

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000283

SITE DETAILS

Site: **Nestle Hellas Single Member S.A- Korpi factory**
Address: Korpi Factory, Monastiraki, 30002, Vonitsa, GREECE
Contact Person: Nikolaus Thalassinos
AWS Reference Number: AWS-000107
Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Core
Date of certification decision: 2022-Sep-03
Validity of certificate: 2025-Sep-03

AUDIT DETAILS

Audited Service(s): AWS Standard v2.0 (2019)
Audit Type(s): Re-Certification Audit
Audit Start Date: 2022-Jun-28
Lead Auditor: Neringa Pumputyte
Audit team participants:
Ioannis Tsikos
Site Participants:
Panagiotis Vellis, Quality manager
Nikolaos Thalassinos, Other

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ADDITIONAL INFO

Summary of Audit Findings: A total of 40 findings were raised during the certification audit, 0 major non-conformities, 19 minor non-conformities, 21 observations.

The audit team recommends re-certification of Nestlé Waters Hellas: Korpi factory at Core level pending approval of the corrective actions plan.

The Client is requested to define corrective actions for all non-conformities on the WSAS audit platform within 60 days of receipt of the audit report, by 10/10/2022.

Minor non-conformities must be closed out by the next annual surveillance audit and will be confirmed at the next audit.

CLOSURE OF FINDINGS: The corrective action plan addressing all minor non-conformities was submitted and approved by WSAS. The implementation will be checked at the next surveillance audit.

Scope of Assessment: The scope of services covers the recertification audit for assessing conformity of the Nestle Korpi site against the AWS International Water Stewardship Standard Version 2.

The site is located in a rural area of Western Greece, close to Monastiraki village, 13 km from Vonitsa town. The site abstracts mineral water and bottles still and sparkling water in plastic (mostly) and glass (small fraction) bottles. Facilities include four wells and the fifth one under construction, two PET lines, one Glass line, and a warehouse.

The facility is located in the mountainous area with karstic features. The site draws its water from groundwater aquifers located in Korpi synclinal groundwater sub-system. A new well has been drilled that reaches Jurassic sub-system. As the region is karstic, these sub-system connect with other sub-systems, including Korpi anticlinal kakirite sub-system where the wells of the municipality are located. These mentioned small sub-systems are all part of the Monastirakiou and Vonitsa-Voulkaria groundwater systems (groundwater bodies using the terminology of the EU Water Framework Directive).

The audit was conducted on site on 28-30 June 2022, with visits to the site, wells, and Monastiraki springs. The [onsite/remote] site visit included the assessment of [insert the facilities and activities that were visited (onsite or virtually) as part of the audit].

FINDINGS

NUMBER OF FINDINGS PER LEVEL

Observation	19
Minor	21

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FINDING DETAILS

Finding No: TNR-000950
Checklist Item No: 1.1.1
Status: For information
Finding level: Observation
Checklist item: The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including:
- Site boundaries;
- Water-related infrastructure, including piping network, owned or managed by the site or its parent organization;
- Any water sources providing water to the site that are owned or managed by the site or its parent organization;
- Water service provider (if applicable) and its ultimate water source;
- Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies;
- Catchment(s) that the site affect(s) and is reliant upon for water.
Findings: The map on stormwater should be made clearer to differentiate where there are pipes, where there is a discharge point, and where there's a natural dry channel.
Corrective action: Review the map already existing.

Finding No: TNR-001079
Checklist Item No: 1.1.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Jun-30
Checklist item: The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including:
- Site boundaries;
- Water-related infrastructure, including piping network, owned or managed by the site or its parent organization;
- Any water sources providing water to the site that are owned or managed by the site or its parent organization;
- Water service provider (if applicable) and its ultimate water source;
- Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies;
- Catchment(s) that the site affect(s) and is reliant upon for water.
Findings: The majority of requirements have been addressed in full but the catchment was not fully identified or mapped (i.e., no storm water runoff pathways have been illustrated or documented, the catchments should be mapped for surface water runoff and nearby receptors, identification of potential receptors of waste water).
Corrective action: Review the maps and add missing elements. Elaborate the storm water runoff and identify and point the receiving body of the storm water runoff.

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Finding No:	TNR-001081
Checklist Item No:	1.2.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Jun-30
Checklist item:	Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall: <ul style="list-style-type: none">- Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people;- 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.
Findings:	The site's stormwater ultimate receiving water body has not been clearly mapped and identified (e.g. a Marine Protected Area (MPA) that is within a 500m radius of the site). MPA management authority has not been identified as a stakeholder.
Corrective action:	Identify more stakeholders that are environment related like the MPA. Run the stakeholder assessment and engagement again in early 2023.
Finding No:	TNR-001082
Checklist Item No:	1.2.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Jun-30
Checklist item:	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.
Findings:	No documentation of aspects, impacts, and risks on the environment from the Factory's operations has been undertaken using a source, pathway, receptor approach, which would have limited the Factory in effectively understanding its potential impacts and risks.
Corrective action:	Expand and review the current document to include source, pathway and receptor.

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Finding No: TNR-001066
Checklist Item No: 1.3.2
Status: For information
Finding level: Observation
Checklist item: Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped
Findings: The site could identify opportunities to reduce water use and achieve progressive water balance targets using the water meters tracking.

Finding No: TNR-001067
Checklist Item No: 1.3.3
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Jun-30
Checklist item: 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.
Findings: Annual high and low variances or seasonal variances should be quantified.
Corrective action: Add the graph of the annual and seasonal variances to indicate high and low variations.

Finding No: TNR-000951
Checklist Item No: 1.3.7
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Jun-30
Checklist item: 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.
Findings: The economic contribution of the Factory and any social, cultural, environmental, or economic water-related value generated by the site should be more specifically documented, including the Factory's Corporate Social Responsibility spend and some of the value created to the municipality can be evaluated, such as water saved and not authorized connections rectified after Nestle donated metering equipment to municipality's wells; or the value of Nestle's studies and data shared with the municipality that served for developing municipality's water management plans.
Corrective action: We will review and investigate the possibility to further estimate the water related values generated from the action done.

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Finding No: TNR-000952
Checklist Item No: 1.3.8
Status: For information
Finding level: Observation
Checklist item: Levels of access and adequacy of WASH at the site shall be identified.
Findings: The toilet doors in the office areas should be fitted with some form of locks for privacy.
Corrective action: Install lock on the inside of the toilet doors.

Finding No: TNR-001069
Checklist Item No: 1.4.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Jun-30
Checklist item: The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be identified.
Findings: The organization should include information about water quality for the primary inputs identified.
Corrective action: Include info about water quality for the primary inputs

Finding No: TNR-000953
Checklist Item No: 1.4.2
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Jun-30
Checklist item: The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.
Findings: To show whether all services were considered whether there is embedded water use, the site should take a list of purchased services and screen and denote which ones have embedded water use, and if it's within the catchment. The embedded water use of outsourced services, when identified, need do be quantified.
Corrective action: A complete list of all services will be extracted and the water related ones will be screened/filtered. Then embedded water use and if in the catchment will be denoted.

