

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)



Audit Number: AO-000205

SITE DETAILS

Site: **Nestlé Waters UK, Buxton Factory**
Address: Waterswallows Lane, Fairfield, SK17 7JD, Buxton, UNITED KINGDOM
AWS Reference Number: AWS-000111
Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: **Certified Platinum**
Date of certification decision: 2022-Jun-30
Validity of certificate: 2024-Mar-09

AUDIT DETAILS

Audited Service(s): AWS Standard v2.0 (2019)
Audit Type(s): Surveillance Audit1
Audit Start Date: 2022-Mar-01
Lead Auditor: Claudia M. Jaime
Audit team participants:
Tanya Christensen, Local Auditor
Site Participants:
Lydia Yates, Water Resources Manager
Matthew Ryan, Water Resources Manager
Hayley Lloyd House, Head of Corporate Affairs & Sustainability
Penny Crookshank, Sustainability Manager
Jez McInerney, Factory Manager

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ADDITIONAL INFO

Summary of Audit Findings: A total of 10 findings were identified during the surveillance audit: 1 major non-conformity, 2 minor non-conformities, 7 observations. The client is requested to address all non-conformities by 18/05/2022 by undertaking a root cause analysis and elaborating a corrective action plan to resolve the issue. The major non-conformity must be satisfactorily closed out within three months from the date of this report. The minor non-conformities must be closed out by the time of the next surveillance audit.

CLOSURE OF FINDINGS AND CERTIFICATION:

All non-conformities (1 major NC, 2 minor NCs) have been successfully closed out.

WSAS has approved the certificate transfer and has issued a WSAS certificate confirming Nestle Waters UK, Buxton Factory's conformance with the AWS International Water Stewardship Standard v 2.0 to Platinum Level.

The certificate validity date remains the same as the Site's original certificate, at 09 March 2024.

Scope of Assessment: The scope of services covers the surveillance audit for assessing conformity of Nestlé Waters Buxton Factory against the AWS International Water Stewardship Standard Version 2.

Nestle Waters UK produces Natural Mineral Water and Spring water in their Buxton bottling factory in the Derbyshire county. A new spring source, also recognised as Natural Mineral Water, was recently acquired by Nestlé Waters UK. This spring, known as Rockhead Spring (RHS), is located 3 km SE from the existing factory and discharges into the River Wye. In accordance with the license requirements, groundwater is pumped from a compensation borehole (Staden Lane) when the water level is too low in the river (Groundwater resource assessment for Rockhead Spring – Buxton, pp. 11). This audit included the visit to the Site's water sources, the production site and storage area.

The natural mineral water and spring water produced by the Nestle Buxton Plant is obtained from three water sources: St. Ann's Spring is an artesian hot spring located in downtown Buxton; the second source of water for the factory comes from wells located in the Lightwood watershed; the third source, Rockhead Spring (RHS), is located 3 km SE of the factory

The regional landform is characterised mostly by rounded hills, plateaus, valleys, limestone gorges and gritstone escarpments. The area is mostly rural outside relatively small urban centres. Several limestone quarries are located around Buxton (Groundwater resource assessment for Rockhead Spring – Buxton, pp. 13).

The audit was conducted onsite on 1-3 March 2022.

The onsite visit included the assessment of 3 water sources, which included the wells (protected) facilities. The audit team also had the opportunity to observe a community volunteer team working on updating a fence and putting new signs on an IWRA, and to visit their production area as part of the audit.

SCORE

105.00

FINDINGS

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NUMBER OF FINDINGS PER LEVEL	
Observation	7
Minor	2
Major	1

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FINDING DETAILS

Finding No: TNR-000427

Checklist Item No: 1.4.2

Status: Closed

Finding level: Minor

Checklist item: The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.

Findings: The site has provided a list of suppliers that are located in the same catchment area. Among them they have selected a few who service their facilities and have requested information about their water use. The information provided by the supplier does not include water use directly related to the provision of the services to the site. The other two service providers have not responded to the Site's questionnaire.

Corrective action: Put plan in place to review indicator and guidance to answer question in an alternative way.

We have further developed the 'vendor with SK postcode' spreadsheet already provided as evidence for this indicator which now demonstrates and evidences our updated response to this indicator.

Updated spreadsheet to be submitted on WSAS platform titled: 'vendors with SK postcode – indirect water usage' with new additional ref document uploaded 'Indirect water use note PCS'

The Audit Report refers to 2020 Correspondence emails – please refer to the 2021 Correspondence emails that were uploaded into the Buxton – Alliance for Water Stewardship SharePoint site (Documents>_Step 1 Gather and Understand>1.4.2 Indirect Water Use > Correspondence > 2021)

The embedded water use of suppliers within the catchment is minimal and therefore negligible.

Finding No: TNR-000428

Checklist Item No: 1.4.3

Status: Open

Finding level: Observation

Checklist item: Advanced Indicator

The embedded water use of primary inputs in catchment(s) of origin shall be quantified.

Findings: No evidence was provided by the site to suggest that the embedded water use has been quantified. The indicator requires that the site quantifies the water embedded in their primary inputs (>5% of the total weight of goods produced by the site, or that represent more than 5% of the costs. An input below this criterion, but still dependent on significant water use, should be included as a primary input) from their catchments of origin. This could include labels, caps and preforms, glass, aluminium for water bottling.

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Finding No:	TNR-000425
Checklist Item No:	2.1.1
Status:	Open
Finding level:	Observation
Checklist item:	<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.
Findings:	NW Buxton have a signed and publicly disclosed 'Together, we care for water' statement for the factory site on show. Some of the commitments stated in Indicator 2.1.1. are not included in that statement.
Finding No:	TNR-000430
Checklist Item No:	3.3.2
Status:	Open
Finding level:	Observation
Checklist item:	<p>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.</p>
Findings:	NW Buxton get live data from the Derby St Mary's monitoring station and are able to anticipate when scarcity will be an issue and either instigate flow restrictions or use the Portobello Compensation point. The site should ensure that sufficient evidence is collected to support the actions taken relating to the above.
Finding No:	TNR-000431
Checklist Item No:	3.6.1
Status:	Open
Finding level:	Observation
Checklist item:	<p>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.</p>
Findings:	Access to safe drinking water and sanitation facilities was observed, but NWB have not quantified the provision for the site, or per employee.

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Finding No: TNR-000452
Checklist Item No: 3.7.1
Status: Closed
Finding level: Major
Checklist item: Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.
Findings: To date indirect water use has not been quantified and no targets have been set.
Corrective action: Put plan in place to review indicator and guidance to answer question in an alternative way.

We have further developed the 'vendor with SK postcode' spreadsheet already provided as evidence for this indicator which now demonstrates and evidences our updated response to this indicator.

Updated spreadsheet to be submitted on WSAS platform titled: 'vendors with SK postcode – indirect water usage' with new additional ref document uploaded 'Indirect water use note PCS'

The Audit Report refers to 2020 Correspondence emails – please refer to the 2021 Correspondence emails that were uploaded into the Buxton – Alliance for Water Stewardship SharePoint site (Documents>_Step 1 Gather and Understand>1.4.2 Indirect Water Use > Correspondence > 2021)

Indirect water use within the catchment is minimal and therefore negligible.

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Finding No: TNR-000453
Checklist Item No: 3.7.2
Status: Closed
Finding level: Minor
Checklist item: 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.
Findings: The site has identified its service providers in the catchment. However, no evidence was provided regarding their engagement with the service providers and any actions taken related to indirect water use.
Corrective action: Put plan in place to review indicator and guidance to answer question in an alternative way.

We have further developed the 'vendor with SK postcode' spreadsheet already provided as evidence for this indicator which now demonstrates and evidences our updated response to this indicator.

Updated spreadsheet to be submitted on WSAS platform titled: 'vendors with SK postcode – indirect water usage' with new additional ref document uploaded 'Indirect water use note PCS'

The Audit Report refers to 2020 Correspondence emails – please refer to the 2021 Correspondence emails that were uploaded into the Buxton – Alliance for Water Stewardship SharePoint site (Documents>_Step 1 Gather and Understand>1.4.2 Indirect Water Use > Correspondence > 2021)

Indirect water use within the catchment is minimal and therefore negligible.

Finding No: TNR-000472
Checklist Item No: 3.7.3
Status: Open
Finding level: Observation
Checklist item: Advanced Indicator
Actions taken to address water related risks and challenges related to indirect water use outside the catchment shall be documented and evaluated.
Findings: Actions taken to address water related risks and challenges related to indirect water use outside the catchment have not been documented and evaluated.

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Finding No:	TNR-000473
Checklist Item No:	3.9.13
Status:	Open
Finding level:	Observation
Checklist item:	Advanced Indicator Evidence of the quantified improvement that has resulted from the collective action relative to a site-selected baseline date shall be identified and evidence from an appropriate range of stakeholders linked to the collective action (including both those implementing the action and those affected by the action) that the site is materially and positively contributing to the achievement of the collective action shall be identified.
Findings:	Although there is ample evidence of collective projects being undertaken and new initiatives being taken forward, there is little quantified evidence on the impact of all these significant projects.
Finding No:	TNR-000474
Checklist Item No:	5.3.3
Status:	Open
Finding level:	Observation
Checklist item:	Advanced Indicator Benefits to the site and stakeholders from implementation of the AWS Standard shall be quantified in the organization's annual report.
Findings:	The Site has not quantified the specific benefits from implementation of the AWS Standard (not included in their annual report).



Signature WSAS

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Report Details

Report	Value
Report prepared by	Claudia Mendez Jaime
Report approved by	Lisa Seufert
Report approved on (Date)	14/04/2022

Surveillance

Proposed date for next audit
2023-Mar-01

Comment WSAS conducted the site's first on site audit.

