressed by 'this' action in our water stewardship plan.</p>
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			Water risks are addressed in the Leven Water Stewardship Plan. The SEPA Scarcity Plan and Flood Risk Strategy were provided.

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			Document meetings, communication etc. The site demonstrated clear evidence of the positive participation, for example, as project partners in the Leven project.	
	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			No water rights 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			CAS scoring was proved. Refer to compliance calendar provided in previous indicator. In addition, a stakeholder interview with the regulator identified that there were no ongoing concerns of the site from SEPA.	
	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			No water rights 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			The site has very frequent meetings regarding targets and resource efficiency and they cascade performance information from site operative to senior management at regular times. In addition, the strata systems includes set threshold levels with exceedance alerts. Overall, the site is very focused in water balance targets and similar and at all times understand their 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 .	Yes			Water scarcity not a Shared Water Challenge.	

	3.3.3 Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified .	Yes			Re-allocation of water not applicable.	
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			The site has very frequent meetings regarding targets and resource efficiency and they cascade performance information from site operative to senior management at regular times. In addition, the strata systems includes set threshold levels with exceedance alerts. Overall, the site is very focused in water balance targets and similar and at all times understand their progress.	
	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			The site has very frequent meetings regarding targets and resource efficiency and they cascade performance information from site operative to senior management at regular times. In addition, the strata systems includes set threshold levels with exceedance alerts. Overall, the site is very focused in water balance targets and similar and at all times understand their progress. In addition, SEPA, has their regulator have their own set of reporting mechanisms on water quality.	
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 river Leven is the only IWRA on site and which is being enhanced by the Leven catchment project, of which Diageo is an active stakeholder and supporter of.	
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			The site has a no unmet needs on WASH.	
	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	Yes			The site is not impinging on WASH.	

	and local communities are being respected, and that remedial actions are in place where this is not the case, and that these are effective.					
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			Noted as addressed in WSP, sited provide specific reference to task in WSP. They recently appointed Diageo LCA expert to look at water use in the supply chain at site. Noting that the indirect water use in the catchment is not relevant to this site.	
	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			Initial document in stakeholder engagement, document conversation with stakeholder indicating level of importance.	
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			No shared infrastructure noted with exception of wastewater outfall, but which in out of catchment. No actions were identified. Outfall has a maintenance programme with outfall inspected by divers each years. We discussed the outfall as part of the WSP, however, it is out of catchment it was not included as the site wanted to constrain activities to site and catchment.	
3.9 Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.	3.9.1 Actions towards achieving best practice, related to water governance, as applicable, shall be implemented .	Yes			Engagement with SEPA, BREF documents and BAT technologies, identification of best Practice, on-site personal, professional bodies (Ichem) Scotch whisky Association which includes innovation. Provided example of the use of Microwave Cooking which is in pilot phase. Project Hoppers is a mechanism to capture opportunities for improvement. OBS 2021.02 was issued. The site identifies best practice guidance via a number of sources, such as Best Available Technology. In addition, the site utilities tacit knowledge to inform best practice knowledge, for example attending a professional conference on wastewater technology. The site explained that they have 'project hoppers' to capture ideas on innovation. However, it was not clear who or how that ideas could be submitted to a	

					project hopper. Accordingly, the observation relates to making this process more user friendly to help capture tacit knowledge on best practice. Diageo subsequently was able to provide a more detailed account of this process. In future audits, it would be informative to see examples of this process.	
	3.9.2 Actions towards achieving best practice, related to targets in terms of water balance shall be implemented .	Yes			Engagement with SEPA, BREF documents and BAT technologies, identification of best Practice, on-site personal, professional bodies (Ichem) Scotch whisky Association which includes innovation. Provided example of the use of Microwave Cooking which is in pilot phase. Project Hoppers is a mechanism to capture opportunities for improvement.	
	3.9.3 Actions towards achieving best practice, related to targets in terms of water quality shall be implemented .	Yes			Engagement with SEPA, BREF documents and BAT technologies, identification of best Practice, on-site personal, professional bodies (Ichem) Scotch whisky Association which includes innovation. Provided example of the use of Microwave Cooking which is in pilot phase. Project Hoppers is a mechanism to capture opportunities for improvement.	
	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			Engagement with SEPA, BREF documents and BAT technologies, identification of best Practice, on-site personal, professional bodies (Ichem) Scotch whisky Association which includes innovation. Provided example of the use of Microwave Cooking which is in pilot phase. Project Hoppers is a mechanism to capture opportunities for improvement.	
	3.9.5 Actions towards achieving best practice related to targets in terms of WASH shall be implemented .	Yes			Engagement with SEPA, BREF documents and BAT technologies, identification of best Practice, on-site personal, professional bodies (Ichem) Scotch whisky Association which includes innovation. Provided example of the use of Microwave Cooking which is in pilot phase. Project Hoppers is a mechanism to capture opportunities for improvement.	
Advanced Points Step 3						
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	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			Strata data review associated to targets and highlighted to tier 1-3 daily meetings, to resolve and performance issues.	

