

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000221

SITE DETAILS

Site: **Nestlé Waters France: Contrexéville**
Address: 306 Rue de Lorraine, 88140, Contrexéville, FRANCE
Contact Person: Francois Negro
AWS Reference Number: AWS-000138
Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Core
Date of certification decision: 2023-Jan-26
Validity of certificate: 2026-Jan-26

AUDIT DETAILS

Audited Service(s): AWS Standard v2.0 (2019)
Audit Type(s): Re-Certification Audit
Audit Start Date: 2022-Apr-05
Lead Auditor: Neringa Pumputyte
Audit team participants:
Marion Dardare, Technical expert
Catherine Hebting, Local Auditor
Site Participants:
Camille Dessimond, Hydrogeologist
Francois Negro, Water Resources Manager
Julien Didelot, Other
Ronan Le Fanic, Factory Manager
Michel Wollenschneider, Quality manager
Sandra Julia, Hydrogeologist

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ADDITIONAL INFO

Summary of Audit Findings: A total of 30 findings were raised during the certification audit: 8 major non-conformities, 15 minor non-conformities, and 7 observations. The major non-conformities were of sufficient concern to warrant the categorisation of the non-conformity as major and related to IWRAs, risks, Best Practice and the Water Stewardship Plan. In order for the certification to be awarded, the site is requested to define corrective actions for each of the non-conformities identified and to submit these to WSAS for approval. All major non-conformities must also be sufficiently addressed and closed out. The site has 60 days to submit corrective action plans for the minor non-conformities, and 90 days to close out major non-conformities by submitting evidence via the WSAS Audit Platform.

CLOSURE OF FINDINGS AND CORRECTIVE ACTION PLAN:

The Client has successfully resolved the major non-conformities and submitted the corrective action plan addressing all findings.

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

Nestle Waters Supply Est, also known as Nestle Waters Vosges is located at two sites, at Contrexeville and Vittel communes, in the Vosges Department, northeastern France. The facilities abstract mineral waters and produce bottled mineral and other water, including brands Vittel and Contrex. The company also owns over 3000 ha of land in the catchment area. Nestle has a subsidiary Agrivair dedicated to creating and sustaining partnerships aimed at sustainable land management in the catchment area. Area under Agrivair's management is called Impluvium - it covers a large section of the recharge area for the aquifers from which Nestle abstracts water.

The facility is located in the catchment of Vair River, which is part of the River Meuse catchment. The facility abstracts water from three aquifers located on top of each other: (a) the deep GTI aquifer, also called aquifer C; (b) aquifer B above a layer of low impermeability on top of the aquifer C; and (c) a shallow horizon A. The upstream (according to groundwater flow) aquifer boundary (to the south) corresponds to the geological unit. The downstream watershed boundary (to the north) is set with topography, using the hill ridges. The Vittel Fault, a gigantic scar partitioning the subsoil from east to west, prevents groundwater from continuing northward.

The audit was conducted onsite on 05-07 April 2022. The onsite site visit included the assessment of Contrexeville site, interviews with a sample of stakeholders, interviews with the relevant personnel of Nestle Water Supply Est and document review.

FINDINGS

NUMBER OF FINDINGS PER LEVEL

Observation	7
Minor	15
Major	6

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FINDING DETAILS

Finding No:	TNR-000432
Checklist Item No:	1.1.1
Status:	Open
Finding level:	Observation
Checklist item:	The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including: <ul style="list-style-type: none">- Site boundaries;- Water-related infrastructure, including piping network, owned or managed by the site or its parent organization;- Any water sources providing water to the site that are owned or managed by the site or its parent organization;- Water service provider (if applicable) and its ultimate water source;- Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies;- Catchment(s) that the site affect(s) and is reliant upon for water.
Findings:	For the boundaries of aquifer C, the site referred to BRGM study (2019) - a long study on the GTI aquifer. Relevant schemes from this long study should be extracted to clearly show the aquifer C boundaries and the boundaries of its relevant sections (especially the section with the water deficit). Overall, information on the catchment boundaries was insufficiently systematic to enable a clear understanding of the site's physical context, and some evidence was provided after the on-site assessment.

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Finding No: TNR-000456
Checklist Item No: 1.2.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Apr-05
Checklist item: 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.

Findings: The site identified the stakeholders but not their water related challenges. The site follows Nestle's general process but with the significant exception - it does not do a survey to see what view the stakeholders have of them. There is evidence of consultation but mostly that is consultation via existing structures such as CLE and therefore does not cover all stakeholders. Evidence was lacking that engagement with smaller local stakeholders related to a shared water challenge indeed encompasses consultation on the shared water challenge.

Corrective action: Add shared water challenge for each stakeholder in our CRP (Community Relations Process) tool.
Note that due to tensions with stakeholders, interviews with stakeholders are not possible (this was indicated during the audit).

Finding No: TNR-000638
Checklist Item No: 1.4.2
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Apr-05
Checklist item: The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.

Findings: The list of service providers to the site has not been screened to evaluate embedded water use.

Corrective action: Summary list of all our subcontractors already provided for the 2021 audit: "1.4.2 synthèse des fournisseurs et de leurs actions principales" (added to the evidences). List to be updated by Quality Manager (M. Wollenschneider).

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Audit Number: AO-000221

Finding No: TNR-000639
Checklist Item No: 1.5.2
Status: Open
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 site may consider whether the historical arrangement that Nestle supplies water for Golf course, horse centre, hippodrome and thermal park, could be regarded as customary water rights.

Finding No: TNR-000457
Checklist Item No: 1.5.3
Status: Closed
Finding level: Major
Due date: 2022-Sep-01
Checklist item: The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.
Findings: Study with comparison of different scenarios for withdrawals from aquifers A and B is available, but a clear table with the current inflows and outflows is not extracted. Water balance of aquifer C has not been updated. Water balance of the Vair catchment was not presented. As this was raised in a previous audit and not addressed, it needs to be addressed to achieve conformity.
Corrective action: Prepare summary document of water balance for Aquifer A, B and C and the Vair catchment.
See word document "1.5.3_Water balance Summary.docx" + related email dated June 27, 2022 "1.5.3_Antea Email_Water balance Vair et Petit Vair".

CORRECTIVE ACTION COMPLETED. GAP TO BE CLOSED

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Audit Number: AO-000221

Finding No: TNR-000636
Checklist Item No: 1.5.5
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Apr-05
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: The information should be organised in a more systematic way clearly listing all IWRAs, why they are important, what their status is, and based on what information, so that a clear link could be seen between this analysis and the water stewardship plan's part for improving IWRAs. The identification of IWRAs should also consider cultural and economic values, not just ecological and chemical status. Therefore areas such as parks, Golf course and other sporting areas, public artesian wells should be identified.
Corrective action: We already provided a summary PPT (1.5.5_Présentation des IWRA sur le site_2022) but we will prepare a summary table with the IWRAS.

Finding No: TNR-000510
Checklist Item No: 1.5.6
Status: Open
Finding level: Observation
Checklist item: Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.
Findings: While mapping of infrastructure was provided, the condition or potential exposure to extreme events has not been indicated/described. This indicator also requires the site to identify infrastructure outside of their control, but within the catchment.