Stakeholder Announcements

Date of publication	Location
Comment Not applicable as this was a Surveillance audit.	
Comment	

Catchment Information

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Surrounded by the Peak District National Park, Buxton is a spa town situated near the headwaters of the River Wye and is renowned for its thermal waters. Buxton is a historic Spa town, since the Romans developed the first spa, Aquae Arnemetiae, 2000 years ago. Buxton mineral water has been bottled since the 1850's, with Nestle Water starting production at Buxton in 1992, relocating to a modern production site at Waterswallows to the North of Buxton in 2012

Natural Mineral Water and Spring Water are sourced from two unique sources. St. Ann's (the source of Buxton Natural Mineral Water) is an artesian thermal spring rising in the centre of Buxton, with the Lions Head fountain accessible by the public. This is located outside of the underground spring chamber, by the Crescent Hotel. Lightwood (the source of Nestlé Pure Life Spring Water) is a well-protected catchment to the north west of the town, with water abstracted through boreholes drilled deep within the folded geology. NW own a third source, known as Rockhead, which is an artesian spring issuing naturally from the limestone of the Wye Valley. This source is not currently being used for production. Nestle owns significant land around both Lightwood and Rockhead and have environmental improvement plans in place for both sites and the factory site.

Water withdrawals: NW have abstraction licenses with the Environment Agency (EA) in place for Lightwood and Rockhead Spring. High Peak Borough Council own St Ann's well and hold the abstraction license; the bottling of BUXTON natural mineral water is done so under license and long term agreement with HPBC. NW also discharge from two compensation sources at Portobello and Staden Lane within the catchment.

Water discharge

Surface water run-off and excess water from the storage tanks is discharged to the infiltration pond on site, the former passes through an oil-water separator beforehand. Water discharged to the pond will infiltrate the ground, evaporate or discharge via a culvert. All other wastewater discharges including trade effluent and foul water are sent to foul sewer and trade effluent passes through a pH balancing tank before discharge. Wastewater is monitored at the discharge points in line with company and regulatory compliance standards. The only chemicals used on-site are for Cleaning in Place (CIP) of water pipes related infrastructure and for pH balancing of the waste water prior to discharge.

Cultural Value:

Buxton's Well Dressing is an ancient custom celebrated mainly in limestone districts of the Peak District in Derbyshire. Thought to date back to Roman and Celtic times when communities would dress wells to give thanks for fresh water supplies. The tradition continues today in many towns and villages between May and September each year. Buxton's Well Dressing and Carnival is celebrated each year during the first two weeks of July, in 2020 it was 180 years since the tradition first started in Buxton. Reference: www.buxtonwelldressing.co.uk



NW Buxton site and catchment overview.png

Client Description and Site Details

Client/Site Background

Nestle Waters built the new bottling factory in 2012 at Waterswallows Lane, Green Fairfield in Buxton (SK177JD) in the United Kingdom. There are 5 bottling lines in the factory.

The site has a permit in place with the Environment Agency, but no longer discharges any foul water or trade effluent. This is now discharged into the sewers after passing through a pH balancing tank and treated at the River Authority's water treatment plan. Surface water run-off and excess water from the storage tanks is discharged to the infiltration pond on site, the former passes through an oil-water separator beforehand. Water discharged to the pond will infiltrate the ground, evaporate or discharge via a culvert. NW are building a nature reserve site around the factory building and are developing a volunteering plan for staff, whereby they can volunteer to work on environmental projects around the site. NW have completed construction of a new warehouse onsite and have planted 1000 tree saplings around the building in this reserve. NW have been working with 2 volunteer ecologists and conservationists from the local community who are passionate in helping Nestle Waters develop a site environmental improvement plan for the nature reserve, which has resulted in six separate volunteering packages of work to date.

Summary of Shared Water Challenges

Summary of Shared Water Challenges

Large sections of the River Wye Valley downstream of Buxton are protected by UK and EU environmental legislation, and water quality thresholds have been assigned to safeguard the habitats of endangered species. A robust local planning policy is in place, in addition to the new Supplementary Planning Document, which aims to minimise the impacts of pollution on the catchment. A large Source Protection Zone is in place to the south of Buxton, ensuring that proposed development within the area is subject to stringent controls to protect the Natural Mineral Water resources of the area. Nestlé Waters is actively engaged with local stakeholders on the long-term preservation of water and the environment in the Buxton area.

The site has identified shared challenges in the catchment:

1. Nutrient Load in the River Wye from waste water and diffused sources. There are efforts underway in Buxton for a reduction of phosphate loads in the River Wye to improve the condition of the Special Protection Area (SPA).
2. Climate Change/Extreme Weather Events. Potential projects involving Natural Flood Management (NFM) are being developed, such as peat land restoration at Lightwood.
3. Water Loss from Peat Moorlands. Work is being done to improve the water retention on the moorlands.
4. Summer Water Scarcity in River Derwent Catchment. Despite the Wye catchment receiving on average 1,000 mm of annual rainfall, there is no water available for additional licensing from groundwater and surface water bodies.
5. Hydrological Regime of the River Lathkill. The river flows declines substantially along its length, which is due to mine drains (known as soughs) that were constructed in the 18th and 19th century to drain water from the mine workings.
6. Pesticides in Surface Water Catchment. Large parts of the Upper Derwent are now Surface Water Safeguard Zones, due to the presence of metaldehyde, 2-4D and MCPA in raw water intakes at water treatment plants.
7. Loss of native Species / Spread of Invasive Species. Native Crayfish species have been all but lost, due to the presence of Signal Crayfish.
8. Dewatering activities of extractive industries. Buxton has large limestone quarries some of require major dewatering operations.

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0.1 General Requirements for Single Sites, Multi-Sites and Groups	
0.1.1	<i>Eligibility Criteria</i>
0.1.1.1	<i>The site(s) occupy one catchment OR an exception has been granted.</i>
Comment	The Nestle Water Buxton site sits within a single water catchment area, all three water sources are located within it.
0.1.1.2	<i>The scope of the proposed certification shall be under the control of a single management system.</i>
Comment	The site is managed under a single site-based management system, covering the Nestle Waters Buxton factory.
0.1.1.3	<i>The scope of the proposed certification shall be homogeneous with respect to primary production system, water management, product or service range, and the main market structures.</i>
Comment	The site's primary production system, water management, product or service range, and the main market structures are homogeneous.



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1 STEP 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	<p><i>The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including:</i></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. <p>Comment Natural Mineral Water and Spring Water are sourced from two unique sources. St. Ann's (the source of Buxton Natural Mineral Water) is an artesian thermal spring rising in the centre of Buxton, with the Lions Head fountain accessible by the public. This is located outside of the underground spring chamber, by the Crescent Hotel. Lightwood (the source of Nestlé Pure Life Spring Water) is a well-protected catchment to the north west of the town, with water abstracted through boreholes drilled deep within the folded geology. NW own a third source, known as Rockhead, which is an artesian spring issuing naturally from the limestone of the Wye Valley. This source is not currently being used for production. Nestle owns significant land around both Lightwood and Rockhead and have environmental improvement plans in place for both sites and the factory site. The site has submitted a catchment map including geology, habitats and their piping network.</p>
1.2	<i>Understand relevant stakeholders, their water related challenges, and the site's ability to influence beyond its boundaries.</i>
1.2.1	<p><i>Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall:</i></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.



Yes



Yes

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Comment

The Buxton site operates a 'Community Relations Process 3.0' tool, which is similar to the Water Stewardship Plan in structure, containing 5 steps: Stakeholder Mapping, Self-Assessment, External Diagnosis, Action Plan, Impact Assessment. The tool is used to identify and understand relevant stakeholders, their challenges and the ability to influence beyond the boundaries of the site. The CRP Action Plan focusses on addressing water-related challenges and NW Buxton reports back quarterly on progress towards initiatives across stakeholder groups. Reporting for Q4 2021 included: 2 UK Water Regeneration Projects submitted to ESG Steering Committee for approval (Comb Moss Peat Restoration and NFM/River Ecclesbourne Restoration), plans for co-hosting a 'Shared Water Challenge' workshop with a range of stakeholders are progressing now that the COVID-19 pandemic restrictions are easing.

NW provided WSAS with a 'Stakeholder Consultation List', which lists 'Internal Stakeholders' i.e., NW staff involved in the water stewardship process, as well as 'External Stakeholders & CRP Category', listing the organisation, role and name. WSAS sampled a number of stakeholders from the list, for NW to arrange a stakeholder interview with during the audit. WSAS reviewed both the emails and stakeholder interview letters that were issued prior to the audit.

NW conducted Local Acceptability Surveys in 2020 and 2021, using an external market research company 'FW Market Research'. WSAS queried whether the company is certified against ISO 20252:2019 'Market, opinion and social research, including insights and data analytics' as this would underpin the trustworthiness of the survey outcomes. For the 2021 survey the company surveyed 110 local residents living in and around Buxton, posing 7 questions, including one on 'the way the factory manages water resources'.

NW Buxton operate a 'Stakeholder Engagement Plan' (SEP) and WSAS reviewed the 'SEP Water Stewardship Tracker' spreadsheet for 2021, which records all engagement activities with stakeholders. It records: date of engagement, stakeholder, position, organisation, method of engagement, topic discussed/outcome and next steps. WSAS observed regular interactions with key catchment stakeholders, recording progress towards joint water-related challenges.

NW Buxton provided WSAS with a 'Correspondence -2020' folder to demonstrate how the site interacted and consulted with catchment stakeholders in 2020 on a range of initiatives. There were correspondence folders for the following stakeholders: Buxton Crescent Heritage Trust, Crescent Hotel, Derbyshire Wildlife Trust - Catchment Partnership, Derbyshire Wildlife Trust - Land Management, Environment Agency - Flood Mitigation, Environment Agency - Phosphates, HPBC - Source Protection Zone, natural England - Catchment Sensitive Farming, Natural England - Lightwood, Rivers Trust, Severn Trent Water - STEPS and the Shared Water Challenges Forum.

WSAS observed and reviewed evidence of interactions with stakeholders across the catchment, and participation in initiatives that address a spectrum of water related challenges.

1.2.2

Current and potential degree of influence between site and stakeholder shall be identified, within the catchment and considering the site's ultimate water source and ultimate receiving water body for wastewater.



Comment







The 'Community Relation Process' (CRP) tool is used to structure and manage stakeholder relationships. Each year a new action plan is set, with objectives, on the back of the feedback received on the previous year's plan.

NW Buxton have mapped the degree of influence between the site and stakeholders, and have also mapped the power of stakeholders at the catchment level. WSAS reviewed both and it contains all relevant stakeholders that are also listed in the CRP. NW Buxton have not only undertaken the mapping (numerical) but have also developed the CRP tool that records the method of influence with stakeholders, including: partner, involve, consult, inform and reciprocate.

