



Alliance for Water Stewardship Assessment Report

Prepared for DEVIN JSC (AWS-000424)

Prepared by: SGS

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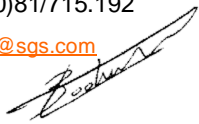
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1 EXECUTIVE SUMMARY

The scope of services covers the conformity assessment of water use in compliance with the AWS International Water Stewardship Standard (Version 2.0) for DEVIN JSC (hereinafter referred to as “the site”) located at Devin.

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 3 boreholes and a spring water intake.

On November 4-5, 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 9 major non conformances, 12 minor non conformance, 9 observations.

An additional audit was conducted on the 21st February to verify the corrective actions taken.

Given the review of evidences produced and site visit inspections performed at the DEVIN JSC plant, SGS recommends that DEVIN JSC, 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 DEVIN JSC Factory (hereinafter referred to as “the site”) located at Devin, in Belgium.

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

On November 4-5, 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.
Konstantin Nikolov	Local expert	ISO 14001 auditor Hydrogeologist and Geotechnical engineer
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 1,5 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 5 November, 2021.

An additional audit was conducted on the 21st February to verify the corrective actions taken linked to major noncompliances.

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 a local newspaper.

It is important to notice that the delay of 30 days announcement with the audit date was not respected because of AWS Administrative issues. So the stakeholder consultation was expended until the 29 November 2021.

During the conformity assessment, no stakeholder participated to the consultation.

Ahead of the on site audit, DEVIN JSC held several stakeholder meetings and a stakeholder survey was realized in November 2020. Evidence of these meetings were showed during the assessment.

During the audit (5/11/2021), the auditors interviewed the main stakeholders. The table below shows the list of interviewed stakeholders.

Name	Description
Mr. Nikola Stamatov	Head of local water supply and sewage company (ViK Devin). During the phone interview Mr. Stamatov confirmed good cooperation with Devin in the area of water governance issues (e.g. maintenance, inspections and disinfection of water supply infrastructure from Baldaran spring to Devin plant as well as other common projects). Regular consultations, discussions and meetings are also been undertaken between them and Devin AD.
Mr. Nikolay Yourukov	Deputy Mayor of Devin Municipality. During the phone interview Mr. Yourukov explained the cooperation and with Devin AD in projects related to water management issues, as well as regular communication with the company regarding water governance topics.
Martin Georgiev	Plant Manager -Devin AD
Petya Manastirska	Sustainability and Quality Manager – Devin AD
Tsveta Gyrova	QHS Manager – Devin AD
Agriana Hadzhijska	ISO Coordinator – Devin AD
Lybomir Georgiev	Packaging and Innovations – Devin AD

Table 2: Stakeholder interview

4 DESCRIPTION OF CATCHMENT

Context

The DEVIN JSC factory is located just in the east of the Devin city which is a spa town in the Smolyan Province in the far south of Bulgaria.

Devin city is located into the valley of the Vacha River, 45 km from the city of Smolyan and 220 km from Sofia. The Devinska river runs through the city and alongside the company site. Numerous other brooks and rivers (namely Krichim, Muglenska and Trigradska) are found nearby, all tributaries of the Vacha river.

Devin is located in a region rich in water, famous in Bulgaria and throughout the Balkans for its mineral waters, which come from cold and hot springs with temperatures ranging from 16 to 76°C.



Figure 1: aerian map (source: google map)

Topography

The topography is mountainous: the city of Devin is located in the Rhodopes mountain massif, with peak around 1.500-2100 m; the highest peak is the Goljam Perelik (2,191 m).

The plant is located in a steep valley in the altitude of 735 m above sea level. Around the site, the peaks are around 1000-1200 m.



Figure 2: topographic map of Rhodopes

Geology and hydrogeology

The region falls inside the boundaries of Shiroka laka rupture zone, which is one of the biggest fault structures in Bulgaria. The Great Shiroka laka fault is located in north-western direction and all southern areas have been displaced downwards along the rupture. The site is located inside Devin graben valley. The western and northern parts of the graben valley are buried under rhyolite blanket and its southern part is marked with faults with south-southwest to north-northeast direction. The eastern boundary of the graben valley is the Great Shiroka laka fault and in southeast direction the graben valley is open.

Paleogene sediments and volcanic rocks are most widely spread in the region and are represented by tuffaceous sandstones, sandstones, breccia-conglomerates, conglomerates, sandstones with marls, shale, limestone, rhyolites.

Proterozoic rocks are revealed to the south and west of Devin town. They are represented mainly by biotite schists, biotite gneiss, amphibolites and marble. The Proterozoic rocks form the impermeable bed of the bottom of the artesian aquifer of Devin mineral water deposit.

Quaternary sediments include the alluvial sediments formed in the plain of Devinska River (boulders, gravels with sandy and silty filler) and negligible amount of deluvial sediments.

The geological layers profile at the site is as follows:

- A surface layer of technogenic top soil – thickness app. 0.5 m;
- Technogenic materials (boulders and large sized construction materials – thickness app. 5.0 m;
- Quaternary alluvial sediments from the plain of Devinska River (boulders, gravels with clay and sand filler) – thickness 20-25 m;
- Paleogene (Oligocene) sandstones with marls, shale and limestone – thickness 30-90 m;
- Paleogene (Oligocene) alternation of sandstone and breccia-conglomerates – thickness 80-120 m;
- Paleogene (Oligocene) conglomerate of granite boulders and blockage – thickness 15-70 m;
- Paleogene (Oligocene) alternation of sandstone and breccia-conglomerates – thickness 100-120 m;
- Paleogene (Oligocene) sandstones with marls, shale and limestone – thickness 200-250 m;
- Paleogene (Oligocene) conglomerate of granite boulders and blockage – thickness 80-170 m;
- Precambrian Biotite schists – thickness 15 m;
- Precambrian Biotite gneiss – thickness unknown.

Beneath the subject site, there is a shallow aquifer formed within the alluvial Quaternary sediments in the plain of Devinska River. The aquifer is unconfined and the static water level is about 1.6 m below the surface, but may be considered to vary during the seasons. The thickness of the alluvial sediments where the aquifer is present is between 20 and 25 m. Based on a topographical estimation, groundwater from the Quaternary aquifer is estimated to flow in east-southeast direction following the changes in direction of the river flow. Given the shallow depth of groundwater from the Quaternary aquifer in the area, groundwater vulnerability is considered to be high (hypothetical likelihood of contaminants reaching groundwater, in case of a surface or near surface contamination source existence).

Bellow the Quaternary sediments, there is app. 700-900 m thick alternations of impermeable Paleogene rocks.

The next aquifer system formed in a depth range from 500-600 m to 1200-1500 m is the thermo mineral water deposit Devin. This artesian aquifer is formed within Paleogene tectonic structure (graben valley) filled with alternations of conglomerates, sandstones, marls, shales

and limestones. The bedrock is represented by Precambrian gneiss and marbles. The aquifer consists mainly of conglomerates and sandstones and is confined by a thick layer (~500 m) of impermeable sandstones with shales, marls and clay limestones. The aquifer is fed mainly by storm water infiltrating through the tectonic rupture systems. The aquifer occupies an area of 20 m², along the Valley of Devinska River.

Hydrography

The factory site is located at the southern slope of the Devinska river valley about 130 m south of the river. This river is an affluent of the Vacha river, which is an affluent of the Maritsa river.

Climate

The annual average precipitation is 765 mm/year, with huge variation between years (650-800 mm).

The company DEVIN JSC

DEVIN JSC was founded in 1992 and since March 2017, is part of Spadel Group. DEVIN's primary scope of activity includes bottling and selling of mineral water, spring water, table and carbonated water and non-carbonated soft drinks.

DEVIN JSC produces three different kinds of water :

1. Natural Mineral Water: Hot and deep water coming from both C3 and C5 wells. There is also another C6 well used only for thermal purpose and not managed by Devin.
2. Spring water : Cold spring water coming from Baldaran Spring; the total flowrate is shared between Devin Factory, Baldaran Factory and the municipality.
3. Table Water : Cold water coming from an alluvial aquifer (25 m deep well located into the factory site).

