Alliance for Water Stewardship Assessment Report

Prepared for SA des Eaux Minérales de Ribeauvillé (Carola) (AWS-000422)

Prepared by: SGS

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REPORT DETAILS

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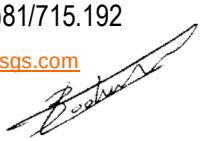
PREPARED BY:	**Olivier BODART** AWS Lead Auditor SGS Belgium SA Parc Créalys - Rue Phocas Lejeune, 4 - B-5032 - Gembloux - Belgium Phone: Ligne +32 (0)81/715.192 E-mail: olivier.bodart@sgs.com Signature: 
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1 EXECUTIVE SUMMARY

The scope of services covers the conformity assessment of water use in compliance with the AWS International Water Stewardship Standard (Version 2.0) for SA des Eaux Minérales de Ribeauvillé (hereinafter referred to as “CAROLA” or “the site”) located in Ribeauvillé (France).

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

The site is a spring water bottling plant including 1 borehole.

On November 30 2021 and 1st December 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 7 minor non conformances and 7 observations. CAROLA sent an action plan to address it and also documents to solve the noncompliance 1 and 4. Two non-conformances were closed after reviewing these documents sent by the plant.

Given the review of evidence produced and site visit inspections performed at the CAROLA plant, SGS recommends that CAROLA, 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 CAROLA Factory (hereinafter referred to as "the site") located in Ribeauvillé, in France.

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

On November 30, 2021 and 1st 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 Gómez Geras	Technical Reviewer	AWS certified auditor, with more than 15 years experience in pollution control, environmental impact assessment, ISO14001 audit and training.

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 1st 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 Ribeauville municipality web site (22/09/21)

Following this announcement, no stakeholder contacted the audit team. So during the audit (1/12/21), the lead auditor made interview by phone with the main stakeholders: interview of the Ribeauvillé Municipality representative was realized during the audit. Several employees were also interviewed.

Name	Description
José Lefort	Staff – Plant Manager
Gilles Oeher	Staff – Production&Maintenance&water ressource
Sandrine Mouton	Staff – Quality, Environment, Safety Manager
Audrey Romain	Staff – Technicienne QSE Carola
Jean-Louis Christ	Maire of Ribeauvillé Municipality – phone interview (1/12/21) Meeting minutes

Table 2: Stakeholder meetings during the audit

Furthermore, CAROLA held several stakeholder meetings and a stakeholder survey was realized in 2017. Evidence of these meetings were showed during the assessment.

4 DESCRIPTION OF CATCHMENT

Context

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

The plant is located just to the North of Ribeauvillé city near the D18 Departemental road.

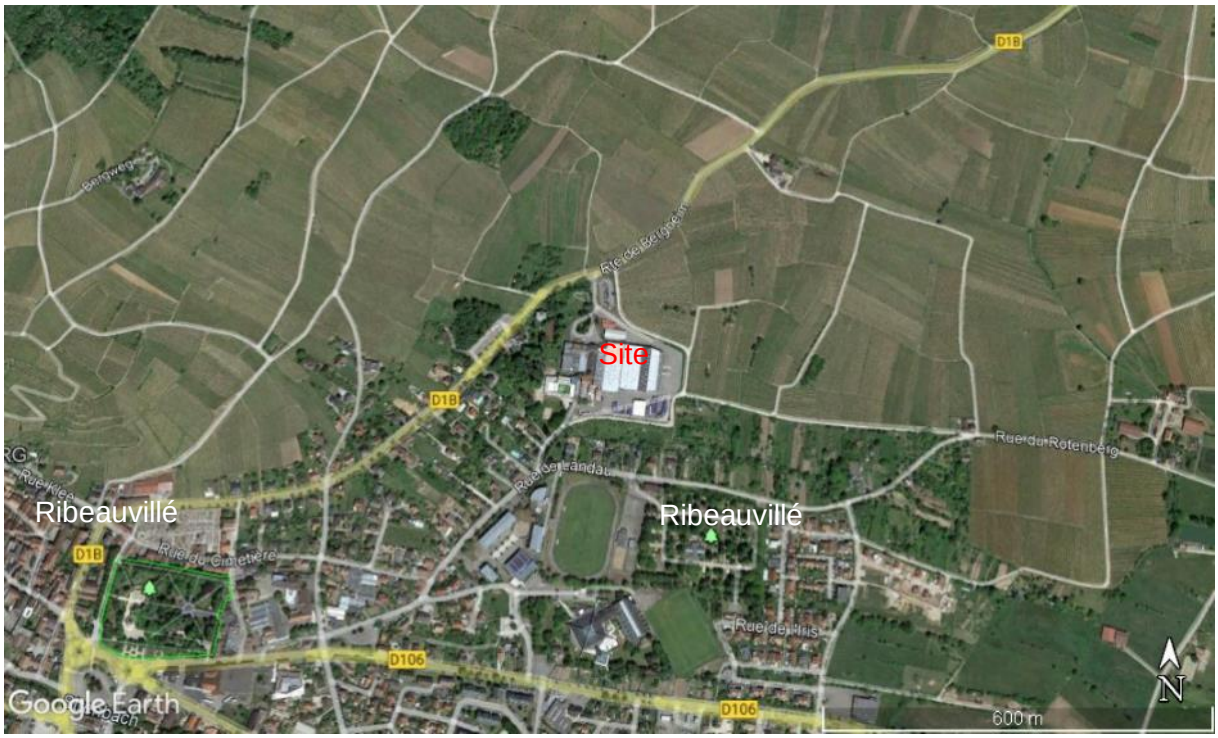


Figure 1: aerian map (source: google Earth)

The site is located into the Regional Natural 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.