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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	<i>Existing water-related incident response plans shall be identified.</i>	 Yes
Comment	The site presents a file with extracts from the water-related risk plan. During the tour of the IWRA, some of these risks were mentioned. The document identifies all possible risks and the procedures to be used when any of them occur.	
1.3.2	<i>Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped</i>	 Yes
Comment	The Site has provide a mapped water balance, including inflows, losses, storage, and outflows. The Site has a tank to regulate and monitor the pH of their effluents. Their map also includes the IWRA. The site provides adequate sanitary services, all employees have access to bottled water and the hygiene conditions include sanitation with spray masks, clothes and glasses (production).	
1.3.3	<i>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.</i>	 Yes
Comment	The site presents information on: water balance, inflows, losses, storage and outflows, including an indication of the annual variation in water use rates. It describes the mechanisms put in place by the Environmental Agency to ensure Abstractions from the Site do not exceed annual availability.	
1.3.4	<i>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.</i>	 Yes
Comment	The site presents evidence on the water quality of each of its water sources and effluents. The site undertakes ongoing water quality monitoring and presents evidence with data from 2012 to 2022. Analysis has identified high ortho-phosphate values in samples from the River Wye, the evidence includes average and maximum values for this parameter from the source of the River Wye to the River Derwent.	
1.3.5	<i>Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.</i>	 Yes
Comment	The Site has participated in water quality monitoring at the catchment level. During the monitoring they identified elevated orthophosphate values, which have been monitored from the source of the River Wye to the River Derwent. One of the graphs presented includes a list of potential sources of pollution.	
1.3.6	<i>On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.</i>	 Yes

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Comment	<p>The site has defined 2 IWRA and has 2 conservation plans, including conservation. The site presents the documents:</p> <p>1.3.6 Cowdale Quarry and Grasslands Ecological Evaluation and Recommendations for future management Nov 2019.</p> <p>1.3.6 Lightwood Ecological Evaluation and Recommendations for future management Nov 2017:</p> <p>1.3.6 Cowdale Management Plan 2021 – 2030 This is the management plan for the IWRA that aims to provide a basis, justification and guidance for management activities on the site that will enable. The plan provides a detailed assessment of the site and the management approaches available.</p> <p>The site produced a Google Earth file in which the location of the IWRAs can be identified in relation to the factory.</p> <p>A groundwater source protection zone was defined by the Environment Agency. The part of the land closest to the River Wye is in Flood Zones 2 and 3.</p> <p>To the north-west of Buxton are Lightwood and Lightwood Reservoir, owned by Nestlé Ltd. These areas include a range of different semi-natural habitats.</p> <p>Both documents present actions to be taken.</p>	
1.3.7	<i>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.</i>	 Yes
Comment	<p>The site presents information for the year 2020 with the following categories:</p> <p>1) Water RELATED COSTS</p> <p>2) Water RELATED REVENUES</p> <p>3) Water shared value creation</p> <p>The site has not produced the financial cost analysis for 2021. The site made the following comment: "The data is for 2020 as our accounts are released in September each year so 2021 is not yet finalised - hence the 2020 data."</p>	
1.3.8	<i>Levels of access and adequacy of WASH at the site shall be identified.</i>	 Yes
Comment	All employees have adequate access to drinking water on bottles the sites has enough sanitary facilities, and it was clear that during the pandemic the sanitary measures have increase they have masks, sanitizers. During the visit to the plant it was strict to wear special clothes and shoes to protect the production area.	
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	<i>The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be identified.</i>	 Yes
Comment	There is no embedded water use from primary inputs within the site's catchment.	
1.4.2	<i>The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.</i>	 No
Comment	The Site has submitted as evidence two emails sent in Nov 2020 and the answer to a series of questions dated Nov 2020. Also one response from the same service provider form 2021. The enquiry made by the site to their suppliers about embedded water refers to their general internal water use (sanitary, toilet and drinking water), which does not meet to the intent of this indicator.	
Finding No: TNR-000427 Due date:2023-Mar-03		
1.4.3	<i>Advanced Indicator The embedded water use of primary inputs in catchment(s) of origin shall be quantified.</i>	 Obs.

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Comment The site has provided a purchase order with a request from Nestlé. However, the indicator asks them to quantify the water embedded in their primary inputs (>5% of the total weight of goods produced by the site, or that represent over 5% of the costs. An input below this criterion, but still dependent on significant water use, should be included as a primary input) from their catchments of origin. This could include labels, caps and preforms, glass, aluminum for water bottling.

1.5 *Gather water-related data for the catchment, including water governance, water balance, water quality, Important Water-Related Areas, infrastructure, and WASH*

1.5.1 *Water governance initiatives shall be identified, including catchment plan(s), water-related public policies, major publicly-led initiatives under way, and relevant goals to help inform site of possible opportunities for water stewardship collective action.*



Comment The NW Buxton site demonstrated a thorough understanding of the water governance structure that the site and catchment sits within. The water governance structural hierarchy is as follows:

1. River Basin District
2. Management Catchment
3. Operational Catchment
4. Water Body

NW Buxton have mapped how the structures are aligned with the requirements of the Water Framework Directive, across the classifications of groundwater and surface water. Each water body has also been allocated a risk status and NW Buxton has provided links to the relevant data sources.

There are 10 River Basin Districts in England and the Buxton site is within the Humber River Basin District. Links were provided to the most recent River Basin Management Plan, listing significant water management issues within the RBD. There are 18 Management Catchments within the Humber RBD, and the Buxton site is within the Derwent Derbyshire Management Catchment. The catchment partnership is hosted by the Derbyshire Wildlife Trust, and water abstraction licensing is managed by the Environment Agency. There is currently no water available for new licensing from either groundwater or surface water in the licensing area.

There are 3 Operational Catchments within the Derwent Derbyshire Management Catchment and the Buxton factory is within the Derwent Upper - Derbyshire Operational Catchment. These catchments are used to group WFD waterbodies together for the purpose of economic appraisal. There are 26 waterbodies within the Derwent Upper - Derbyshire Operational Catchment and the Buxton factory and all of its water sources are within the Wye from Source to Monk's Dale water body catchment (WFD:nGB104028058460).

NW Buxton provided WSAS with a breakdown of: catchment plans, public bodies, projects and opportunities. These were split down into:

1. National/Public Initiatives e.g., Environment Agency -Restoring Sustainable Abstraction Programme.
2. Water Utility Documents e.g., Severn Trent Water - Water Resource Management Plan 2019.
3. Local Government Documents e.g., High Peak Local Plan 2016.
4. NGOs and Initiatives e.g., The Catchment Based Approach (CaBA) www.catchmentbasedapproach.org




Overall, NW Buxton have collated significant information on and are an active stakeholder in numerous water governance initiatives. This is further demonstrated in a number of public company reports, such as:

1. Nestle Commitment to Water Stewardship
2. Nestle Creating Shared Value Report
3. Nestle Corporate Business Principles

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1.5.2	<i>Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.</i>	 Yes
Comment	<p>NW Buxton supplied WSAS with a summary of all Abstraction Licenses held, which are 5 in total. Two of them: Staden Lane (03/28/39/0079/1/RO1) and Portobello (03/28/39/0011) are for Compensation, although Staden Lane also has some Industrial Bottled Water. The main source licenses are Rockhead (03/28/39/0026/RO1), Lightwood (03/28/39/0111/RO1) and Buxton (3/28/39/66/G). The License Conditions for all five sources are clearly listed.</p> <p>High Peak Borough Council (HPBC) owns the St. Ann's Spring abstraction licence and NW have an abstraction agreement in place with HPBC. The Crescent Hotel in Buxton also utilises water from the thermal springs, under a separate HPBC abstraction licence, however there is an agreement to share water with the hotel in low flow conditions from St. Anns spring</p> <p>The Applicable water related legal and regulatory requirements are listed across: European Legislation, National Policy (England) and Local Policy (Derbyshire). Please refer to the '1.5.2. Regulatory Context' powerpoint for additional detail.</p>	
1.5.3	<i>The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.</i>	 Yes
Comment	<p>NW Buxton are interacting with relevant water-related stakeholders in the catchment and have access to catchment level data. A simplified water catchment balance has been captured in the 'Buxton 3D Water Diagram' listing the primary inputs and withdrawals from the catchment. The Inputs have been identified as: rainfall, discharge into catchment, evapotranspiration (ETP) and runoff. The catchment has a positive water budget of +14.63Mm3/year. The actual situation is more complex than the simplified calculation, owing to the effect of stream sinks, deep drainage and cross-catchment water movement through karstic geology.</p> <p>NW Buxton supplied two reports to support this criteria; the Lightwood Sustainability Assessment and the Rockhead Spring - Groundwater Resource Assessment. The Lightwood report contains a water balance summary for the source, outlining the source specific inputs, outputs and the balance of inputs and outputs with abstraction in place. The Rockhead Spring report is the only supporting evidence that gives an indication of annual variance in the water balance</p> <p>The water-balance for the site is readily available, with supporting documentation.</p>	
1.5.4	<i>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.</i>	 Yes
Comment	<p>NW Buxton provided WSAS with a Google Earth KMZ file, which has mapped the Environment Agency monitoring locations within the catchment. The file 'EA SW Monitoring Locations (Wye & Tribs)' contains location links, that take you through to the EA's monitoring data for that location. Providing water quality data as well as a site level classification. The reader is able to download the monitoring site data (CSV) for each catchment monitoring location.</p> <p>The following link, will also take you through to the Environment Agency's Catchment Data Explore, for the Water Body that the Buxton factory is located within:</p> <p>Link: https://environment.data.gov.uk/catchment-planning/WaterBody/GB104028058460</p> <p>NWB in addition, provided a range of WQ data spreadsheets for the Sources, River Wye and their Effluent data.</p>	

