Alliance for Water Stewardship Assessment Report

Prepared for SA ‘Les Grandes Sources de Wattwiller’ (Wattwiller) (AWS-000421)

Prepared by: SGS

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REPORT DETAILS

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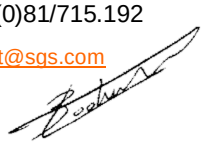
PREPARED BY:	Olivier BODART AWS Auditor **SGS Belgium SA** Parc Créalys - Rue Phocas Lejeune, 4 - B-5032 - Gembloux (Belgium) Phone: Ligne +32 (0)81/715.192 E-mail: olivier.bodart@sgs.com Signature: 
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1 EXECUTIVE SUMMARY

The scope of services covers the conformity assessment of water use in compliance with the AWS International Water Stewardship Standard (Version 2.0) for the company Les Grandes Sources de WATTWILLER (hereinafter referred to as “the site”) located in the Municipality of Wattwiller in France.

The assessment has been completed in compliance with the AWS Certification requirements, Version 2.0 dated March 2019.

The site is a mineral water bottling plant including 5 boreholes.

On December 1-2, 2021, SGS BELGIUM S.A., (hereinafter referred to as “SGS”) conducted the conformity assessment for site´s facilities and activities with regard to certification to the AWS Standard. Findings were raised during the course of the audit process, and they were categorized as 4 minor non conformance, 8 observations.

Given the review of evidence produced and site visit inspections performed at the WATTWILLER plant, SGS recommends that WATTWILLER, is awarded AWS Core Certified status with a surveillance audit interval of annual frequency.

2 SCOPE OF ASSESSMENT

The scope of services covers the conformity assessment of water use in compliance with the AWS International Water Stewardship Standard (Version 2.0) for the company 'Les Grandes Sources de WATTWILLER' Factory (hereinafter referred to as "the site") located in Wattwiller, in France.

The assessment has been completed in compliance with the AWS Certification requirements, Version 2.0 dated March 2019.

On 1st and 2nd December 2021, SGS conducted the conformity assessment of site's facilities and activities with regard to certification to the AWS Standard. Table 2.1 presents SGS audit team. The audit plan is attached as a separate document.

Audit Team	Qualifications/Experience	
Olivier Bodart	Team Leader	AWS certified auditor, with more than 20 years experience in pollution control, environmental impact assessment, ISO14001 audit and training.
Paula Sofía Gómez Geras	Technical Reviewer	AWS certified auditor

Table 1:SGS Audit Team

During the conformity assessment, the audit team spent 0,25 day on the stakeholder consultation meeting, and 1,25 day on the inspection of site´s installations and activities in its bottling plant, together with personnel interviews and document reviews.

Site provided most of the requested supporting documentation as evidence whilst on site. SGS provided initial feedback on the gaps between site's current management and the level required by the standard during the closing meeting of the conformity assessment on the 2nd December, 2021.

3 STAKEHOLDER ANNOUNCEMENT AND CONSULTATION

Following the AWS Certification Requirements, before the on-site conformity assessment, site´s prepared a stakeholder announcement, which stated intention to pursue AWS certification (published on the AWS website).

Besides submitting to AWS for publication on the AWS website, the stakeholder announcement was also :

- posted on the SPADEL website (11/10/2021): https://www.spadel.com/en/all-news/aws-stakeholders-announcement
- posted in the Wattwiller municipality newspaper (01/10/21)

Following this announcement, no stakeholder contacted the audit team. So during the audit (2/12/21), the lead auditor made interview by phone with the main stakeholders: interview of the Wattwiller Municipality representative was realized during the audit. Several employees were also interviewed.

Ahead of the on site audit, WATTWILLER held several stakeholder meetings and a stakeholder survey. Evidence of these meetings were showed during the assessment. Some of them are listed below:

Name	Description
José Lefort	Staff – Plant Manager
Alexandre Huck Stéphane Pascolo	Staff – Production&Maintenance&water ressource
Sandrine Mouton	Staff – Quality, Environment, Safety Manager
Anne Herbach	Staff – Technicienne QSE Wattwiller
Matthieu Ermel	Maire of Wattwiller – phone interview 2/12/21 Meeting minutes 10/05/21
DOMAINE DU HIRTZ	Meeting minutes 10/05/21
Camping Wattwiller	Meeting minutes 10/05/21

Table 2: Stakeholder meetings

4 DESCRIPTION OF CATCHMENT

Context

The WATTWILLER factory is located in the Wattwiller Municipality, in the Haut-Rhin department and in Grand Est Region, in north-eastern of France.

The plant is located just in the South-East of Wattwiller village near the Departemental road D5.

Figure 1: aerian map (source: google Earth)

The site is located into the Regional Nature Park of Ballons des Vosges. Created in 1989 at the initiative of the Alsace, Lorraine and Franche-Comté Regions, the Ballons des Vosges Regional Natural Park regroups 201 communes across four departments : Vosges, Haut-Rhin, Territory of Belfort and Haute-Saône. It covers an area of 2,921 km2 for 251,707 inhabitants. In this respect, it is the most densely populated Regional Natural Park. It spreads from the northern valley of Sainte-Marie-aux-Mines, to the doors of Belfort and Luxeuil-les-Bains. Five door-cities and two conurbation communities surround and support the Park as an official token of their attachment to this territory. A key player in heritage preservation, the Ballons des Vosges Regional Natural Park is also greatly involved in the economic dynamism of this medium mountain territory.