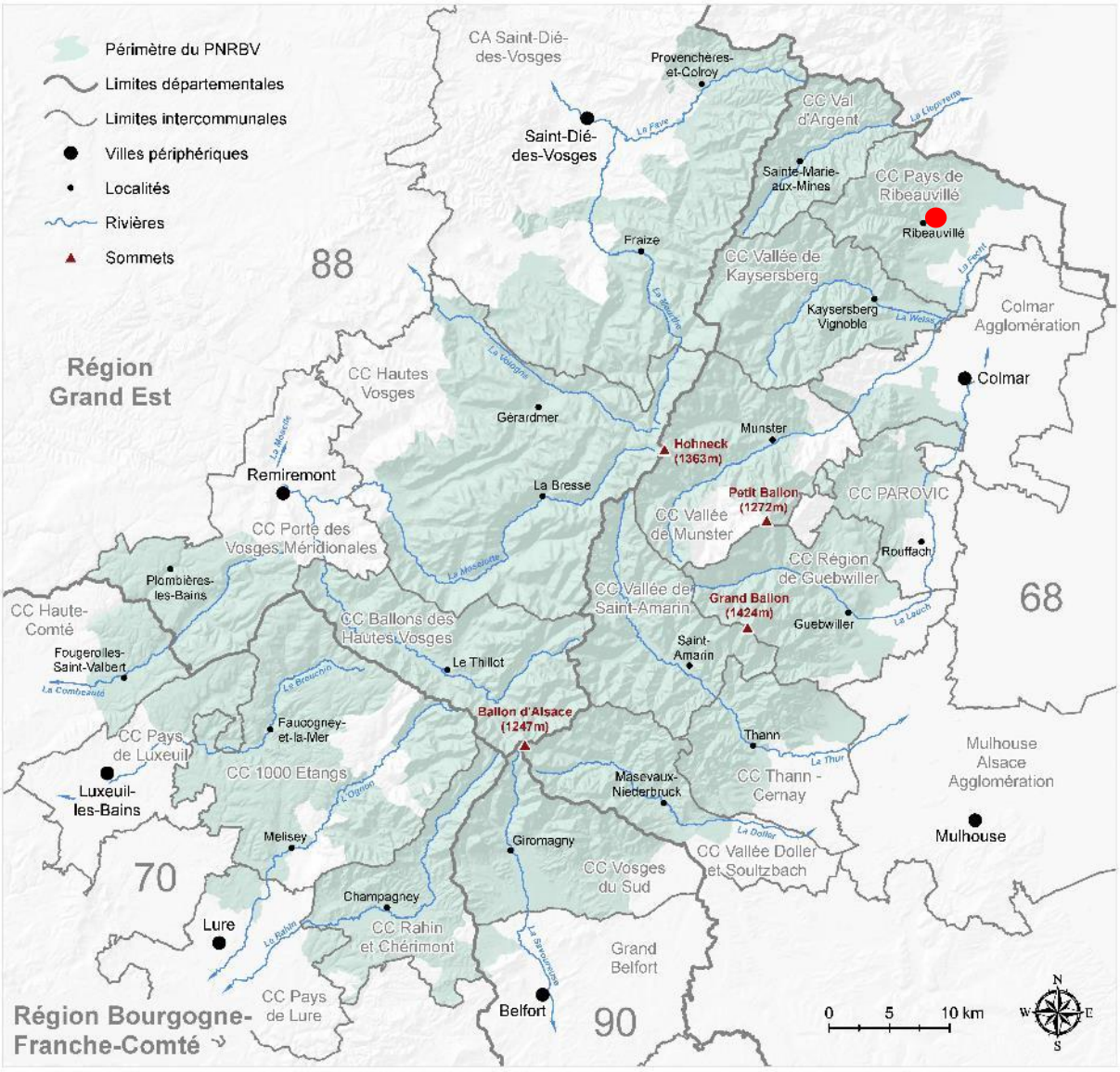


Figure 2:Location of the CAROLA Factory into the natural park of the 'Vosges balloons'

Topography

The site lies in the Alsace plain, just at the foot of the Vosges Mountains in a altitude of 223 meters above the sea level. The sub-Vosgesian hills are located just in the west of the site.

Geology and hydrogeology

The bedrock of this region is the crystalline bedrock. The following figure shows the geology map.