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1.5.5	<i>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.</i>	 Yes
Comment	<p>NW Buxton have identified and mapped the two Important Water Related Areas within the catchment. These are:</p> <ol style="list-style-type: none"> 1. The River Wye Valley 2. Buxton Mineral Water SPZ <p>NW Buxton have assessed both IWRA's and provided a summary of the two sites in the '1.5.5. IWRA's' powerpoint presentation, which outlines the following aspects: Importance/Value, Statutory Designations, Summary, Condition and Risks/Threats. NW Buxton have demonstrated a satisfactory understanding of the IWRA's within their catchment, including any threats to people and the natural environment.</p>	
1.5.6	<i>Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.</i>	 Yes
Comment	<p>Severn Trent Water are responsible for public water supply management and wastewater treatment and disposal in the catchment. This includes investment in new and maintenance of water and wastewater related infrastructure. The 'Severn Trent Water Resource Management Plan' (WRMP) is a 25 year plan for managing impacts of droughts, environmental obligations and climate change, on the supply and demand balance. Please find the main narrative of the WRMP attached, without the supporting data tables.</p> <p>The Water Act (2003) made it a statutory requirement for water companies, such as Severn Trent Water, to produce and maintain a Drought Plan every five years. This sets out how Severn Trent will manage the resources and supply system during dry and drought years, whilst balancing the interests of customers, the environment and the wider economy. Please follow the link for the Drought Plan: www.severntrent.com/about-us/our-plans/</p> <p>Severn Trent are also responsible for delivering an 'Asset Management Plan' for 2020-2027- and a 'Drainage and Waste Water Management Plan' (DWMP). Links to the plans can be found in the '1.5.6 Catchment Water Related Infrastructure' PP supplied by NW Buxton as evidence.</p>	
1.5.7	<i>The adequacy of available WASH services within the catchment shall be identified.</i>	 Yes
Comment	<p>The majority of households and businesses in the catchment are on public water supply through Severn Trent Water. The 'DWI Drinking Water 2019 Private Water Supplies' indicates that in HPBC and Derbyshire Dales District Council there are 302 and 220 private water supplies respectively (Appendix 1).</p> <p>The Drinking Water Inspectorate has guidance documents for managing periods of insufficiency for private water supplies.</p> <p>The majority of households and business in the catchment are connected to mains sewage managed by Severn Trent Water. Buildings that are not connected will utilise septic tanks, cesspits or small sewage treatment plants.</p>	
1.5.8	<i>Advanced Indicator Efforts by the site to support and undertake catchment level water-related data collection shall be identified.</i>	 Yes

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Comment NW Buxton have provided access to the Cowdale and Lightwood Weather Stations to local residents and stakeholders, which was accessed the University of Derby, Environment Agency and local residents.

There are 25 examples of data sharing interactions with catchment stakeholders in the evidence provided by NW Buxton. It includes examples such as:

- * Sharing weather data with Pooles Cavern Research facility and local academic
- * Equipping an Environment Agency monitoring borehole with a data logger and providing them with data.
- * Dialogue with White Hall Centre regarding monitoring of a private borehole.
- * Method statement for sharing spring flow data with the Crescent Hotel.

As this is an advanced indicator, there is evidence that NW Buxton have developed a scheme for collecting catchment level data and have made the weather station data available to stakeholders. NW Buxton have collected external water-related data, such as sharing Hogshaw Brooks Flow with the Environment Agency and sharing data with a local resident (Claire Miller) on monitoring a local spring. NW Buxton utilised an external lab to undertake water quality data testing and shared it with The Crescent Hotel.

Score 7

1.5.9 *Advanced Indicator*
The adequacy of WASH provision within the catchments of origin of primary inputs shall be identified.



Yes

Comment This was covered under Indicator 1.5.7 and the score was awarded by default as WASH is addressed through the municipal water supply and waste water services.

As an additional note, NW Buxton provided water during the Covid-19 pandemic to vaccination clinics, care homes and hospitals.

Score 4

1.6 *Understand current and future shared water challenges in the catchment, by linking the water challenges identified by stakeholders with the site's water challenges.*

1.6.1 *Shared water challenges shall be identified and prioritized from the information gathered.*



Yes

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Comment NW Buxton have identified a range of shared water challenges, through dialogue with stakeholders. The site will continue to look into future water related challenges within the catchment. The current shared water challenge priorities are:

1. Nutrient Load in the River Wye from waste water and diffused sources. There are efforts underway in Buxton for a reduction of phosphate loads in the River Wye to improve the condition of the Special Protection Area (SPA).
2. Climate Change/Extreme Weather Events. Potential projects involving Natural Flood Management (NFM) are being developed, such as peat land restoration at Lightwood.
3. Water Loss from Peat Moorlands. Work is being done to improve the water retention on the moorlands.
4. Summer Water Scarcity in River Derwent Catchment. Despite the Wye catchment receiving on average 1,000 mm of annual rainfall, there is no water available for additional licensing from groundwater and surface water bodies.
5. Hydrological Regime of the River Lathkill. The river flows declines substantially along its length, which is due to mine drains (known as soughs) that were constructed in the 18th and 19th century to drain water from the mine workings.
6. Pesticides in Surface Water Catchment. Large parts of the Upper Derwent are now Surface Water Safeguard Zones, due to the presence of metaldehyde, 2-4D and MCPA in raw water intakes at water treatment plants.
7. Loss of native Species / Spread of Invasive Species. Native Crayfish species have been all but lost, due to the presence of Signal Crayfish.
8. Dewatering activities of extractive industries. Buxton has large limestone quarries some of require major dewatering operations.

The site provided WSAS with a range of communication records, to demonstrate how they are working with stakeholders on shared water challenges.

1.6.2 *Initiatives to address shared water challenges shall be identified.*



Yes

Comment The initiatives to address the shared water challenges are outlined in the comment section for indicator 1.6.1.
Please reference the documents uploaded to support indicator 1.6.1.

1.6.3 *Advanced Indicator*
Future water issues shall be identified, including anticipated impacts and trends



Yes

Comment NW Buxton have supported High Peak Borough Council in the development of the 'Water in Buxton - Supplementary Planning Document'. The SPD provides further guidance to ensure that development preserves the quality of water resources within the Buxton sub-area and supports water efficiency. This document will be a material consideration when considering planning applications or planning appeals. The fragility of the Buxton water source has been identified and NW Buxton is working with the HPBC to secure it for future generations.

NW Buxton has identified Emerging Contaminants as a future water issue. which means substances that are not yet regulated but may be of environmental or humans health concern. Substances include medicines, personal care products and industrial compounds. Natural England are in the early stages of exploring potential impacts of emerging contaminants on the freshwater ecology. There are links to some informative reports in the '1.6.3 Future water issues' PP provided as evidence.

NW has also referenced an additional two issues: the High Peak Local Plan 'Shaping the Future' and Nitrates in Groundwater.

Score 3

1.6.4 *Advanced Indicator*
Potential water-related social impacts from the site shall be identified, resulting in a social impact assessment with a particular focus on water.










Yes

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Comment	NW Buxton commissioned an Ecological Appraisal of the site in 2017, which consisted of an extended Habitat survey to inform the planning application to extend the current car parking facilities and the existing building to create warehouse storage.	
	NW have created a new nature reserve site surrounding the Buxton factory, as part of the warehouse expansion. Employee volunteers are to take ownership and help manage and maintain the land, whilst learning new ecology and nature conservation skills. Staff will be given 1-2 volunteering days per year, to help manage the nature reserve. Activities will start in 2022 and initially focus on the pond and scrape management, habitat building and tree care and maintenance.	
Score	4	
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	<i>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.</i>	 Yes
Comment	The site has presented a plan of water related risk; there are some ERP training records and program. At the WSP they include the column business Risk Description and there are some reputational and regulatory risks linked to their targets.	
1.7.2	<i>Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.</i>	 Yes
Comment	The Site keeps a tracker on their water related projects shared challenges tracker where the opportunities are presented along with the progress to reach their targets	
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	<i>Relevant catchment best practice for water governance shall be identified.</i>	 N/A
Comment	The indicator was not assessed in this surveillance audit.	
1.8.2	<i>Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.</i>	 N/A
Comment	The indicator was not assessed in this surveillance audit.	
1.8.3	<i>Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.</i>	 N/A
Comment	The indicator was not assessed in this surveillance audit.	
1.8.4	<i>Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.</i>	 N/A
Comment	The indicator was not assessed in this surveillance audit.	
1.8.5	<i>Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.</i>	 N/A
Comment	The indicator was not assessed in this surveillance audit.	

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2 STEP 2: COMMIT & PLAN - Commit to be a responsible water steward and develop a Water Stewardship 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	<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.
Comment	<p>NW Buxton have a signed and publicly disclosed 'Together, we care for water' statement for the factory site on show, and they supplied WSAS with an in situ picture. The declaration has been signed by Jez McInerney (Buxton Factory Manager) and Lydia Yates (Water Resource Manager) on the 28.02.22. The statement cover the following elements clearly:</p> <ul style="list-style-type: none"> - That the site's stakeholders will be engaged in an open and meaningful way. - That the site will allocate resources to implement the Standard. <p>The two remaining commitments: that the site will implement and disclose progress, in order to achieve AWS water stewardship outcomes; and, that the site implementation will be aligned to and in support of existing catchment sustainability plans, are not overtly conveyed in the statement.</p> <p>WSAS notes that Nestle Waters is fully committed to water stewardship. as evidenced in the articles supplied for this indicator: Nestle Water Pledges commitment to water stewardship (2018)</p>
2.1.2	<p>Advanced Indicator</p> <p>A statement that explicitly covers all requirements set out in Indicator 2.1.1 and is signed by the organization's senior-most executive or governance body and publicly disclosed shall be identified.</p>
Comment	<p>Please note the observation for indicator 2.1.1.</p> <p>The text does not explicitly cover the requirements set out in 2.1.1. However, the 'Nestle Commitment on Water Stewardship' which is an Appendix to the Nestle Policy on Environmental Sustainability does, and demonstrates that water stewardship is part of their long-term corporate strategy. NW Buxton also supplied the 'Caring for Water - our group-wide flagship initiative for the Planet impact area' letter, signed by the CEO, committing the company to water stewardship.</p>
Score	1
2.2	Develop and document a process to achieve and maintain legal and regulatory compliance.
2.2.1	<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 - Process for submissions to regulatory agencies.

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Comment NW Buxton (NWB) have identified the process for maintaining compliance obligations for their water abstraction activities, as well as their discharge and waste water consents. NWB record monthly meter readings for all licensed abstraction, but have different reporting routes for the St. Ann's license from the High-Peak Council and the Lightwood & Rockhead licenses from the Environment Agency. These are clearly defined and the submission routes are linked in the 'Process for Submission of regulatory compliance data' (2.2.1) powerpoint. The maintenance of compliance obligations are also assessed annually during the ISO 14001 audit for the NWB site undertaken by Bureau Veritas.