Finding No: TNR-001071
Checklist Item No: 1.5.1
Status: For information
Finding level: Observation
Checklist item: 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.
Findings: There should be links to all the documents in the 'AWS Plan' document.

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Finding No:	TNR-000954
Checklist Item No:	1.5.2
Status:	For information
Finding level:	Observation
Checklist item:	Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.
Findings:	The last documented regular update of the legal compliance excel list was noted as September 2020. The site should maintain a procedure of regular monitoring of legal compliance, at least on a yearly basis. It should also include the conditions of the Environmental Permit regarding water management into the table.
Corrective action:	Establish an annual routine for legal compliance update in collaboration with the Market. Include the review of all permits of the factory (currently done ad-hoc and in hard copy).
Finding No:	TNR-000955
Checklist Item No:	1.5.3
Status:	For information
Finding level:	Observation
Checklist item:	The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.
Findings:	A transparent record of the calculation of a water balance for the public poster should be kept.
Corrective action:	Keep a file with the exact calculation of the water balance shown on the 3d map.
Finding No:	TNR-001075
Checklist Item No:	1.5.5
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Jun-30
Checklist item:	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.
Findings:	Considering the identification, mapping and status assessed of the IWRA in the catchment, the identification of threats to people or the natural environment, using scientific information and through stakeholder engagement could be done.
Corrective action:	Expand the IWRA mapping file to include info from scientific sources and feedback from stakeholder engagement.

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Finding No: TNR-001087
Checklist Item No: 1.5.6
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Jun-30
Checklist item: Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.
Findings: Existing and planned water-related infrastructure could be clearly identified, including the condition and potential exposure to extreme events should be assessed.
Corrective action: Review and the expand the file of mapping the infrastructure to include condition and potential exposure to extreme events.

Finding No: TNR-001089
Checklist Item No: 1.5.7
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Jun-30
Checklist item: The adequacy of available WASH services within the catchment shall be identified.
Findings: Public information could be obtained as evidence of the adequate WASH services in the catchment.
Corrective action: Investigate the possibility and/or the availability of such public information

Finding No: TNR-001077
Checklist Item No: 1.6.1
Status: For information
Finding level: Observation
Checklist item: Shared water challenges shall be identified and prioritized from the information gathered.
Findings: Where shared water challenges were identified, it is important to understand their cause, in order to accurately prioritize, to develop appropriate mitigation actions, and to know whether collective action is appropriate. This assessment method should be made clearer in terms of severity and urgency.

Finding No: TNR-001078
Checklist Item No: 1.6.2
Status: For information
Finding level: Observation
Checklist item: Initiatives to address shared water challenges shall be identified.
Findings: The initiatives are mainly considering water governance. The site should address all the water challenges identified in the water catchment, considering to achieve the five outcomes from the AWS standard.

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Finding No: TNR-000957
Checklist Item No: 1.7.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Jun-30
Checklist item: 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.
Findings: The site should collect already identified physical risks from the business continuity plan and consider also reputational and regulatory risks.
Corrective action: Review the file and include physical, reputational and regulatory risks from the BCP plan of the factory.

Finding No: TNR-000959
Checklist Item No: 1.8.1
Status: For information
Finding level: Observation
Checklist item: Relevant catchment best practice for water governance shall be identified.
Findings: Best practice analysis should be expanded with practices that could be done. A direct link to the evidence collected should be provided, allowing for more effective tracking of efforts undertaken.

Finding No: TNR-000958
Checklist Item No: 1.8.4
Status: For information
Finding level: Observation
Checklist item: Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.
Findings: Further best practices for the IWRA's based on research and analysis should be identified that may not yet be done but towards which the site and stakeholders may aim to work.

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Finding No: TNR-000960
Checklist Item No: 2.1.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Jun-30
Checklist item: A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:
- That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes
- That the site implementation will be aligned to and in support of existing catchment sustainability plans
- That the site's stakeholders will be engaged in an open and transparent way
- That the site will allocate resources to implement the Standard.

Findings: A declaration by the site manager should be publically disclosed, e.g. on the site's website.

Corrective action: Post in the site's website the site's manager declaration.

Finding No: TNR-001092
Checklist Item No: 2.1.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Jun-30
Checklist item: A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:
- That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes
- That the site implementation will be aligned to and in support of existing catchment sustainability plans
- That the site's stakeholders will be engaged in an open and transparent way
- That the site will allocate resources to implement the Standard.

Findings: The majority of the commitment requirements are addressed. No mention is made of the site engaging with stakeholders in an open and transparent way. No explicit mention of site implementation being aligned to and in support of existing catchment sustainability plans.

Corrective action: Include in the public statement that the site is engaging with stakeholders in an open and transparent way and be aligned and support existing catchment sustainability plans.

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Finding No: TNR-001093
Checklist Item No: 2.3.2
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Jun-30
Checklist item: 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.
Findings: The plan lacks quantitative indicators to enable effective measurement of performance over time.
Where available, the link between each target and the achievement of best practice should be made available.
Corrective action: Investigate the possibility to quantify more actions included in the water stewardship plan and where available connect with best practice.

Finding No: TNR-000963
Checklist Item No: 2.3.2
Status: For information
Finding level: Observation
Checklist item: 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.
Findings: The water stewardship plan can be improved by:
- Splitting or colour-coding to separate completed (past) actions, and new/underway actions;
- For actions related to implementation of projects or programmes with a longer time frame, where the metrics is adherence to plan, having more detailed project plans and tracking progress against plans
- Splitting larger/longer projects or programmes into smaller parts. E.g. implementing replenish project is listed as a stand-alone action but actually several different projects will be implemented with the aim to achieve the target of replenishment

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Finding No: TNR-001094
Checklist Item No: 2.4.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Jun-30
Checklist item: A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.
Findings: A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies should be made available.
Corrective action: Investigate the possibility to create such a plan with the public sector. There is a plan created by the factory.

Finding No: TNR-001095
Checklist Item No: 3.3.1
Status: For information
Finding level: Observation
Checklist item: Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.
Findings: It is good to see some actions taking place, but it is difficult to contextualise it due to the lack of supplied flow data, as well as the a consistent baseline data to measure potential progress against AWS outcomes.

Finding No: TNR-001096
Checklist Item No: 3.4.2
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Jun-30
Checklist item: 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.
Findings: There is no evidence available from the site to currently seeking to implement continual improvement due to them currently adhering to legal requirements and the current good quality of their effluent.
Corrective action: Investigate if there is a best practice for effluent and compare with our results.