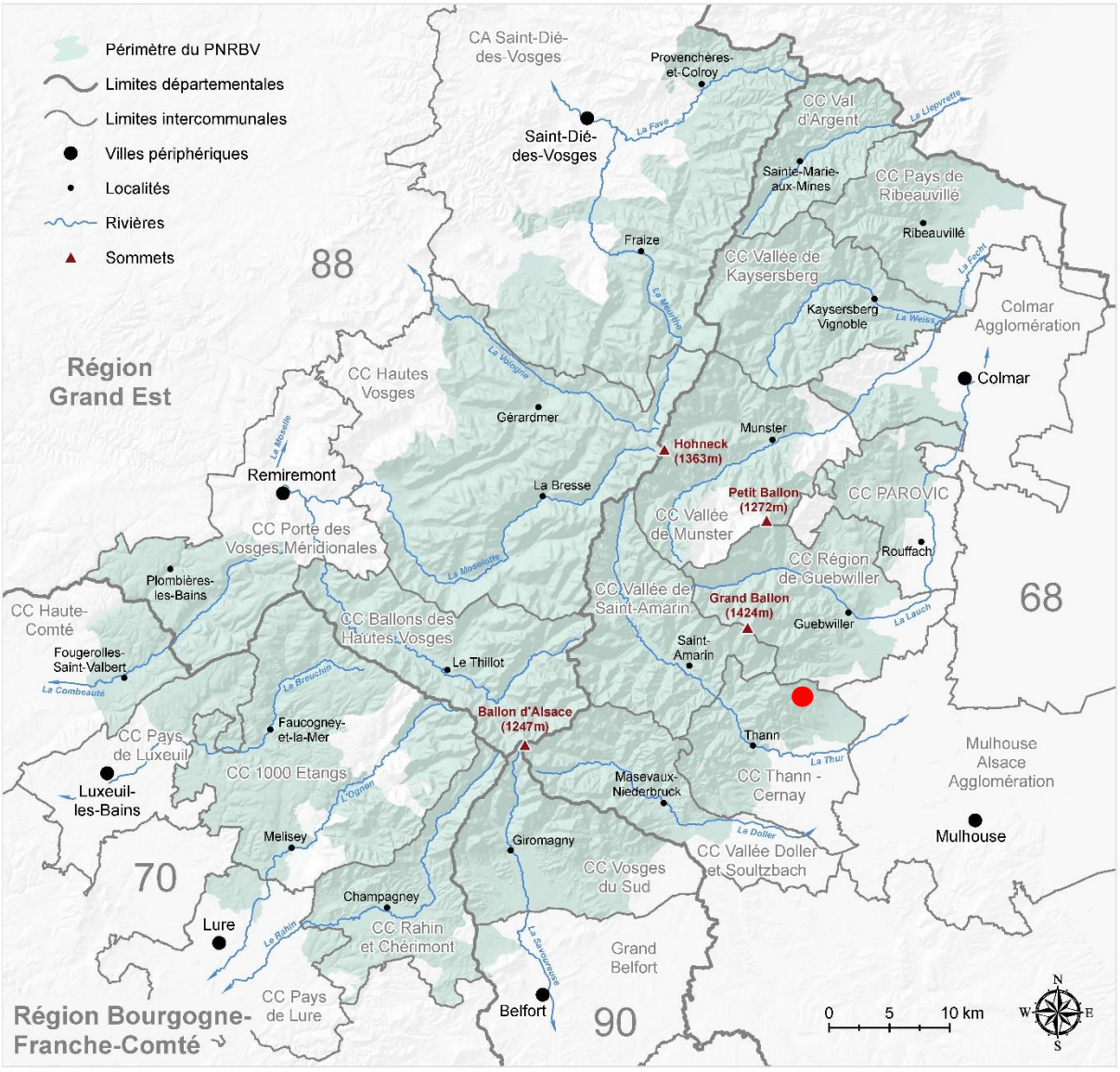


Figure 2: Location of the WATTWILLER Factory into the natural park of the 'Vosges balloons'

Topography

The site lies in the Alsace plain (called also rhenan plain), just at the foot of the Vosges Mountains in a altitude of 300-305 meters above the sea level. The Wattwiller village at the West of the site is located in the Sub-Vosgian hills: the slope is steep in the Wattwiller area (the village is in altitude around 300-400 meters). More in the West, in the Vosgian mountain, the slope is important with the Molkenrain peak around 1100 meters.

Geology

The bedrock of this region is the Cambro-Silurian basement. The formations are mainly composed of schists, phyllades, quartzophyllades and fissured quartzites (500 million ago).

The Wattwiller area is located in the southern part of the Vosges. This area has undergone many different structural regimes in the course of its history: the great constraints of the Hercynian orogeny was followed by the sedimentation of the Secondary before the establishment of the Rhine Graben in the Tertiary.

The following lithological succession can be observed in this area:

- At the foot of the sub-hills: various scree and cryoclasts of Pleistocene to Holocene age are present.They are the residue of the alteration of the Vosges and the sub-Vosges hills. We also find coastal conglomerates of the Upper Eocene to the west of Wattwiller. These conglomerates are the result of the period during which the sea invaded the Rhine Graben.
- Then a fault gap is present. This means that a set of crushed rocks that remained in place when the Rhine Graben was laid down can be observed in the outcrop. These rocks are latites and ignimbrites of Viséan age. These rocks are the result of a volcanic episode volcanic episode that took place during the Viséen (Crémillot episode). These rocks are called volcanic-sedimentary because they are the result of volcanic flows or clouds of fire deposited in layers on the layers on the ground during the volcanic episode.
- Finally, once the Vosges summits have been reached, 2-mica granites and porphyroid granites. Also dated to the Viséen period, these fundamental granites are derived from anatexis (melting) of the Ante-Hercynian basement.

The following figure shows the local geology map with the localization of the boreholes.

It is very clear that the boreholes are positioned in the heart of the intensely faulted zone. The largest faults are shown on the map.