NWB deliver an annual report on their Discharge Consent Permit (EPR/KP3228XC/V002) to the Environment Agency, however, as the trade and sewer effluent is now discharged to the sewer, rather than the on-site pond, the requirement to monitor under the permit is no longer necessary.

The site reports to Severn Trent under a Trade Effluent Consent (008679V) ; water quality measurements are not required, but NWB report on flow measurements.

The NW Buxton team demonstrated the 'Environment Agency - Managing your Abstraction Licenses' portal during the audit and explained that the last EA audit took place in 2020, due to the pandemic.

2.3 *Create a water stewardship strategy and plan including addressing risks (to and from the site), shared catchment water challenges, and opportunities.*

2.3.1 *A water stewardship strategy shall be identified that defines the overarching mission, vision, and goals of the organization towards good water stewardship in line with this AWS Standard.*



Comment The site presents as evidence documents signed by Nestlé Waters management. It includes the strategy along with its objectives. The Caring for water document presents Nestlé's global vision. A global framework for our local actions. A clear and aligned approach to water management. An ambition for priority sites to embark on a journey towards Water Stewardship Alliance certification. The Water Stewardship Alliance standard. A compelling story well told, globally and locally, to mitigate reputational issues.

2.3.2 *A water stewardship plan shall be identified, including for each target:*
- How it will be measured and monitored
- Actions to achieve and maintain (or exceed) it
- Planned timeframes to achieve it
- Financial budgets allocated for actions
- Positions of persons responsible for actions and achieving targets
- Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.







Comment The site presents its - Water Stewardship Plan v2, which identifies for each target: How it will be measured and monitored; The measures to achieve and maintain (or exceed) it; The expected timelines for achieving it; including progress reports from July 2021 to February 2022. The financial budgets allocated to the actions; The positions of those responsible for the actions and for the achievement of the objectives; and Identifies whether it can be linked to a water engagement project or opportunity (best practice).

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2.3.3	<i>Advanced Indicator</i> <i>The site's partnership/water stewardship activities with other sites within the same catchment (which may or may not be under the same organisational ownership) shall be identified and described.</i>	 Yes
Comment	<p>The site presents evidence of activities undertaken to improve watershed management. Evidence includes regenerative land management plans to protect nature, water cycles and inspire the community.</p> <p>A new nature reserve has been created around the Buxton factory.</p> <p>Volunteers are employed to manage and maintain the land, while learning new skills in ecology and nature conservation.</p> <p>Visits to the site have been arranged for volunteers to learn about the site. This will also be used as an opportunity to share and communicate water management activities and opportunities.</p> <p>Volunteer participation in IWRA protection activities was observed in the field.</p> <p>The site has been involved in diagnosing phosphate content in the River Wye a shared challenge in the catchment related to water quality by providing data on the presence of phosphates in the water. The presence of phosphates in the water is related to agrochemicals, which are unrelated to the site.</p> <p>Nestlé Waters is currently working in partnership with a number of organizations to develop a River Wye catchment restoration project to address local flooding issues.</p>	
2.3.4	<i>Advanced Indicator</i> <i>The site's partnership/water stewardship activities with other sites in another catchment(s) (either under same corporate structure or with another corporate site) shall be identified.</i>	 Yes
Comment	<p>The site presents evidence of collaboration with local authorities and businesses located outside the Buxton catchment.</p> <p>Works with Princes Gate Mineral Water Ltd (Wales)</p> <p>River Ecclesbourne Restoration project.</p>	
Score	4	
2.3.5	<i>Advanced Indicator</i> <i>Stakeholder consensus shall be sought on the site's water stewardship plan. Consensus should be achieved on at least one target. A list of targets that have consensus and in which stakeholders are involved shall be identified.</i>	 Yes
Comment	<p>The site demonstrates collaboration with local authorities, citizens (volunteers) and businesses; as well as close collaboration with organizations at national level such as 3KEEL and wildlife trust. This collaboration was confirmed during the site visit where we had the opportunity to observe the community volunteers working on the repair of a fence and information board at the site's entry. Also confirmed at the stakeholder's interviews.</p>	
2.4	<i>Demonstrate the site's responsiveness and resilience to respond to water risks</i>	
2.4.1	<i>A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.</i>	 Yes

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Comment NWUK has established general requirements regarding planning, hazard identification, risk assessment, and subsequent control in case of the Nestle Management System. The purpose of identifying environmental, safety, health, food safety and quality aspects to ensure that the associated potential risk of an incident are reduced and that the needs of the business and interest parties are considered.

The processes described allow the creation of lists detailing significant impacts and residual risks.

Once identified, these impacts and risks will become input data for other processes of the NMS which determines the objectives and targets, establishment of the management programs, identification of training needs, and establishment of indicators to ensure measurement and monitoring systems are defined and continual improvement.

Hazard identification is an ongoing process, not a singular or timed event. It will consider normal activities, day to day fluctuations and planned changes.

The Site has conducted an assessment of water related risk-site security. Referring at the summary the following: Security in water resources operations, the Buxton factory water resources team ensures the security principles are applied and implemented to all water resource areas/catchment.

Assessments are used to identify risk and improvement opportunities. When identifying hazards, the process will consider physical aspects and human factors.

2.4.2 *Advanced Indicator*
A plan to mitigate or adapt to water risks associated with climate change projections developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.



Yes

Comment NW category has committed to achieve carbon neutrality by 2025 (Care creating shared value and sustainability report, 2020, p.50). Tackling emissions across the value chain demands collaboration. We have a five-point strategy to focus our interventions:

- Tackling deforestation
- Reducing food loss and waste
- Developing alternative protein sources
- Designing alternative packaging solutions
- Promoting natural climate solutions




Nestlé is going beyond their commitments: they are specifying their plan to halve Nestlé's greenhouse gas (GHG) emissions by 2030 and to achieve net zero by 2050 – even as our business continues to grow. Nestlé is making their footprint transparent and will make their progress clear.

Score 6

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3 STEP 3: IMPLEMENT - Implement the site's stewardship plan and improve impacts		
3.1	Implement plan to participate positively in catchment governance.	
3.1.1	Evidence that the site has supported good catchment governance shall be identified.	 Yes
Comment	<p>The Site has identified 13 strategic objectives related to water governance and developed good practices:</p> <p>Managing the shared resource by continued dialogue / data / sharing knowledge / Influencing - Two way communication between Crescent Hotel and NW.</p> <p>Engage with the University of Derby via their Steering Group for Ecological Management of Cuckoo Tors to ensure Lightwood source recharge zone is protected from experiment, whilst supporting the wider aims of the project.</p> <p>To be consulted and involved during the supplementary planning process, providing technical input by attendance of relevant meetings.</p> <p>Annual review session to be scheduled to complete review root cause analysis of any emergency incidents if occurred, identifying corrective action and identifying general risk levels.</p> <p>Completed block diagrams visualising wider catchment, Lightwood, Rockhead and Buxton source including geology, water related info and supporting text.</p> <p>Interpretation boards to be placed at the Lightwood Site - showcasing catchment block diagram alongside biodiversity / land management information, working alongside DWT management plan timelines for implementation.</p> <p>Implementing water educational material for Buxton source at the Crescent Visitor Experience, as part of our agreement with the Crescent Heritage Trust.</p> <p>Create a Water Stewardship infographic based on evaluation of performance measures from Water Stewardship Plan in Year 1, making use of the newly created catchment diagrams.</p> <p>Deliver presentation on AWS at the Central Solutions Community of Practice meeting (currently being developed in the UK for the first time).</p> <p>Support Tutbury and Wisbech sites through their AWS gap assessments and by providing support throughout the process.</p> <p>Support Princes Gate through their AWS gap assessments and by providing support throughout the process.</p> <p>Work with MidLENs coalition (STW, National Trust, 3Keel) to identify meaningful project(s) to act as a first trade (proof of concept) by the end of the year.</p> <p>University of Derby presentation on sustainability and water stewardship.</p>	
3.1.2	Measures identified to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be implemented.	 Yes
Comment	Water rights for abstraction and discharges to surface water are covered under legal and regulatory mechanisms.	
3.1.3	Advanced Indicator Evidence of improvements in water governance capacity from a site-selected baseline date shall be identified.	 Yes

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Comment	<p>The Site has Objectives related to improvements in water governance capacity:</p> <p>Support the local community with access to water where applicable. To share knowledge and transparency on our source catchments: Increase visibility and awareness of the catchments in which we operate to selected local stakeholders: To contribute to new NW water sources website when finalised. To share knowledge and transparency on our source catchments: Increase visibility and awareness of the catchments in which we operate to selected local stakeholders: Implementing water educational material for Buxton source at the Crescent Visitor Experience, as part of our agreement with the Crescent Heritage Trust. Disclose relevant water stewardship performance, once fully evaluated, to relevant and applicable stakeholders: Create a Water Stewardship infographic based on evaluation of performance measures from Water Stewardship Plan in Year 1, making use of the newly created catchment diagrams</p>	
Score	2	
3.1.4	<p><i>Advanced Indicator</i> <i>Evidence from a representative range of stakeholders showing consensus that the site is seen as positively contributing to the good water governance of the catchment shall be identified.</i></p>	 Yes
Comment	<p>The site has been identified as a relevant actor in the decision-making process at the basin level as mentioned by stakeholders in the interviews. In addition, the site has submitted a document with a large number of stakeholders (more than 50) mentioning different issues related to governance, water quality, risk management and conservation programmes where the site is perceived as a highly engaged local actor.</p>	
Score	2	
3.2	<p><i>Implement system to comply with water-related legal and regulatory requirements and respect water rights.</i></p>	
3.2.1	<p><i>A process to verify full legal and regulatory compliance shall be implemented.</i></p>	 Yes
Comment	<p>NW Buxton have identified the linkages from this indicator to the following indicators: 1.5.2, 2.2.1 and 5.1.1.</p> <p>Under indicator 1.5.2, NW Buxton provided a breakdown of the applicable water-related legal and regulatory requirements, including:</p> <ul style="list-style-type: none"> - Abstraction license summary - Abstraction Agreement with High-Peak Borough Council - European Legislation - National Policy (England) - Local Policy (Derbyshire) <p>WSAS had view of all relevant Abstraction Licenses and Waste Water Consents.</p> <p>NW Buxton also have processes in place for submitting regulatory compliance data, which includes: abstraction returns to the Environment Agency (monthly/annual) and reporting on their discharge consent permit to the EA. The site also reports on their trade effluent consent to Severn Water. The Nestle Management System Manual (section 6.2) describes how legal and regulatory requirements are accessed and maintained. These methods are verified externally through their ISO 14001 process, which is audited by Bureau Veritas. WSAS had view of the NW Buxton certificate, which was issued on the 01.12.21 and maintained annually.</p> <p>Under the indicator 2.2.1 evidence folder, there are numerous examples of EA Inspection Reports on their licenses.</p>	