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Finding No:	TNR-000964
Checklist Item No:	3.5.1
Status:	For information
Finding level:	Observation
Checklist item:	Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.
Findings:	The site could encourage or facilitate the clean up of the stream next to the Monastiraki springs. Picking up the litter would improve the attractiveness of the area.
Finding No:	TNR-001097
Checklist Item No:	3.6.2
Status:	For information
Finding level:	Observation
Checklist item:	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.
Findings:	Adequate access to effective sanitation and protective hygiene was observed, but this has not been quantified by the site.
Finding No:	TNR-001098
Checklist Item No:	3.9.5
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Jun-30
Checklist item:	Actions towards achieving best practice related to targets in terms of WASH shall be implemented.
Findings:	However WASH is being constantly being reviewed via Nestle's WASH tool. This includes assessment, planning, actions, and monitoring of implementation, no WASH targets were set in the water stewardship plan.
Corrective action:	Investigate the need and applicability of setting targets in WASH

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Finding No: TNR-000965
Checklist Item No: 4.1.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Jun-30
Checklist item: Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.
Findings: As per the Guidance document, the site should also report on how it has contributed to achieving each of the five AWS Outcomes. Additionally, the rate at which targets are achieved should be compared with timelines given in the water stewardship plan.
Corrective action: Review the Water Stewardship plan in order to show the contribution on each of the five AWS Outcomes. Also compare versus the timelines

Finding No: TNR-000966
Checklist Item No: 4.1.2
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Jun-30
Checklist item: Value creation resulting from the water stewardship plan shall be evaluated.
Findings: The value creation could be improved by expanding the evaluation and evaluating also the value for the site (provide a financial water cost-benefit component and report on its financial investment in water stewardship and the services and benefits achieved). Please note that this should be accompanied by the analysis of any potential value creation.
Corrective action: Investigate ways to improve the value creation file and provide a water cost-benefit analysis where applicable.

Finding No: TNR-000967
Checklist Item No: 4.1.3
Status: For information
Finding level: Observation
Checklist item: The shared value benefits in the catchment shall be identified and where applicable, quantified.
Findings: The value of some of the actions could be more specifically evaluated or even quantified, as they clearly have generated value for the municipality and hence for the catchment - in particular the installation of the meters on municipal wells and the sharing of the data and study that the municipality would not have obtained otherwise (as reported by the municipality's hydrogeologist). This may be a financial benefit, but it may also be improved natural capital and ecosystem services, or improved long term water security.

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Finding No: TNR-001100
Checklist Item No: 4.3.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Jun-30
Checklist item: Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.
Findings: Stakeholder consultation was undertaken with several of key stakeholders, but there is no evidences of consultation focussed on facilitating input on the site's water stewardship performance.
Corrective action: Investigate the need to include question in the stakeholder interview template regarding the site's water stewardship performance.

Finding No: TNR-000968
Checklist Item No: 4.4.1
Status: For information
Finding level: Observation
Checklist item: 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.
Findings: The site should improve traceability on the changes in response to the evaluations, for example by adding a change log to note the evaluations and description of key modifications.

Finding No: TNR-000886
Checklist Item No: 5.1.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Jun-30
Checklist item: The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.
Findings: The disclosure is limited to the disclosure of the site manager and the disclosure itself is difficult to find for interested parties if they are not deeply familiar with corporate disclosures. According to the Guidance, The disclosure should:

- Provide a summary of how water-related issues at the site are governed at the site level. This can be a general overview of the management systems in place.
- Note positions accountable for compliance with water-related laws and regulations and note if this is a committee.
- Indicate the hierarchy between those accountable for water and the senior-most leadership at the site level (CEO or equivalent) or the board.

Corrective action: Create a new file with those responsible and accountable related only to Water Resources issues

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Finding No: TNR-000969
Checklist Item No: 5.2.1
Status: For information
Finding level: Observation
Checklist item: The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.
Findings: The site should consider slightly expanding the description in the CRP tracker what was discussed, what different sides presented/requested/answered. This would improve transparency and would facilitate change management.

Finding No: TNR-000970
Checklist Item No: 5.3.1
Status: For information
Finding level: Observation
Checklist item: A summary of the site’s water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.
Findings: The site should seek a way how an annual disclosure (a summary of performance) could be done of the performance in line with AWS guidance without disclosing too many details.

Finding No: TNR-000971
Checklist Item No: 5.4.1
Status: For information
Finding level: Observation
Checklist item: The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.
Findings: Together with improving disclosure of water stewardship performance, the site should seek to improve the disclosure of the water-related challenges.

Signature WSAS

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Report Details

Report	Value
Report prepared by	Neringa Pumputyte
Report approved by	Lurdes Brandão Guerra
Report approved on (Date)	

Surveillance

Proposed date for next audit
2023-Jun-30

Comment 30/06/2023

Stakeholder Announcements

Date of publication	Location
2022-Jun-07	Corporate profile in Facebook
2022-Jun-06	Announcement board of the municipality
2022-Jun-04	Local newspaper: article related to the media/stakeholders event with the title "The sustainable water cycle"

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Catchment Information

Catchment Information

The site draws its water from groundwater aquifers located in Korpi synclinal groundwater sub-system. A new well has been drilled (but is not yet connected to the site) that reaches Jurassic sub-system. As the region is karstic, these sub-systems connect with other sub-systems, including Korpi anticlinal kakirite sub-system where the wells of the municipality are located. All these sub-systems fall within the Monastirakiou groundwater system and Vonitsa-Voulkaria groundwater system - those are groundwater bodies identified for the implementation of the EU Water Framework Directive, for which public data on quantitative and ecological status is available.

Next to the site, a dry riverbed is located, and a valley of a dry stream where the site's wastewater gets discharged into (not continuously). The small stream's valley leads to the dry river bed, and this dry river bed leads further downstream into Giourgia (yourya) and Voutoumias. The dry river bed has not had any water flow for many years - all water flows are underground. Any rainwater or the site's wastewater discharge infiltrates the stream bed. Therefore the surface water catchment is not really relevant for this site.



Dry river bed that is the recipient of the site's treated wastewater effluent and the stormwater
Dry river bed2.jpg

Client Description and Site Details

Client/Site Background

The Nestle Waters Factory in Monastirak is located in 30002 Vonitsa, Greece. The site withdraws groundwater and produces bottled still and sparkling water in plastic and glass bottles - the vast majority are PET bottles. There are 52 permanent staff and 8 temporary staff. The products are mostly for Greece market and only a small portion is exported.



Site view from a parking area
20220629_172214.jpg

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Summary of Shared Water Challenges

Summary of Shared Water Challenges

Education about water (water challenges), rational usage and water preservation is the primary shared water challenge in NW Greece on a par with rational water usage in the catchment. It is important to raise awareness on the use of water targeting mainly farmers and children and avoid that irrigation is done without control of the withdrawals, leading to a risk of over pumping in the plain. Moreover, infrastructure for potable water suffers from leakage and lack of governance.

Perception about Water Quantity in the Area: population is concerned about the available water in the area, especially during summer.

Water Quality in the catchment due to farming activities: the site is surrounded by minor farming activities and there are a lot of agricultural fields in the plain, until Vonitsa. These activities could potentially harm the quality of the water due to the use of fertilizers.

0.1 General Requirements for Single Sites, Multi-Sites and Groups

0.1.1 Eligibility Criteria

0.1.1.1 *The site(s) occupy one catchment OR an exception has been granted.*



Comment: The site occupy one catchment. The site is not connected to municipal water supply or discharge - it is self-sufficient for all water-related services.

0.1.1.2 *The scope of the proposed certification shall be under the control of a single management system.*



Comment: The site is managed under a single "site-based" management system by the Nestle Waters Korpy Factory.