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Audit Number: AO-000221

Finding No: TNR-000459
Checklist Item No: 1.7.1
Status: Closed
Finding level: Major
Due date: 2022-Sep-01
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: What is identified as risks is mostly risks stemming from shared water challenges, and not necessarily to the site - often a rephrased challenge. No reputational risks have been identified when there are clear reputational risks. Potential costs and business impact have not been identified.
Corrective action: Add water risk, likelihood, severity of impact, potential costs and business impact in Master File. See column B for risk, E for severity of impact, F for likelihood, G for potential costs and H for business impact in TAB "1.7.1_Water Risk" of file: Master file WS plan Vosges 2022 synthesis-V3"

CORRECTIVE ACTION COMPLETED. GAP TO BE CLOSED

Finding No: TNR-000662
Checklist Item No: 1.7.2
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-May-24
Checklist item: Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.
Findings: The site should expand the identification of opportunities going beyond actions to address the risks and considering opportunities that water stewardship may bring (refer to the Standard Guidance).
Corrective action: Identify new opportunities following the WS plan. Added column P "Identify new opportunities following the WS plan/ Further action required for current action (item 1.7.2)" to TAB "2.3.2_Water Stewardship Plan" of file: Master file WS plan Vosges 2022 synthesis-V3".

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Finding No: TNR-000460
Checklist Item No: 1.8.1
Status: Open
Finding level: Observation
Checklist item: Relevant catchment best practice for water governance shall be identified.
Findings: Identification of best practice for water governance refers to external websites and it is not clear what about those initiatives is best practice, or what is missing in the current catchment governance to be close to best practice. SDAGE is referred to among best practices but the structure has been established as part of implementing the Water Framework Directive, in order to improve the bad quantitative status of the GTI aquifer. It is also doubtful whether the existing governance is best practice if an extension to WFD implementation deadline had to be sought for the GTI aquifer. There is also no clear identification of best practice for the surface water catchment best governance and if better governance for aquifers A and B is relevant.

Finding No: TNR-000640
Checklist Item No: 1.8.2
Status: Closed
Finding level: Major
Due date: 2022-Sep-01
Checklist item: Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.
Findings: Identification of best practice for water balance is insufficiently specific and does not allow identifying what improvement could be made for water balance of the GTI aquifer, aquifers A+B, and the surface water catchment to be closer to or align with the best practice.
Corrective action: Prepare summary document of identified best practices and implementation of those best practices. See PPT/ evidence "1.8.2-3.9.2-4.3.1_Best practices and implementation" + related report "1.8.2-3.9.2-4.3.1_Conclusion enquête publique Gite A et B".

CORRECTIVE ACTION COMPLETED. GAP TO BE CLOSED

Finding No: TNR-000642
Checklist Item No: 1.8.4
Status: Open
Finding level: Observation
Checklist item: Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.
Findings: Identification of catchment Best Practice for maintenance of IWRAs should be documented or identified in a more systematic and clear manner.

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Audit Number: AO-000221

Finding No:	TNR-000587
Checklist Item No:	2.1.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Apr-05
Checklist item:	<p>A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:</p> <ul style="list-style-type: none">- That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes- That the site implementation will be aligned to and in support of existing catchment sustainability plans- That the site's stakeholders will be engaged in an open and transparent way- That the site will allocate resources to implement the Standard.
Findings:	<p>Several changes to the commitment need to be made to allow it to comply with the requirement of the standard.</p> <p>The letter mentions the intention of the site to respect and follow the water stewardship action plan though does not include a commitment to disclose progress on water stewardship programmes to achieve improvements in water stewardship outcomes. This letter is not available on the website. Based on interviews, this letter was not sent to stakeholders. A different communication - a letter from March 2022 that includes a combination of commitments and description of the site's selected water stewardship activities - was made available on the website: https://watersfr.factory.nestle.com/sites/g/files/pydnoa621/files/2022-03/11032022_aws%20engagements%20NW%20Vosges%202022.pdf It was also sent to a list of stakeholders but this list includes primarily institutions but does not include all relevant local stakeholders. This letter includes commitments to water stewardship, although it does not include a commitment to disclose progress on water stewardship progress. The site considers that this communication discloses the progress but it presents selected actions and does not detail progress against targets. This communication and the water stewardship plan do not match. There is no commitment to provide resources to implement the standard. The new version of the commitment must be publicly disclosed and evidence of disclosure kept for the Surveillance Audit.</p>
Corrective action:	<p>In the commitment letter (2.1.1-2.3-1-3.9.1_Site Commitments and Performances 2022 03) add progress regards to responsible water management programs to improve water outcomes. Make it consistent with the WS plan (TAB "2.3.2_Water Stewardship Plan" of file "Master file WS plan Vosges 2022 synthesis-V3"). Publish it on the NW website. Send it to all local stakeholders. See email sent to WSAS on July 26, 2022 (Evidence : "5.3.1_NW Email Major Finding TNR-000530") to merge the 2 gaps TNR-000530 and TNR-000587 as 1 minor gap.</p>

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Finding No: TNR-000466
Checklist Item No: 2.3.2
Status: Closed
Finding level: Major
Due date: 2022-Sep-01
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 metrics and timelines included in the plan are for actions but it is not clear what timelines are set for objectives and targets, and many targets are not measurable. Targets should be specific and metrics, measurable. Deadlines should be set per month per year. There should be separate targets for different years, building on learnings and achievements of previous targets and actions. The link between targets and best practice is not available. The WS Plan must include the budget allocated to achieving the target and also the positions of the persons responsible for the actions and targets. The WS Plan will need to be amended to achieve conformity.

Corrective action: Clarify/add objectives, targets, metrics, link with best practice, actions, budget, allocated responsible person, timeline to WS plan. See column A for objectives, B for target, C for metrics, D for link with best practices, E for actions, F for cost/budget, K for allocated responsible person, L for timeline in TAB "2.3.2_Water Stewardship Plan" of file: "Master file WS plan Vosges 2022 Synthesis-V3".

CORRECTIVE ACTION COMPLETED. GAP TO BE CLOSED

Finding No: TNR-000467
Checklist Item No: 2.4.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Apr-05
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: There is a lack of actions to mitigate/address external risks, and as reputational risks were not mentioned it is not clear if the action plan covers actions to address reputational risks.

Corrective action: Add reputational risk in column D "Nature of risk for the site (item 2.4.1)" of TAB "1.7.1_Water Risk" in file: "Master file WS plan Vosges 2022 synthesis-V3".

CORRECTIVE ACTION COMPLETED. GAP TO BE CLOSED

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Audit Number: AO-000221

Finding No: TNR-000652
Checklist Item No: 3.1.2
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Apr-05
Checklist item: Measures identified to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be implemented.
Findings: Clearer evidence should be presented about consulting on and addressing the tensions around the future supply of water for the Golf course, horse centre, hippodrome and thermal park.
Corrective action: Continue engagement with stakeholder regards to supply of water for their activities and participate to development of other projects (e.g. horse riding competition etc.). We also communicate regards to saving groundwater and protecting resources (communication of the recent "arrêté de sécheresse" by email etc.). Keep all evidences of communication.

Finding No: TNR-000592
Checklist Item No: 3.3.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Apr-05
Checklist item: Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.
Findings: There is no progress towards meeting water balance targets included in the WS Plan. As the WS Plan already requires much improvement this is an additional change to be incorporated into the plan.
Corrective action: Add in the WS plan the water balance objectives. See lines 7, 8 and 9 of TAB "2.3.2_Water Stewardship Plan" of file: Master file WS plan Vosges 2022 synthesis-V3".