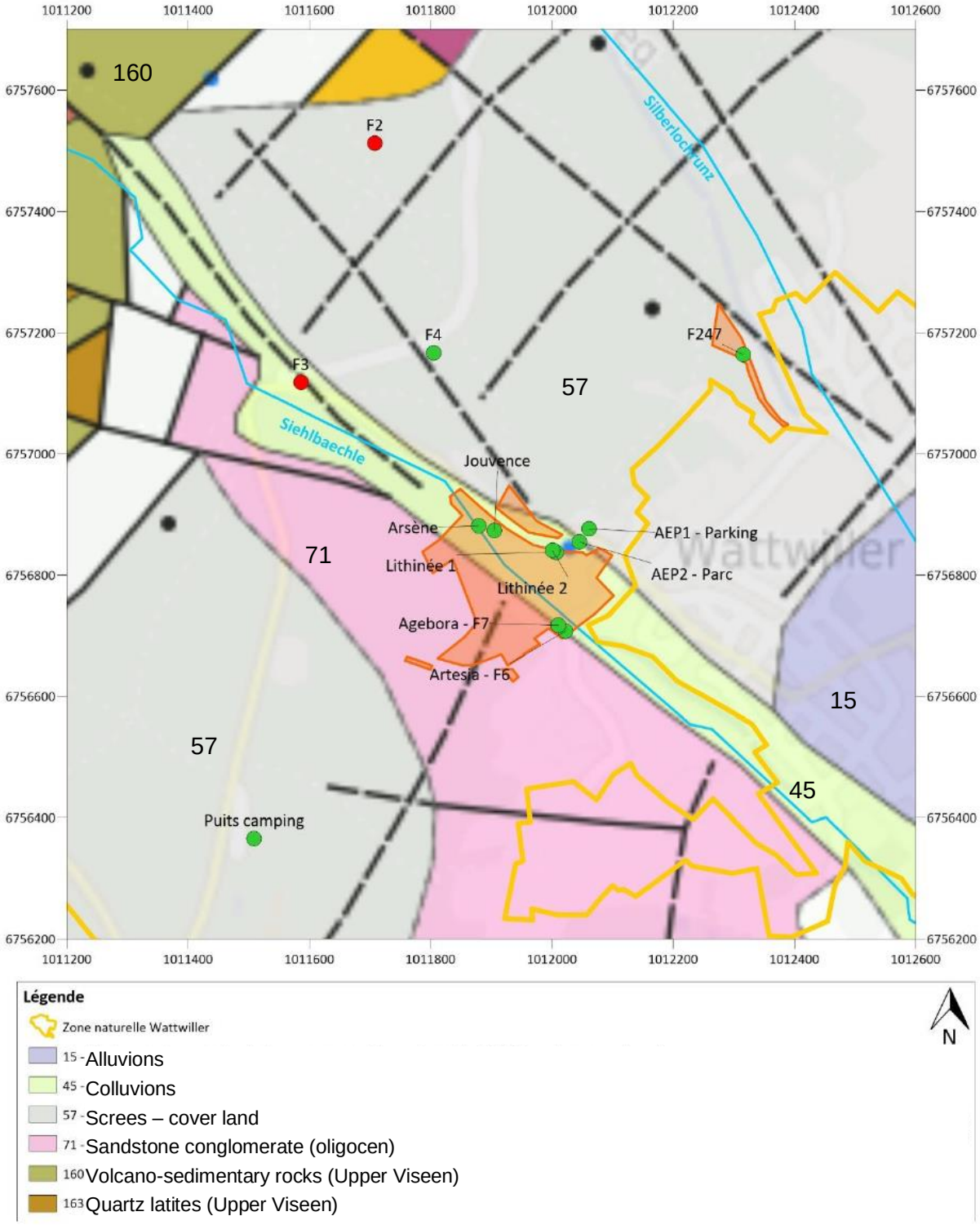


Figure 3: local geology map

Hydrogeology

The faulted edge of the Alsatian slope of the Vosges with the Rhine Graben is dotted with mineral and thermal water springs. These mineral and thermal waters belong to three hydrochemical families: chloride, cold sulphate and bicarbonate.

The springs, tapped by wells and boreholes, are fed by one of the two large deep Triassic reservoirs of the Rhine Gap: the sandstone Triassic (Buntsandstein) and the limestone Triassic (Upper Muschelkalk). They emerge through the edge faults in the Lower Rhine (Morsbronn-les-Bains, Merkwiller-Pechelbronn and Niederbronn-les-Bains) and in the Upper Rhine (Wattwiller and Ribeauvillé).

In the Wattwiller sector, several formations are likely to be aquifer:

- he Plio-Quaternary scree (thickness of about 20 m): the first groundwater encountered at the site is located in the Oligocene slope colluvium. The flow follows the line of the steepest slope. This water table is tapped in particular at the communal springs (AEP) located to the immediate north-east of the mineral springs.
- the Lettenkohle (possible thickness of 70 m): dolomitic ground,
- the carbonate formations of the Muschelkalk (possible thickness of 100 m): dolomite and grey dolomitic limestone
- the Vosges sandstone of the Buntsandstein (thickness limited to about 50 m)
- the granitic basement.

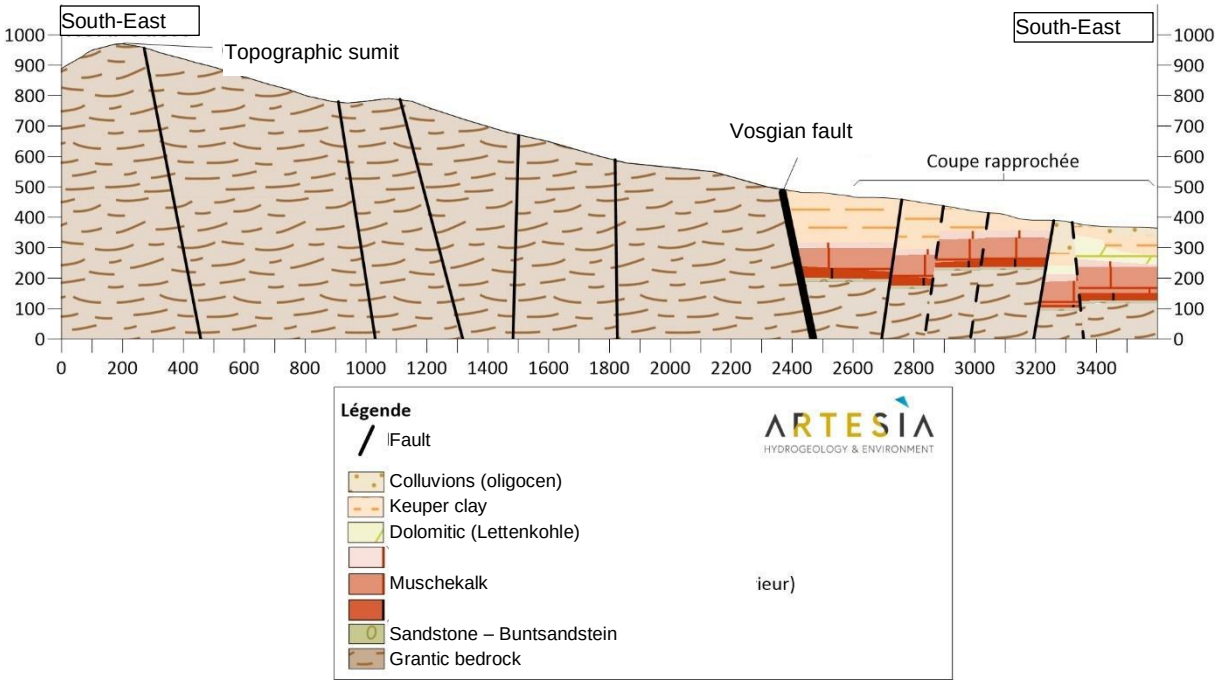


Figure 4: Geological sectional map (North-west to the South-east)

The annual average precipitation is 930 mm/year, with huge variation between years. The evapotranspiration is estimated to 630 mm/year. The Infiltration is around 300 mm.

Hydrography

The site is located in the left bank of the river 'La Thur' which is an affluent of the river 'L'Ill'. In the Wattwiller areas, two main river are observed: the 'Siehlbaechle' on the south, which flows in the spring parc and along the plant; the 'Silberlochrunz' on the North which flows through the Wattwiller town.

These small rivers have their sources in the mountain (Molkenrain) 3-4 km away and have a strong slope (> 6%) which confer a torrential character.

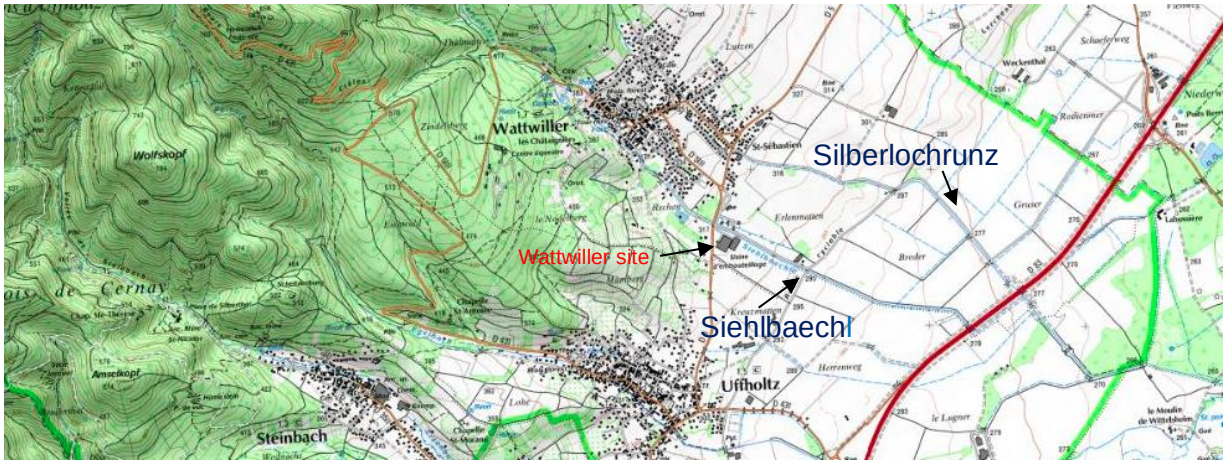


Figure 5: map of the surface water

Wattwiller spring

The 'SA Les Grandes Sources de Wattwiller' manages the natural mineral water bottling plant and markets the brand 'Wattwiller water'. It belonged to a French regional water company. The plant was built in 1992. Since 2004, the Belgian group Spadel is the owner of the company.