0.1.1.3 *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.*



Comment: The site's primary production system, water management, product or service range, and the main market structures are homogeneous.

1 STEP 1: GATHER AND UNDERSTAND

1.1 *Gather information to define the site's physical scope for water stewardship purposes, including: its operational boundaries; the water sources from which the site draws; the locations to which the site returns its discharges; and the catchment(s) that the site affect(s) and upon which it is reliant.*

1.1.1 *The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including:*

- Site boundaries;
- Water-related infrastructure, including piping network, owned or managed by the site or its parent organization;
- Any water sources providing water to the site that are owned or managed by the site or its parent organization;
- Water service provider (if applicable) and its ultimate water source;
- Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies;
- Catchment(s) that the site affect(s) and is reliant upon for water.

 No

Comment Korpi Maps ppt includes a range of maps that cover the requirements considering the site boundary: Physical scope factory boundaries map, and factory site: wells are mapped, WWTP (own) location, WW discharge point, piping. There is no piping yet between the new deep well and the site. Apart from the factory site, the company owns several small pieces of land where wells are located. Immediate surroundings map should be created.

The catchments could be mapped for surface water runoff and nearby receptors. The map on stormwater should be made clearer to differentiate where there are pipes, where there is a discharge point, and where there's a natural dry channel. Reportedly, the dry channel next to the site is always dry, even during the rain events. The site's WW and stormwater is discharged into a smaller dry channel that leads to that larger channel.

The site is not connected to municipal water supply or discharge - it is self-sufficient for all water-related services.
 The new well K5 is located in subcatchment 6 and existing wells K1-K4 are in the sub-catchment 1. All subcatchments are interrelated. Subcatchments:
 1 Subcatchment - Synclinal sub-system (deep): K1-K4 wells are located in it and one one of the municipality's wells (M1).
 2 Subcatchment to the right - anticlinal kakirite sub-system: municipal wells G2 and G5, Korpi springs (an IWRA), and the Monovalta well under refurbishment financed by Nestle are located there.
 3 Jurassic aquifer sub-system is actually part of 1, just a higher part of it
 4 Shear zone subcatchment to the left from 1 - it feeds Monastiraki springs and the stream that flows from it (an IWRA)
 5 Small transversal sub-catchment that recharges others
 6 A shallow sub-system that's on the lower slopes and where wells for irrigation are located. This sub-catchment is fed by others (the water pushes above).

As the dry surface water drain nearby the site does not have a flow, effectively the site does not affect any surface water basin.

The majority of requirements have been addressed in full. The catchment was not fully identified or mapped (i.e., no storm water runoff pathways have been illustrated or documented, the catchments should be mapped for surface water runoff and nearby receptors, identification of potential receptors of waste water).

Finding No: TNR-000950
Finding No: TNR-001079

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1.2 *Understand relevant stakeholders, their water related challenges, and the site's ability to influence beyond its boundaries.*

Finding No: TNR-001081

1.2.1 *Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall:*

- *Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people;*
- *Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies;*
- *Provide evidence of stakeholder consultation on water-related interests and challenges;*
- *Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups;*
- *Identify the degree of stakeholder engagement based on their level of interest and influence.*

➤
No

Comment

Nestle-wide CRP tool was used for identifying stakeholders.

- Step 1 - stakeholder mapping: local authorities, local businesses and local influencers were identified and interviewed to identify concerns and expectations - about anything related to the site. Then if they are a AWS stakeholder, additional questions were answered, including about water challenges/concerns. Ranking is done and the first mapping in relation to the strength of the relationship and the relationship on water issues. More important ones were selected for interviews. The tools allows to do the follow up of stakeholder engagement but the site does the tracking separately.
- Step 2 - self-assessment. Section 1 is on water resources management.
- Step 3 - External diagnosis, done as interviews. Interviewees were selected in step 1. Panos and Nicos did latest round of interviews. And an external study is done every 3 years. Nov 2019 was the last one. Min 100 respondents with a questionnaire.
- Step 4 - Action plan (is done for every year)
- Step 5 - Impact assessment. It's actually action plan per topic.

Dashboard compares the scores between interviews and external survey. But water availability questions were not included in the last survey
Follow up: every Q, comments by the site, by the region (Jeremy), the management team, and Cell.

Conclusion:
The majority of key stakeholders have been identified and numerically mapped, considering different categories and in terms of their interest and influence on the Factory. The site's stormwater ultimate receiving water body has not been clearly mapped and identified. List of stakeholders does not includes a combination of neighbouring, impacting, and dependent stakeholders.

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.*

➤
No

Comment

The degree of influence is identified as part the CRP process - result view is attached.

No documentation of aspects, impacts, and risks on the environment from the Factory's operations has been undertaken using a source, pathway, receptor approach, which would has limited the Factory in effectively understanding its potential impacts and risks.





Finding No: TNR-001082

1.3 *Gather water-related data for the site, including: water balance; water quality, Important Water-Related Areas, water governance, WASH; water-related costs, revenues, and shared value creation.*

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1.3.1	<i>Existing water-related incident response plans shall be identified.</i>	 Yes
Comment	Emergency response plan covers a variety of emergencies. Includes leakage of chemicals, drought or no water availability in the surrounding areas; pollution of the aquifer. Plans are reasonable.	
1.3.2	<i>Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped</i>	 Obs.
Comment	<p>Water mapping every year for August and Sep (Aug is heavy for production and Sep is not so busy) - they are considered representative months of the average. The map determines the flows and losses at each stage.</p> <p>Conclusion: Site uses water meters for tracking of water losses or early warning of leak detection or weak piping points. The site could identify opportunities to reduce water use and achieve progressive water balance targets using the water meters tracking.</p>	
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>	 in progress
Comment	<p>Quantification of all flows is done for two months (an average of two months). Monthly calculation is done for the water use ratio - for this indicator, the graph per month is available. Hardly any seasonality can be noticed. For this indicator, water for hygienic purposes is not considered.</p> <p>Conclusion - Record of site water balance assessed monthly. - Annual high and low variances or seasonal variances have not been quantified.</p> <p style="text-align: right;">Finding No: TNR-001067</p>	
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	<p>Monitoring sampling plan is followed. Quarterly sampling. Samples are analysed in Nestle's accredited lab in France. Sample taking is done by the site. No cases of concerns. Also a daily monitoring of the deepwells (basic chemistry and basic microbiology) and finished product. Results are recorded in SAP. A sample of test reports were seen.</p> <p>For the well water (water source), it's physical, microbiological, and chemical parameters. Most parameters are tested in a certified laboratory monthly, some – quarterly. Operational monitoring is daily.</p> <p>For the effluent, it's pH, COD and BOD. As the release is not constant but in batches, the monitoring frequency depends on releases but it is about weekly.</p> <p>The discharge is monitored several times per month. The readings are within limits. There were no concerns with the effluent quality and there is no challenge of water quality in the area, so there was no requirement to improve further.</p> <p>For water quality in the basin (and mostly “upstream” of the site, i.e. in the recharge areas) the site monitors the quality to have a trend on nitrates and other parameters as a pro-active measure and to share that data with the municipality, but stakeholders do not have quality-related challenges in the area.</p>	