The production facilities include 5 production lines in 5 workshops, 3 warehouses and auxiliary facilities, such as compressor rooms, boiler rooms, fresh water treatment facilities, etc. Main production processes include water extraction and transportation; treatment of source water (filtration, reverse osmosis, ozonation, UV lightening); intermediate storage of water in buffer tanks; carbonisation (only for carbonated water); blowing of preforms to bottles; checking, re-capping and cleaning of gallons (line 6); filling and labelling the bottles; shrink wrapping (lines 1 & 2); palletizing; storage of ready products; transport of ready production by trucks.

The site generates industrial waste water (from washing the gallons, washing and disinfection of the production lines, washing the floors of the workshops). Sanitary waste water is also generated from the administrative building, canteen and sanitary premises in the workshops. Both waste water streams are mixed in one common sewage system, which leads to a concrete collection reservoir, equipped with pumps, located at the most eastern part of the subject site. The pumps are automatically triggered by the level sensors and the water is pumped into Devin municipality sewage system via pipeline. The discharge point is located on Vasil Levski Street just before the eastern bridge.

Storm water from the roof of the warehouse for ready production is collected separately and is discharged directly into Devinska River. There are 2 discharge points for the storm water from warehouse roof, located just outside the fence south from the warehouse. There is also a waste water discharge into the river from osmoser treatment.

AWS scope

The AWS site includes the factory site which covers a superficies of 30.295 m² and also different wells areas:

- two minerals wells (C-3 and C-5): ground water well C-3 is located near the eastern boundary of the site and the GW well C-5 is located app. 0.9 km west from the site.
- The spring water is coming from Baldaran spring located at about 10 km northwest from the subject site at app. 1330 m AMSL. The watershed area of spring is app. 15 km².
- The shallow underground well (TK-1) is located just north from the southern boundary of the site at a distance of app. 20 m to Devinska River.

The scope is defined based on the shallow underground water catchment. Concerning the surface water catchment, the scope is limited downstream until the Vacha river.

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

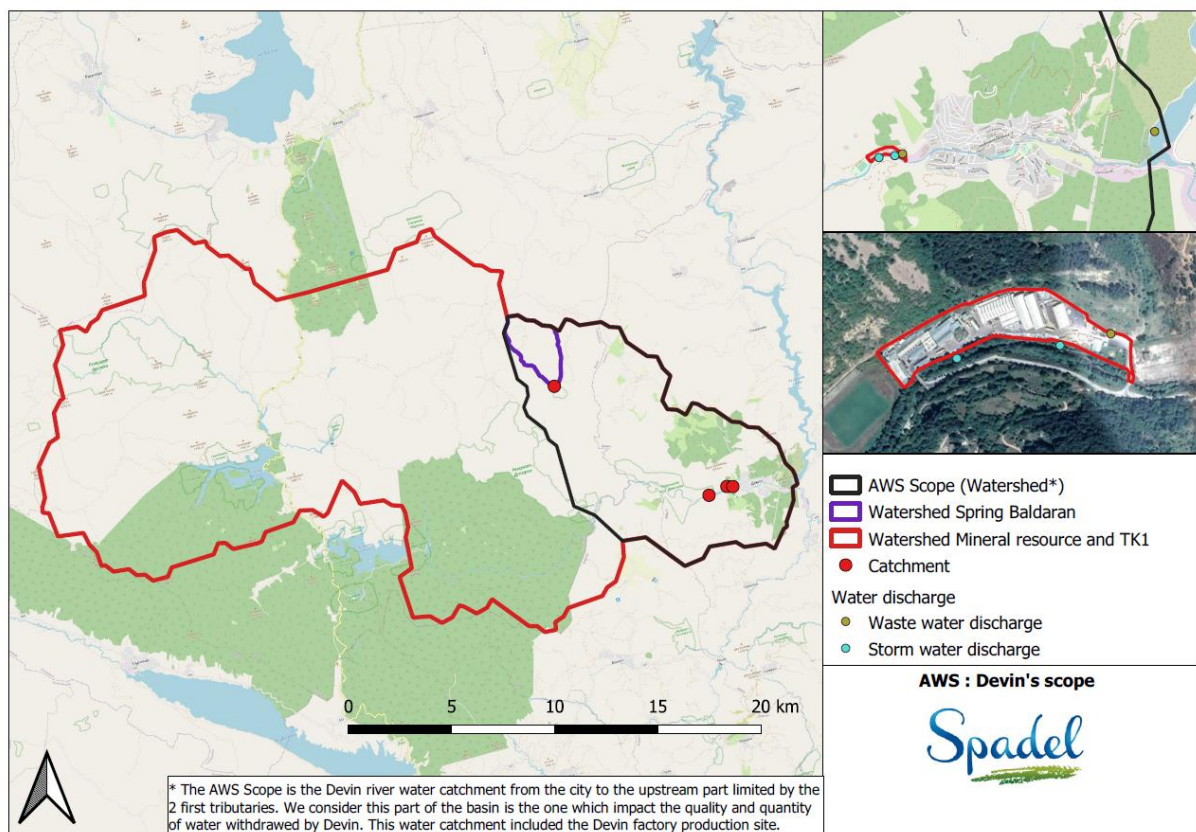
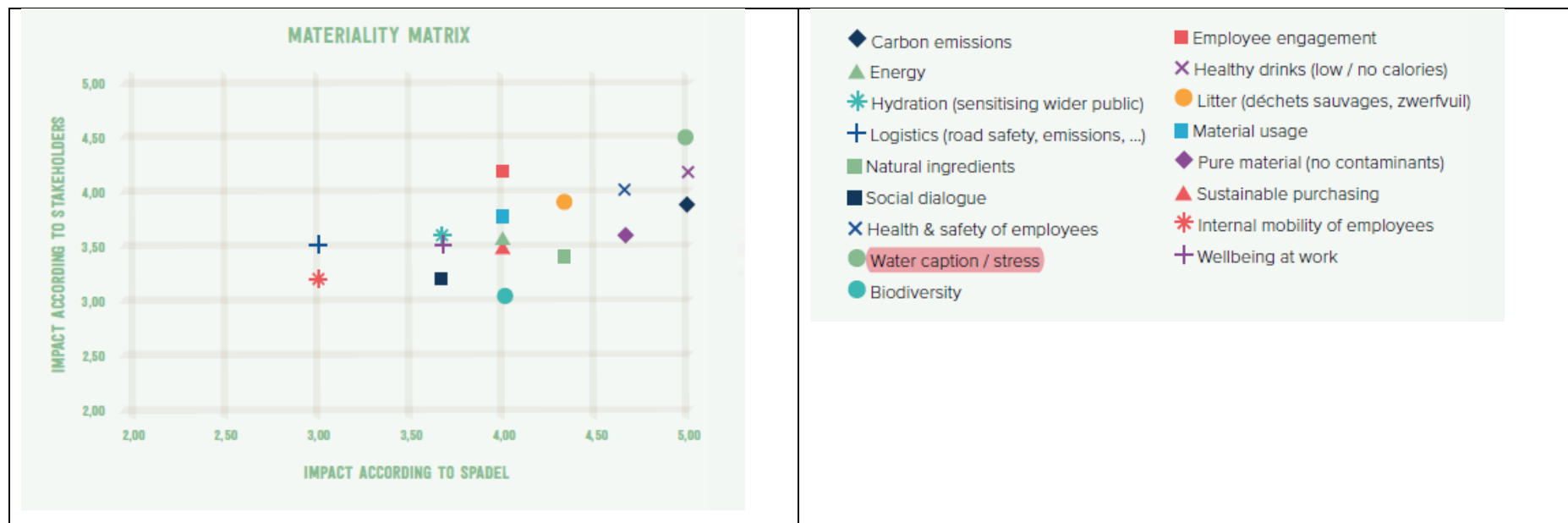


Figure 3:Map of AWS catchment for DEVIN JSC

DEVIN JSC takes its environmental stewardship responsibilities seriously and is committed to sustainable natural resources management.