The company markets different versions: still water, fine gazous water and intense gazous water. This effervescence is obtained by adding carbon dioxide, as the undergroundwater is not naturally carbonated.

The Company has different boreholes:

- exploited boreholes for mineral water, called F6 (234 m deep) and F247 (180 m deep) which tap the Muschelkalk aquifer; these boreholes are deep and artesian;
- exploited for a public fountain: 'Lithinée 1'
- unexploited boreholes, called 'Lithinée 2' (unexploited), 'Jouvence' (unexploited), 'Arsène' (unexploited).

The plant includes water treatment equipments, storage tanks, CIP treatment, one botling line. The wastewater are neutralised before the discharge to the public sewage; they are treated in a public wastewater treatment plant. There is also a rainwater discharge into the river 'Siehlbaechle'. The rain water from the truck area are treated into a oil separator.

AWS scope

The company 'Les Grandes Sources de Wattwiller' called WATTWILLER has a bottling plant in the town of Wattwiller and two boreholes.

The scope is defined based on the underground water catchment. Concerning the surface water catchment, the scope is limited downstream because the impact of the wastewater discharge of the site is low (river Silberlochrunz; river Siehlbaechle).

The map below defines the scope of AWS identifying the water relationships with the main stakeholders.

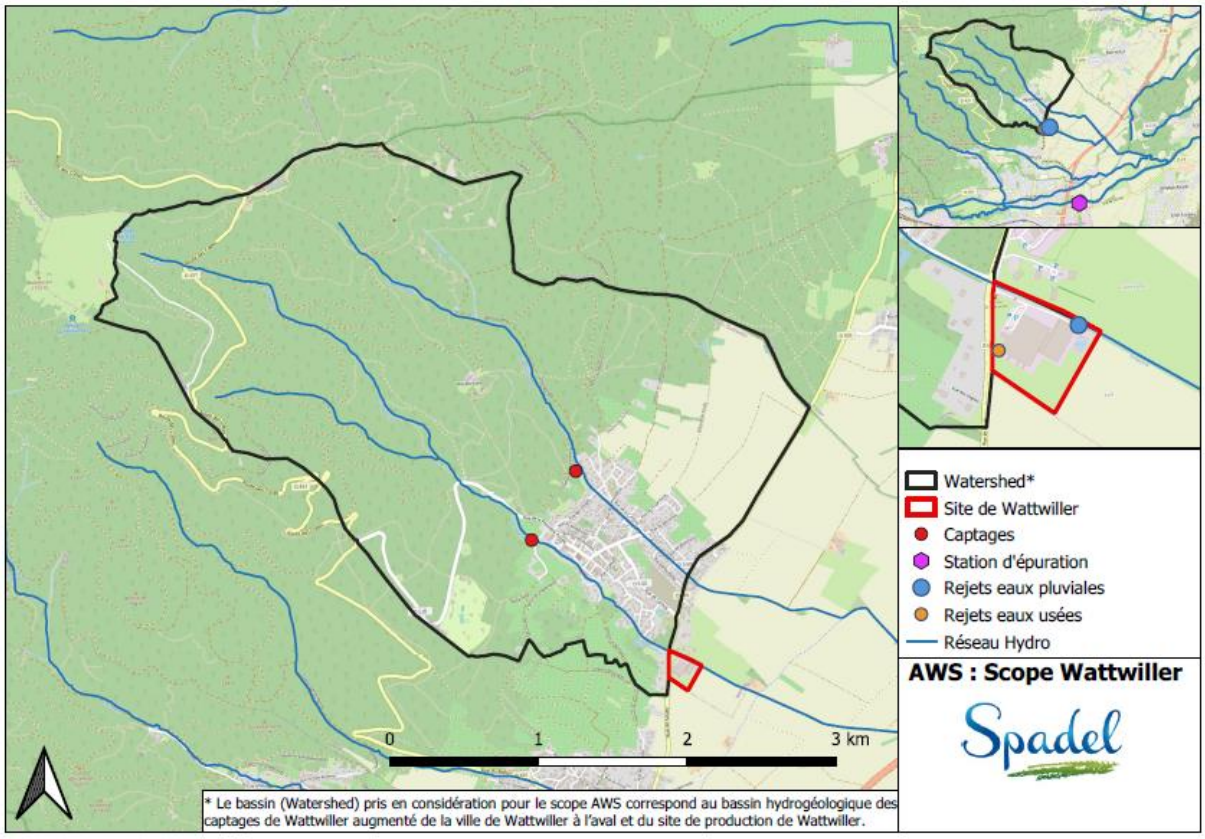


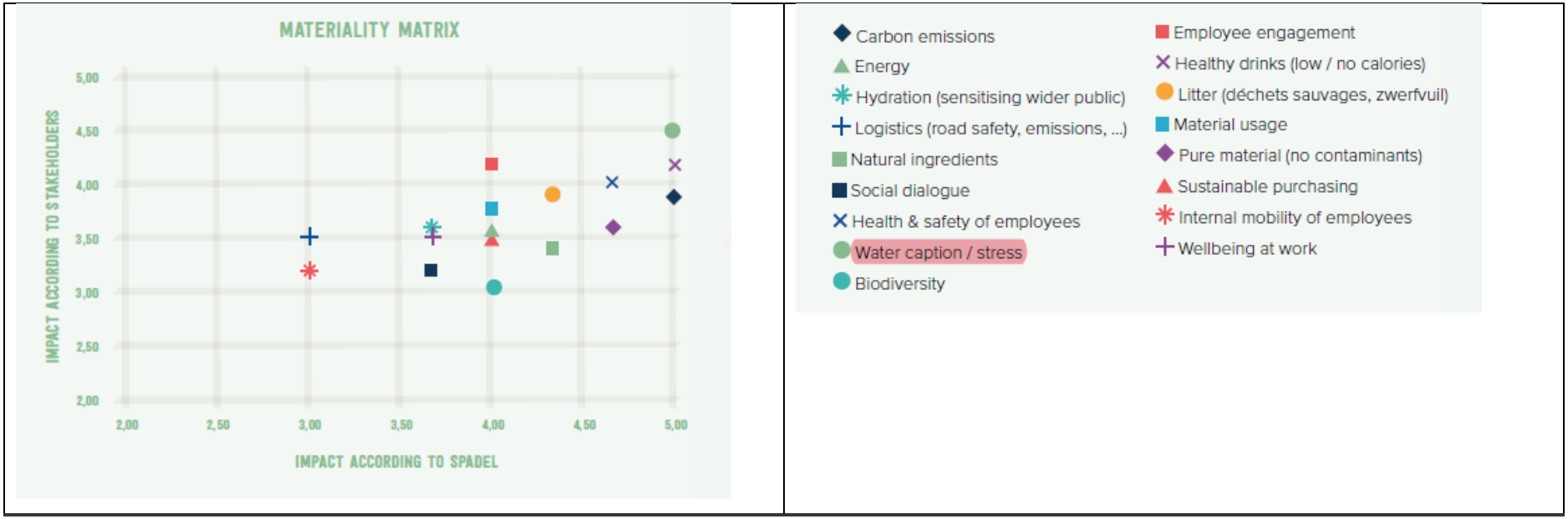
Figure 6:Map of AWS catchment for WATTWILLER

WATTWILLER takes its environmental stewardship responsibilities seriously and is committed to sustainable natural resources management. The company monitors groundwater, habitat and precipitation in the region to guide its activities and share water knowledge to build mutual understanding. WATTWILLER supports regular studies carried out by third-party scientists.