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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	Factory layout with places indicated where chemicals are stored, and which chemicals. The largest threat is large quantities of caustic and acid in the CIP area.	
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
Comment	There are no important water related areas (IWRA) on site.	
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>	 in progress
Comment	<p>Costs are identified and quantified - what is AWS-related costs. Non-tangible activities are listed. Value generated is not clearly described in the quantification but some description in the water stewardship plan.</p> <p>Conclusion: The economic contribution of the Factory and any social, cultural, environmental, or economic water-related value generated by the site should be more specifically documented.</p> <p style="text-align: right;">Finding No: TNR-000951</p>	
1.3.8	<i>Levels of access and adequacy of WASH at the site shall be identified.</i>	 Obs.
Comment	<p>WASH self-assessment tool was completed by the EHS manager (1.3.8_WBCSD_WASH_Self-Assessment_Tool_v2_Korpi_20042022). NW Korpi have also used the 'World Business Council's Sustainable Development's' (WBCSD) self-assessment tool to evaluate access to WASH. Criteria for this rating is 90% and Site score was 100%.</p> <p>It was identified that the site does not yet have a toilet for disabled or the ramp for disabled. During the site visit auditors noted that there is no possibility to lock a toilet from inside in the newly refurbished office areas.</p> <p>Conclusion: All WASH aspects have been comprehensively addressed.</p>	
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>	 in progress
Comment	<p>Primary inputs are outside the catchment. The site looked at primary inputs, and for the four major suppliers, collected some more information on blue water footprint of the region where suppliers are located; water risk, baseline water stress, seasonal variability and drought severity in the area of the suppliers - using publicly available information; and whether suppliers monitor water use.</p> <p>Conclusion: NW Korpi have documented the embedded water use of primary input and identified that they are outside the catchment. The organization should include information about water quality for the primary inputs identified.</p> <p style="text-align: right;">Finding No: TNR-001069</p>	

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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	<p>The site looked at those services that would be related to water use or water control. The water use of these services is included in the site's water use. The site was not able to identify a service that would have embedded water use but was able to demonstrate that it screen all outsources services.</p> <p>Conclusion: The site is not able to identify a service that would have embedded water use, despite the screen of all outsources services, the site should take a list of purchased services and screen and denote which ones have embedded water use. If so, embedded water use of outsourced services need do be quantified, and noted if it's within the catchment or not.</p> <p style="text-align: right;">Finding No: TNR-000953</p>	
1.5	<i>Gather water-related data for the catchment, including water governance, water balance, water quality, Important Water-Related Areas, infrastructure, and WASH</i>	
1.5.1	<i>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.</i>	 Obs.
Comment	<p>The site has identified a number of initiatives. Most relevant ones:</p> <ul style="list-style-type: none"> - Management Plan of the River Basins of Western Sterea Ellada River Basin District where the site's catchment is located (RBMP). Published in 2014, with the first revision done in 2017. The second revision was supposed to be issued at the end of this year but the revision has not even started (late according to the WFD). Monastirakiou system has a good water status. - The Periphery (an administrative area) issues proposed measures for adapting to climate change - preliminary suggestions. <p>The site looked at actions in the RBMP and identified which actions from that plan relate to the site's actions (and so contribute). E.g. the site supplied water meters for the municipality to identify and then repair leakages - this contributes to the respective action.</p> <p>The documents are available in greek.</p> <p>Conclusion: The site has identified a number of significant water governance initiatives.</p>	
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>	 Obs.
Comment	<p>The company holds all the relevant permits, licenses, and registrations according to the national legislation. The applicable water related legal and regulatory requirements are listed across European and National (Hellenic) legislation. The company, in the context of ISO certification, maintains an extensive database of relevant legislation concerning Health Safety and Environmental aspects. Additionally, the company has developed a more detailed list of water related legal requirements as well as the relevant water use permits. In both lists the company monitors and documents the level of compliance.</p> <p>For the conditions in the permits, they are in the permits but it could be more clearly shown how the site tracks compliance with those conditions (step 3).</p> <p>Conclusion: Water-related legal and regulatory requirements are identified and documented in a extensive data base of relevant legislation concerning Health Safety and Environmental aspects, dates of expiry are tracked, and all requirements were met at the time of the audit.</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>	 Obs.

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Comment	<p>Water resource study in Korpi done in May 2020. There is also a detailed water balance of the catchment and each sub-system that accompanies this study. Both documents are too large to be uploaded on the system, therefore only an extract is attached.</p> <p>For a 3D map recently prepared for the site, a different balance result was presented because of the different scope of sub-systems. The site did not have a traceable calculations of how the balance for the poster was calculated to match it with the detailed balance.</p> <p>Both balances show no concern with water availability.</p>	
1.5.4	<p><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></p>	 Yes
Comment	<p>Status assigned by the river basin management authority to the larger aquifer where the site's sub-catchment is located.</p> <p>The site also takes samples and analyses them in the site's lab. Sample locations (nine) were selected without a scientific approach, the site tried to spread them in the catchment geographically. So far the results do not indicate water quality issues.</p> <p>Conclusion: The site has gathered data on water quality issues in the catchment, without a scientific approach, but there was no evidence of water quality issues.</p>	
1.5.5	<p><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></p>	 in progress
Comment	<p>Three IWRA: (1) Korpi springs; (2) protected area higher in the mountain - protected as a catchment area for all the water in the area, protected from any industrial activity; (3) Monastiraki springs and small river in the Monastiraki village - important for the village. Areas are identified and status described in a table. The site also keeps additional information about these IWRA.</p> <p>Conclusion: IWRA are identified, mapped and their status assessed. There are no information about threats to people or the natural environment, using scientific information and through stakeholder engagement.</p> <p style="text-align: right;">Finding No: TNR-001075</p>	
1.5.6	<p><i>Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.</i></p>	 in progress
Comment	<p>Map of wells/boreholes and springs. A list of municipal infrastructure and their exposure to extreme events is compiled. Piping and tanks are in another map. This could include also the Korpi and Monastiraki spring infrastructure, and condition could be clearly identified, although the site is already well aware of these.</p> <p>Conclusion: Existing and planned water-related infrastructure could be clearly identified. The condition and potential exposure to extreme events should be assessed.</p> <p style="text-align: right;">Finding No: TNR-001087</p>	
1.5.7	<p><i>The adequacy of available WASH services within the catchment shall be identified.</i></p>	 No