5 SUMMARY OF SHARED WATER CHALLENGES

Spadel has developed a matrix to identify the shared environmental challenges for all plants and ranked them according to their impacts. Reasons for ranking were 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.



DEVIN JSC has developed a matrix to identify the shared environmental challenges for the Devin site and ranked them according to their impact. Reasons for ranking were provided together with reasons why the challenges are to be considered priorities for both stakeholders and the site. The Shared water challenges are evaluated into the materiality matrix (2020): the shared water challenges are the Use of the water and the risk of the surface water pollution.

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 evidences provided by DEVIN JSC for each indicator with which it is associated.

Clause	Details	Yes	No	Score	Comments/Evidence
1	GATHER AND UNDERSTAND				
1.1	<i>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.</i>				
1.1.1 (core)	<p>The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including:</p> <ul style="list-style-type: none"> - Site boundaries; - Water-related infrastructure, including piping network, owned or managed by the site or its parent organization; - Any water sources providing water to the site that are owned or managed by the site or its parent organization; - Water service provider (if applicable) and its ultimate water source; - Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies; - Catchment(s) that the site affect(s) and is reliant upon for water. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>		<p>A map (Ref 'AWS_Scope Devin') shows the AWS scope, considering:</p> <ul style="list-style-type: none"> - the Devin factory production site, the infrastructures (water piping), the water sources and borehole boundaries, - The Mineral underground watershed - The Spring underground watershed - Tap water watershed - Devinska river River watershed until the Vacha river <p>This water catchment including the site, the large protection area of undergroundwater, the wastewater discharge points and the ultimate receiving water body (Wayai until the Municipality limit); wastewater treatment plant.</p> <p>The AWS Scope is the Devin river water catchment from the city to the upstream part limited by the 2 first tributaries. We consider this part of the basin is the one which impact the quality and quantity of water withdrawn by Devin.</p> <p>OBS: the map should be clearer considering the limit (make a zoom on the AWS scope limit) and includes all piping.</p>
1.2	<i>Understand relevant stakeholders, their waterrelated challenges, and the site's ability to influence beyond its boundaries.</i>				
1.2.1 (core)	Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified.	<input checked="" type="checkbox"/>	<input type="checkbox"/>		<p>DEVIN JSC has a procedure for stakeholder identification (GP1). The document F04_GP01 listed their stakeholders in a Excel sheet ('Stakeholders Matrix_Devin for water'). The process used for stakeholder identification is described in a procedure GP 01 Context for the organization, ver. 02.</p>

Clause	Details	Yes	No	Score	Comments/Evidence
	<p>This process shall:</p> <ul style="list-style-type: none"> - Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people; - Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies; - Provide evidence of stakeholder consultation on water-related interests and challenges; - Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups; - Identify the degree of stakeholder engagement based on their level of interest and influence. 				<p>Stakeholders identification is made in F04_GP01_Stakeholders identification – water related issues and F02-ENVP01 Assessment of risks and opportunities related to water management</p> <p>For each stakeholders, DEVIN JSC identified:</p> <ul style="list-style-type: none"> - the water-Related challenges - the evidence of engagement - the degree of stakeholder engagement - risk level which is evaluated to define priority of actions. <p>Devindel has realized a survey in November 2020 for the main stakeholders in terms of water related challenge (see Stakeholder study and Materiality Matrix). After this population consultation, DEVIN JSC has developed meetings with the main stakeholders identified in order to define the action plan.</p> <p>Level of engagement of stakeholders on water issues are evaluated. The degree of stakeholder engagement has been assessed in F04_GP01 Stakeholders identification and varies, between 1 – low or no interest to 3 – high interest.</p> <p>NCminor: some stakeholders are missing in the document 'F04_GP01_Stakeholders identification': other water users (like Spa Hotel and Baldarian company,...); forest administration. This NC was closed after additional audit on the 21/02/2022.</p> <p>NCmajor: No records from stakeholder consultation were provided during the audit. This NCmajor was closed after additional audit on the 21/02/2022.</p> <ul style="list-style-type: none"> - The organization made a stakeholder survey in December 2021: see report 'Обратна връзка от консултацията със заинтересованите страни през 2021'. - The stakeholder matrix was updated: see document "F01_02_03_04-GP01 Контекст_Заинт. страни_Рискове_14.10.2021. - A Meeting was also organized with the water public company VIK.
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>		DEVIN JSC has identified and assessed the influence of the site on the stakeholder within the catchment (REF: document F04_GP01 listed their stakeholders in a Excel sheet 'Stakeholders Matrix_Devin for water').

Clause	Details	Yes	No	Score	Comments/Evidence
1.3	<i>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.</i>				
1.3.1 (core)	Existing water-related incident response plans shall be identified.	<input checked="" type="checkbox"/>	<input type="checkbox"/>		DEVIN JSC has a Emergency Plan for the factory. An emergency plan will be also realized for the resource protection. OBS: The Emergency plan, ver. 03 29.06.2021 covers identification of possible emergency situations and defines response actions inside site boundaries only.
1.3.2 (core)	Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped.	<input checked="" type="checkbox"/>	<input type="checkbox"/>		DEVIN JSC has realized a site water balance map, including the water inflow, storage and outflows. OBS: the map does not cover the water for the bottle cleaning (for the moment is not monitored).
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>		DEVIN JSC monitored the water flowrate each day (see Excel file 'H2O_report_2021'). The file 'Water use Devin' shows the water inflow by month. Another ratio studied by DEVIN JSC is water use ratio-WUR (liter inflow in the plant/ liter bottling): the 2020 is 1.45 and 2021 ratio is 1.53 (target 1,50). DEVIN JSC 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. NCminor: the water balance does not include waste water outflow. The data are available but in another document. This NC was closed after additional audit on the 21/02/2022. <ul style="list-style-type: none">- The document 'Water use Devin 2015_2016_2017_2018_2019_2022 actual' was updated and includes the wastewater discharge volume. OBS: The water efficiency index is not calculated. It is planned by the company.
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.	<input type="checkbox"/>	<input checked="" type="checkbox"/>		DEVIN JSC realizes water quality analysis periodically (monitoring programma; QA.SDL.19 v3/11/2020): <ul style="list-style-type: none">- Underground Water inflow quality is analysed in the entrance of the plant in a daily basis (main chemical composition; microbiology); monthly for some parameter; quarterly for other parameter and annually for pesticides : for mineral water; for spring water; for table water- Wastewater discharge are analysed twice a year: ph, Phosphore, suspended solid; total nitrogen; COD; BOD. The evidences show they comply with their limits (report of the 21/06/21).- Contract #1/20.08.2015 for waste water discharge with local water sewage company, dated 20.08.2015

Clause	Details	Yes	No	Score	Comments/Evidence
					<p>- F01-GP10 Monitoring plan 2021</p> <p>NCminor: annex of the contract for wastewater discharge. It is not clear how the organization has determined the suitable wastewater parameters to be monitored. The last test reports contain values of 6 parameters, since the BG Regulation #7, sets ELVs for total of 25 parameters.</p> <p>NCminor: the wastewater from osmoser is not evaluated.</p> <p>This NC was closed after the additional audit on the 21/02/2022.</p> <ul style="list-style-type: none"> - "Written protocols for Bi-annual monitoring of wastewater discharged, osmosis. - - Devin will be start to measure all 25 parameters according Regulation 7 in connection with waste water osmose" - "Programa 2022g; - Monitoring was realized on the таблица Отпадни води" <p>NCminor: For underground water and waste water, there is not always Excel tables to evaluate the results with limit values and summary the water quality evaluation.</p> <p>The table contains data for 3 wastewater streams and 1 water sample from the river (surface water). The ELV in column B are applicable only to the wastewater discharged in the settlement sewage system (columns D&E), and not applicable to the other 3 water streams. There are different ELV set in the legislation for wastewater discharged directly into river (the other 2 waste water samples) and different limit values for the river water itself. Another limit values apply to the groundwater (which is not mentioned) in the attached table. There is a mistake in the allowed pH range (should be 6.5 – 9.0).</p> <p>→ So, the NC remains open.</p> <p>OBS: The waste water samples should be taken by the laboratory.</p>
1.3.5 (core)	Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.	<input type="checkbox"/>	<input checked="" type="checkbox"/>		<p>DEVIN JSC has identified the risk of soil/underground pollution on a map (Devin_risk activities map_additional soil drills</p> <p>NCminor: The map with water pollution risks on the site is not updated (for example, removed fuel station is still in this map).</p>
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>		<p>DEVIN JSC has a list and a map with IWRA: 'Devin_IWRA_map'. The IWRA area are evaluated based on the protection level.</p>