5 SUMMARY OF SHARED WATER CHALLENGES

Spadel has developed a matrix to identified the shared environmental challenges and ranked them according to their impact. Reasons for ranking was provided together with reasons why the challenges are to be considered priorities for both stakeholders and the site.

Below, the matrix summarizes the identified shared challenges including water challenge.



Wattwiller has also realized a local stakeholder survey in 2018, which identified the shared water challenges between the local stakeholders and the site: in summary, the share water chalenges are the risks of underground pollution (forest exploitation, Snow removal salt, road).

6 INDICATORS CHECKLIST

As per the requirement set out in the AWS certification requirements, below is a checklist of all the **core AWS** indicators with the relevant reviewed evidence provided by the site and the indicator with which it is associated.

Clause	Details	Yes	No	Score	Comments/Evidence
1	**GATHER AND UNDERSTAND**				
1.1	***Gather information to define the site's physical scope for water stewardship purposes, including: its operational boundaries; the water sources from which the site draws; the locations to which the site returns its discharges; and the catchment(s) that the site affect(s) and upon which it is reliant.***				
1.1.1 (core)	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.	☒	☐		A map 'AWS scope Watt' shows the scope: including the site, the infrastructures (water piping), the boreholes, the wastewater discharge point and the ultimate receiving water body; the munipality wastewater treatment plant. The surface water catchment that the site affect is identified: it is limited downstream of the site because the site has no impact on the river.
1.2	***Understand relevant stakeholders, their waterrelated challenges, and the site's ability to influence beyond its boundaries.***				
1.2.1 (core)	Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall: - Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people; - Consider the physical scope identified, including stakeholders, 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;	☒	☐		WATTWILLER has listed their stakeholders in a Excel sheet (files 'Analyse des parties prenantes et sphere d'influence_CAROLA_WATTWILLER.Xlsx). For each stakeholders, WATTWILLER identified: - the water-Related challenges - the evidence of engagement - the degree of stakeholder engagement - risk level which is evaluated to define priority of actions (level of importance and level of relation). After the population consultation, WATTWILLER has developed meetings with the main stakeholders identified in order to define the action plan. WATTWILLER has performed different activities related to stakeholder engagement:

Clause	Details	Yes	No	Score	Comments/Evidence
	- 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.				- Meeting with the Wattwiller Municipality (see meeting minutes; 09/11/2020; 25/1/2021&10/05/21 presentation of risk analysis for the ressources protection) - Meeting with the hotel Domaine du Hirtz 10/05/2021 - Meeting with the camping 10/05/2021 - Meeting with stakeholder concerning the geothermic risks OBS-The stakeholder list does not include the company 'comcom' which manage the munipality wastewater treatment plant; in some case, the description is very general: for instance, the camping, the Hotel Hirtz are not nominated.
1.2.2 (core)	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.	☒	☐		WATTWILLER has identified and assessed the influence between the site and the stakeholder within the catchment, but the work is not finalized. NC1.2.2-minor: The evaluation of the influences with stakeholders is not totally finalized and the mutual influences are not clearly evaluated.
1.3	***Gather water-related data for the site, including: water balance; water quality, Important Water-Related Areas, water governance, WASH; water-related costs, revenues, and shared value creation.***				
1.3.1 (core)	Existing water-related incident response plans shall be identified.	☒	☐		WATTWILLER has two Emergency Plan, including : - 'Procedure d'urgence en cas de déversement accidentel ou d'utilisation d'extinction incendie' - Emergency Plan for the resource; v24/07/2012.
1.3.2 (core)	Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped.	☒	☐		WATTWILLER realized a site water balance map, including the water withdrawals, the losses (natural discharge in the river), the storage, inflows in the plant and outflow. OBS1.3.2: the supervision map does not include the waste water discharge flowrate meter.
1.3.3 (core)	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.	☒	☐		WATTWILLER has quantified its site water balance: - Online monitoring for the site water consumption (flowrate meters are available in different point of the site) - once a month: monitoring of the flow rate for the boreholes – withdrawal of each boreholes (5). - monthly report of the water consumption and WUR (water use ratio) - Yearly report of the withdrawals which is communicated to the authorities - Monthly wastewater discharge flowrate: Table 'monthly wastewater flowrate monitoring' The water consumption variation is monitored.

Clause	Details	Yes	No	Score	Comments/Evidence
					The ratio studied by WATTWILLER is water use ratio-WUR (liter inflow in the plant/ liter bottling), 2020 ratio was 1.14 and 2021 ratio is 1,15 (the target is 1.2). The WUR is very low and no actions are planed for the moment to improve it. OBS: The Water Efficiency is not calculated for the moment, but the company followed an indicator natural rate discharge. These figures showed that the WEI is high in 2021 and represents an axe of improvement.
1.3.4 (core)	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.	☒	☐		WATTWILLER realizes water quality analysis periodicaly: - Underground Water quality is analysed daily, weekly and monthly ('plan de prélèvements et analyses microbiologiques et plan chimiques): control of pH/conducitivity/T°/NO3/As/Fe/ by intern laboratory; different samples are analysed in the different step of the process. - Sanitary Control plan by extern laboratory (report of ARS 16/02/21) - Annual control of the underground water by the Spadel group laboratory - Wastewater after the pre-treatment plant are analysed: online monitoring (flowrate, ph, T°), quarterly (legal requirement by extern laboratory: MES; DCO, DBO5, N; P; As, metal)).
1.3.5 (core)	Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.	☒	☐		WATTWILLER has identified the risk of soil/underground pollution on site ('Analyse env 2020') and evaluated the risks. There are maps with the main pollution risks: 'Plan de stockage et chargement-déchargement des produits dangereux'. For the water resource (outside area), the water risk areas are mapped on a QGIS map (presence of houses, camping, hotel, cemetery).
1.3.6 (core)	On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.	☒	☐		WATTWILLER has identified and evaluated all the IWRA based on the sector map, the natural status and the occupation. The status of IWRA is evaluated in a map: 'WATTWILLER_IWRA'. OBS: It is recommended that the evaluation of the IWRA takes in account some area with less protection (hotel, camping).
1.3.7 (core)	Annual water-related costs, revenues, and a description or quantification of the social, cultural, environmental, or economic water-related value generated by the site shall be identified and used to inform the evaluation of the plan in 4.1.2.	☒	☐		The cost and revenues of the site are identified annually (see annual report): - table CAPEX including the investment for water management; - table OPEX: monthly and annual financial report including costs fo water (wastewater treatment. - Budget QSE 2021: include water taxes The impact of the site on the economic, environmental, and socio-economic is evaluated in the document 'Water source, environmental and socio-economic impact assessment of WATTWILLER'.