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Comment	<p>It is considered that all population has adequate access to WASH services but no evidence could be presented.</p> <p>Conclusion: Although it is considered that all population has adequate access to WASH services, public information could be gathered to prove and consolidate the information regarding WASH status in the catchment.</p> <p style="text-align: right;">Finding No: TNR-001089</p>	
1.6	<i>Understand current and future shared water challenges in the catchment, by linking the water challenges identified by stakeholders with the site's water challenges.</i>	
1.6.1	<i>Shared water challenges shall be identified and prioritized from the information gathered.</i>	 Obs.
Comment	<p>Identified in the table and prioritised. The wording is now more specific than during the initial certification.</p> <p>Conclusion: To develop appropriate mitigation actions, and to know whether collective action is appropriate the assessment method should be made clearer in terms of severity and urgency.</p>	
1.6.2	<i>Initiatives to address shared water challenges shall be identified.</i>	 Obs.
Comment	<p>The table identifies initiatives - those are mainly municipality's initiatives, which is appropriate for the site's challenges.</p> <p>Conclusion: The initiatives are mainly considering water governance.</p>	
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>	 in progress
Comment	<p>Shared challenges are analysed as risks. Identification of physical risks is done as part of the business continuity plan and is available. The site should collect already identified physical risks from the business continuity plan and consider also reputational and regulatory risks.</p> <p>Conclusion Water risks do not address potential costs and business risks.</p> <p style="text-align: right;">Finding No: TNR-000957</p>	
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	<p>Opportunities are identified from shared challenges - they are somewhat generic and the site's water stewardship plan reflects a deeper understanding of the opportunities.</p> <p>Conclusion: The 'Water_risks_and_opps' tab, spreadsheet contains a 'Future Trends' section. It has identified four relevant opportunities, that will be assessed at the next follow-up audit.</p>	
1.8	<i>Understand best practice towards achieving AWS outcomes: Determining sectoral best practices having a local/catchment, regional, or national relevance.</i>	

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1.8.1	<i>Relevant catchment best practice for water governance shall be identified.</i>	 Obs.
Comment	<p>The site has identified which actions they do that can be considered best practice. E.g. digitalisation of water flows that helps achieve low water use ratio. Measures in the RBMP are considered best practice.</p> <p>Conclusion: The Site has identified the best practices considering the five AWS outcomes, making a record of the frequency of its application and the evidence gathered in the process. The justification for identifying these examples will be assessed at the certification audit.</p>	
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>	 Yes
Comment	<p>The site discussed with the regional person to understand best practices in Nestle sites and listed actions the site does that can be considered best practice. On water balance (for the site as well as the aquifer) indeed a number of actions the site does can be considered best practice. Water use ratio benchmarking study done by an external consulting company on water and food plants (not just Nestle) indicates the site's water use ratio is very good.</p>	
1.8.3	<i>Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.</i>	 Yes
Comment	<p>The site identified which practices that they do are considered best practice. See observation for 1.8.1 - the list could be expanded with anything that can be additionally done, and not just by the site.</p>	
1.8.4	<i>Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.</i>	 Obs.
Comment	<p>As for other best practices, the site has identified the actions already done that can be considered best practice. The auditors believe on IWRA's there can be further best practices identified towards which the site could aim to work together with relevant stakeholders.</p>	
1.8.5	<i>Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.</i>	 Yes
Comment	<p>The practices identified as already happening on WASH can indeed be considered best practice. Donating drinking water to the areas in the catchment during the disruptions to the municipal water supply could also be considered best practice on WASH in the catchment.</p> <p>Actions that address WASH-related issues should also be taken into account from a continuous improvement perspective.</p>	

2 STEP 2: COMMIT & PLAN - Commit to be a responsible water steward and develop a Water Stewardship Plan	
2.1	<p><i>Commit to water stewardship by having the senior-most manager in charge of water at the site, or if necessary, a suitable individual within the organization head office, sign and publicly disclose a commitment to water stewardship, the implementation of the AWS Standard and achieving its five outcomes, and the allocation of required resources.</i></p>
2.1.1	<p><i>A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:</i></p> <ul style="list-style-type: none"> - <i>That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes</i> - <i>That the site implementation will be aligned to and in support of existing catchment sustainability plans</i> - <i>That the site's stakeholders will be engaged in an open and transparent way</i> - <i>That the site will allocate resources to implement the Standard.</i>
Comment	<p>Nestle commitment on water stewardship - company-wide. And for the site, a declaration signed by site manager - however, this declaration could not be found on the site's website. A number of articles in the press that were published after the latest press event reflect that the site publically announced its commitment to water stewardship.</p> <p>Conclusion:</p> <ul style="list-style-type: none"> - No direct mention is made to site engaging with stakeholders in an open and transparent way. However, the site does commit to "actively engage with partners and stakeholders". - No explicit mention of site implementation being aligned to and in support of existing catchment sustainability plans, but this is partly implied in the site commitment regarding "necessary steps ... to ensure that the Korpi site complies with all relevant legal and regulatory requirements". <p style="text-align: right;">Finding No: TNR-001092 Finding No: TNR-000960</p>
2.2	<p><i>Develop and document a process to achieve and maintain legal and regulatory compliance.</i></p>
2.2.1	<p><i>The system to maintain compliance obligations for water and wastewater management shall be identified, including:</i></p> <ul style="list-style-type: none"> - <i>Identification of responsible persons/positions within facility organizational structure</i> - <i>Process for submissions to regulatory agencies.</i>
Comment	<p>Nestle Management system manual. System for regulatory reporting is established. EHS manager is responsible for maintaining compliance and reporting.</p> <p>A scheme on compliance maintaining.</p> <p>Table/scheme on permits - until when valid, progress if it needs renewal.</p> <p>Environmental permit should also be added to the tracker as it has a section on water (see observation for 1.5.2).</p> <p>Conclusion:</p> <p>Responsible persons/positions within the site's organizational structure have been clearly determined regarding the various compliance obligations, considering the management system implemented.</p> <p>Whilst the process for submissions to regulatory agencies is not formally documented, based on current compliance it is clear that a process exists and is being implemented effectively.</p>
2.3	<p><i>Create a water stewardship strategy and plan including addressing risks (to and from the site), shared catchment water challenges, and opportunities.</i></p>

 in progress

 Yes

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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.* ✔
Yes

Comment Original strategy was adopted and signed in 2018. It has basically remained the same in the version adopted by the new plant manager.

The Site's Water Strategy is to sustain and lower the physical and reputational water risks and benefit to their stakeholders and the community, considering defined key goals and objectives of the water stewardship strategy:

- Manage overall water usage
- Increase water capacity and efficiency
- Explore new aquifer
- Engage the public on water related issues
- Monitoring water quantity
- Monitoring water quality
- Preparedness on extreme and emergency events

Conclusion:

The statement is a good vision and mission statement, containing overarching goals for the site's water stewardship approach.

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. ✘
No

Comment The site maintains a water stewardship plan structured around the five AWS outcomes and addresses the Risks and Opportunities, it lists:

- water topics (which effectively are shared water challenges);
- Objectives - which are worded in a generic way, mostly as AWS outcomes, e.g. sustainable water balance;
- Targets, which in most cases include by when they should be achieved. Part of the targets are more like actions than targets to be achieved (e.g. implement a project or programme)
- Actions (the plan also includes already completed actions);
- Metrics: in cases where actions are related to implementing a project or programme, the metric is 'adherence to plan' - do those plans exist?
- Costs (for most actions) and a description of benefits
- Links to desired results (AWS outcomes)
- Responsible and accountable individuals
- Start and end (for completed actions) dates
- Progress indication and comment
- Performance vs target and evaluation vs target
- Value creation

The plan can be further improved - see observation.