Clause	Details	Yes	No	Score	Comments/Evidence
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>		The cost and the revenues of the site are identified monthly: includes costs and water taxes. There is also a table with CAPEX investment. The water-related value generated by the site on the economic, environmental, and socio-economic is also evaluated (document: REF 'Economic, environmental, and socio-economic impact of Devin JSE_2020_BG.docx').
1.3.8 (core)	Levels of access and adequacy of WASH at the site shall be identified.	<input checked="" type="checkbox"/>	<input type="checkbox"/>		DEVIN JSC provides water and sanitair to employees on the plant. NCminor: there is no formal document for WASH evaluation. This NC was closed after additional audit on the 21/02/2022. The risk analysis includes the evaluation of WASH (see document 'F02-ENVP01 Оценка на рисковете и възможностите за водите_Попълнен').
1.4	<i>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.</i>				
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>		DEVIN JSC has made this evaluation: No water consumption from supplier located in the catchment are identified.
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>		DEVIN JSC has made this evaluation of the embedded water use of outsourced services: impact assessment – PEF evaluation including logistique. No embedded water use of outsourced services located in the catchment are identified.
1.5	<i>Gather water-related data for the catchment, including: water governance, water balance, water quality, Important Water-Related Areas, infrastructure, and WASH</i>				
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>		The process of identification of applicable requirements is described in GP07. F03-GP07 Register of legal and other requirements, contains the identified requirements that apply to the organization. This table includes water governance initiatives.
1.5.2. (core)	Applicable water-related legal and regulatory requirements shall be quantified, including legally-defined and / or stakeholder verified customary water rights.	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Devin has a list F03_GP07 with environmental applicable legislation. DEVIN JSC plans to use a database ('Readonline') where the legal and regulatory requirements are identified. Concession contract for mineral water from C-3, dated 19.04.1999, subsequently amended

Clause	Details	Yes	No	Score	Comments/Evidence
					<p>Concession contract for mineral water from C-5, dated 14.04.1999, subsequently amended</p> <p>Permit for groundwater consumption from TK-1 #31590430/06.06.2011 (amended in 2012 and 2015), reissued with Decision #PP-4285/02.06.2021, and valid till 06.06.2027. Permitted water volumes: 91400 m3/year for bottling and 54800 m3/year for drinking and sanitary purposes</p> <p>Permit for spring water from "Baldaran" spring # 300626/30.11.2004, last amended 2017</p>
1.5.3. (core)	The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.	<input checked="" type="checkbox"/>	<input type="checkbox"/>		<p>Devin has made the calculation of the water extraction Index (WEI=0,95%).</p> <p>The catchment water balance is described in a report of ULg University: « 1995_Les ressources hydrominérales et les eaux souterraines de la région de Devin ». The mass balance of the catchment, summarized in a table as follow, showed that the mass balance is positive.</p> <p>The evolution of the mass balance is indirectly evaluated in another report (Etat des nappes DEVIN JSC 2009-2018): the Water levels are relatively constant over the 2009-2018 period. The difference in level between seasonal averages in the same year is rarely greater than 2 m. The difference between summer level averages for two consecutive years rarely exceed 3 m. Particularly dry years such as 2018 do not cause a significant drop in levels.</p> <p>The general quantitative state of the water resource for the three types of water exploited is good and does not cause a significant drop in levels doesn't seem to degrade over time.</p> <p>Water Extraction Index is also calculated based on the period 1980-2010: this Index is 2,92% (<10%) that means there are no scarcity for the catchment.</p>
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.	<input type="checkbox"/>	<input checked="" type="checkbox"/>		<p>DEVIN JSC has analyzed physical, biological, chemical parameters about all the underground water yearly (see §1.3.4).</p> <p>Minor NC: the quality of surface water (river) is not evaluated. There is a report from authorities which includes the river quality evaluation, but the document was not yet evaluated by the company.</p> <p>Analyses upstream and downstream the storm water discharge point to be done. Environmental impact of the CH3 raw water containing As discharge in the river has to be evaluated (see document 'таблица Отпадни води'). "Programa 2022g;</p> <p>But, the table contains data for 3 wastewater streams and 1 water sample from the river (surface water). The ELV in column B are applicable only to the wastewater discharged in the settlement sewage system (columns D&E), and not applicable to</p>

Clause	Details	Yes	No	Score	Comments/Evidence
					the other 3 water streams. There are different ELV set in the legislation for for the river water itself. So, the NC remains open.
1.5.5 (core)	Important Water-Related Areas shall be identified, and where appropriate, mapped, and their status assessed including any threats to people or the natural environment, using scientific information and through stakeholder engagement.	<input checked="" type="checkbox"/>	<input type="checkbox"/>		DEVIN JSC has a list and a map with IWRA: 'Devin_IWRA_map'. The IWRA areas are evaluated based on the protection level in the catchment (see §1.3.6). OBS: the map with the IWRA does not include the area affected by the fire in the past.
1.5.6. (core)	Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.	<input checked="" type="checkbox"/>	<input type="checkbox"/>		The boreholes and pipes are listed and mapped.
1.5.7. (core)	The adequacy of available WASH services within the catchment shall be identified.	<input checked="" type="checkbox"/>	<input type="checkbox"/>		This WASH services in the catchment are good (no issues in Bulgaria).
1.6	<i>Understand current and future shared water challenges in the catchment, by linking the water challenges identified by stakeholders with the site's water challenges.</i>				
1.6.1 (core)	Shared water challenges shall be identified and prioritized from the information gathered.	<input checked="" type="checkbox"/>	<input type="checkbox"/>		The Shared water challenges are evaluated into the materiality matrix (2020): the shared water challenge are the water use ratio and the AWS certification. 3.3 Use of the water; risk of pollution of the surface water.
1.6.2. (core)	Initiatives to address shared water challenges shall be identified	<input checked="" type="checkbox"/>	<input type="checkbox"/>		The water ratio is monitored annually and monthly. An action plan is developed to reduce this ratio.
1.7	<i>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.</i>				
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>		The Water risks are identified (sheet : F02_EnvP01.xlsx) and prioritized based on likelihood, severity of impact and also vulnerability. minorNC: the water risk assessment matrix shall be reviewed and updated (final risk scores, responsibilities, etc.). This NC was closed after additional audit on the 21/02/2022. - The document 'F02-ENVP01 Оценка на рисковете и възможностите за водите_Попълнен_Indicatuers' was updated including risk score table and responsibilities.

Clause	Details	Yes	No	Score	Comments/Evidence
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Water oportunities are identified in a table (sheet : F02_EnvP01.xlsx). OBS: some actions are not clearly defined (are not opportunities).
1.8	<i>Understand best practice towards achieving AWS outcomes: Determining sectoral best practices having a local/catchment, regional, or national relevance.</i>				
1.8.1. (core)	Relevant catchment best practice for water governance shall be identified.	<input checked="" type="checkbox"/>	<input type="checkbox"/>		DEVIN JSC has many contacts with Authorities, Federations, other companies. A Benchmarking with other company of Spadel group is also realized. 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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>		A benchmark of water balance (AWS) was realized in 2019. 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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>		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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>		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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>		No relevant best practice was identified; it is not an issues in Bulgaria.