Clause	Details	Yes	No	Score	Comments/Evidence
1.3.8 (core)	Levels of access and adequacy of WASH at the site shall be identified.	☒	☐		WATTWILLER provides water and sanitair to employees on the plant. There is a list of WC and showers for the site and a comparaison with the legal requirements.
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 (core)	The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be identified.	☒	☐		WATTWILLER has made this evaluation: No water consumption from supplier located in the catchment.
1.4.2 (core)	The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.	☐	☐		WATTWILLER has made this evaluation during the WFP report: the transport companies are the main exemple of outsourced services. The outside services companies from the catchment do not use water. OBS: The evaluation is realized globally for the Spadel group and not site by site. The evaluation is not realized for the Munipality wastewater treatment plant.
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. (core)	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.	☒	☐		WATTWILLER has developed or has taken part in different initiatives in order to improve and inform about a better water management.
1.5.2. (core)	Applicable water-related legal and regulatory requirements shall be quantifed, including legally-defined and / or stakeholder verified customary water rights.	☒	☐		WATTWILLER has a database ('Readonline') where the legal and regulatory requirements are identified. The site plant has an Authorization ICPE – 27/03/2006', including the water discharges. Addendum of the ICPE – 02/2021. The boreholes F6 and F247 have an authorization for the water withdrawal (AP12/12/2018). The document with the 'com com' (comumauté of commune) for the treatment of wastewater (12/06/2017; validity 10 years).
1.5.3. (core)	The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.	☒	☐		The water balance in the catchment is evaluated in a hydrogeology report (Artesia report).

Clause	Details	Yes	No	Score	Comments/Evidence
					Each year (2016-2020), the company calculated the Water Extraction index WEI: around 2-3% depending the year (below 10% the extraction is sustainable), that means there are no scarcity for the catchement. The evolution of the mass balance is indirectly evaluated by the Water levels in the piezometer. OBS: the WEI Index does not take in account the other withdrawals in the catchment (public boreholes).
1.5.4. (core)	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.	☒	☐		WATTWILLER realizes underground water quality analysis periodicaly (see §1.3.4). No other informations are available (no other borehole in the catchment). The quality of surface water (upstream of the plant) was evaluated in 2020 and 2021 in the Artesia report. minorNC1.5.4_The quality of surface water and the impact of the site on the surface water are not evaluated (upstream and downstream of the wastewater discharge including the natural water discharge).
1.5.5 (core)	Important Water-Related Areas shall be identified, and where appropriate, mapped, and their status assessed including any threats to people orthe natural environment, using scientific information and through stakeholder engagement.	☒	☐		WATTWILLER has identified and evaluated all the IWRA based on the sector map, the natural status and the occupation. The status of IWRA is evaluated in a map: 'IWRA_WATT'.
1.5.6. (core)	Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.	☒	☐		The boreholes are listed and mapped. Public boreholes are identified in the catchment. There is a municipality wastewater treatment (com com) in the catchment.
1.5.7. (core)	The adequacy of available WASH services within the catchment shall be identified.	☒	☐		This WASH services in the catchment are good (no issues in France). See water risk from WWF.
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 (core)	Shared water challenges shall be identified and prioritized from the information gathered.	☒	☐		A stakeholder consultation meeting was conducted in 2018 (Municipality; client; supplier; com com) The shared-water challenges are evaluated into a table: for each stakeholder, the share water challenge are identified and prioritized.
1.6.2. (core)	Initiatives to address shared water challenges shall be identified	☒	☐		The actions are included in the AWS action plan.

Clause	Details	Yes	No	Score	Comments/Evidence
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 (core)	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.	☒	☐		The Water risks are identified (Wattwiller_analyse des risques ressources2.xlsx) and prioritized based on likelihood, severity of impact and also vulnenability.
1.7.2 (core)	Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.	☒	☐		Water oportunities are identified in a table: document 'Wattwiller_analyse des risques ressources.xlsx').
1.8	***Understand best practice towards achieving AWS outcomes: Determining sectoral best practices having a local/catchment, regional, or national relevance.***				
1.8.1. (core)	Relevant catchment best practice for water governance shall be identified.	☒	☐		The document Standard_Water Stewarship_V2 includes a list of best practive in term of governance.
1.8.2. (core)	Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.	☒	☐		The document Standard_Water Stewarship_V2 includes a list of best practive in term of water balance.
1.8.3. (core)	Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.	☒	☐		The document Standard_Water Stewarship_V2 includes a list of best practive in term of water quality. A benchmark for Good water Quality is traduced into a document "Standard_analyse et controle' which includes the best practice for water analysis.
1.8.4. (core)	Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.	☒	☐		The document Standard_Water Stewarship_V2 includes a list of best practive in term of IWRA maintenance.
1.8.5 (core)	Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.	☒	☐		No relevant best practice was identified; it is not an issues in France.

Clause	Details	Yes	No	Score	Comments/Evidence
2	**COMMIT AND PLAN**				
2.1	***Commit to water stewardship by having the senior-most manager in charge of water at the site, or if necessary, a suitable individual within the organization head office, sign and publicly disclose a commitment to water stewardship, the implementation of the AWS Standard and achieving its five outcomes, and the allocation of required resources.***				
2.1.1. (core)	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.	☒	☐		CEO of Spadel (Marc du Bois) signed a statement AWS including the required comitments. The Spadel statement is publicly disclosed in the Spadel website.
2.2.	***Develop and document a process to achieve and maintain legal and regulatory compliance.***				
2.2.1. (core)	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.	☒	☐		WATTWILLER has an Environmental management system (ISO 14001 certication): There is a procedure to maintain compliance obligation (document F/QSE/P/GEN-1 26/05/21). The responsabilities for water and wastewater management are identified in this procedure.
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. (core)	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.	☒	☐		The Spadel water stewardship strategy is defined into the document 'standard_Water stewardship document_v2'.

Clause	Details	Yes	No	Score	Comments/Evidence
2.3.2 (core)	A water stewardship plan shall be identified, including for each target: - How it will be measured and monitored - Actions to achieve and maintain (or exceed) it - Planned timeframes to achieve it - Financial budgets allocated for actions - Positions of persons responsible for actions and achieving targets - Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.	☒	☐		A water stewardship plan is defined (document 'Carola_Watt_analyse risques ressources2'). The plan includes actions concening the water risks, the opportunities and the best practices. The plan includes the planned timeframes to achieve it; How it will be measured and monitored; Financial budgets allocated for actions.
2.4.	***Demonstrate the site's responsiveness and resilience to respond to water risks***				
2.4.1 (core)	A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.	☒	☐		The risk analysis and the action plan was presented and discussed with the Authorities (meeting with the Wattwiller municipality : Minutes 10/05/2021).