Finding No: TNR-000963

Finding No: TNR-001093

2.4 *Demonstrate the site's responsiveness and resilience to respond to water risks*

2.4.1 *A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.* ➤
in progress

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Comment Business continuity plan has elements that relate to water. Water resources contingency plan is also available. The site states their resilience to water risks is demonstrated by compliance with internal and regulatory programs and then lists a number of examples. However, this does not constitute a plan that has been developed in co-ordination with relevant public sector and infrastructure agencies.






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3 STEP 3: IMPLEMENT - Implement the site's stewardship plan and improve impacts

3.1	<i>Implement plan to participate positively in catchment governance.</i>	
3.1.1	<i>Evidence that the site has supported good catchment governance shall be identified.</i>	 Yes
Comment	- CRP meeting tracker shows regular meetings with the mayor, village presidents and other stakeholders. - A public announcement from the municipality on the cooperation between Nestle and Municipality - Based on the interview with the municipality's hydrogeologist, the key ways the site contributes to the catchment governance is by sharing the studies and data that enable the municipality to make their strategic decisions, as well as by sponsoring meters that enabled the municipality to find (and then fix) leakages and illegal consumers of water. Conclusion: The key role of the Nestle Waters with public water authorities, based on the interview with the municipality's hydrogeologist, evidences the involvement and establishment and ongoing functioning of their support for good catchment governance.	
3.1.2	<i>Measures identified to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be implemented.</i>	 Yes
Comment	There is no concern with the water rights of others identified, so no measures were needed.	
3.2	<i>Implement system to comply with water-related legal and regulatory requirements and respect water rights.</i>	
3.2.1	<i>A process to verify full legal and regulatory compliance shall be implemented.</i>	 Yes
Comment	The water related legal compliance is being monitored in the context of ISO 14001 certification. Additionally, the company implements a top to bottom regulatory compliance process, managed by the legal department of NESTLE Greece (see attachment). An opportunity for improvement would be to align the ISO 14001 legal monitoring process with the one of the central legal department.	
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	No water rights of external parties were identified by the site or audit team as being legal and regulatory requirements that the site can influence or is responsible to implement.	
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>	 Obs.

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Comment	<p>The water balance of the sub-catchment where the site's wells are located as well as a wider catchment of inter-related sub-catchments, is well positive. In the sub-catchment where the municipality's wells and Korpi springs (which are also a source of municipal water supply) are located, there is some pressure on Korpi springs during the summer months. To alleviate that, Nestle is supporting the refurbishment of the Monovalta deep well located further downstream in that sub-catchment. Nestle financed installation of metering equipment on municipal wells and this allowed the municipality to reduce leakages and illegal connections massively.</p> <p>It is good to see some actions taking place, but it is difficult to contextualise it due to the lack of supplied flow data, as well as the a consistent baseline data to measure potential progress against AWS outcomes.</p>	
3.3.2	<p><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></p>	 Yes
Comment	<p>Water scarcity is not an issue at the site's catchment - only perception of it. However, the site does set quantified water ratio targets each year. The ratio is already very good compared to industry average, so improvements are difficult. For the last few years the ratio has stayed almost stable, with some increases. The site already has a digitalisation of water flows. Recent attempt to improve the water ratio included changing the cooling tower operation to have more closed loop system, however, the project was reversed because of a steep increase in energy consumption. Further planned measures include adding additional functionality to the monitoring and digitalisation tool.</p> <p>Conclusion: Progress towards meeting water use efficiency targets was demonstrated, and these targets have been integrated into the water stewardship plan.</p>	
3.3.3	<p><i>Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.</i></p>	 Yes
Comment	<p>No issue of the shortage of water for social, cultural or environmental needs has been identified, and no need for re-allocation.</p>	
3.4	<p><i>Implement plan to achieve site water quality targets</i></p>	
3.4.1	<p><i>Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.</i></p>	 Yes
Comment	<p>The water quality targets are:</p> <ul style="list-style-type: none">- By 2023 ensure farming activities do not pose a threat for the catchment- Monitoring the quality of water of the wider aquifer <p>Progress towards the second target has been recorded and it was concluded tha there is currently no issue with water quality. Site actions are matched with the measures identified in the larger basin management plan identified in the first step. Further monitoring of nitrates (in response to the observation raised in the initial certification) showed that an increase is during the water recharge period and then concentration reduces.</p>	
3.4.2	<p><i>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.</i></p>	 in progress

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Comment	<p>There is no concern with the site's wastewater effluent. The quality concern relates to a potential pollution of the aquifer from farming activities. For that, the site monitors water quality at a selection of points spread through the catchment area.</p> <p>Conclusion: There is no evidence available from the site to currently seeking to implement continual improvement due to them currently adhering to legal requirements and the current good quality of their effluent.</p> <p style="text-align: right;">Finding No: TNR-001096</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>	🔍 Obs.
Comment	Currently there are no actions in the water stewardship plan to maintain or enhance the IWRAs. During the site visit, an opportunity was identified for the site to encourage or facilitate the clean up of the stream next to the Monastiraki springs. Picking up the litter would improve the attractiveness of the area.	
3.6	<i>Implement plan to provide access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers at all premises under the site's control.</i>	
3.6.1	<i>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.</i>	✅ Yes
Comment	During the site visit, the provision of WASH was seen and it is adequate. See observation in step 1 about adding locks to the toilets in the newly refurbished office area.	
3.6.2	<i>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.</i>	🔍 Obs.
Comment	<p>No concerns with the site impinging on the human rights to safe water and sanitation have been identified. The site continues to support local population in case of municipal water supply disruptions by providing free drinking water bottles during such incidents. This is reflected in satisfactory WASH facilities as shown against indicator 1.3.8.</p> <p>Conclusion: Adequate access to effective sanitation and protective hygiene was observed, but this has not been quantified by the site.</p>	
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>	✅ Yes
Comment	There are no indirect water use targets in the water stewardship plan as indirect water use is outside the catchment.	
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>	✅ Yes
Comment	No suppliers or service providers with indirect water use have been identified in Step 1, therefore there are no engagement actions.	

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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>	 Yes
Comment	As the site is in a relatively remote area and not connected to municipal water-related infrastructure, there is no shared water-related infrastructure. When the site sees cases of leakage on the roads or other damage to the municipality's infrastructure, they inform the municipality.	
3.9	<i>Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.</i>	
3.9.1	<i>Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.</i>	 Yes
Comment	The site has identified which practices they implement can be considered best practice. Sharing of studies and data with the municipality to enable them to improve their water management, can be added to the list.	
3.9.2	<i>Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.</i>	 Yes
Comment	Same document as above. Digitalisation of water flows on site that facilitates maintaining a good water use ratio. Funding of the installation of meters on the municipal boreholes. Cooperation with the municipality on refurbishment of Monovalta well.	
3.9.3	<i>Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.</i>	 Yes
Comment	The site takes samples and conducts analysis in its lab to monitoring water quality in locations across the aquifer, and shares the data with the municipality.	
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
Comment	See observation in 1.8 on identifying further best practices on IWRAs.	
3.9.5	<i>Actions towards achieving best practice related to targets in terms of WASH shall be implemented.</i>	 in progress
Comment	<p>The site donates drinking water bottles to areas in the catchment during municipal supply disruptions.</p> <p>Conclusion: However WASH is being constantly being reviewed via Nestle's WASH tool. This includes assessment, planning, actions, and monitoring of implementation, no WASH targets were set in the water stewardship plan.</p>	

Finding No: TNR-001098

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4 STEP 4: EVALUATE - Evaluate the site's performance.