Clause	Details	Yes	No	Score	Comments/Evidence
2	COMMIT AND PLAN				
2.1	<i>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.</i>				
2.1.1. (core)	<p>A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:</p> <ul style="list-style-type: none"> - That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes - That the site implementation will be aligned to and in support of existing catchment sustainability plans - That the site's stakeholders will be engaged in an open and transparent way - That the site will allocate resources to implement the Standard. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>		<p>CEO of Spadel (Mars du Bois) signed a statement AWS including the required commitments.</p> <p>The Spadel statement is publicly disclosed in the Spadel website.</p> <p>https://sourceofchange.spadel.com/goals/pure/</p>
2.2.	<i>Develop and document a process to achieve and maintain legal and regulatory compliance.</i>				
2.2.1. (core)	<p>The system to maintain compliance obligations for water and wastewater management shall be identified, including:</p> <ul style="list-style-type: none"> - Identification of responsible persons/positions within facility organizational structure 	<input checked="" type="checkbox"/>	<input type="checkbox"/>		<p>DEVIN JSC has an Environmental management system (ISO 14001 certified) and procedure to evaluate QSE compliance. Procedure GP07 includes the responsibilities for water and wastewater management and identifies responsible persons / position within facility organizational structure.</p>

Clause	Details	Yes	No	Score	Comments/Evidence
	- Process for submissions to regulatory agencies.				The procedure GP06 about communication includes the process for environmental communication with authorities. The process for communication and reporting with regulatory agencies is described in GP06 Communication and F01-GP06 Communication matrix.
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>		The Spadel water stewardship strategy is defined into the document 'standard_Water stewardship document'.
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.	<input type="checkbox"/>	<input checked="" type="checkbox"/>		A water stewardship plan is defined: water stewardship plan_DEVIN JSC; The plan includes the Planned timeframes to achieve it; . NCminor: the AWS plan does not include the actions from the risk assessment. The link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes are not included.
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Major NC: There are no evidences that the plan to mitigate identified water risks was consulted or discussed with public sector and/or infrastructure agencies. This NC was closed after the additional audit on the 21/02/2022. OK_ major NC_241 is closed Water Risk and Opportunity Assessment was discussed with stakeholders. No real feed-back. "F02-ENVP01 Оценка на рисковете и възможностите за водите_Попълнен _ SHEET_ Анализ на рисковете; The organization made a stakeholder survey in December 2021: see report 'Обратна връзка от консултацията със заинтересованите страни през 2021'.

Clause	Details	Yes	No	Score	Comments/Evidence
					A Meeting was also organized with the water public company VIK.
3	IMPLEMENT				
3.1.	<i>Implement plan to participate positively in catchment governance.</i>				
3.1.1. (core)	Evidence that the site has supported good catchment governance shall be identified.	<input checked="" type="checkbox"/>	<input type="checkbox"/>		<p>No evidence during the audit.</p> <p>NCmajor: No evidence was provided that the site has supported good catchment governance. This NC was closed after additional audit on the 21/02/2022. This NC was closed after additional audit on the 21/02/2022.</p> <p>Protocol with Description of the Good practices signed from Spadel sites.</p> <p>Protocole with the public company VIK.</p>
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>		DEVIN JSC has an obligation to give water access to people (included in the concession to exploit the water for C3 and C5). The DEVIN implemented water fountain near theses two boreholes.
3.2.	<i>Implement system to comply with water-related legal and regulatory requirements and respect water rights.</i>				
3.2.1. (core)	A process to verify full legal and regulatory compliance shall be implemented.	<input checked="" type="checkbox"/>	<input type="checkbox"/>		DEVIN JSC is certified ISO 14001: the procedure GP07 includes the evaluation of the environmental legal compliance. This evaluation is realized on the F03_GP07 (v10/08/2021).
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>		There is legal requirement arising from the concession contracts for mineral water to ensure public access to mineral water. There are two fountains at C-3 and C-5 to ensure free access to the public to mineral water.

Clause	Details	Yes	No	Score	Comments/Evidence
3.3.	<i>Implement plan to achieve site water balance targets.</i>				
3.3.1 (core)	Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.	<input checked="" type="checkbox"/>	<input type="checkbox"/>		The Document 'Water Stewardship Plan_DEVIN JSC' identifies the targets and their progress towards achieving the water stewardship plan: water use ratio which is followed weekly, monthly and annually (WUR Devindel.xls).
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>		There is Low risk of water scarcity according to the WWF tool; any way, the WUR targets (KPI) are being set to reduce water consumption and increase water efficiency. OBS: There are low risks of water scarcity, but the document of Spadel which evaluate the scarcity risk is not correct.
3.3.3 (core)	Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.	<input checked="" type="checkbox"/>	<input type="checkbox"/>		DEVIN JSC has an obligation to give water access to people (included in the concession to exploit the water for C3 and C5). The DEVIN implemented water fountain near these two boreholes.
3.4.	<i>Implement plan to achieve site water quality targets.</i>				
3.4.1 (core)	Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.	<input checked="" type="checkbox"/>	<input type="checkbox"/>		There are some actions in the AWS action plan concerning the water quality (action 21. Improving infrastructure for temporary waste storage; action 22-Improving the condition of the Baldaran Spring pipeline). The status of implementation is included in the AWS plan.
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>		majorNC: no evidence for the moment concerning best practice for wastewater discharge. This NC was closed after the additional audit on the 21/02/2022. <ul style="list-style-type: none"> - Monitoring on the 3/12/2021 of the wastewater discharge points and river water. - Wastewater table with evaluation statement (see document 'таблица Отпадни води') - F03-GP07 Register of regulatory and other requirements_10.08.2021" was completed - Programme 2022 including twice a year a monitoring of the wastewater discharge and river water.

Clause	Details	Yes	No	Score	Comments/Evidence
3.5.	<i>Implement plan to maintain or improve the site's and/or catchment's Important Water-Related Areas.</i>				
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>		The actions linked to the most important Water related areas (IWRA) are listed in the AWS plan. There is a project for biodiversity monitoring in the spring area (BeeOmonitoring Project) Reforestration project is in progress (contract for donation is signed) – 10 dka of area inside the AWS catchment boundaries, affected by the fire.
3.6	<i>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.</i>				
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>		DEVIN JSC gives access to WASH for all workers on the plant. See evaluation of WASH (see document 'F02-ENVP01 Оценка на рисковете и възможностите за водите_Попълнен').
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>		The procedure GP07 includes the evaluation of the environmental legal compliance. This evaluation is realized on the F03_GP07 (v10/08/2021). No imping on the water right was identified. The Devin citizen has a water access (public network).
3.7.	<i>Implement plan to maintain or improve indirect water use within the catchment.</i>				
3.7.1. (core)	Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.	<input checked="" type="checkbox"/>	<input type="checkbox"/>		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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>		There is no significant water use of suppliers within the catchment.

Clause	Details	Yes	No	Score	Comments/Evidence
3.8	<i>Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have</i>				
3.8.1. (core)	Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.	<input checked="" type="checkbox"/>	<input type="checkbox"/>		See §2.4.1: There is a shared water related infrastructures (spring pipe). MajorNC: no evidence of enegagement for the moment. This NC was closed after additional audit on the 21/02/2022. <ul style="list-style-type: none"> - MINUTES of VIK Devin meeting (public water distribution company) - Protocole with VIK devin meeting
3.9	<i>Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.</i>				
3.9.1. (core)	Actions towards achieving best practice, related to water governance, as applicable, shall be implemented	<input checked="" type="checkbox"/>	<input type="checkbox"/>		The document Water Stewardship Plan includes actions in terms of water governance: <ul style="list-style-type: none"> - SPADEL conducted audits on the Devin plant in regard to the standard water facilities and action plan are realized - The modernization of the boreholes is planned in horizon 2025.
3.9.2. (core)	Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.	<input checked="" type="checkbox"/>	<input type="checkbox"/>		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:.
3.9.3. (core)	Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.	<input checked="" type="checkbox"/>	<input type="checkbox"/>		The Water Stewardship Plan includes action linked to the best practice for water quality: protection of the catchment in regard to the Modus Vivendi comitee. <ul style="list-style-type: none"> • Reduction of pollution risks • Management forest
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>		The Water Stewardship Plan includes action linked to the best practice for IWRA: protection of the catchment in regard to the Modus Vivendi comitee. <ul style="list-style-type: none"> • Reduction of pollution risks • Management forest
3.9.5. (core)	Actions towards achieving best practice related to targets in terms of WASH shall be implemented.	<input checked="" type="checkbox"/>	<input type="checkbox"/>		WASH is not a shared water challenge in Bulgaria, in the city of Devin and in the DEVIN JSC factory.