3	IMPLEMENT				
3.1.	***Implement plan to participate positively in catchment governance.***				
3.1.1. (core)	Evidence that the site has supported good catchment governance shall be identified.	☒	☐		The most important evidences verified are: - Meeting with the city of Wattwiller. - Biodiversity projects in progress in collaboration with Wattwiller municipality and other stakeholders (group including the Municipality, the camping Utopia, hotel 'domaine du Hirtz', ONF, …). OBS: there is no convention of collaboration with the municipality of Wattwiller for the moment (good practice to define).
3.1.2. (core)	Measures identified to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be implemented.	☒	☐		WATTWILLER has a obligation to supply water to a public fountain - non-potable water ('bail amphytéotique' with the com com; v30/08/2016). The supply is realized from the borehole 'Lithiné 1'.
3.2.	***Implement system to comply with water-related legal and regulatory requirements and respect water rights.***				
3.2.1. (core)	A process to verify full legal and regulatory compliance shall be implemented.	☒	☐		WATTWILLER is certified ISO 14001. The process to evaluate the environmental legal compliance is documented and implemented. - The compliance evaluation in regard to the general requirements is realized with the Redonline database: 754 environmental requirements are identified with a compliance rate of 88% - The compliance evaluation in regard to the different authorizations (table of verification October 2021): for the Wells; for the plant activities; for the wastewater discharge; ICPE classification (AP 27/03/2006; AP 02/02/2021). Authorizations were checked during the audit.
3.2.2 (core)	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.	☒	☐		WATTWILLER has identified a legal water supply right (AP 12/12/2018): obligation of water supply to the population. There is a fountain in the entrance of the site which is accessible to the public.
3.3.	***Implement plan to achieve site water balance targets.***				
3.3.1 (core)	Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.	☒	☐		The Document 'WATTWILLER_Analyse risques ressources2' identifes the targets and their progress towards achieving the water stewardship plan including the actions linked to the water balance: - risk reduction for water governance, water balance, water quality, IWRA status. - Action to reduce the water efficiency are planed
3.3.2 (core)	Where water scarcity is a shared water challenge, annual targets to improve the site's water use	☒	☐		Based on the evaluation with the WWF indicator (Water scarcity _Spadel_v1), WATTWILLER area is not in a scarcity area.

	efficiency, or if practical and applicable, reduce volumetric total use shall be implemented.				However, WATTWILLER followed the water use ratio (WUR): the ratio Bottled water / catchment water. OBS_The Water efficiency is not calculated for the moment.
3.3.3. (core)	Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.	☒	☐		WATTWILLER has a obligation to supply water to the public. See §3.2.2.
3.4.	***Implement plan to achieve site water quality targets.***				
3.4.1. (core)	Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.	☒	☐		WATTWILLER monitored periodically the underground water quality: several analysis which guarantee the water quality. WATTWILLER has an action plan linked to water quality: action to reduce the risk of pollution.
3.4.2. (core)	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.	☒	☐		Some actions are planed in the AWS plan to improve the waste water management: A RCA procedure should be implemented for each environmental incident; update of the source emergency plan;
3.5.	***Implement plan to maintain or improve the site's and/or catchment's Important Water-Related Areas.***				
3.5.1. (core)	Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.	☒	☐		The actions linked to the most important Water related areas (IWRA) are listed in the AWS plan. WATTWILLER implemented several actions to improve the IWRA in the past. The biodiversity project is started in collaboration with the Wattwiller Municipality and other stakeholders.
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. (core)	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.	☒	☐		WATTWILLER gives access to WASH for all workers. See §1.3.8.
3.6.2. (core)	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.	☒	☐		The Wattwiller citizens have a water access (city public network). Wattwiller has authorization to withdraw the water and does not imping on the right of community to water right.

3.7.	***Implement plan to maintain or improve indirect water use within the catchment.***				
3.7.1. (core)	Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.	☒	☐		It is not applicable: there is not indirect water use within the catchment.
3.7.2. (core)	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.	☒	☐		It is not applicable: there is no significant water use of suppliers within the catchment.
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. (core)	Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.	☒	☐		There are no shared water related infrastructures. There is a contract with the com com for the wastewater treatment plant.
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. (core)	Actions towards achieving best practice, related to water governance, as applicable, shall be implemented	☒	☐		The document Water Stewardship Plan includes actions in terms of water governance (see 3.1.1).
3.9.2. (core)	Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.	☒	☐		The document Water Stewardship Plan includes actions in terms of water balance and are detailed in the WUR action plan: many actions are realized to improve the water use ratio. See 3.1.1.
3.9.3. (core)	Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.	☒	☐		The Water Stewardship Plan includes action linked to the best practice for water quality: Reduction of pollution risks. See 3.4.1.
3.9.4. (core)	Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.	☒	☐		The Water Stewardship Plan includes action linked to the best practice for IWRA: see 3.5.1.
3.9.5. (core)	Actions towards achieving best practice related to targets in terms of WASH shall be implemented.	☒	☐		WASH is not a shared water challenge in France, in the city of Wattwiller and in the WATTWILLER factory. Actions were realized to maitain WASH infrastructures on site.

4	EVALUATE				
4.1	***Evaluate the site's performance in light of its actions and targets from its water stewardship plan and demonstrate its contribution to achieving water stewardship outcomes.*** These indicators will be reviewed during the surveillance audit.				
4.1.1 (core)	Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated	☒	☐		Performance against targets in the site´s water stewardship plan are indentified in Water Stewardship Plan: - PI global indicator in regard of the water related risk: in November 2021, the global risk is 42% (target > 50% for 2022) - Water use ratio WUR is monitored periodically: (liter inflow in the plant/ liter bottling), 2020 ratio was 1.14 and 2021 ratio is 1,15 (the target is 1.2). - Legal compliance evaluation results 88% (target >90%) OBS: for the compliance indicator, the indicator is not correctly calculated (only general requirements are counted in the readonline data base).
4.1.2. (core)	Value creation resulting from the water stewardship plan shall be evaluated.	☒	☐		The water source, environmental and socio-economic impacts were evaluated in November 2021. Impacts Study of of water bottle company on socio-economic in France. Study of water bottle company on biodiversity in France.
4.1.3 (core)	The shared value benefits in the catchment shall be identified and where applicable, quantified.	☒	☐		The water source, environmental and socio-economic impact is evaluated.
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.*** These indicators will be reviewed during the surveillance audit.				
4.2.1. (core)	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.	☒	☐		The management review ISO 14001 (13/01/2021) include the environmental accident and incidents of the site: - in 2020, 0 environmental accidents and 3 incidents on site linked to water. - In 2021, 0 environmental accidents and 6 incidents on site linked to water. The Report of the incident - 26/4/2021 included the root-cause analysis and the corrective actions.