CORRECTIVE ACTION COMPLETED. GAP TO BE CLOSED

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Finding No: TNR-000594
Checklist Item No: 3.4.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Apr-05
Checklist item: Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.
Findings: There is no progress towards meeting water quality targets for the factory included in the WS Plan. As the WS Plan already requires much improvement this is an additional change to be incorporated into the plan.
Corrective action: Add in the WS plan the quality objectives. See lines 19, 20 and 21 22 of TAB "2.3.2_Water Stewardship Plan" of file: Master file WS plan Vosges 2022 synthesis-V3".

CORRECTIVE ACTION COMPLETED. GAP TO BE CLOSED

Finding No: TNR-000595
Checklist Item No: 3.4.2
Status: Closed
Finding level: Major
Due date: 2022-Sep-01
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: The site has identified water quality as a shared water challenge, however, has not identified continual improvement toward best practice for effluent. This should be reflected in the Water Stewardship Plan.
Corrective action: Identify continual improvement toward best practice for effluent in the WS plan. See lines 19, 20 and 21 in TAB "2.3.2_Water Stewardship Plan" of file: "Master file WS plan Vosges 2022 Synthesis-V3".

CORRECTIVE ACTION COMPLETED. GAP TO BE CLOSED

Finding No: TNR-000646
Checklist Item No: 3.7.1
Status: Open
Finding level: Observation
Checklist item: Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.
Findings: The water stewardship plan should include indirect water use targets and evidence how they have been met, quantified.

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Audit Number: AO-000221

Finding No: TNR-000526
Checklist Item No: 3.9.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Apr-05
Checklist item: Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.
Findings: Nestle participates actively in activities of CLE (local water committee for finding solutions to bring the GTI aquifer back to balance) as one of the two largest institutional users of water from this aquifer. However actions beyond the needed participation, aimed at achieving best practice, could not be clearly identified.
Corrective action: Already provided (see evidences 3.1.1) + see commitment letter (3.9.1_Official Site Commitment_2022 03 and 2.1.1-2.3-1-3.9.1_Site Commitments and Performances 2022 03).

CORRECTIVE ACTION COMPLETED. GAP TO BE CLOSED

Finding No: TNR-000656
Checklist Item No: 3.9.2
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Apr-05
Checklist item: Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.
Findings: The current water balance of the GTI aquifer has not been updated to understand the effect of withdrawal reductions undertaken by Nestle. Insufficient evidence was presented to ascertain the actions toward Best Practice for the water balance.
Corrective action: The indicator is about water quality and the finding about water balance. Please clarify. See email sent to WSAS on July 26, 2022 "3.9.2_NW Email Minor Finding TNR-000656".
The water balance for the GTI aquifer is realized by French geological survey (BRGM) and not possible to update; Nestlé does not have the possibility to update the model.

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Audit Number: AO-000221

Finding No: TNR-000527
Checklist Item No: 4.1.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Apr-05
Checklist item: Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.
Findings: A number of objectives and targets are not quantified, the evaluation of progress against targets and outcomes is patchy. E.g. one of the key targets is bringing the GTI aquifer to balance by 2027, and whilst there is progress in implementing actions such as reducing the withdrawal or attending meetings within the SAGE framework, the current water balance has not been evaluated. Water quality targets is not quantified, so progress is available only for separate actions. Also, some targets in the first part of the table provided as evidence of evaluation of performance, are different from the targets in the water stewardship plan. The structure of objectives, targets and actions differs between the two tables. The site needs to improve on the way in which performance is evaluated once the WS Plan has been corrected.
Corrective action: The water balance for the GTI aquifer is realized by the French geological survey (BRGM).
Add progress in the WS plan. Performances against targets added in Column N "Status / Performance Evaluation (item 4.1.1)" of TAB "2.3.2_Water Stewardship Plan" of file: "Master file WS plan Vosges 2022 synthesis-V3"

Finding No: TNR-000469
Checklist Item No: 4.1.2
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Apr-05
Checklist item: Value creation resulting from the water stewardship plan shall be evaluated.
Findings: Value creation has not been identified as it was understood by the site that identifying benefits (which are identified in generic terms) cover value creation. The site has not presented enough evidence to demonstrate that value creation has been addressed.
Corrective action: Shared value benefits added in column O "Shared Value benefits (Item 4.1.2)" of TAB "2.3.2_Water Stewardship Plan" of file: "Master file WS plan Vosges 2022 synthesis-V3".

CORRECTIVE ACTION COMPLETED. GAP TO BE CLOSED

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Audit Number: AO-000221

Finding No: TNR-000470
Checklist Item No: 4.3.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Apr-05
Checklist item: Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.
Findings: The site engages with the CLE to address the challenge of the negative water balance of the GTI aquifer. However, there are other shared water challenges that the site's water stewardship plan aims to address and Nestle is not consulting on its performance on other elements of its water stewardship plan to the CLE. And consultation with other stakeholders to get their feedback on the sites' water stewardship performance (on both GTI aquifer and other shared challenges) was not presented the auditors.
Corrective action: See Slide 11 of the PPT / evidence "1.8.2-3.9.2-4.3.1_Best practices and implementation" + related report "1.8.2-3.9.2-4.3.1_Conclusion enquête publique Gite A et B".

CORRECTIVE ACTION COMPLETED. GAP TO BE CLOSED

Finding No: TNR-000529
Checklist Item No: 5.2.1
Status: Open
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: This communication explains what the AWS certification means and selected (main) actions implemented by Nestlé over time. However a comprehensive plan with targets is not communicated. Also only a list of local institutions/administrations are sent this document, but not other stakeholders mentioned in this report.

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Finding No:	TNR-000530
Checklist Item No:	5.3.1
Status:	Closed
Finding level:	Major
Due date:	2022-Sep-01
Checklist item:	A summary of the site’s water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.
Findings:	<p>The disclosure is not sufficient:</p> <ul style="list-style-type: none">- it communicates performance on part of the water stewardship plan (not all), bundles performance over a longer period rather than presenting an annual performance, and quantified performance (in a graph) can only be seen for withdrawals of water from the aquifer C and for the water use ratio. Quantified annual performance against other targets is hard to discern from this communication.- The action plan listed in this communication does not clearly align with the water stewardship plan presented during the audit. E.g. the pdf communication on the website lists 5 goals/targets/actions, and out of these, 3 are not mentioned in the detailed action plan presented during the audit. And the complete plan includes more targets than the pdf communication encompasses.- There is no reference to the earlier water stewardship plan.- For some commitments there is no performance information, e.g. “we are committed to renewed contact with local stakeholders to enrich our ambition to relate to local communities, and to better understand their views on water resource issues, and on our site’s performance in this area.” No commentary on performance is provided on the stakeholders engagement.