Clause	Details	Yes	No	Score	Comments/Evidence
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	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Performance against targets in the site's water stewardship plan are identified in Water Stewardship Plan: <ul style="list-style-type: none"> - global indicator in regard of the water related risk is not - Water use ratio is monitored periodically. MinorNC: DEVIN JSC has an indicator about the water quality risk (target: risk > 8 should be mastered), but it is not correctly calculated. This NC was closed after additional audit on the 21/02/2022. <ul style="list-style-type: none"> - The PI was updated (see document F02-ENVP01 Оценка на рисковете и възможностите за водите_Попълнен_Indicators).
4.1.2. (core)	Value creation resulting from the water stewardship plan shall be evaluated.	<input checked="" type="checkbox"/>	<input type="checkbox"/>		The water source, environmental and socio-economic impacts were evaluated (see document: REF 'Economic, environmental, and socio-economic impact of Devin JSE_2020_BG.docx'). OBS: the value creation should be evaluated each year.
4.1.3 (core)	The shared value benefits in the catchment shall be identified and where applicable, quantified.	<input checked="" type="checkbox"/>	<input type="checkbox"/>		The water source, environmental and socio-economic impact is evaluated. (see document: REF 'Economic, environmental, and socio-economic impact of Devin JSE_2020_BG.docx').
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>		The ISO 14001 data base for non-compliance includes the environmental incidents of the site: 1 incident in 2020 (fire outside the plant) including root cause analysis; no incident in 2021. minorNC: A written annual report did not include root-cause analysis and corrective action (incident on the site and outside the plant). This NC was closed after additional audit on the 21/02/2022. <ul style="list-style-type: none"> - The management review (see report on the 4/02/22) includes AWS system. No incident recorded in 2021

Clause	Details	Yes	No	Score	Comments/Evidence
4.3.	<i>Evaluate stakeholders' consultation feedback regarding the site's water stewardship performance, including the effectiveness of the site's engagement process.</i>				
4.3.1 (core)	Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.	<input checked="" type="checkbox"/>	<input type="checkbox"/>		<p>DEVIN JSC performed a survey in November 2020, but the survey does not include AWS performance.</p> <p>MajorNC: There is no evidence of consultation effort with stakeholders on the site's AWS performance with any feed-back. This NC was closed after additional audit on the 21/02/2022.</p> <ul style="list-style-type: none"> - A document 'Devin JCS AWS Action plan consultation and information Stakeholders 2021 PRESENTATION' was sent to the stakeholders including AWS performances - MINUTES of VIK Devin meeting
4.4.	<i>Evaluate and update the site's water stewardship plan, incorporating the information obtained from the evaluation process in the context of continual improvement.</i>				
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>		It will be reviewed on Surveillance audit.

Clause	Details	Yes	No	Score	Comments/Evidence
5	COMMUNICATE & DISCLOSE				
5.1	<i>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.</i>				
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>		The AWS statement includes a summary of the site governance in term of environment. It is published in the Spadel Web site.
5.2	<i>Communicate the water stewardship plan with relevant stakeholders.</i>				
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Major NC: No communication evidence of its AWS plan to the relevant stakeholders. This NC was closed after additional audit on the 21/02/2022. - A document 'Devin JCS AWS Action plan consultation and information Stakeholders 2021 PRESENTATION' was sent to the stakeholders including AWS plan. - See also MINUTES of VIK Devin meeting
5.3	<i>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.</i>				
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.	<input type="checkbox"/>	<input checked="" type="checkbox"/>		See the sustainable report 2020, included water ratio. Minor-NC: the site has not disclosed annually its performance against all AWS target. As the system is new, it is logical. It will be reviewed on Surveillance audit. The organization sent a document to the stakeholder ('Devin JCS AWS Action plan consultation and information Stakeholders 2021 PRESENTATION'). This document does not include all PI.
5.4	<i>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.</i>				
5.4.1. (core)	The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.	<input checked="" type="checkbox"/>	<input type="checkbox"/>		majorNC: The site's shared water-related challenges and efforts were not disclosed. This NC was closed after additional audit on the 21/02/2022. - A document 'Devin JCS AWS Action plan consultation and information Stakeholders 2021 PRESENTATION' was sent to the stakeholders including the share water challenge and efforts.

Clause	Details	Yes	No	Score	Comments/Evidence
					- MINUTES of VIK Devin meeting
5.4.2. (core)	Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.	<input checked="" type="checkbox"/>	<input type="checkbox"/>		<p>Interviews with the Head of the local water supply and Deputy Mayor of Devin Municipality proved that significant efforts has been made to engage stakeholders and provide support in water goveranance issues.</p> <p>MajorNC: No evidence for the moment about efforts made by the site to engage stakeholders and coordinate and support public-sector agencies.</p> <p>This NC was closed after additional audit on the 21/02/2022.</p> <ul style="list-style-type: none"> - "Devin JCS AWS Action plan consultation and information Stakeholders 2021 PRESENTATION; - MINUTES of VIK Devin meeting
5.5	<i>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.</i>				
5.5.1. (core)	Any site water-related compliance violations and associated corrections shall be disclosed.	<input checked="" type="checkbox"/>	<input type="checkbox"/>		The non compliances linked to water are identified. There are no compliance identified.
5.5.2. (core)	Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.	<input checked="" type="checkbox"/>	<input type="checkbox"/>		The incidents are recorded in the ISO 14001 database. No exemple of corrective actions to prevent future compliance violations are identified for the moment.
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>		<p>There are no compliance identified that may pose significant risk and threat to human or ecosystem health for the moment.</p> <p>The emergency plan includes the communication to the authorities in case of accident.</p> <p>There is a procedure in case of significant water related violations for communication with relevant public agencies - F01-GP06 Communication matrix</p>

7 AUDIT FINDINGS

A findings log was issued to DEVIN JSC 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. DEVIN JSC 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.

A remote meeting was organized on the 21/02/2022 to reviewed actions concerning the major non-conformances.

7.1 MAJOR NON CONFORMANCES

During the course of the audit, 9 major non-conformances were raised.

An additional audit review was organized on the 21/02/22 and all 9 major CAR were closed.