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3.2.2	<i>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.</i>	 Yes
Comment	<p>NW Buxton have an Abstraction Agreement in place with the Local Authority (High-Peak Borough Council) for the St. Ann's spring which also covers the sharing of water with the Crescent Hotel at times of low flow.</p> <p>The Buxton Crescent Hotel extracts the thermal water for use in the spa treatment rooms and pool. WSAS reviewed the Method Statement MC47 (July 2020), which was produced by Aecom, for data storage, transfer and access of the thermal water monitoring scheme. A scheme has been put in place to monitor all the abstracted thermal flows, the main overflows from the thermal water issues, basic water chemistry and water levels.</p>	
3.3	<i>Implement plan to achieve site water balance targets.</i>	
3.3.1	<i>Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.</i>	 Yes
Comment	<p>NW Buxton have four objectives in the Water Stewardship Plan (WSP) that are linked to 'Sustainable Water Balance', these are:</p> <p>#1 - Maintaining quantity and reviewing availability. Reduction on impact on river systems. #2 - Operate in accordance with annually defined water balance targets. #10 - To develop more efficient working practices leading to greater water use efficiency and visibility of data. #11 - Reduce the risk of flooding downstream of Lightwood on Lightwood Road.</p> <p>Objective 1 is not launched yet, but Objective 2 is launched and on track. Objective 10 is launched and on track and Objective 11 is not launched.</p>	
3.3.2	<i>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.</i>	 Obs.
Comment	<p>NW Buxton have identified summer scarcity as an issue and a shared water challenge, but have not provided evidence to support what was stated during the audit.</p> <p>NW Buxton have only identified the Water Ratio presentation, submitted against the 1.3.3. indicator, which would provide an indication of water scarcity issues.</p> <p>At the audit, NW Buxton stated that the site falls under the 'Derby St. Mary's' monitoring station. The monitoring station data can be tracked on the Environment Agency's Hydrological Data Explorer: www.environment.data.gov.uk/hydrology. NW Buxton get live data and are able to anticipate when scarcity will be an issue and either instigate flow restrictions or use the Portobello Compensation point.</p>	
3.3.3	<i>Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.</i>	 Yes

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Comment NW are implementing a Regeneration project, whereby they aim to regenerate the water cycle to help create a positive water impact by 2025 everywhere they operate. This includes targets for water neutrality locally in NW Buxton. NW aim to regenerate the water cycle through: reforestation, wetland restoration, rainwater harvesting, drip irrigation, constructed wetland treatment system and water access initiatives.

Nestle Waters operate and External Expert Panel consisting of high-level global organisation representatives to review and approve initiatives. Nestle Waters UK have three projects under review by the panel:

1. BUX1: Lightwood and Combs Natural Flood Management and Peat Restoration project
2. BUX7: River Lathkill Restoration Project
3. River Ecclesbourne Restoration and Habitat Improvement

All three projects are part of the NW Buxton catchment. The site has also been instrumental in establishing a 'Forum on Shared Water Challenges in the Buxton Catchment', which met virtually (28.10.2020) during the lockdown and had good stakeholder representation.

NWB are looking at methodologies for undertaking water replenishment projects and referred WSAS to the following guides:

- Volumetric Water benefit Accounting (VWBA) A practical guide to Implementing Water Replenishment Targets.
- Volumetric Water Benefit Accounting (VWBA) A method for Implementing and Valuing Water Stewardship Activities.

3.3.4 *Advanced Indicator*
The total volume of water voluntarily re-allocated (from site water savings) for social, cultural and environmental needs shall be quantified.

Comment NWB are in the early stages of establishing a reporting process for 'Volumetric Water Benefits' (VWBs), which is the volume of water resulting from water stewardship activities. The Working Paper for VWBs has primarily been developed by the World Resource Institute, who are represented on the Nestle Waters Expert Panel (reference indicator 3.3.3.). WSAS will be able to review tangible outcomes of the VWB process and applied methodology at the next annual audit. Although NWB are in the very early stages of quantifying the water voluntarily reallocated from the site, they have identified the accounting methodology and have a significant portfolio of projects under development that will produce water volumes from water stewardship activities. Please refer to indicator 3.3.3 for a breakdown of the Regenerate projects.


Yes

Score 6

3.4 *Implement plan to achieve site water quality targets*

3.4.1 *Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.*


Yes

Comment NWB have established the following water quality objectives in their Water Stewardship Plan:

- #6 - Protection of Lightwood Source Quality
- #7 - Safeguard the Rockhead source against future quality impacts
- #12 - Better understand the risk of flooding to the rockhead source

\objective 6 & 7 were both launched in 2019 and are on track, both are deemed ongoing projects with progress updates recorded. Objective 12 has not been launched yet.




3.4.2 *Where water quality is a shared water challenge, continual improvement to achieve best practice for the site's effluent shall be identified and where applicable, quantified.*


Yes

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Comment	<p>The site presents evidence of water quality monitoring of its effluents in the period from 2016 to 2022. In that period only 4 pH values have been outside the established limits. The evidence in the first sheet of "3.4.2 Best Practice for Site Effluent" does not provide adequate context to understand it. The second sheet indicates that discharging to the drainage system instead of the infiltration pond significantly reduced the phosphate content (2014-2015). As well as the request to reduce the maximum allowable value for COD from 300 mg/l to 200 mg/l.</p> <p>The document "2021-12-09 CSF Farm Visits - Dialogue", describes the preparation for farm visits in the catchment to promote the "Keeping Pesticides Out of Water" initiative between "Mat Ryan Nestle Waters and Robert.Marsden of naturalengland.org.</p> <p>The document "Effluent parameters at STW compliant with NER requirements", presents the communication between Tim Clark of severntrent and Reid Scott Nestle Waters Buxton. On the values obtained in the analyses comply with the established standard.</p>	
3.5	<i>Implement plan to maintain or improve the site's and/or catchment's Important Water-Related Areas.</i>	
3.5.1	<i>Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.</i>	 Yes
Comment	<p>The Site has identified 5 strategic objectives related to water governance and developed good practices:</p> <p>Explore land management options for the rockhead site, implementing a land management partner.</p> <p>Work with DWT and Rootwave to understand whether a unit could be joint purchased by a contractor in the Peak District and then service other properties/farms on a contract basis.</p> <p>Work with Margaux Delalex and local partners to understand how GRP funding could support Water Pledge and other initiatives (including Derwent Connections Project - DWT).</p> <p>Continue attending steering committee calls to understand potential opportunities for Nestle.</p> <p>Engage with STW / EA / DWT to lock in dates and funding commitments.</p>	
3.5.2	<i>Advanced Indicator</i> <i>Evidence of completed restoration of non-functioning or severely degraded Important Water-Related Areas including where appropriate cultural values from a site-selected baseline date shall be identified. Restored areas may be outside of the site, but within the catchment.</i>	 Yes
Comment	<p>The site has purchased land to the north-east of Buxton including Lightwood & Reservoir. The land includes a range of different semi-natural habitats that have a long history of management and modifications, but have more recently been left largely unmanaged. Derbyshire Wildlife Trust were contracted by Nestlé Waters UK in 2017 to assess the current wildlife and nature conservation interest found at the site and to draw up a management plan for the site.</p> <p>The management plan is intended to provide a foundation, rationale and guide for taking forward management activities across the site that result in achieving the overall vision for the site. The plan provides detailed assessment of what we currently understand about the site and the management approaches available to try and achieve the site vision.</p> <p>The Plan is for 2018-2027 includes management objectives, prescriptions and activities</p> <p>It is possible to observe the evolution of the management at this link: http://www.pennyanderson.com/news/habitat-creation-12-years-on </p>	
Score	6	
3.5.3	<i>Advanced Indicator</i> <i>Evidence from a representative range of stakeholders showing consensus that the site is seen as positively contributing to the healthy status of Important Water-Related Areas in the catchment shall be identified.</i>	 Yes

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Comment The Site has presented their management plans for their IWRA; both are managed by the wild life trust.
Related to Lightwood project:
This reservoir on the hills above Buxton and was built to supply water to the town. It was retained by an earth dam 13.4m high and at 105m in length it had a capacity of 73,000 cubic metres. The reservoir was decommissioned in 2004.
The project involved draining the reservoir, leaving behind the brick and concrete lining and dam walls. The old concrete and brick liners were then broken out and the water tower and valve chambers demolished. Arisings from the dams were used to reprofile the sides of the reservoir to form a natural valley shape, with a stream at the base feeding four pools, designed to encourage aquatic vegetation and associated wildlife. As a nice little touch we even included stepping stones across the stream.
A team of engineers and landscape architects, supported by ourselves at PAA, ensured that the resulting landform and habitats were as close as possible to the natural valley form and habitat types. Alongside the pools, other target habitats were species-rich grassland and wet woodland.
We seeded the reprofiled valley sides with a flower rich seed mix applied at a very low density to allow plenty of gaps for natural colonization and fenced the area to exclude grazing livestock for 3 years.
<http://www.pennyanderson.com/news/habitat-creation-12-years-on>
The site presents evidence from a representative sample of stakeholders indicating a consensus that the site makes a positive contribution to the good status of Important Water Related Areas in the catchment.
Presents communication between the Water Resource Manager, NW BUXTON and Solicitor, High Peak Borough Council, on their contributions to the SPD.
Communication between NW Buxton staff and Patrick Sutton contains very positive comments.
Communication between staff at NW Buxton and researchers from the University of Derby, with positive comments on the actions taken by NW Buxton.
Document 3.5.3 IWRA Management- Green Dye. It includes several twitters with comments on the tests carried out with a tracer that dyed the river green. The comments can be considered positive.