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Corrective action: TNR-000530 (a summary of the site’s water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum) is ready to be closed. Please find attached the final document (in French) that was validated and issued by communication today. As requested, the letter summarizes the Site’s progress for all actions that are part of our AWS action plan. Hard copies of the letter were sent to stakeholders today and the letter will be published on our website this week (we will provide URL ASAP). Online documents are uploaded:

- The Engagements :
https://watersfr.factory.nestle.com/sites/g/files/pydnoa621/files/2022-12/Engagements%20AWS%20de%20NWV_VDEF_20_12_2022_1.pdf
- Organigramme :
https://watersfr.factory.nestle.com/sites/g/files/pydnoa621/files/2022-12/2.2.1.organisation%20et%20animation%20du%20waterstewardship%20chez%20NWSE%202022_VDEF.pdf

Concerning communication to stakeholders, Aline, in copy, confirmed she send hard copies and emails with acknowledgement of receipt to the attached list of stakeholders. Aline will forward the receipts as soon as she receives them. But please note that due to holiday season, it might be a while before we receive any notification from stakeholders. This site will disclosed to stakeholders

- The distribution list and its follow up
- Emails and receipts : emails sent to each stakeholder and acknowledgement of receipt / reading
- Letters and receipts : hard copies and acknowledgement of receipt (To date, I’ve received 4 receipts)

Finding No: TNR-000600

Checklist Item No: 5.4.1

Status: Closed

Finding level: Minor

Due date: 2023-Apr-05

Checklist item: The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.

Findings: The site's shared water-related challenges and efforts made to address these challenges shall be disclosed. Insufficient evidence has been present to achieve complete conformity.

Corrective action: Provide a table that summarizes stakeholder communication.



Signature WSAS

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)



Audit Number: AO-000221

Report Details

Report	Value
Report prepared by	Neringa Pumputyte
Report approved by	Mia Antoni-Naidoo
Report approved on (Date)	3 June 2022

Surveillance

Proposed date for next audit
2023-Apr-05

Comment Annual surveillance is recommended for early April 2023

Stakeholder Announcements

Date of publication	Location
2022-Mar-03	WSAS Website
2022-Mar-03	AWS Website
2022-Mar-21	Letter to all Stakeholders
2022-Apr-06	Nestle Website

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Catchment Information

Catchment Information

Surface water: catchment of river Vair

See attached scheme for recharge area of the aquifers:.

1) Aquifer Gite A (9 wells): water for Hepar and part of Contrex brand:

- Hepar area (6 wells)
- Crainvilliers area (2 wells)
- Thierry Lorraine area (1 well)

Withdrawals:

- Current withdrawals = 796 250 m³/year
- Requested withdrawals = 902 280 m³/year
- Extra volume requested = 106 030 m³/year (+13%)
- This volume corresponds to the pumping rates achieved in 2014.

2) Aquifer Gite B (19 wells): mineral water for Contrex and Vittel Grand Source brands and process water;

- Contrexville area (5 wells)
- Suriauville area (4 wells)
- Vittel area (9 wells)
- Reine Lorraine area (1 well)

Withdrawals:

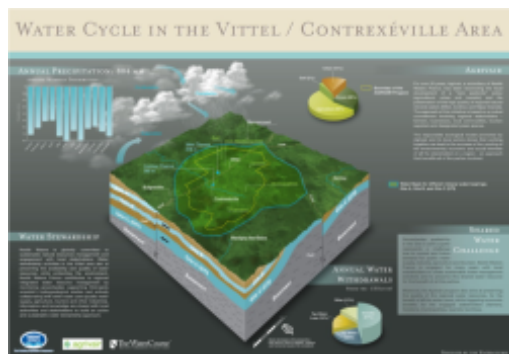
- Current withdrawals = 1 419 776 m³/year
- Requested withdrawals = 1 706 800 m³/year
- Extra volume requested = 287 024 m³/year (+20%)
- These volumes have never been reached in this aquifer, the increase being focused in the Contrexville area and Suriauville (new drilled well).

3) Aquifer Gite C or GTi (2 wells): mineral water for Vittel Bonne Source brand

Withdrawals

- Authorized withdrawals = 1 Mm³/year
- Current withdrawals (2021) = 461 933 m³/year, a decrease from 916 356 m³ in 2010

Gite C aquifer's southwest section has been subject to groundwater depletion throughout the years due to over-abstraction and naturally slow recharge as the recharge area is very small and seepage rate is low.



Aquifers_0cb6b309-5bf0-4873-be58-9213d961affa.jpg

Comment Scheme showing aquifers, groundwater recharge area, and area under Agrivair's management

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Client Description and Site Details

Client/Site Background

Nestlé abstracts water from 30 wells across three aquifers and produces bottled water, including brands Vittel and Contrex, at two factories: Contrexeville and Vittel. The history of mineral waters at these locations dates back to mid-19th century. For a long time, a large mineral waters company used abstracted mineral water for a variety of purposes including mineral water, thermal baths, and other leisure and sports activities. Gradually, with ownership changing, the main activity moved to be bottled mineral water production. However, due to the historical arrangements, Nestlé keeps providing water to the golf course, hippodrome, horse centre, and the thermal park - all of which are operated by other companies on the land owned by Nestlé.

Summary of Shared Water Challenges

Summary of Shared Water Challenges

- Deficit in the southwest section of aquifer C;
- seasonal availability of drinking water upstream of the catchments of the Vair and Petit Vair rivers;
- providing water for sport, leisure and outdoor activities (golf courses, horse centre, hippodrome, thermal park), especially in the future with climate change effects;
- surface water quality at the Vair and Petit Vair catchments (nitrates and plant protection products) and groundwater quality below these catchments;
- risk of flooding in Contrexeville and Vittel towns.

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.* ✔
Yes

Comment Both factory locations are within the same surface water catchment and their wells are within the same defined groundwater aquifers

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

Comment One management system

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.* ✔
Yes

Comment Both locations have water abstraction and bottling activities, with associated ancillary services

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.

 Obs.

Comment The following documents in the system are relevant:
 1.1.1 Carte Générale du Site_2022 - shows Nestle factories, Nestle-owned land, and land under Agrivair management
 1.1.2 Forages exploités REE (25) au sein du site_2022 - shows water wells
 1.1.3 Carte des rejets site_2022 and 1.1.3 Site discharge points_2022 - show wastewater and rainwater discharge points and their locations, as well as location of the municipal wastewater treatment plant that treats the site's effluent.
 Schemes with water-related infrastructure owned by the site was shown during the on-site assessment.

There are several relevant catchments : for aquifers A and B (section), for aquifer C (and its two relevant parts), and for surface water. Information on the catchment boundaries is available but was scattered among different reference sources and there are some inconsistencies:

'1.1.4 AWS catchment area_2022' depicts catchment boundaries but: (a) the surface water catchment boundaries are approximate and do not fully correspond to the boundaries based on topography; (b) what is depicted as groundwater recharge area in this document, is indicated as area under Agrivair's management in the document '1.5.3 Catchment Water Balance' (i.e. that it is based on management, not on physical boundaries), and the latter document indicates that groundwater recharge area is larger than land under Agrivair's management.

After the on-site assessment, the site provided maps with physical boundaries of the surface water catchment (1.1.1 BV Vair and 1.1.1 subdivision of catchments)

For the boundaries of aquifer C, the site referred to BRGM study (2019) - a long study on the GTI aquifer. Relevant schemes from this long study should be extracted to clearly show the aquifer C boundaries and the boundaries of its relevant sections (especially the section with the water deficit).

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

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

- 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.