Figure 3: General map of the aquifer in the Ribeauvillé region

The geological formations found in this sector are the following, from the most recent to the oldest:

- The Lower Keuper (t7): grey marl with green shades and white gypsum levels with an average thickness of 65 metres.
- The Lettenkohle (t6): transitional formation comprising both more or less calcareous dolomites similar to those of the Upper Muschelkalk and bariolated marls identical to those of the overlying Keuper;
- The Upper Muschelkalk composed of the following formations from top to bottom:
    - The Ceratite Beds (t5b): alternating hard smoky grey limestone beds at the break, yellow on alteration with thin slab flow and dark grey marl-clay beds. The thickness of this formation is 60 metres. The lithological characteristics of this formation are modified in the Ribeauvillé fracture field by a secondary dolomitization which induces the transformation of limestones into compact

yellow dolomites with chalcedony strings. The marly levels are then reduced to centimetric interbeds;

- The Entrobic Limestones (t5a): massive, compact grey-beige limestone cut into metric banks at the base and oolitic at the top. The strength of this formation reaches 10 to 15 metres;

- The middle Muschelkalk (t4): composed of light marls locally coloured with red and green and evaporites characterised by lenses of rock salt and gypsum which by dissolution give the rock a chaotic appearance. Twenty metres of cavernous dolomites complete this formation, the total strength of which is about sixty metres;
- The lower Muschelkalk, composed of the following formations from top to bottom:
  - Dolomitic marls (t3b): yellow marls alternating with friable and vacuolated yellow dolomites with a sometimes undulating structure of about thirty metres;
  - Shell sandstone (t3a): dolomitic and clayey sandstone finely micaceous ochre-yellow to brown spotted with black. The thickness of this formation is 20 metres;
- The Upper Buntsandstein, composed of the following formations from top to bottom
  - The Voltzia Sandstone (t2b): a formation subdivided into two horizons distinguished by the abundance of sandstone banks and finely bedded clay, the lower Voltzia Sandstone or millstone sandstone, which is 8 to 12 metres thick, and the upper Voltzia Sandstone or clayey sandstone, which is 4 to 8 metres thick;
  - Intermediate layers (t2a): coarse dark wine-lime or reddish-brown sandstone with numerous black manganese oxide nodules. The formation is limited at the base and top by two brecciated sandstone banks with dolomite elements. The thickness of this formation varies between 30 and 50 metres;

- The Middle Buntsandstein, composed of the following formations from top to bottom

  - The Main Conglomerate (t1d): a sandstone matrix containing quartz pebbles of 2 to 10 centimetres in diameter. The thickness of this formation is between 10 and 20 metres;
  - Vosges Sandstone (t1): light reddish-brown to yellowish-pink Vosges sandstone formed from quartz grains in a silico-ferruginous cement. The thickness of this formation decreases from the North (180 m at the Taennchel massif near Ribeauvillé) to the South (60 m near Guebwiller).

Hydrogeology

The faulted edge of the Alsatian slope of the Vosges with the Rhine Graben is dotted with mineral and thermal water springs. 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 area, the ground likely to be aquiferous is as follows (from the most recent to the oldest):

- Lettenkohle: this aquifer is in a dolomitic formation and is probably linked to the upper muschelkalk aquifer.
- Upper Muschelkalk (entrobic limestone and Ceratite layers): this aquifer is tapped by the original springs of CAROLA (entrobic limestone) and by borehole S3 at a depth of 40 to 60 m (Ceratite layers).
- Middle Buntsandstein (main conglomerate and Vosges sandstone): this aquifer is called the GTi aquifer (Grés du Trias inférieur; Vosgien Sandstone water) and is tapped by CAROLA's CH3 and F8 boreholes. The Borehole F8 taps the aquifer at a depth of 147.5 to 216.5 m; The water static level is around 121,2 m in October 2017 (i.e. approximately +246 m NGF). At the CAROLA site, the water level of the GTi aquifer is artesian and is approximately +14 m above ground level (i.e. +241 m NGF). The water level of the GTi aquifer is therefore in charge of the Muschelkalk aquifer in front of the CAROLA plant.

The annual average precipitation is around 880 and 1028 mm/year, with huge variation between years. The evapotranspiration is estimated between 414 and 547 mm/year. The effective Infiltration is estimated around 110 mm (2010-2017).

The following figure summarizes the geology and hydrogeology context.

At the CAROLA site (borehole CH3), the water level of the GTi aquifer is artesian. It is not the case of the F8 borehole. The GTi aquifer recharge is principally realized in the free aquifer area.