Table 3: list of major non-conformances raised during the AWS audit process

No.	Type	Ref.	Details	Response by DEVIN JSC (action plan)	Status (evaluation by SGS auditors 21/02/22)
1	Major NC	1.2.1	No records from stakeholder consultation were provided during the audit.	<p>Root cause: Stakeholders communication were performed by online tool without written signed document.</p> <p>Action:</p> <ol style="list-style-type: none"> 1. Complete Stakeholder Matrix 2. Identify who are the relevant stakeholder 3. Send a survey and making a report on the survey <p>Date: 25/01/22</p> <p>Responsible: PM/TG</p>	<p>OK major NC 121 is closed</p> <p>The organization made a stakeholder survey in December 2021: see report 'Обратна връзка от консултацията със заинтересованите страни през 2021'.</p> <p>The stakeholder matrix was updated: see document "F01_02_03_04-GP01 Контекст_Заинт. страни_Рискове_14.10.2021.</p> <p>A Meeting was also organized with the water public company VIK.</p>

2	Major NC	2.4.1	There are no evidences that the plan to mitigate identified water risks was developed or discussed with public sector and/or infrastructure agencies.	<p>Root cause: Provided evidence were in different documents integrated in the available IMS System.</p> <p>Action: 1. Action plan regarding water risk to develop</p> <p>2. Water risks Report to make and to send to relevant stakeholder</p> <p>3. Ask stakeholder feedback in the survey and include this feedback in the action plan</p> <p>Date: 25/01/22</p> <p>Responsible: PM/TG</p>	<p>OK_ major NC_241 is closed</p> <p>Water Risk and Opportunity Assessment was discussed with stakeholders. No real feed-back. "F02-ENVP01 Оценка на рисковете и възможностите за водите_Попълнен _ SHEET_ Анализ на рисковете;</p> <p>The organization made a stakeholder survey in December 2021: see report 'Обратна връзка от консултацията със заинтересованите страни през 2021'.</p> <p>A Meeting was also organized with the water public company VIK.</p>
3	Major NC	3.1.1	No evidence that the site has supported good catchment governance.	<p>Root cause: No written protocols from common activities were implemented in the operational system.</p> <p>Action: "Short process agreement for Be-Annual water supply infrastructure cleaning with Water supply Organisation will be developed and signed.</p> <p>Protocol with Description of the Good practices signed from both sites."</p> <p>Date: 25/01/22</p> <p>Responsible: PM/TG</p>	<p>OK_ major NC_311 is closed</p> <p>Protocol with Description of the Good practices signed from both sites.</p> <p>Protocole with the public company VIK.</p>
4	Major NC	3.4.2	No evidence for the moment concerning action to reach best practice concerning wastewater discharge.	<p>Root cause: Missing in the process for evaluation of the requirements valid for the production site</p> <p>Action: "Including in the register "" F03-GP07 Регистър нормативни и други изисквания_10.08.2021"" of evaluation of legal and all other requirements, evaluation and conclusion.</p> <p>Written protocols for Bi-annual monitoring of waste water discharged with conclusion."</p> <p>Date: 25/01/22</p>	<p>OK_ major NC_342 is closed</p> <p>Monitoring on the 3/12/2021 of the wastewater discharge points and river water.</p> <p>Wastewater table with evaluation statement (see document 'таблица Отпадни води')</p> <p>F03-GP07 Register of regulatory and other requirements_10.08.2021" was completed</p> <p>Programme 2022 including twice a year a monitoring of the wastewater discharge and river water.</p>

				Responsible: PM/TG	
5	Major NC	3.8.1	No Evidence of engagement, and the key messages relayed with confirmation of receipt for the owners of any shared water-related infrastructure (in this case the water public company).	<p>Root cause: No written protocols from common activities were implemented in the engagement initiatives.</p> <p>Action: The Only Shared water infrastructure is the Baldaran Pipe. A meeting is already set up with the water supplier and a bi annual water supply infrastructure cleaning process is ongoing. Minutes meeting will be provided.</p> <p>Date: 25/01/22</p> <p>Responsible: PM/TG</p>	<p>OK_ major NC_381 is closed</p> <p>MINUTES of VIK Devin meeting (public water distribution company)</p> <p>Protocole with VIK devin meeting</p>
6	Major NC	4.3.1	There is no evidence of consultation effort with stakeholders on the site's AWS performance with any feed-back.	<p>Root cause: In the available consultation approach with stakeholders is not included enough information regarding AWS performance</p> <p>Action: "Annual report with reviewd results achieved in water management will be prepared and communicated with the local Water supply company and local stakeholders.</p> <p>Written feedback will be requested.</p> <p>Moreover, A survey will be send to relevant stakeholder to receive feedback on action we did and we plan to do to tackle water risks"</p> <p>Date: 25/01/22</p> <p>Responsible: PM/TG</p>	<p>OK_ major NC_431 is closed</p> <p>A document 'Devin JCS AWS Action plan consultation and information Stakeholders 2021 PRESENTATION' was sent to the stakeholders including AWS performances.</p> <p>MINUTES of VIK Devin meeting</p>
7	Major NC	5.2.1	No communication evidence of its AWS plan to the relevant stakeholders.	<p>Root cause: AWS plan as separate document is missing because actions were part of other action plans related to Environmental MS.</p> <p>Action: AWS Action plan and shared challenges – one pager will be prepared for open communication with the relevant stakeholders and will be send by emails and published in the local newspaper.</p>	<p>OK_ major NC_521 is closed</p> <p>A document 'Devin JCS AWS Action plan consultation and information Stakeholders 2021 PRESENTATION' was sent to the stakeholders including AWS plan.</p> <p>See also MINUTES of VIK Devin meeting</p>

				Date: 25/01/22 Responsible: PM/DG	
8	Major NC	5.4.1	The site's shared water-related challenges and efforts were not disclosed.	<p>Root cause: AWS challenges and efforts as separate document are missing because actions were part of other action plans related to Environmental MS.</p> <p>Action: AWS Action plan and shared challenges – one pager will be prepared for open communication with the relevant stakeholders and will be send by emails and published in the local newspaper.</p> <p>Date: 25/01/22</p> <p>Responsible: PM/TG</p>	<p>OK_ major NC_541 is closed</p> <p>A document 'Devin JCS AWS Action plan consultation and information Stakeholders 2021 PRESENTATION' was sent to the stakeholders including the share water challenge and efforts. MINUTES of VIK Devin meeting</p>
9	Major NC	5.4.2	No evidence for the moment of efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.	<p>Root cause: No written protocols from meeting with the relevant stakeholders.</p> <p>Action: "AWS Action plan and shared challenges – one pager will be prepared for open communication with the relevant stakeholders and will be send by emails and published in the local newspaper. Survey monkey questionnaire will be sent. "</p> <p>Date: 25/01/22</p> <p>Responsible: PM/TG</p>	<p>OK_ major NC_542 is closed</p> <p>"Devin JCS AWS Action plan consultation and information Stakeholders 2021 PRESENTATION; MINUTES of VIK Devin meeting</p>

7.2 MINOR NON CONFORMANCES

12 minor non-conformances was raised during the audit process. DEVIN JSC sent an action plan to address it.

An additional audit review was organized on the 21/02/22 and 5 minor CAR were still open.

Table 4: Minor Non-Conformances raised during the AWS audit process

No.	Type	Ref.	Details	Response by DEVIN JSC (action plan)	Status (evaluation by SGS auditors)
1	Minor NC	1.2.1	Some stakeholders are missing in the document 'F04_GP01_Stakeholders identification': other water users (like Spa Hotel and Baldarian company,...); forest administration; .	Root cause: Detailed descriptions and contacts were missing in the AWS stakeholders document. Action: AWS stakeholder matrix to be updated Date: 25-11-21 Responsible: TG/AH	The minor NO_121 is closed. The AWS stakeholder matrix was updated to include the hotel and the Baldarian company (see document 'F01_02_03_04-GP01 Контекст_Заинт страни_Рискове_14.10.2021_ SEE Sheet_F04_GP01_Заинтер.стр.-води).
2	Minor NC	1.3.3	The water balance does not include waste water outflow. The data are available but in another document.	Root cause: Different people collected water balance data in different files The water balance file has to be improved to calculate a better water balance. Action: The water discharge volume will be included in the water balance file. Date: 19-11-21 Responsible: MG/AH/AC	The minor NO_133 is closed. The document 'Water use Devin 2015_2016_2017_2018_2019_2022 actual' was updated and includes the wastewater discharge volume.
3	Minor NC	1.3.4	annex of the contract for wastewater discharge. It is not clear how the organization has determined the suitable wastewater parameters to be monitored. The last test reports contain values of 6 parameters, since the BG Regulation #7, sets ELVs for total of 25 parameters. Furthermore, the wastewater from osmosis is not evaluated.	Root cause: Missing in the process for evaluation of the requirements valid for the production site Action: "Written protocols for Bi-annual monitoring of wastewater discharged, osmosis. Devin will be start to measure all 25 parameters according Regulation 7 in connection with waste water and osmosis Date: 23-11-21	The minor NO_134 is closed. "Written protocols for Bi-annual monitoring of wastewater discharged, osmosis. Devin will be start to measure all 25 parameters according Regulation 7 in connection with: - waste water - osmosis" "Programa 2022g; Monitoring was realized on the таблица Отпадни води"