and demonstrate its contribution to achieving water stewardship outcomes.	4.1.2 Value creation resulting from the water stewardship plan shall be evaluated .	Yes			This data is included in Water Stewardship Plan in addition to a forthcoming project addressing the value of water in the catchment.	
	4.1.3 The shared value benefits in the catchment shall be identified and where applicable, quantified .	Yes			This data is included in Water Stewardship Plan in addition to a forthcoming project addressing the value of water in the catchment.	
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			Water Stewardship Plan reviewed every 2 weeks as a minimum and actions reviewed and resolved accordingly. Evidence provided on resolution on an emergency plan enacted in response to leachate from a super grain skip leaching water into underground infrastructure. We reviewed the complete process including root cause analysis.	
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			Environmental Resilience Array (ERA) with Stirling university (who run the programme) to determine environmental health of catchment. This is a demonstrator project. Diageo are part of steering group which includes liaising with other stakeholders including SEPA. Project duration is 5 years but likely to be longer. Leven programme minutes seen Sustainable growth agreement is initial commitment Overall clear evidence of meetings with stakeholders, see board meetings. MIRO board facilitated by SEPA to look at Catchment shared challenges (water working group). Next water working group to be confirmed. OBS 2021.03 was issued. Provide a system to record contact with stakeholders who have contacted the site to alert them to a water-related concern. In addition, the mechanism could enable the stakeholder to update with any actions undertaken.	
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			Version control in place will be controlled with quarterly reviews. OBS 2021.04 was issued. The Water Stewardship Plan is regularly reviewed and discussed during the ongoing AWS site meetings. However, it	

information obtained from the evaluation process in the context of continual improvement.	this step and these changes shall be identified .				may prove useful to agree when the plan is formally reviewed, and the plan updated to the next version of the plan. It was suggested, by Diageo, that going forward this occur on a quarterly basis with the plan version updated accordingly.	
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			Organizational chart seen and duty manager is available to provide a point of contact via the gate house for members of public. Gatehouse is the point of contact. Diageo do not publish their organizational chart	
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			AWS outcomes are included in Water Stewardship Plan and referenced during dialogue with stakeholders.	
5.3 Disclose annual site water stewardship summary, including the relevant information about the site's annual water stewardship performance and results against the site's targets.	5.3.1 A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.	Yes			Progress disclosed in corporate report in Diageo corporate report as is publicly available but not at a site level. Newsletter (13/12/2021) every six month will be the vehicle to summarize work to date, example of newsletter provided by site.	
5.4 Disclose efforts to collectively address shared water challenges,	5.4.1 The site's shared water-related challenges and efforts made to address these challenges shall be disclosed .	Yes			Newsletter (13/12/2021) every six month will be the vehicle to summarize work to date, example of newsletter provided by site.	

including: associated efforts to address the challenges; engagement with stakeholders; and coordination with public-sector agencies.	5.4.2 Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified .	Yes			The site clearly demonstrated that they are actively engaged with public-sector agencies.	
5.5 Communicate transparency in water-related compliance: make any site water-related compliance violations available upon request as well as any corrective actions the site has taken to prevent future occurrences.	5.5.1 Any site water-related compliance violations and associated corrections shall be disclosed .	Yes			Any water related compliance violations are recorded via SEPA regulatory process and available on SEPA CAS license to show violations in addition to FOI requests.	
	5.5.2 Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.	Yes			Corrective actions undertaken are conveyed to SEPA as the regulator and are the public domain or via a FOI request.	
	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			Any water related compliance violations are recorded via SEPA regulatory process and available on SEPA CAS license to show violations in addition to FOI requests.	