4.1 Evaluate the site's performance in light of its actions and targets from its water stewardship plan and demonstrate its contribution to achieving water stewardship outcomes.

4.1.1 Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated. 🔍
Obs.

Comment Performance vs target is tracked in the water stewardship plan. Contribution to each of the five water stewardship outcomes is not explicitly included in the performance evaluation, although the link with the outcomes is made in the best practices document.

Conclusions:
Although, the organization list the targets for action and improvement from its water stewardship plan, it lacks the report on to what extent they are being, or have been met. This site should also report on how it has contributed to achieving each of the five AWS Outcomes. Additionally, the rate at which targets are achieved should be compared with timelines given in the water stewardship plan.

4.1.2 Value creation resulting from the water stewardship plan shall be evaluated. 🔍
Obs.

Comment The water stewardship plan describes what kind of value was created but in generic wording and mostly related to the value generation in the catchment, whilst this indicator is related to the value for the site. Although for some actions, the value is described as community's engagement with the site and thus is about the value for the site. It could be improved by expanding the evaluation and evaluating also the value for the site.
A financial water cost-benefit component for a water bottling site has no relevance as all costs and benefits are water-related here.

Conclusion:
The value creation could be improved by expanding the evaluation and evaluating also the value for the site (provide a financial water cost-benefit component and report on its financial investment in water stewardship and the services and benefits achieved). Please note that this should be accompanied by the analysis of any potential value creation.

4.1.3 The shared value benefits in the catchment shall be identified and where applicable, quantified. 🔍
Obs.

Comment The water stewardship plan describes what kind of value was created but mostly in generic wording. The value of some of the actions could be more specifically evaluated or even quantified, as they clearly have generated value for the municipality and hence for the catchment - in particular the installation of the meters on municipal wells and the sharing of the data and study that the municipality would not have obtained otherwise (as reported by the hydrogeologist).

4.2 Evaluate the impacts of water-related emergency incidents (including extreme events), if any occurred, and determine the effectiveness of corrective and preventative measures.

4.2.1 A written annual review and (where appropriate) root-cause analysis of the year's emergency incident(s) shall be prepared and the site's response to the incident(s) shall be evaluated and proposed preventative and corrective actions and mitigations against future incidents shall be identified. ✅
Yes

Comment Not applicable as no emergency incident(s) have taken place, in more than 10 years, necessitating review and root-cause analysis.

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4.3 *Evaluate stakeholders' consultation feedback regarding the site's water stewardship performance, including the effectiveness of the site's engagement process.*

4.3.1 *Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.*



Yes

Comment The CRP process includes interviews with the stakeholders that cover discussion on the site's water stewardship performance. An external survey every few years also evaluates this.

Conclusion:
Stakeholder consultation was undertaken with several key stakeholders, but there is no evidences of consultation focussed on facilitating input on the site's water stewardship performance.

4.4 *Evaluate and update the site's water stewardship plan, incorporating the information obtained from the evaluation process in the context of continual improvement.*

4.4.1 *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.*



Obs.

Comment The water stewardship plan is maintained as a live document that gets updated with performance and where new actions are added. It is clear the document has been updated but not easy to trace when and what was updated.

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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.* 🚩 in progress

Comment External powers document lists accountable persons from Greece - this denotes that these people can represent and sign for the company, and includes the site manager. The document is published in the government gazette. It would be difficult to find for stakeholders who are not familiar that such information can be found on the government gazette. This also limits disclosure to the top manager at the site, without information on the governance. The site should look for a way to disclose the site’s water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations, in a way that meets the restrictions applied by Nestle.
Finding No: TNR-000886

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.* 🔍 Obs.

Comment Last communication was at an environmental media event on June 01. It summarised key new actions the site is having and key actions done. The articles released by the press after the event indicate the key messages were conveyed. The CRP meeting tracker shows meetings held with stakeholders and very short descriptions of the topics discussed. It can be seen that actions relevant to specific stakeholders are discussed. It is difficult to understand to what extent other measures are also communicated.

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.* 🔍 Obs.






Comment The disclosure was during the media event in June. The presentation content is a high level summary of cumulative results of the main actions (e.g. water saved) and main actions planned (without the indication over what period of time) although the media articles indicate a relevant high level understanding of key water stewardship areas. The detailed presentation on water stewardship plan and implementation was communicated to stakeholders in 2021. An updated one for 2022 has not yet been done and is reportedly planned for later this year. The company wants to keep a low profile in the general public, focusing on communicating more detailed performance only to stakeholders. The site should seek a way how an annual disclosure could be done of the performance without disclosing too many details. Please note that, The disclosure of water stewardship performance needs to be accessible in a suitable format for the target audience(s) with results that pertain to material issues for the target audience.

5.4 *Disclose efforts to collectively address shared water challenges, including: associated efforts to address the challenges; engagement with stakeholders; and co-ordination with public-sector agencies.*

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5.4.1	<i>The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.</i>	 Obs.
Comment	<p>Shared challenges are disclosed and efforts per challenge presented to stakeholders. For general public, the disclosure is limited to high level generic information - see 5.3.1. The site plans to make a poster on the groundwater balance public by posting it on a board next to Monastiraki springs - this poster includes a good description of one of the challenges.</p> <p>It is important to disclose efforts to collectively address shared water challenges, including associated efforts to address the challenges; engagement with other companies, organizations and community groups in the area; and coordination with public-sector agencies.</p>	
5.4.2	<i>Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.</i>	 Yes
Comment	<p>The efforts can be seen in the CRP tracker and were confirmed during stakeholder interviews. The annual Site Water Stewardship Summary referenced in Section 5.3.1 is expected to cover the requirements of this indicator and the comments made against indicator 5.4.1 applies to this one as well.</p>	
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>	 Yes
Comment	<p>There have not been any site water-related compliance violations and associated corrections to be disclosed.</p>	
5.5.2	<i>Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.</i>	 Yes
Comment	<p>There have been no incidents. The site has a corrective action procedure should an incident occur.</p> <p>Necessary corrective actions by the site to prevent future occurrences have not been applicable and have therefore not been disclosed.</p>	
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>	 Yes
Comment	<p>There have not been any site water-related compliance violations that have required communication to relevant public agencies and disclosure.</p>	

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Photographic Evidence from Audit

✔
Yes

Comment Photos of the site from the road, one of the existing wells, a new well that's been drilled but is not yet connected to the site, site's wastewater treatment facility, dry river bed that is a recipient of the site's treated effluent (discharged sporadically) and stormwater, and Monastiraki springs - one of the IWRA's.



Well.jpg



Site view from the road.jpg



Monastiraki springs.jpg

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WWT.jpg



New well not connected to site yet.jpg



Dry river bed2.jpg

Previous Findings

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



Yes

Comment

There were no non-conformities raised in the previous (surveillance) audit.