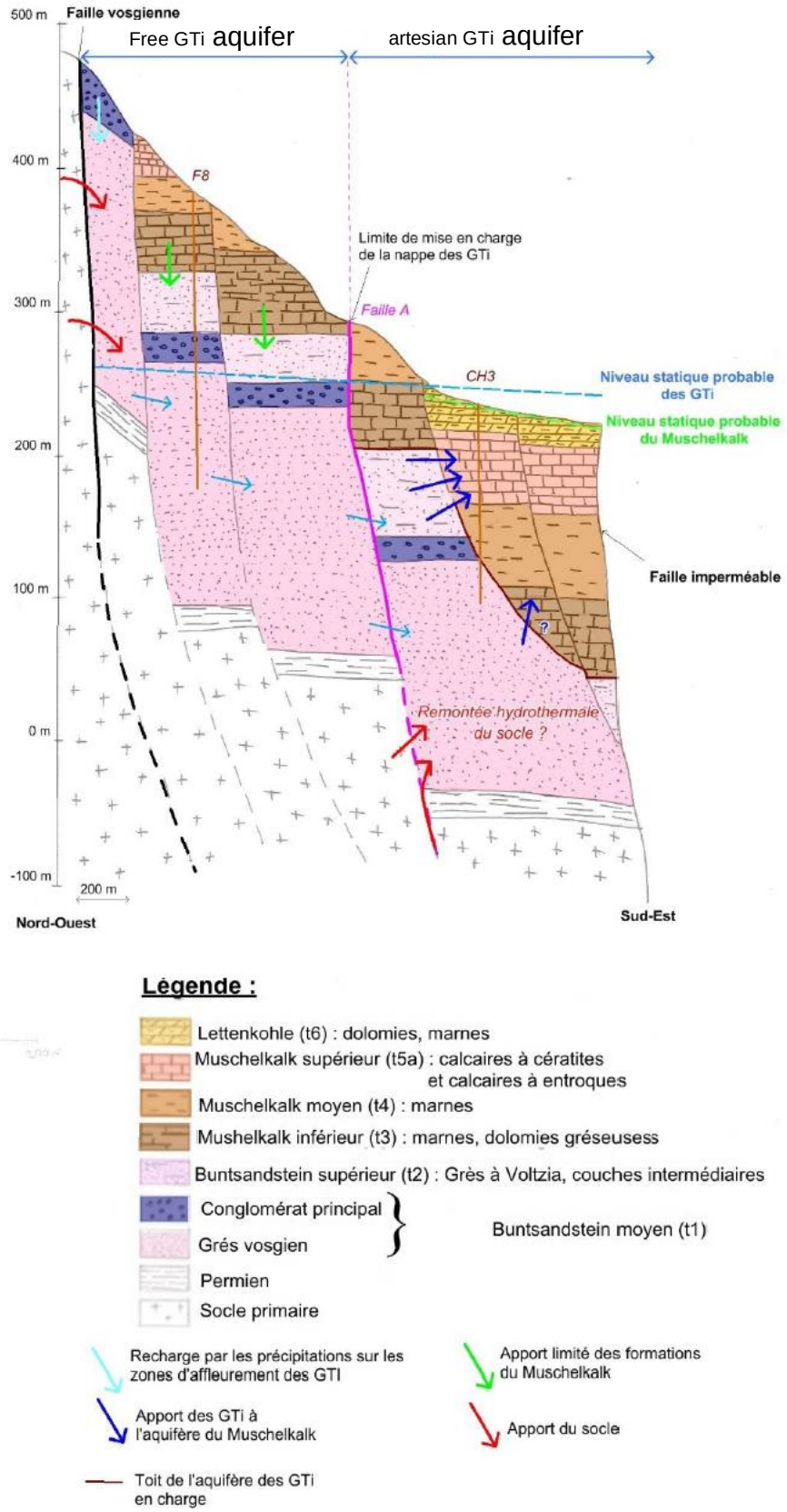


Figure 4: Geological section of the area

Hydrography

The site is located in the left bank of the river 'Strengbach' which flows through the Ribeauvillé town. This river length is around 17.2 km and is an affluent of the river 'Fecht'. A small river, the Muehlbach, flows just in the south of the site; there is small ponds downstream of this river.

Figure 5: map of the surface water body on Vesdre catchment

Carola spring

The Carola spring has a long story which start in the end of the 19th century. The SA des Eaux Minérales de Ribeauvillé, created in 1919, manages the water bottling plant and markets the Carola Spring brand. It belonged to the French regional water company (SFER), a subsidiary of the Nestlé food group. Since July 2013, the Belgian group Spadel is the owner of the company.

CAROLA exploits the GTi water from one borehole (CH3) at 180 m deep. There is also another borehole: the F8 borehole, which tapes the GTi aquifer, is a prospective borehole. The S3 and S4 boreholes and the CAROLA source which tapes the Muschelkalk aquifer are unexploited. There are also two piezometers.

The company markets different versions: natural water (blue label), aromatic water (with 7 different fruct flavours), slightly sparkling (green) and well sparkling (red). This effervescence is obtained by adding carbon dioxide, as the water from this spring is not naturally carbonated.

The total annual water intake was between 90.000 and 110.000 m^3 (2010-2020).

The water mass balance of the CH3 borehole was evaluated during the authorization process based on pump tests. CAROLA monitors periodically the water intake quantities and verifies the compliance with the legal limit. The water pressure level into the borehole is also monitored to check if there is an impact on the aquifer.

The Carola plant includes the CH3 borehole, a underground water treatment unit, 4 water storage tanks, two botling lines (one glass bottle line, one PET bottle line), a glass bottle washing machine and a CIP unit. The wastewater are neutralized before the discharge into the public sewage; the wastewaters are treated by a public wastewater treatment plant managed by a public company (SDEA).