Comment

- The site follows a Nestle-wide system of identifying and mapping stakeholders based on (a) the influence the site may have on the stakeholder, as understood by Nestle, and (b) the stakeholder's influence on the site, as well as colour-coding stakeholders based on whether stakeholders have a favourable view of Nestle, neutral view, some tensions, or major tensions.
- The stakeholders are identified based on any interest, not necessarily related to water.
- Stakeholders' water-related challenges have not been identified.
- Nestle's standard process should also include a survey to check what view stakeholders actually have of Nestle but this part has not been done for this site because of historical strong negative view of some stakeholders.
- In the online system, there are engagement plans for key stakeholders and completed plans for the previous year. Actual evidence appears to be not stored in the online system. For the golf course, hippodrome, and horse centre (stakeholders with a shared water challenge of future water supply), the plan and evidence of engagement does not clearly show active engagement on water issues.
- There is evidence of consultation but mostly that is consultation via existing structures such as CLE and therefore does not cover all stakeholders

Finding No: TNR-000456

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.* 🔍 Obs.

Comment

The degree of influence is identified, as well as categorisation of stakeholder view of the site, however the categorisation reflects any topic. E.g. current employees are marked red indicating that there are tensions but the tensions are related to the recent as well as upcoming redundancies.

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

1.3.1 *Existing water-related incident response plans shall be identified.* ✅ Yes

Comment






Incidents response plans are available as part of the certified ISO 14001 management system.

1.3.2 *Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped* ✅ Yes

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Comment	1.3.2 et 1.3.3 Water MapMassBalance_Vosges_2021 maps out the measured inflows and outflows and calculated losses. The mass balance of water for 2021 shows 8% of water abstracted was "lost", whilst in 2020 only 0,4% were 'lost'. The site still needs to look at this issue.	
1.3.3	<i>Site water balance, inflows, losses, storage, and outflows, including indication of annual variance in water usage rates, shall be quantified. Where there is a water-related challenge that would be a threat to good water balance for people or environment, an indication of annual high and low variances shall be quantified.</i>	 Yes
Comment	Whilst there is a water-related challenge of water deficit in aquifer C, there is currently no seasonal variance of water abstraction and production. Abstraction from aquifer C is decreasing: from over 900 000 m3 in 2010-2012 to 737 656 m3 in 2017, 495 716 m3 in 2020, and 461 933 m3 in 2021. The site calculates water ratio: the volume (liters) of abstracted water per liter of bottled water. The calculated ratio is slightly different in different spreadsheets: 1,73 L/L in '1.3.2 et 1.3.3 Water MapMassBalance_Vosges_2021' and 1,526 L/L in 'NWV SCORE CARD 2021 décembre', when the objective for 2021 was 1,475 L/L.	
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>	 Obs.
Comment	There is a shared water challenge of surface and groundwater quality from pollution by nitrates and plant protection products in agricultural activities. Monthly wastewater quality data is collected. Once a year the site's piping is cleaned with nitric acid and the maximal concentration as well as load is exceeded at that time. The wastewater treatment plan has been informed about the situation and reasons and the the site checked with the WWTP that its treatment capacity is sufficient for this exceedance and its effluent does not exceed limits set for its effluent. 1.3.4 2021 bilan NWSE -GIDAF REJETS - wastewater quality monitoring results 1.3.4 copie ecran GIDAF 2021 - compliance of wastewater monitoring frequency and results 1.3.4 Water Quality 2021 - abstracted groundwater quality	
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	Potential sources of pollution have been identified in the documents '1.3.5 Risque pollution (carte) (n° 1-53)' and '1.3.5 Risque pollution (inventaire des sources)'.	
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>	 Obs.
Comment	In this case wells are also regarded as the site. They are mapped and their status is known, albeit primarily considering the chemical water quality. Cultural values are not clearly identified though and may be relevant for the wells that belong to Nestle but are used by the public (especially the artesian ones). The evidence presented for this indicator relates to the description and mapping of Impluvium - the area almost matching with the recharge area of the wells and managed by Agrivair (1.3.6 présentation des IWRA sur le site_2022). Most of that mapping is relevant for the indicator 1.5.5.	
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>	 Obs.
Comment	Water-related costs and revenues have been identified and quantified, whilst social and environmental value generation is only partially evaluated: essentially only topics of value generation are listed.	

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1.3.8	<i>Levels of access and adequacy of WASH at the site shall be identified.</i>	 Yes
Comment	WASH self-assessment based on Nestlé Guidelines on Respecting the Human Rights to Water and Sanitation has been completed (1.3.8 WASH Self-Assessment Tool_NWSE v MARS 2022).	
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>	 Obs.
Comment	The site has commissioned a study of water footprint of the bottles it uses, quantified in liters per unit of packaging. The bottles are produced outside the site's catchment, so the footprint is global. Summary of the study's approach and results for some bottles are provided in '1.4.1 Empreintes eau'. Other inputs such as caps, labels and packaging material are also produced outside the catchment and have not been assessed. The level of water risk for the inputs (e.g. what proportion of inputs is produced in water stressed areas) cannot be seen in the analysis presented.	
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>	 in progress
Comment	Terrideal is a contractor maintaining the golf course, centre équestre and hippodrome and as part of this maintenance service they use water for watering. This use is quantified. There is no identification of water use of other outsources services as it was considered that any water use for the services for the site is accounted for in the site's water usage. To show whether this assumption is valid, all purchased services should be screened to identify if there is embedded water use for those services and whether that use is within the catchment.	
Finding No: TNR-000638		
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	Water related governance initiatives include: (a) Agence de l'Eau Rhin-Meuse (river basin management authority established as part of implementation of the Water Framework Directive) that developed the river basin management plans for 2016-2021 and now for 2022-2027 (so-called SDAGE), and (b) Committee de l'Eau that developed a plan for management of the GTI aquifer (so-called SAGE GTI) in response to the water deficit in this aquifer and the need to bring it back to the balance in line with the Water Framework Directive. An extension of the deadline for achieving the balance was requested for this aquifer. A wealth of documents have been provided or shown during the audit related to these initiatives. Given the number and length of the documents and importance of these initiatives, a summary description of these initiatives and a timeline of consultations, plan development, agreements, etc should be developed, with summary of key relevant outcomes and references indicated to full documentation.	
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.