Score 2

3.6 *Implement plan to provide access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers at all premises under the site's control.*

3.6.1 *Evidence of the site's provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers onsite shall be identified and where applicable, quantified.*


Obs.

Comment NWB have supplied a site facilities map, with the location of all hand wash basins and toilets clearly mapped for the site. There are a number of chilled drinks cabinets located throughout the site, where people can help themselves to free bottles of water, providing ample access to safe drinking water.

There are high levels of protective hygiene in place, due to the pandemic, including a masks on the move policy and enhanced hand washing notices. NWB provided examples of employee communications, for example the 'Factory Relation Covid Guidance - GEMBA'. All visitors are required to read the 'Contractor & Visitor Covid-19 Mandatory Brief' and sign off that it has been read and understood.







3.6.2 *Evidence that the site is not impinging on the human right to safe water and sanitation of communities through their operations, and that traditional access rights for indigenous and local communities are being respected, and that remedial actions are in place where this is not the case, and that these are effective.*


Yes

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Comment	This indicator is not directly relevant to the NW Buxton site. It is noted that the site have provided safe drinking water during the pandemic, by distributing bottled water to vaccination centres, care homes and similar locations. Please refer to indicator 1.8.5 for further information of water donations during Covid-19.	
3.6.3	<i>Advanced Indicator</i> <i>A list of actions taken to support the provision to stakeholders in the catchment of access to safe drinking water, adequate sanitation and hygiene awareness shall be identified.</i>	 Yes
Comment	During the construction of the pipeline to the 3rd spring Rockhead Water, NW Buxton put down an additional line to supply reliable drinking water to a local farm, which was located near the pipe-run. The cost was incorporated into the overall project cost.	
	NW Buxton provided the schematics for the pipe-run and photographic evidence of the construction phase.	
Score	5	
3.6.4	<i>Advanced Indicator:</i> <i>In catchments where WASH has been identified as a shared water challenge, evidence of efforts taken with relevant public-sector agencies to share information and to advocate for change to address access to safe drinking water and sanitation shall be identified.</i>	 Yes
Comment	WASH is not an identified shared water challenge within the catchment, but the NW Buxton site has been providing bottled water donations during the pandemic to Medical Centres, Vaccination Sites, Hospices and Sports Events. The site supplied WSAS with an extract from the '2021 Water Donations' spreadsheet, but this has not been uploaded as it contains personal information and would contravene GDPR requirements.	
Score	4	
3.7	<i>Implement plan to maintain or improve indirect water use within the catchment:</i>	
3.7.1	<i>Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.</i>	 No
Comment	The Site's Water Stewardship Plan does not include targets for indirect water use. Finding No: TNR-000452 Due date:2022-Jul-18	
3.7.2	<i>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.</i>	 No
	Finding No: TNR-000453 Due date:2023-Mar-03	
3.7.3	<i>Advanced Indicator</i> <i>Actions taken to address water related risks and challenges related to indirect water use outside the catchment shall be documented and evaluated.</i>	 Obs.
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	<i>Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.</i>	 N/A
Comment	The indicator was not assessed in this surveillance audit.	
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>	

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3.9.1	<i>Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.</i>	 Yes
Comment	<p>NW Buxton are part of a catchment wide 'CaBA Water Governance Group' with all the relevant stakeholders within the catchment. It is being administered by The Rivers Trust and the group had its first formal workshop in February 2022. The theme of the workshop was 'What are the key blockers to more holistic water governance'. The outputs of this group will be monitored at future assessments.</p> <p>Nestle are also a signatory to the 'Catchment management; the declaration' (2018) which is 'a call from business, civil society organisations and the public sector to commit to the water catchment-related ambition of the UK Governments 25 year Environment Plan and support collective activities that will deliver successful catchment management'.</p>	
3.9.2	<i>Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.</i>	 Yes
Comment	<p>NW Buxton undertake weekly water planning and dialogue, to manage abstractions in response to production plan. The ' 3.9.2 Water balance best practice' powerpoint, contains an example email of the Production Schedule Planner requesting a reduction on the flow rate from Buxton, as production is running slightly behind and would be running the risk of tipping water.</p> <p>The site produces monthly company updates on Water Availability for Water Balance for the sources that provide the factory with water. They proactively manage abstraction at the Lightwood site, in response to water availability, demand and sustainability reductions.</p> <p>The site also has to comply with license compensation requirements and have supplied the '2021 Flow Restriction Log' in the indicator presentation.</p> <p>The NWB Water Stewardship Plan has a number of Water Quantity targets, which the actions listed above contribute towards. Water balance issues are proactively management issues are proactively managed on a weekly and monthly basis.</p>	
3.9.3	<i>Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.</i>	 Yes
Comment	<p>NW Buxton have been instrumental in setting up the 'Forum on Shared Water Challenges in the Buxton Catchment' and the minutes were supplied for the meeting in October 2020. A key shared water challenge is the presence of phosphates in the River Wye. The group broke down the issues that the Forum needs to understand and potential actions. There was broad agreement that it is a shared water challenge and the solution does not lie in targeting one major contributor, but rather shaving concentration across all contributors in the catchment, in order to make overall reductions.</p> <p>Evidence was also seen of NW trying to organise a Shared Water Challenges event for World Water Day.</p>	
3.9.4	<i>Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.</i>	 Yes

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Comment NW Buxton have 11 IWRA Objectives in their Water Stewardship Plan and are actively involved in a number of projects that maintain and improve IWRAs within the catchment.

The Lightwood Site ponds are important to the local community, as well as an IWRA. WSAS observed a working party from the Derbyshire Wildlife Trust (DWT) install a new information board at the site, funded by NWB, during the catchment tour. The Lightwood Land Management Plan is a joint publication between the DWT and NWB, covering the time period 2018-2027. NW owns the land around the Pond and they have established a comprehensive management plan to improve the ecological value and habitats for wildlife and people.

NWUK have also bought the former Cowdale Quarry Site and surrounding grassland and have contracted Derbyshire Wildlife Trust (DWT) to assess the current wildlife and nature conservation interest found at the site and draw up a management plan. Japanese Knotweed is present on the site and DWT and NWB are hoping to control and eventually eradicate it from the site, as it is an invasive species.

3.9.5 *Actions towards achieving best practice related to targets in terms of WASH shall be implemented.*


Yes

Comment NW Buxton have made significant donations of clean drinking water, by donating bottled water during the Covid pandemic to vaccination centres, hospices and numerous others. Please reference indicator 1.8.5 for the donation log.

3.9.6 *Advanced Indicator
Achievement of identified best practice related to targets in terms of good water governance shall be quantified.*


Yes

Comment The 'SEP Water Stewardship Tracker Buxton' spreadsheet (refer to indicator 1.2.1) was started in July 2021 and it records engagements with stakeholders and the outcomes, next steps and whether they are an identified AWS Stakeholder in the CRP. In terms of this indicator it minutes actions towards achieving the Water Pledge projects and how NWB engage with and influence water governance in the catchment.

NWB have a number of projects being developed through the Water Pledge commitment. The River Ecclesbourne Restoration & Habitat Improvement project is outside the immediate catchment of the site, but within the wider catchment of the river Ecclesbourne. The project will restore the natural and unimpeded flow along 28km of the River Ecclesbourne from its headwaters in the Peak District to the River Derwent confluence, allowing Atlantic salmon to return to their natural spawning grounds for the first time since the industrial revolution.

Score 8

3.9.7 *Advanced Indicator
Achievement of identified best practice related to targets in terms of sustainable water balance shall be quantified.*


Yes

Comment NWB proactively manage abstraction from the Lightwood source in response to water availability, demand and sustainability reductions. Please refer to the powerpoint evidence for indicator 3.9.2 (slide 3). The site has continuously reduced abstraction from the Lightwood source since the 2016 baseline and have now passed the sustainable abstraction target. WSAS did not have access to the background data that informed the graphs.

The Water Ratio 2022 powerpoint (Key Documents and indicator 1.3.3) contains a graph that shows the water ratio decreasing over time. The current Water Ratio target of 1.15 was met in 2018, but went up again in 2019 when the public water supply was included in the calculation.

Score 8





3.9.8 *Advanced Indicator
Achievement of identified best practices related to targets in terms of water quality shall be quantified*


Yes

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Comment	The 'Effluent Quality 2016-22' spreadsheet contains a 'Lab Effluent Data' record, containing 669 entries with COD (mg/l) and pH readings, against the consent limits. The second tab contains the 'Effluent Water Quality Monitoring Report' for samples up to 2016.	
	NWB provided correspondence between the site and Natural England, regarding concerns of pesticide storage at farms around Cowdale, as this could have a significant detrimental impact on the Cowdale Abstraction source. NWB secured funding for Natural England to conduct 10 farm visits in the Cowdale area and deliver the 'Keep Pesticides Out of Water' advice visits. The planning for this will commence in 2022 and will be reviewed at the next assessment.	
Score	8	
3.9.9	<i>Advanced Indicator</i> <i>Achievement of identified best practices related to targets in terms of the site's maintenance of Important Water-Related Areas have been implemented.</i>	 Yes
Comment	NWB have the Lightwood Land Management Plan (2018-2027) in place, with the Derbyshire Wildlife Trust. Please reference indicator 3.9.4 for the plan. A number of projects have been implemented under the Plan.	
	Discussions were had with NWB on how to quantify qualitative actions, such as the Supplementary Planning Document for the Buxton Mineral Zone (IWRA).	
3.9.10	<i>Advanced Indicator</i> <i>Achievement of identified best practice related to targets in terms of WASH shall be quantified.</i>	 Yes
Comment	NWB have made a number of water bottle (clean water) donations to emergency services and community facilities during the pandemic. Please reference the Water Donations Log in previous indicators.	
Score	4	
3.9.11	<i>Advanced Indicator</i> <i>A list of efforts to spread best practices shall be identified.</i>	 Yes
Comment	NWB have provided a list of communication links, that are efforts to spread best practice.	
	The site also supplied correspondence records with key stakeholders, demonstrating their efforts to spread best practice. Topics include: Derbyshire Derwent Catchment Partnership (2021), Cowdale grazing licence conditions (2020), Environment Agency AWS restricted water availability (2018)	
Score	3	
3.9.12	<i>Advanced Indicator</i> <i>A list of collective action efforts, including the organizations involved, positions of responsible persons of other entities involved, and a description of the role played by the site shall be identified.</i>	 Yes
Comment	An extract from the 'Community Relations Process 2021' provides a summary of actions undertaken in 2021. It shows a quarterly review of progress by Site, Market and Zone.	
	The evidence files contain the 'MidLENS Draft Concept' paper, under indicator 1.8.1 'Evidence'. MidLENS is a collaborative initiative between the National Trust, Severn Trent Water and Nestle, delivered in partnership with 3Keel. It is using the Landscape Enterprise Networks (LENS) approach to arrange collective procurement of nature-based solutions in landscapes. The 'LENS explainer' document provides some explanation on the concept.	
Score	The MidLENS meeting minutes can be located in the evidence folder for indicator 2.3.3. 11	

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3.9.13

Advanced Indicator

Evidence of the quantified improvement that has resulted from the collective action relative to a site-selected baseline date shall be identified and evidence from an appropriate range of stakeholders linked to the collective action (including both those implementing the action and those affected by the action) that the site is materially and positively contributing to the achievement of the collective action shall be identified.