AWS scope

The AWS CAROLA scope is defined based on the underground water catchment. Concerning the surface water catchment, the scope is limited downstream to the ponds because the impact of the wastewater discharge of the site is low. The scope includes the public wastewater treatment plant.

The map below defines the scope of AWS identifying the water relationships with the main stakeholders. The AWS scope includes the plant, the boreholes and the public wastewater treatment plant. The catchment superficy is 7,9 km^2.

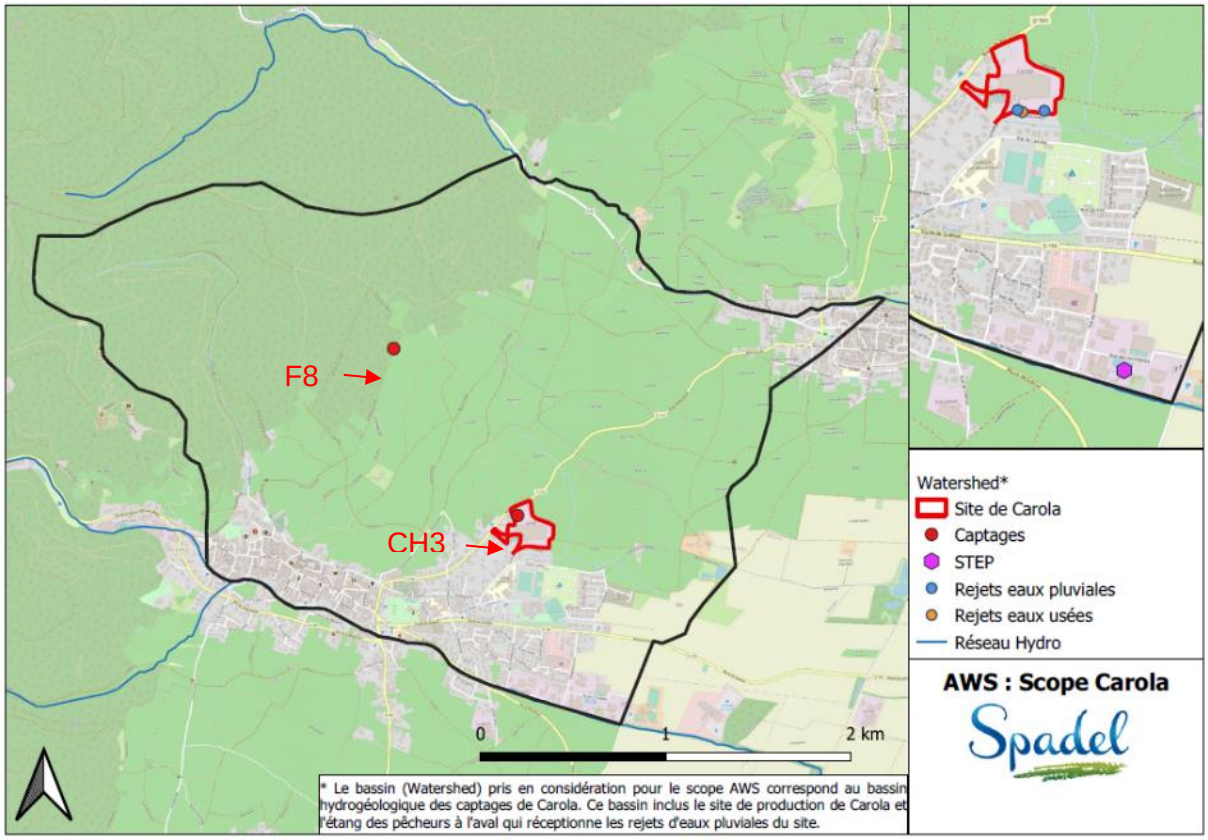


Figure 6:Map of AWS catchment for CAROLA

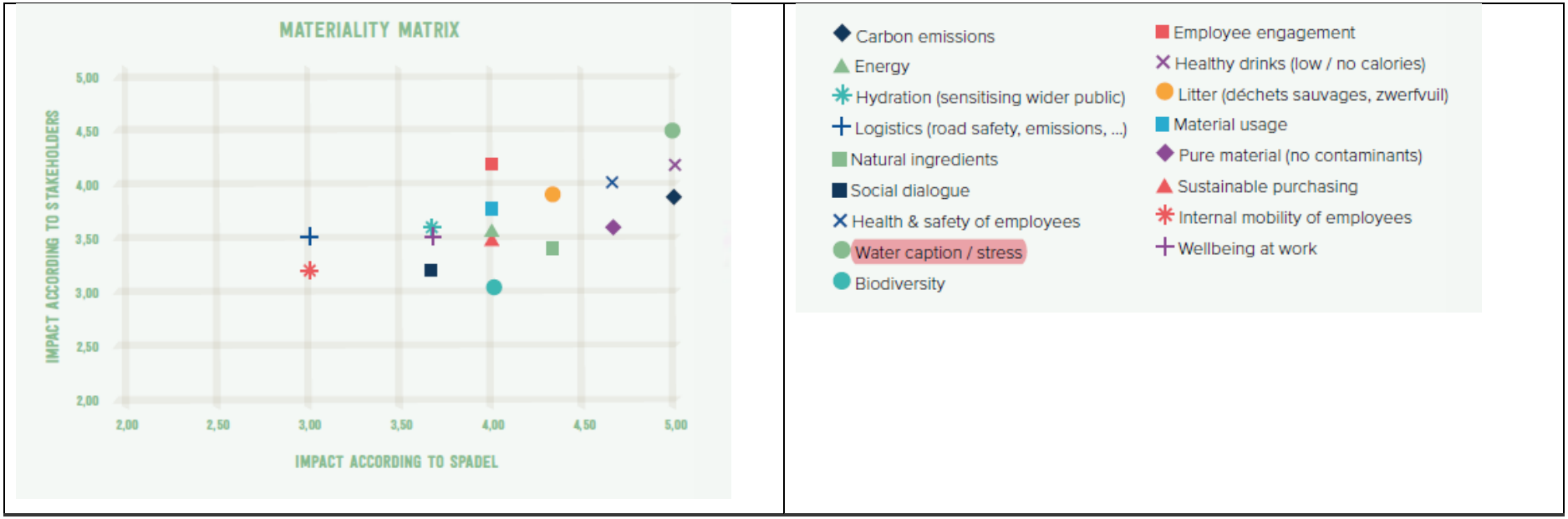
CAROLA takes its environmental stewardship responsibilities seriously and is committed to sustainable natural resources management. The company monitors groundwater, habitat and

precipitation in the region to guide its activities and share water knowledge to build mutual understanding. CAROLA 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.



Carola has also realized a local stakeholder survey in 2017, which identified the shared water challenges between the local stakeholders and Carola: in summary, the share water chalenges are the risks of soil pollution by winegrowing operations.

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 Carola 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 Carola' shows the scope: including the site, the infrastructures (water piping), the water sources and borehole boundaries, the large protection area of undergroundwater, the wastewater discharge points and and the ultimate receiving water body; munipality wastewater treatment plant. The surface water catchment that the site affect is identified: it is limited to the river. MinorNC1.1.1_The map with the AWS physical scope does not include a small part of the river catchment (from the downstream to the ponds). The map was corrected after the audit (AWS_Scope Carola_2021_12_07), including the extension of the catchment downstream of the site until the ponds. →The minorNC1.1.1 is closed.

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; - 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.	☒	☐		CAROLA has listed their stakeholders in a Excel sheet (files 'Analyse des parties prenantes et sphere d'influence_CAROLA_WATTWILLER.Xlsx). For each stakeholders, CAROLA 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 this population consultation, CAROLA has developed meetings with the main stakeholders identified in order to define the action plan. CAROLA has performed different activities related to stakeholder engagement: - Meeting with the Ribeauvillé Municipality (see meeting minutes; 13/05/2020; 19/10/2021; presentation of risk analysis for the ressources protection) - Meeting with the stakeholders – 13/10/2017. NC1.2.1 - The stakeholder list does not include the company SDEA which manage the munipality wastewater treatment plant.