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Comment	Water-related legal and regulatory requirements have been identified as part of the certified ISO 14001 management system (1.5.2 2022 03 06 AWS VEILLE ROL). The historical arrangement that Nestle supplies water for Golf course, horse centre, hippodrome and thermal park, could potentially be regarded as customary water rights.	
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>	 closed
Comment	For the water balance of catchments A and B, the site refers to a study commissioned by Nestle and recently conducted by Antea as part of application to re-distribute water withdrawal authorisations between different wells. As part of this study, different scenarios are compared. Also effect of climate change is modelled. The full study includes a number of tables with water balance comparisons whilst a non-technical summary describes an impact of the application on various considerations. Still, a clear table with the current inflows and outflows was not extracted. For the water balance of aquifer C, the site referred to BRGM study done at regional level in 2010. In the previous surveillance audit, an observation was raised to update the balance of aquifer C before the next audit but this hasn't been done. Water balance of the Vair catchment was not presented, although the study on scenarios for aquifers A and B analysed what effect the change in withdrawals would have for the outflow from these aquifers to the surface waters. Finding No: TNR-000457	
1.5.4	<i>Water quality, including physical, chemical, and biological status, of the catchment shall be identified, and where possible, quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be identified.</i>	 Yes
Comment	Water status for the Vair river as identified by the authorities is available.	
1.5.5	<i>Important Water-Related Areas shall be identified, and where appropriate, mapped, and their status assessed including any threats to people or the natural environment, using scientific information and through stakeholder engagement.</i>	 Obs.
Comment	Documentation provided as evidence for this indicator (1.5.5 présentation des IWRA sur le catchment_2022) describes and maps the Impluvium - area managed by Nestle's subsidiary Agrivair. The information gathered includes land use, wet areas, status of surface water bodies (The whole of River Vair) assigned according to the Water Framework Directive. The status of areas is designated per type of land use, e.g. good status for parks. However e.g. golf park or public artesian wells enjoyed by the local population are not identified as an IWRA.	
1.5.6	<i>Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.</i>	 Obs.
Comment	Evidence uploaded was the annual report on the operation of the of the sewage system. Mapping or listing of infrastructure in the catchment not directly related to Nestle operations, including its condition and potential exposure to extreme events, was not provided during the on-site audit (e.g. the water storage tanks for the centre equestre, hippodrome and golf, the sheet for water storage installed at the premises of the centre équestre, or the infrastructure on rivers). After the on-site audit, a document with mapped infrastructure was provided. Condition or potential exposure to extreme events has not been indicated/described.	
1.5.7	<i>The adequacy of available WASH services within the catchment shall be identified.</i>	 Yes
Comment	No issues with the WASH services in the catchment.	
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>	

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1.6.1	<i>Shared water challenges shall be identified and prioritized from the information gathered.</i>	 Yes
Comment	The shared water challenges are taken from the SDAGE (catchment management plan) and SAGE GTI (aquifer C management roadmap). As the water challenges of stakeholders have not been identified, it is not possible to evaluate if water challenges taken from SDAGE and SAGE indeed encompass the challenges of stakeholders.	
1.6.2	<i>Initiatives to address shared water challenges shall be identified.</i>	 Yes

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Comment	<p>Initiatives have been identified - those are the same initiatives listed in 1.5.1</p> <p>Communication with stakeholders is essentially happening through the CLE (local water commission) activities. Indeed, NWSE is one of its members. The CLE (comission locale de l'eau) is the Local Water Commission, it draws up and revises the SAGE (see further explanation in the introduction of the report).</p> <p>The Schémas d'Aménagement et de Gestion des Eaux (SAGE) were created by the 1992 Water Act.</p> <p>The SAGE is a planning document for water management on the scale of a coherent hydrographic territory (watershed, aquifer, etc.). Drawn up collectively, it sets general objectives for the use, development, quantitative and qualitative protection of water resources. It is drawn up by the Local Water Commission.</p> <p>In the case of the GTI SAGE, there is a problem of quantity in the water table, today the water table of the Grès du Trias Inférieur (Lower Triassic Sandstone) is in deficit compared to water consumption.</p> <p>The Vosges Departmental Council is the structure that carries the project, the one that provides the human and financial means for the constitution of the SAGE.</p> <p>As mentioned above, the CLE (comission locale de l'eau) is the Local Water Commission, it draws up and revises the SAGE</p> <ul style="list-style-type: none">- It defines the main lines of work, seeks funding and organises the implementation of the SAGE- It takes into account everyone's opinions to reach a consensus on the choices to be made <p>This institution is compared to a "water parliament" in terms of its operation and composition. It is during the meetings of the CLE that all the questions are addressed and that the debates are open. Each member is aware of the studies carried out beforehand by different organisations to propose solutions to the problems. A vote is then held to define the solutions to be developed or rejected according to the problems of the sector (quantity, quality, etc.).</p> <p>As the Local Water Commission does not have its own legal entity, it must rely on an organisation, known as the support structure, to carry out the tasks of coordination, project management and communication.</p> <p>In 2017, the Local Water Commission entrusted the Departmental Council with the tasks of the support structure, thus succeeding the association La Vigie de l'eau.</p> <p>The CLE has a total of 46 members:</p> <ul style="list-style-type: none">- 24 people representing the local authorities- 13 people representing the users- 9 people representing the State and its various departments <p>NWSE is part of the users committee.</p> <p>The users' committee is composed of the following:</p> <ul style="list-style-type: none">> M. Manuel Lembke, Conservatory of Natural Spaces of Lorraine> M. Bruno Cunin, representative of the chamber of commerce and industry> M. Christian Vuillaume, Association for the Protection of Valleys and the Prevention of Pollution> M. Bernard Sion, representative of the Chamber of Agriculture> M. Jean-François Fleck, president of Vosges Nature Environment> M. Michel Balay, representative of the departmental federation for fishing and protection of the aquatic environment> M. François Negro, director of water resources Nestlé Waters France/Belgique
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- > M. Jean Charles Le Squeren, general director of Fromagerie l'Ermitage
- > M. Robert Muller, president of the ADEIC
- > M. Jacques Collinet, UDAF
- > Mme Christiane Lecoanet, UFC que choisir
- > M. Yves Gatto, representative of the association of forest communities
- > M. Bernard Schmitt, Oiseau Nature



It can be noted that the original target was to reach the water table balance was in 2015, then 2021, finally it is 2027.

- 1.7** *Understand the site's water risks and opportunities: Assess and prioritize the water risks and opportunities affecting the site based upon the status of the site, existing risk management plans and/or the issues and future risk trends identified in 1.6.*
- 1.7.1** *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.* ✔
closed
- Comment: What is identified as risks (1.7.1-2.3.2-3.4.2-4.1 WS plan Vosges 2022 Synthesis – v2) is mostly risks stemming from shared water challenges, and not necessarily to the site - often a rephrased challenge. No reputational risks have been identified when there are clear reputational risks. Potential costs and business impact have not been identified.
Finding No: TNR-000459
- 1.7.2** *Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.* ➔
in progress
- Comment: The site has identified actions to address risk as being opportunities (1.7.1-2.3.2-3.4.2-4.1 WS plan Vosges 2022 Synthesis – v2). Opportunities represent actions which can be taken to improve a situation rather than mitigate a risk
Finding No: TNR-000662
- 1.8** *Understand best practice towards achieving AWS outcomes: Determining sectoral best practices having a local/catchment, regional, or national relevance.*
- 1.8.1** *Relevant catchment best practice for water governance shall be identified.* ✘
No
- Comment: Identification of best practice for water governance refers to external websites and it is not clear what about those initiatives is best practice, or what is missing in the current catchment governance to be close to best practice. SDAGE is referred to among best practices but the structure has been established as part of implementing the Water Framework Directive, in order to improve the bad quantitative status of the GTI aquifer. It is also doubtful whether the existing governance is best practice if an extension to WFD implementation deadline had to be sought for the GTI aquifer. There is also no clear identification of best practice for the surface water catchment best governance and if better governance for aquifers A and B is relevant.
Finding No: TNR-000460
- 1.8.2** *Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.* ✔
closed
- Comment: Identification of best practice is generic and for all indicators on best practice identification refers to external websites - from these links it is not clear what about those initiatives is best practice for water balance, especially given that several water balances are relevant for this site (for the GTI aquifer, aquifers A and B, and surface water catchment).
Finding No: TNR-000640
- 1.8.3** *Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.* ✔
Yes

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Comment	A document '1.8.2. Benchmark protection impluvium' was provided as a summary of a recently conducted study on best practice for land use and biodiversity management in the recharge area that should lead to good water quality. The study is recent.	
1.8.4	<i>Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.</i>	 Obs.
Comment	Documentation provided for this indicator is generic and points to external websites where it is not clear what about those initiatives is best practice for IWRAs. When the identification of IWRAs is improved considering the comments for the indicators 1.3.6 and 1.5.5, the site should revisit this indicator as well.	
1.8.5	<i>Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.</i>	 No
Comment	The site considers this indicator to be not relevant. However one of the shared challenges identified is a seasonal shortage of potable water . This indicates that best practice should be analysed for the provision of WASH services as well.	