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 (core)	Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.	☒	☐		Meeting with the Wattwiller Municipality (minutes of 7/10/2021).
4.4.	***Evaluate and update the site's water stewardship plan, incorporating the information obtained from the evaluation process in the context of continual improvement.***				
4.4.1. (core)	The site's water stewardship plan shall be modified and adapted to incorporate any relevant information and lessons learned from the evaluations in this step and these changes shall be identified.	☒	☐		The AWS plan was reviewed following the stakeholders meeting (Updated following meeting with Hirtz, Camping and Mayor of Wattwiller on 10/5/21).

5	COMMUNICATE & DISCLOSE				
5.1	***Disclose water-related internal governance of the site's management, including the positions of those accountable for legal compliance with water-related local laws and regulations.***				
5.1.1. (core)	The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.	☒	☐		The AWS statement includes a summary of the site governance in term of environment. It is published in the Spadel Web site. The document includes the responsibility for the Wattwiller site.
5.2	***Communicate the water stewardship plan with relevant stakeholders.***				
5.2.1. (core)	The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.	☒	☐		WATTWILLER has communicated a summary of the AWS plan and the AWS plan to the Wattwiller Municipality, the Hirtz and the camping as well to the staff. MinorNC5.2.1: the AWS plan was not communicated to all relevant stakeholders (ex: ONF; some authorithies).
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. (core)	A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.	☐	☒		The CSR report 2020 includes indicators linked to water balance indicator (WUR ratio). Minor Non-conformity 5.3.1: There is no annual summary report of the site's water stewardship performances (evaluation of the action realized in regard to the AWS plan, indicators, incidents) which is publicly disclosed at least annually.
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. (core)	The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.	☒	☐		WATTWILLER has communicated a summary of the stakeholder survey and the AWS plan to the relevant stakeholders (meeting Minutes with Wattwiller Municipality).
5.4.2. (core)	Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.	☒	☐		The meetings with the Wattwiller city has been performed to engage stakeholders and public-sector. A group including Wattwiller municipality, the ONF and other local stakeholders has been created in the initiative of the company (cfr meeting minutes – 24/02/2021).

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. (core)	Any site water-related compliance violations and associated corrections shall be disclosed.	☒	☐		The non compliances linked to water are identified. There are no compliance identified for the moment. The non compliance is summarized in management review report. The emergency procedure and the crisis manual procedure include the communication to the stakeholders in case of environmental accident.
5.5.2. (core)	Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.	☒	☐		The corrective actions summarized in management review report. For the moment, there is no occurrence.
5.5.3. (core)	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.	☒	☐		There are emergency procedures for the site, including the management of environment incidents and for the catchment with communication.

7 AUDIT FINDINGS

A findings log was issued to WATTWILLER which detailed the findings raised during the audit. As there were a large number of documents supplied to SGS as evidence and each one had to be reviewed, the findings log acted as a live document and was updated periodically until all indicators and documents had been reviewed for compliance. WATTWILLER was then afforded time to respond to the findings and supply additional information for SGS to the review and to either accept and close the finding or request further information or action. Once all findings were closed by the Lead Auditor all documentation and audit trail were then reviewed by the Certifier.

7.1 MAJOR NON CONFORMANCES

During the course of the audit, no major non-conformances were raised.

7.2 MINOR NON CONFORMANCES

Four minor non-conformances was raised during the audit process. WATTWILLER sent an action plan to address it.

Table 3: Minor Non-Conformances raised during the AWS audit process

No.	Type	Ref.	Details	Action plan by WATTWILLER	Auditor evaluation
1	Minor NC	§1.2.2	The evaluation of the influences with stakeholders is not totally finalized and the mutual influences are not clearly evaluated.	Root cause: no enough time to finish the evaluation Action: Stakeholder matrix to be completed with the inter influence evaluation Date: 01/03/22 Responsible: Sandrine Mouton	The action plan is adequate and will be reviewed during the next audit.
2	Minor NC	§1.5.4	The quality of surface water and the impacts of the site on the surface water are not evaluated (upstream and downstream of the wastewater discharge including the natural water discharge).	Root cause: bad interpretation of the standard Action: Analyses upstream and downstream the strom water discharge point to be done. Date: 1/10/22 Responsible: Arnaud Collignon:	The action plan is adequate and will be reviewed during the next audit.
3	Minor NC	§5.2.1	The AWS plan was not communicated to all relevant stakeholders (ex: ONF; some authorithies).	Root cause: bad interpretation of the standard Action: AWS plan to communicate to relevant stakeholder Date: 01/6/22 Responsible: Arnaud Collignon and Sandrine Mouton	The action plan is adequate and will be reviewed during the next audit.
4	Minor NC	5.3.1	There is no annual summary report of the site's water stewardship performances (evaluation of the action realized in regard to the AWS plan, indicators, incidents) which is publicly disclosed at least annually.	Root cause: bad interpretation of the standard Action: AWS performance against all PI and KPI defined in the water stewardhip strategy has to be evaluated and communicated to relevant stakeholders. Date: 1/6/22 Responsible: Arnaud Collignon and Sandrine Mouton	The action plan is adequate and will be reviewed during the next audit.

7.3 OBSERVATIONS

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

Table 4: Observations and New Information Requests raised during the AWS audit process

No.	Type	Ref.	Details	Response by WATTWILLER	Relevant References
1	Observation	1.2.1	The stakeholder list does not include the com com which manage the munipality wastewater treatment plant; in some case, the description in this list is very general: for instance, the camping, the Hotel Hirtz are not nominated.		
2	Observation	1.3.2	The supervision map does not include the waste water discharge flowrate meter and discharge point.		
3	Observation	1.3.3	The Water Efficiency is not calculated for the moment, but the company followed an indicator natural rate discharge. These figures showed that the WEI is high in 2021 and represents an axe of improvement for the .		
4	Observation	1.3.6	The evaluation of the IWRA does not take in account some area with less protection (hotel, camping).		
5	Observation	1.4.2	The evaluation of embedded water use of outsourced services is realized globally for the Spadel group and not site by site.		
6	Observation	1.5.3	The water extraction Index - WEI does not take in account the other withdrawals in the catchment.		
7	Observation	3.1.1	There is no convention of collaboration with the municipality of Wattwiller for the moment (good practice; realized for the Carolla site).		
8	Observation	4.1.1	The compliance indicator is not correctly calculated (only general requirements are counted in the readonline data base and not the particular requirements).		

8 SUMMARY

In reviewing the body of evidence presented by WATTWILLER, it is apparent that a considerable quantity of effort and work has been put into the preparation for the audit for Alliance for Water Stewardship Certification.

4 minor non-conformances has been identified. An action plan was presented to solve these non-conformances and was evaluated by the auditor as adequate. The action plan is adequate and will be reviewed during the next audit.

9 OPPORTUNITIES FOR IMPROVEMENT

The certification audit for WATTWILLER against the AWS Standard is for the initial assessment of conformity and as such allows for some areas for improvement going forward.

As this was a first year assessment focus of the review has been centred on the documented plan and implementation of it to date.

10 CONCLUSIONS AND RECOMMANDATIONS

Given the review of evidences produced and site visit inspections performed at the company ‘Les Grandes sources de WATTWILLER’ Plant in Wattwiller, SGS recommends that ‘Les Grandes sources de WATTWILLER’ is awarded Core AWS Certified status with a surveillance audit interval of annual frequency.