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.	☒	☐		CAROLA 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 influence is not totally finalized; 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.	☒	☐		CAROLA has a site Emergency Plan ('Procedure d'urgence en cas de déversement accidentel ou d'utilisation d'extinction incendie'). Tests of emergency plan were realized in december 2020. OBS1.3.1: The Emergency plan does not cover the outside site boundaries. It is planned in the AWS action plan to develop an outside emergency plan (2022).

1.3.2 (core)	Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped.	☒	☐		CAROLA has realized a site water balance map, including the water withdrawals, the losses (natural , the storage and outflows and it is mapped. OBS1.3.2: It is recommended that the waste water discharge flowrate is included in the map in the supervision system.
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.	☒	☐		CAROLA has quantified its site water balance: - Online monitoring for the site water consumption - Twice a month: monitoring of the flow rate – withdrawal of each boreholes (9). - 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 ratio studied by CAROLA is water use ratio-WUR (liter inflow in the plant/ liter bottling), 2020 ratio was 1.53 and 2021 ratio is 1,56 (the target is 1.55). CAROLA checks also the ratio m^3 outflow / m^3 inflow in order to study the aquifer sustainability. This indicator of performance is checked each week and monthly. The water consumption variation is monitored. OBS1.3.3: It is recommended that the wastewater outflow is included in the mass balance calculation sheet to check the water balance (double check).
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.	☒	☐		CAROLA 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° by intern laboratory; different samples are analysed in the different step of the process. - Sanitary Control plan by extern laboratory - Annual control of the underground water by the Spadel group laboratory - Wastewater after the pre-treatment plant are analysed: online monitoring (flowrate, ph, T°), twice a month by the intern laboratory (MES, DCO) and quarterly (legal requirement by extern laboratory: MES; DCO, DBO5, N; P; As)); twice a year by the SDEA. The evidences showed the results comply with their limits.
1.3.5 (core)	Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.	☒	☐		CAROLA 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'.