Finding No: TNR-000644

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>A letter of March 11th 2022 in English signed by Ronan Le Fanic has been presented as evidence. The letter mentions the intention of the site to respect and follow the water stewardship action plan though does not include a commitment to disclose progress on water stewardship programmes to achieve improvements in water stewardship outcomes. This letter is not available on the website. Based on interviews, this letter was not sent to stakeholders. A different communication - a letter from March 2022 that includes a combination of commitments and description of the site's selected water stewardship activities - was made available on the website: https://watersfr.factory.nestle.com/sites/g/files/pydnoa621/files/2022-03/11032022_aws%20engagements%20NW%20vosges%202022.pdf It was also sent to a list of stakeholders but this list includes primarily institutions but does not include all relevant local stakeholders. This letter includes commitments to water stewardship, although it does not include a commitment to disclose progress on water stewardship progress. The site considers that this communication discloses the progress but it presents selected actions and does not detail progress against targets. This communication and the water stewardship plan do not match. There is no commitment to provide resources to implement the standard.</p> <p style="text-align: right;">Finding No: TNR-000587</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>The site has a system to maintain legal compliance as part of its certified ISO 14001 management system.</p> <p>2.2.1 Manuel QSE NWV 06 04 2020 2.2.1.organisation et animation du waterstewardship chez NWSE 2022</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>
2.3.1	<p><i>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.</i></p>

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Comment The same communication from March 2022 as described under 2.1.1 is considered by the site to contain the strategy and plan. This however is a commitment from Top Management and does not qualify as a water stewardship strategy. The goals and targets in this communication and targets in the plan provided for 2.3.2 do not match or not clear how they link together.

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.



closed

Comment The WS plan '2.3.2 WS plan Vosges 2022 Synthesis' contains planned actions but it is not structured in the SMART way: the metrics and timelines included in the plan are for actions but it is not clear what timelines are set for objectives and targets, and many targets are not measurable. The link between targets and best practice is not available.

Finding No: TNR-000466

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






Comment See 1.7.1. As the shared water challenges and risks are mixed/bundled in the site's analysis, when the action plan was developed to address water challenges, it was implicitly expected to address risks. However there is a lack of actions to mitigate/address external risks, and as reputational risks were not mentioned it is not clear if the action plan covers actions to address reputational risks.

Finding No: TNR-000467

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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	NWSE is part of the CLE committee with other private users and industrial companies. CLE aims to work on good water governance of the GTI aquifer. 3.1.1 Catchment Governance 2022 - this presentation includes snippets indicating key involvements in catchment governance 3.1.1 PAGD_final_charte_CLE - a roadmap to bring the GTI aquifer to balance. This includes a commitment for Nestle to reduce withdrawals from the aquifer C to 450000 m3/yr by 2024, and for Nestle and/or Fromagerie to make further reductions after that.	
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>	 Obs.
Comment	The historical arrangement that Nestle supplies water for Golf course, horse centre, hippodrome and thermal park, could potentially be regarded as customary water rights. In such case, water is still provided to these users but there are tensions and concerns on the continuation of this supply. These tensions can be seen from the interviews but are not clearly visible in the evidence on stakeholder communication or development of measures to address these concerns.	
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	Evidence is available that there is a process and records of legal and regulatory compliance. During the on-site assessment, evidence of environmental authorisation for all used wells was not provided but this was provided after the on-site assessment. About twice a year when the site undertakes the piping cleaning, the effluent exceeds the limits on nitrogen. The site communicated with the municipal wastewater treatment company about these peaks and the wastewater treatment plant is able to take these sporadic increases in nitrogen without exceeding its own regulatory requirements for this effluent.	
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 as part of legal or regulatory requirements.	
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>	 No
Comment	There is no progress towards meeting water balance targets included in the WS Plan, however there is a performance evaluation which gives an indication that there are actions taking place with regards to achieving water quantity targets.	

Finding No: TNR-000592

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3.3.2	<i>Where water scarcity is a shared water challenge, annual targets to improve the site's water use efficiency, or if practical and applicable, reduce volumetric total use shall be implemented.</i>	 Yes
Comment	Volumetric total withdrawal from aquifer C has been implemented: in 2021, less than 500 000 m3 were withdrawn. The site also implemented a water reuse/recycling project, which was seen by the auditors during the on-site assessment.	
3.3.3	<i>Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.</i>	 N/A
Comment	The site is intending to provide one of its wells for the municipal use as part of the re-arrangements of withdrawal authorisations for wells in aquifers A and B. Currently, a public consultation is ongoing, so the arrangement has not yet been finalised.	
3.4	<i>Implement plan to achieve site water quality targets</i>	
3.4.1	<i>Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.</i>	 in progress
Comment	There are several water quality targets in the WS PLAN, however the site is implementing actions that are in fact focused on Agrivair's activities; are aimed primarily at partnerships and actions aimed at reducing water pollution, and should have targets which contribute to better water quality for the factory itself. The status of meeting the water quality targets has not been addressed, however there is performance evaluation of the actions which have already been performed.	
	Finding No: TNR-000594	
3.4.2	<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>	 closed
Comment	Although water quality is among shared water challenges, the site's activities are related to other factors but not the site's effluent. For the site's effluent, about twice a year when the site undertakes the piping cleaning, the effluent exceeds the limits on nitrogen. The site communicated with the municipal wastewater treatment company about these peaks and the wastewater treatment plant is able to take these sporadic increases in nitrogen without exceeding its own regulatory requirements for this effluent. However, the WWTP indicated it wanted the site to look for solutions and looking for solutions is not yet reflected in the site's water stewardship activities.	
	Finding No: TNR-000595	
3.5	<i>Implement plan to maintain or improve the site's and/or catchment's Important Water-Related Areas.</i>	
3.5.1	<i>Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.</i>	 Yes
Comment	Although IWRA's have not been adequately identified, the recharge area of the site's wells is regarded as IWRA and Agrivair's activities are aimed at enhancing these areas, including planting trees and hedgerows and renaturalising part of river Vair.	
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	There are no issues with the provision of WASH at the site.	