Q
Obs.

Comment

NW Buxton have had a material impact on the Lightwood site since the Management Plan was established in 2018. WSAS notes that a Peat Restoration project has been approved by NW globally through the External Expert Panel for the Lightwood site. Although there is ample evidence of projects being undertaken and new initiatives being taken forward, there is little quantified evidence on the impact of all these significant projects.

The Lightwood and Cowdale Management Plans are great statements of intent, of how NWB will work with stakeholders to improve the environmental state of the lands they have purchased. WSAS was unable to locate any reviews of how the plans are progressing relative to the baseline data recorded in the plans. The Lightwood plan contains Key Objective 11 'Monitor and review the plan delivery and effectiveness' but WSAS could not locate any interim reports to that effect.






The 'Water Ratio' Powerpoint presentation includes a simplified graph showing demonstrable improvements, but there is no corresponding briefing note to explain the data.

NWB are undertaking significant work to address shared water challenges in the catchment, but would benefit from working on how to quantify the work they are undertaking, including interim reviews on the effectiveness of site management plans.

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4 STEP 4: EVALUATE - Evaluate the site's performance.		
4.1	<i>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.</i>	
4.1.1	<i>Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.</i>	 Yes
Comment	<p>The site presents its water management plan which presents 33 objectives, sets out measures and improvements for each of them in its sustainable water management plan. 33 objectives, sets out the measures and improvements for each of them in its sustainable water management plan.</p> <p>It reports on a regular basis and updated up to the first months of 2022, describes the status of each and the challenges they have faced.</p> <p>It reports how it is contributing to achieving each of the five AWS outcomes.</p>	
4.1.2	<i>Value creation resulting from the water stewardship plan shall be evaluated.</i>	 Yes
Comment	<p>The Site presents the proposed water savings in its sanitary discharges that would represent a saving of 76.6% of the water used in this service, with an economic saving.</p> <p>It shows savings realised by the site from the revocation of a discharge permit.</p> <p>During the audit, the use of Aquassay Ewater was mentioned as a tool to increase water efficiency and generate cost savings.</p>	
4.1.3	<i>The shared value benefits in the catchment shall be identified and where applicable, quantified.</i>	 Yes
Comment	<p>The Site is involved in landscape restoration and natural flow management to reduce runoff and minimize the impact of flooding on Buxton and downstream communities.</p> <p>Cowdale and Lightwood have recreational and community value, Cowdale has restricted access to visitors.</p> <p>The reclamation of these IWRAs has encouraged citizen engagement and involvement; enthusiastic volunteer participation was observed during the IWRA visit.</p>	
4.1.4	<i>Advanced Indicator</i> <i>A governance or executive-level review, including discussion of shared water challenges, water risks, and opportunities, and any water-related cost savings or benefits realized, and any relevant incidents shall be identified.</i>	 Yes
Comment	<p>The Site participates in the activities carried out to address shared risks, the "Water Stewardship Plan_v2" includes the following list:</p> <ul style="list-style-type: none"> • Nutrient Load in the River Derwent catchment from wastewater and diffuse sources • Flooding and Extreme Weather Events - River Derwent Catchment • Dewatering activities of the quarrying industry - River Wye Catchment • Species loss / spread of invasive species • Pesticides in the River Derwent Catchment • Hydrological regime of the River Lathkill • Water loss from peat moorlands • Impact of Ash Dieback Disease on the water environment of the Peak District • Seasonal Water Scarcity impacting environmental baseflows in the Derwent Catchment. 	
4.2	<i>Evaluate the impacts of water-related emergency incidents (including extreme events), if any occurred, and determine the effectiveness of corrective and preventative measures.</i>	
4.2.1	<i>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.</i>	 N/A
Comment	The indicator was not assessed in this surveillance audit.	




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4.3	<i>Evaluate stakeholders' consultation feedback regarding the site's water stewardship performance, including the effectiveness of the site's engagement process.</i>	
4.3.2	<i>Advanced Indicator</i> <i>The site's efforts to address shared water challenges shall be evaluated by stakeholders. This shall include stakeholder reviewing of the site's efforts across all five outcome areas, and their suggestions for continual improvement.</i>	 Yes
Comment	Please refer to indicator 4.3.1 for examples of catchment stakeholders evaluating the sites efforts to address shared water challenges.	
	Stakeholders were invited to participate in an 'Online Dialogue on how Businesses can achieve a positive water impact' in June 2021. This was in support of the Nestle Water Commitment to support the environmental sustainability of watersheds by aiming to regenerate water cycles and create a positive water impact everywhere its water businesses operate by 2025. The invite was sent to all relevant catchment stakeholders, many of whom are actively involved in addressing shared water challenges with NWB. Evidence of wide-ranging stakeholder consultation efforts for general feedback and specific project development were observed.	
	The 'River Ecclesbourne Restoration Project' which is a NWUK Water Pledge project was submitted to the Nestlé External Expert Panel for review and approved. The 'Comb's Moss Peat Restoration and Natural Flood Management' project was also reviewed and approved by the panel, details of the panel are attached.	
Score	6	
4.3.1	<i>Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.</i>	 Yes
Comment	NW Buxton undertake consultations with stakeholders and this is recorded in the 'Community Relations Process' (CRP) Tool. The interviews are recorded in the Acceptability Survey Results.	
	WSAS had view of results from a survey carried out on the 24.07.19 with 110 respondents, from across stakeholder categories i.e., Local Authorities, Businesses, NGOs and local Community. In terms of the site's water stewardship performance, respondents were asked the following questions:	
	<ul style="list-style-type: none"> - What is your opinion, in the factory's contribution to local development? - What is your opinion, on the way the factory manages its impact on the environment? - What is your opinion, on the way the factory manages water resources? 	
	These questions are representative of the site's water stewardship performance. The CRP Tool functionality was demonstrated during the audit.	
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	<i>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.</i>	 Yes

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Comment	The site includes in its water management plan the progress of the implementation of the plan. Updates (2022-02) Updates (2022-01) Updates (2021-12) Updates (2021-11) Updates (2021-07) Updates (2021-09)
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5	STEP 5: COMMUNICATE & DISCLOSE - Communicate about water stewardship and disclose the site's stewardship efforts	
5.1	Disclose water-related internal governance of the site's management, including the positions of those accountable for legal compliance with water-related local laws and regulations.	
5.1.1	The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.	 N/A
Comment	The indicator was not assessed in this surveillance audit.	
5.2	Communicate the water stewardship plan with relevant stakeholders.	
5.2.1	The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.	 Yes
Comment	The WSP integrates the outcomes of the standard AWS as has been described in 4.4.1 where updates to its WSP are demonstrated. This has been described to a broad group of stakeholders through a 2022 forum; for this they have provided the agenda of the meeting and the list of participants to whom they have reported.	
5.3	Disclose annual site water stewardship summary, including: the relevant information about the site's annual water stewardship performance and results against the site's targets.	
5.3.1	A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.	 Yes
Comment	The Site showed performance against their targets. The site has shared links to videos and documents showing the activities being carried out. In their WSP they present the progress of their proposed objectives every two times resulting in 6 updates per year.	
5.3.2	<i>Advanced Indicator</i> The site's efforts to implement the AWS Standard shall be disclosed in the organization's annual report.	 Yes
Comment	The site has presented a "creating shared value and sustainability" report 2021 (pp. 31 & 33); "Our Nestlé Waters business Our bottled water business, which includes brands such as Perrier, S.Pellegrino, Vittel and Buxton, aims to advance the regeneration of the water cycle in order to the regeneration of the water cycle to help create a positive impact on water in all parts of the world. positive impact on water everywhere it operates by 2025". "In July 2021, we announced our commitment to help create a positive impact on water everywhere our bottled water business operates by 2025. While this commitment is still relatively new, we are already implementing several projects: - Buxton: Land conservation and natural flood management in Derbyshire, UK. in Derbyshire, UK".	
Score	1	
5.3.3	<i>Advanced Indicator</i> Benefits to the site and stakeholders from implementation of the AWS Standard shall be quantified in the organization's annual report.	 Obs.

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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	<i>The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.</i>	 N/A
Comment	The indicator was not assessed in this surveillance audit.	
5.4.2	<i>Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.</i>	 N/A
Comment	The indicator was not assessed in this surveillance audit.	
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	<i>Any site water-related compliance violations and associated corrections shall be disclosed.</i>	 N/A
Comment	The indicator was not assessed in this surveillance audit.	
5.5.2	<i>Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.</i>	 N/A
Comment	The indicator was not assessed in this surveillance audit.	
5.5.3	<i>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.</i>	 N/A
Comment	The indicator was not assessed in this surveillance audit.	

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Photographic Evidence from Audit



Description of IWRA and audit team.JPG



Community volunteers working 1st March 2022.JPG



Amonia chiller plant 1.JPG

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Hills where water is captured.JPG



Amonia Chiller Plant 2.JPG

Comment

During the site visit it was possible to observe the storage room the infiltration pond (no longer in use), visit to the IWRA, extraction wells, and production site



Yes

Previous Findings

All non-conformities raised in the previous audit have been satisfactorily closed.



N/A

Comment

No non-conformities were raised in the previous audit.