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.	☒	☐		CAROLA 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: 'CAROLA_IWRA'. OBS1.3.6: It is recommanded that the evaluation of the IWRA takes in account the sector zones for the Berghiem municipality and the type of vegetation in the forest.
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 CAROLA'.
1.3.8 (core)	Levels of access and adequacy of WASH at the site shall be identified.	☒	☐		CAROLA provides water and sanitair to employees on the plant. MinorNC1.3.8: There is no evaluation document of the WASH adequation for the site (list of WC and showers and a comparaison with the legal requirements). After the audit, a list of WC and showers and a comparaison with the legal requirements was edited. So the minorNC1.3.8 is closed.
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.	☒	☐		CAROLA 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.	☒	☐		CAROLA 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. OBS1.4.2: It is recommended that the evaluation is realized specifically for the site and including the public 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.	☒	☐		CAROLA 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.	☒	☐		CAROLA has a database ('Readonline') where the legal and regulatory requirements are identified. The site plant has an Authorization ICPE – 17/10/2006', including the water discharges. The borehole CH3 has an authorization for the water withdrawal (AP 1996). The convention with the company SDEA for the treatment of wastewater (20/12/2019; 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 (ANTEA report). Each year (2016-2020), the company calculated the Water Extraction index WEI: around 3-5% 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. OBS1.5.3: it is recommended that the WEI Index is calculated based on the effective recharge area.
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.	☐	☒		CAROLA 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 was evaluated in 2013. minorNC1.5.4_The quality of surface water is 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	☒	☐		CAROLA 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: 'CAROLA_IWRA'.

	environment, using scientific information and through stakeholder engagement.				
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. No other boreholes are identified in the catchment. There is a municipality wastewater treatment (SDEA) 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.	☒	☐		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.
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 (Carola_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 'Carola_analyse des risques ressources2.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.

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 (Mars 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.	☒	☐		CAROLA 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'.

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. OBS2.3.2: It is recommended that the actions linked to the WUR improvement are included in the AWS plan. For the moment, the actions linked to the WUR ratio are in stand by (cfr meeting of the 3/06/2019); many actions are realized in the past.
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 to the Authorities (meeting with the Ribeauvillé municipality : Minutes 15/03/2020 & 19/10/21).

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: - Meetings with the city of Ribeauvillé - Biodiversity projects are in progress in collaboration with the Ribeauvillé municipality (document intention letter) - Convention of collaboration with the municipality of Ribeauvillé
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.	☒	☐	CAROLA has no obligation to supply water.
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.	☒	☐	CAROLA 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: the compliance evaluation rate is 98% - The compliance evaluation in regard to the different authorizations: for Wells; for the plant activities; for the wastewater discharge; ICPE classification. Authorizations were checked during the audit. There is no environmental compliance linked to water management.
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.	☒	☐	CAROLA has not identified any water rights.
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 'CAROLA_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. - water use ratio (WUR) which is followed weekly, monthly and annually. Actions are taken to improve the water efficiency: in 2020, reduction of CIP frequency.

3.3.2 (core)	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.	☒	☐		Based on the evaluation with the WWF indicator (Water scarcity _Spadel_v1), CAROLA area is not in a scarcity area. However, CAROLA followed its water use ratio (WUR): the ratio Bottled water / catchment water.
3.3.3. (core)	Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.	☒	☐		CAROLA has no contract or legal-binding document to supply water.
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.	☒	☐		CAROLA monitored periodically the underground water quality: several analysis which guarantee the water quality. CAROLA has action plan: implementation of emergency plan outside the site; discussion about snow removal practice with Ribeauvillé municipality.
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.	☒	☐		CAROLA monitors the Wastewater composition (intern laboratory make analysis twice a month; extern laboratory makes quarterly analysis); the results shows that the effluents are under the limits of discharge. Some actions are planed to improve the waste water management: PID of the network outside the factory to be carried out; PID of the network in the factory to be updated
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. CAROLA implemented several actions to improve the IWRA in the past and in particular the biodiversity project in the vine yards in collaboration with the Ribeauvillé Municipality.
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.	☒	☐		CAROLA gives access to WASH for all workers.

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 Ribeauvillé citizens have a water access (city public network). Carola 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 only a convention with the SDEA which manages the public wastewate 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 Belgium, in the city of Ribeauvillé and in the CAROLA 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 11% (target > 30% for 2022) - Water use ratio WUR is monitored periodically: (liter inflow in the plant/ liter bottling), 2020 ratio was 1.53 and 2021 ratio is 1,56 (the target is 1.55 in 2021). - Legal compliance evaluation results (target >90%)
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.
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 in November 2021.
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 report (13/01/2021) included the environmental accidents and incidents of the site: - in 2020, 0 environmental accidents and 2 incidents on site linked to water. - In 2021, 0 environmental accidents and 0 incidents on site linked to water. Report of the incident 6/8/2020 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 (core)	Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.	☒	☐		Meeting with the Ribeauvillé Municipality (minutes of 19/10/2021).