				Responsible: AH/DTs	
4	Minor NC	1.3.4	For underground water and waste water, there is not always Excel tables to evaluate the results with limit values and summary the water quality evaluation.	<p>Root cause: Missing in the Annual Laboratory monitoring program</p> <p>Action: "Analyses will be added in Annual Laboratory monitoring program. The limits of waste water""s and underground water""s parameters will be added in table with measured values"</p> <p>Date: 25-11-21</p> <p>Responsible: DTs/AH</p>	<p>The minor NO_134 is still open.</p> <p>There is a table with wastewater analysis and comparison with the limit values.</p> <p>Програма 2022г; таблица Отпадни води</p> <p>The table contains data for 3 wastewater streams and 1 water sample from the river (surface water). The ELV in column B are applicable only to the wastewater discharged in the settlement sewage system (columns D&E), and not applicable to the other 3 water streams. There are different ELV set in the legislation for wastewater discharged directly into river (the other 2 waste water samples) and different limit values for the river water itself. Another limit values apply to the groundwater (which is not mentioned) in the attached table. There is a mistake in the allowed pH range (should be 6.5 – 9.0).</p> <p>→ So, the NC remains open.</p>
5	Minor NC	1.3.5	The map with water pollution risks on the site is not updated (for example, removed fuel station is still in this map).	<p>Root cause: Update of Map with water pollution risks was not part of Annual Groupe Audit.</p> <p>Action: Map with water pollution risks on the site will be updated</p> <p>Date: 25-01-21</p> <p>Responsible: AC</p>	The minor NC_135 is still open.
6	Minor NC	1.3.8	There is no formal document for WASH evaluation.	<p>Root cause: WASH was not part of ENV and Water Risk Assessm</p> <p>Action: In the F02-ENVP01 Оценка на рисковете и възможностите за водите_Попълнен Devin WASH availability and conditions will be evaluated;</p> <p>Date: 26-01-21</p> <p>Responsible: DTs/AH</p>	<p>OK The minor NO_138 is closed.</p> <p>The risk analysis includes the evaluation of WASH (see document ' F02-ENVP01 Оценка на рисковете и възможностите за водите_Попълнен')</p>

7	Minor NC	1.5.4	The quality of surface water (river) is not evaluated. There is a report from the authorities which includes the river quality evaluation, but the document was not yet evaluated by the company.	<p>Root cause: Annual report evaluation was not part of process of lega and other requirements and IMS Heandbook</p> <p>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</p> <p>Date: 25-01-21</p> <p>Responsible: AC</p>	<p>The minor NC_135 is still open.</p> <p>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 (see document 'таблица Отпадни води'). "Programa 2022g;</p> <p>But, the table contains data for 3 wastewater streams and 1 water sample from the river (surface water). The ELV in column B are applicable only to the wastewater discharged in the settlement sewage system (columns D&E), and not applicable to the other 3 water streams. There are different ELV set in the legislation for for the river water itself.</p> <p>So, the NC remains open.</p>
8	Minor NC	1.7.1	the water risk assessment matrix shall be reviewed and updated (final risk scores, responsibilities, etc.).	<p>Root cause: Lack of experience with specific AWS risk assessment;</p> <p>Action: The water risk assessment matrix will be updated with the Spadel Water resource Department</p> <p>Date: 26-01-21</p> <p>Responsible: TG/AH/DTs/AC</p>	<p>OK The minor NO_171 is closed.</p> <p>The document 'F02-ENVP01 Оценка на рисковете и възможностите за водите Попълнен_Indicatuers' was updated including risk score table and responsibilities.</p>
9	Minor NC	2.3.2	<p>the AWS plan does not include the actions from the risk assessment.</p> <p>The link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes are not included in the AWS plan.</p>	<p>Root cause: Lack of experience with specific AWS risk assessment;</p> <p>Action: The action plan will be updated</p> <p>Date: 26-01-21</p> <p>Responsible: TG/AH/DTs/AC</p>	<p>OK The minor NO_138 is still open.</p>
10	Minor NC	4.1.1	DEVIN JSC has an indicator about the water quality risk (target: risk > 8 should be maitrised), but it is not correctly calculated.	<p>Root cause: Lack of experience with specific AWS risk assessment;</p> <p>Action: The PI will be updated</p> <p>Date: 26-01-21</p> <p>Responsible: TG/AH/DTs/AC</p>	<p>OK The minor NO_411 is closed.</p> <p>The PI was updated (see document F02-ENVP01 Оценка на рисковете и възможностите за водите_Попълнен_Indicatuers).</p>

11	Minor NC	4.2.1	A written annual review report of the emergency incidents including root-cause analysis and corrective action is not available (incident on the site and outside the plant).	<p>Root cause: Annual rannual review report of the emergency incidents was not part ot process of lega and other requirements and IMS Heandbook</p> <p>Action: The evaliuation of emergency incidents and root-cause analysis and corrective actions will be included as part of annual management review and requirement documented in IMS Heandbook</p> <p>Date: 26-01-21</p> <p>Responsible: PM/TG</p>	<p>OK The minor NO_421 is closed.</p> <p>The management review (see report on the 4/02/22) includes AWS system. No incident recorded in 2021.</p>
12	Minor NC	5.3.1	The site has not yet disclosed annually its performance against all AWS target. As the system is new, it is logical. It will be reviewed on Surveillance audit.	<p>Root cause: The site has not yet disclosed annually its performance against all AWS target. As the system is new.</p> <p>Action: AWS performance against all PI and KPI defined in the water stewardship strategy has to be evaluated and communicated to relevant stakeholders.</p> <p>Date: 26-01-21</p> <p>Responsible: AC/PM</p>	<p>The minor NC_531 is still open.</p> <p>The organization sent a document to the stakeholder ('Devin JCS AWS Action plan consultation and information Stakeholders 2021 PRESENTATION').</p> <p>This document does not include all PI.</p>

7.3 OBSERVATIONS

9 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 5: Observations and New Information Requests raised during the AWS audit process

No.	Type	Ref.	Description	Relevant References
1	Observation	1.1.1	The map 'AWS_Scope Devin' should be clearer considering the limit (make a zoom on the AWS scope limit) and includes all piping.	
2	Observation	1.3.1	The Emergency plan, ver. 03 29.06.2021 covers identification of possible emergency situations and defines response actions inside site boundaries only.	
3	Observation	1.3.2	The map with the water balance should cover the water for the bottle cleaning (for the moment is not monitored).	
4	Observation	1.3.3	The water efficiency index is not calculated. It is planned by the company.	
5	Observation	1.3.4	The waste water sample should be taken by the laboratory.	
6	Observation	1.5.5	The map with the IWRA should include the area affected by the fire.	
7	Observation	1.7.2	Some actions in the table sheet 'F02_EnvP01.xlsx' are not clearly defined (there are not opportunities).	
8	Observation	3.3.2	There are low risks of water scarcity, but the document of Spadel which evaluate the scarcity risk should be corrected.	
9	Observation	4.1.2	The value creation of the AWS plan should be evaluated each year.	

8 SUMMARY

In reviewing the body of evidence presented by DEVIN JSC, 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.

Following the additional review on the 21 February 2022, five minor non-conformances has been identified. An action plan is presented to solve these five non-conformances.

9 OPPORTUNITIES FOR IMPROVEMENT

The certification audit for DEVIN JSC 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.

In regard to the certification of other Devindel plants, it would be interesting to improve the documentation of the system (in particular, for the step 1:).

10 CONCLUSIONS AND RECOMMENDATIONS

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

May 19, 2022

**[ALLIANCE FOR WATER STEWARDSHIP ASSESSMENT
REPORT_DEVIN]**

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