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 with the Ribeauvillé Municipality (minutes of 19/10/2021).
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 Carola 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.	☐	☒		CAROLA has communicated a summary of the AWS plan and the AWS performances to the Ribeauvillé Municipality. NC5.2.1minor: the AWS plan was only communicated to the Ribeauvillé Municipality (presentation 13/05/21); there are other relevant stakeholders which are not informed for the moment (ONF; Bergheim municipality; …).
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). MinorNC5.3.1: There is no annual summary report of the site's water stewardship performance (evaluation of 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.	☒	☐		CAROLA has communicated a summary of the stakeholder survey and the AWS plan to the relevant stakeholders (meeting Minutes with Ribeauvillé 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 Ribeauvillé city have been performed to engage stakeholders and pubic-sector. A convention including water management was signed with Ribeauvillé city.
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 CAROLA 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. CAROLA 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

Seven minor non-conformances was raised during the audit process. CAROLA sent an action plan to address it and also documents to solve the noncompliance 1 and 4. Two non-conformances were closed after reviewing these documents sent by the plant..

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

No.	Type	Ref.	Details	Action plan by CAROLA	Auditor evaluation
1	Minor NC	§1.1.1	The map with the AWS physical scope does not include a small part of the river catchment (from the site to the downstream ponds).	Root cause: bad interpretation of the standard Action: AWS new scope to be mapped. Date: Done after the audit (7/12/2021) Responsible : Arnaud Collignon	The map was corrected after the audit (AWS_Scope Carola_2021_12_07), including the extension of the catchment downstream of the site until the ponds. The Minor NC1.1.1 is closed.
2	Minor NC	§1.2.1	The stakeholder list does not include the company 'SDEA' which manages the munipality wastewater treatment plant; also fisherman.	Root cause: forget Action: Stakeholder matrix to be updated with these stakeholders Date: 1/03/22 Responsible: Sandrine Mouton	Action plan is adequate and will be reviewed during the next audit
3	Minor NC	§1.2.2	The evaluation of the influences with stakeholders is not totally finalized; 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	Action plan is adequate and will be reviewed during the next audit
4	Minor NC	§1.3.8	There is no evaluation document of the WASH adequation for the site (list of WC and showers and a comparaison with the legal requirements).	Root cause: bad interpretation of the standard Action: Evaluation of the number of access points to water to be done Date: Done Responsible: Arnaud Collignon	A list of WC and showers and a comparaison with the legal requirements was realized (document "évaluation accès point d'eau_Carola_2021). The Minor NC1.3.8 is closed.

5	Minor NC	§1.5.4	The quality of surface water is not evaluated (upstream and downstream of the wastewater discharge including the natural water discharges).	Root cause: bad interpretation of the standard Action: Analyses upstream and downstream the strom water discharge point to be done. Environmental impact of the CH3 raw water containing As discharge in the river has to be evaluated Date: 1/10/22 Responsible: Arnaud Collignon	Action plan is adequate and will be reviewed during the next audit
6	Minor NC	§5.2.1	The AWS plan was only communicated to the Ribeauvillé Municipality (presentation on 13/05/21); there are other relevant stakeholders which are not informed for the moment (ONF; Bergheim municipality; …).	Root cause: bad interpretation of the standard Action: AWS plan to communicate to relevant stakeholders Date: 01/6/22 Responsible: Arnaud Collignon and Sandrine Mouton	Action plan is adequate and will be reviewed during the next audit
7	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 should 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	Action plan is adequate and will be reviewed during the next audit

7.3 OBSERVATIONS

7 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 CAROLA	Relevant References
1	Observation	1.3.1	The Emergency plan does not cover the outside site boundaries. It is planned in the AWS action plan to develop an outside emergency plan (2022).		
2	Observation	1.3.2	It is recommended that the waste water discharge flowrate is included in the map in the supervision system.		
3	Observation	1.3.3	It is recommended that the wastewater outflow is included in the mass balance calculation sheet to check the water balance (double check).		
4	Observation	1.3.6	It is recommanded that the evaluation of the IWRA takes in account the sector zones for the Berghiem municipality and the type of vegetation in the forest.		
5	Observation	1.4.2	It is recommended that the evaluation of the embedded water use for outsourced services is realized specifically for the site and including the public wastewater treatment plant.		
6	Observation	1.5.3	It is recommended that the WEI Index is calculated based on the effective recharge area.		
7	Observation	2.3.2	It is recommended that the actions linked to the WUR improvement are included in the AWS plan. For the moment, the actions linked to the WUR ratio are in stand by (cfr meeting of the 3/06/2019); many actions are realized in the past.		

8 SUMMARY

In reviewing the body of evidence presented by CAROLA, 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.

7 minor non-conformances has been identified during the audit. An action plan is presented to solve these non-conformances and two non-conformances were closed after reviewing the documents sent by the plant.

9 OPPORTUNITIES FOR IMPROVEMENT

The certification audit for CAROLA 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 evidence produced and site visit inspections performed at the CAROLA Plant in Ribeauvillé, SGS recommends that CAROLA is awarded Core AWS Certified status with a surveillance audit interval of annual frequency.