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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	One of the shared water challenges is seasonal water availability issues in the areas upstream of the Vair and Petit Vair rivers. There was not enough time during the audit to understand if those seasonal issues are related or not to the withdrawals by the site. Actions to remedy the situation included repairing the pipes and, and in one of the impacted municipalities the water well was deepened.	
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>	🔍 Obs.
Comment	As the indirect water use is outside of the catchment, no actions have been planned on indirect water use.	
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>	🔍 Obs.
Comment	As the indirect water use of the inputs is outside of the catchment, no actions have been planned on indirect water use.	
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	Some of Nestle's wells (artesian fountains) are used for public purposes. They are maintained and no concerns needed to be raised. The site also plans to transfer a well for the Vittel municipality's residents' needs - this forms part of the current proposal to re-distribute authorisation of withdrawals from aquifers A and B and will need to undertake a public consultation before finalising the plan. See also the description of the tensions related to the water provision for and use by the hippodrome, golf course and equestrian centre. Limited evidence was seen on the engagement by Nestle directly with these stakeholders to find solutions, although at the same time time Nestle installed the automated system for the water supply to these users.	
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>	🚀 in progress
Comment	See 1.8.1. - identification of the catchment best practice was presented by the site as Nestle participates actively in activities of CLE (local water committee for finding solutions to bring the GTI aquifer back to balance) as one of the two largest institutional users of water from this aquifer. However actions beyond the needed participation, aimed at achieving best practice, could not be clearly identified.	
Finding No: TNR-000526		
3.9.2	<i>Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.</i>	🚀 in progress


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Comment Nestle has taken the decisions to reduce the withdrawals from the GTI aquifer by half compared to 2010 and the recent reduction is higher/faster than what was agreed in the roadmap agreed under coordination by the CLE. However the current water balance of the GTI aquifer should be updated to understand the effect of reductions.


Finding No: TNR-000656
Finding No: TNR-000597

3.9.3 *Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.* 
Yes

Comment Agrivair's activities such as partnerships with farmers aimed at zero pesticide use, environmentally friendlier manure spreading, tree and hedgerow planting, and financial support to take underwater fuel storage tanks out of use, can be regarded as actions towards achieving best practice related to water quality targets. The site is now planning to establish an environmental monitoring network on the watercourses to evaluate the effect of the Agrivair's activities.

3.9.4 *Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.* 
Yes

Comment Nestle regards all of the groundwater recharge area for its wells as IWRA and Agrivair's activities are aimed namely at improving practices in this area to reduce possible pollution and improve water recharge. Actions include creating and keeping partnerships with the farmers aimed at reducing the application of chemical crop protection use and limiting the period of manure application; planting trees and managing hedges; de-activating underground fuel storage tanks owned by residents; voluntary restoration of a considerably larger section of a degraded river than required.

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

Comment There are no issues with the provision of WASH services at the site, so no action had to be implemented. However, please see the finding on the indicator 1.8.5.

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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.* in progress

Comment: The site has evaluated progress in implementing actions. As a number of objectives and targets are not quantified, the evaluation of progress against targets and outcomes is patchy. E.g. one of the key targets is bringing the GTI aquifer to balance by 2027, and whilst there is progress in implementing actions such as reducing the withdrawal or attending meetings within the SAGE framework, the current water balance has not been evaluated. Water quality targets is not quantified, so progress is available only for separate actions. Also, some targets in the first part of the table provided as evidence of evaluation of performance, are different from the targets in the water stewardship plan. The structure of objectives, targets and actions differs between the two tables.

Finding No: TNR-000527
- 4.1.2** *Value creation resulting from the water stewardship plan shall be evaluated.* in progress

Comment: Value creation has not been identified as it was understood by the site that identifying benefits (which are identified in generic terms) cover value creation.

Finding No: TNR-000469
- 4.1.3** *The shared value benefits in the catchment shall be identified and where applicable, quantified.* Obs.

Comment: Shared value benefits have been presented by the site in a column in the water stewardship plan, however the description is short and generic.
- 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: There have been no recent water-related incidents at the site. The site also supports a local emergency call and response system to any possible pollution incidents in the recharge area. Those incidents are also analysed and actions are proposed. Two incident analyses were seen by the audit team.
- 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.* in progress

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Comment The documents uploaded are minutes of the meeting with the CLE (local water commission) and the press release about the advancement of the commission and its members on the water related issues.

Communication with stakeholders is essentially happening through the CLE (local water commission) activities. Indeed, NWSE is one of its members. The CLE (comission locale de l'eau) is the Local Water Commission set up to address the challenge of the negative water balance of the GTI aquifer. Under the framework of the CLE, the SAGE (see further explanation in the introduction of the report) was developed. There is no doubt about the continuous engagement of NWSE with the CLE.

However, there are other shared water challenges that the site's water stewardship plan aims to address and Nestle is not detailing its performance on other elements of its water stewardship plan to the CLE. And consultation with other stakeholders to get their feedback on the sites' water stewardship performance (on both GTI aquifer and other shared challenges) was not presented the auditors.

Participation in the CLE shows a good participation in already existing local instances, though no consultancy is organized by Nestlé directly.

Finding No: TNR-000470

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.*



No

Comment As indicated in 4.1.1, there are differences in some targets and in the structure of objectives, targets and actions differs between the two tables that were presented as the current plan (with progress of implementation shown) and as the evaluation of performance. From interviews it was not clear how and why the plan was modified, and the changes are not identified in the documents.

Finding No: TNR-000528

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5 STEP 5: COMMUNICATE & DISCLOSE - Communicate about water stewardship and disclose the site's stewardship efforts	
5.1	<i>Disclose water-related internal governance of the site's management, including the positions of those accountable for legal compliance with water-related local laws and regulations.</i>
5.1.1	<i>The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.</i>
Comment	<p>The following information is available on the Website:</p> <p>- https://www.nestle-waters.fr/nos-engagements/gestion-durable-ressources-eau/aws-gestion-collaborative</p> <p>- https://www.nestle-waters.fr/sites/g/files/pydnoa621/files/2021-02/2.2.1.organisation%20et%20animation%20du%20waterstewardship%20chez%20NWSE_public%20sur%20le%20site%20NWF.pdf</p> <p>This provides a summary information on the positions and names of the responsible personnel, including positions accountable for compliance with water-related laws and regulations.</p>
5.2	<i>Communicate the water stewardship plan with relevant stakeholders.</i>
5.2.1	<i>The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.</i>
Comment	<p>The following is available on the website:</p> <p>- https://www.nestle-waters.fr/nos-engagements/gestion-durable-ressources-eau/aws-gestion-collaborative</p> <p>- https://watersfr.factory.nestle.com/sites/g/files/pydnoa621/files/2022-03/11032022_aws%20engagements%20NW%20Vosges%202022.pdf</p> <p>This communication explains what the AWS certification means and selected (main) actions implemented by Nestlé over time. However a comprehensive plan with targets is not communicated. Also only a list of local institutions/administrations are sent this document, but not other stakeholders mentioned in this report.</p> <p style="text-align: right;">Finding No: TNR-000529</p>
5.3	<i>Disclose annual site water stewardship summary, including: the relevant information about the site's annual water stewardship performance and results against the site's targets.</i>
5.3.1	<i>A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.</i>

Yes

No

closed

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Comment The communication indicated in 5.2.1 above includes a summary of key actions implemented. However it communicates performance on part of the water stewardship plan (not all), bundles performance over a longer period rather than presenting an annual performance, and quantified performance (in a graph) can only be seen for withdrawals of water from the aquifer C and for the water use ratio. Quantified annual performance against other targets is hard to discern from this communication.

The action plan listed in this communication does not clearly align with the water stewardship plan presented during the audit. E.g. the pdf communication on the website lists 5 goals/targets/actions, and out of these, 3 are not mentioned in the detailed action plan presented during the audit. And the complete plan includes more targets than the pdf communication encompasses.

There is no reference to the earlier water stewardship plan.

Finally, for some commitments there is no performance information, e.g. "we are committed to renewed contact with local stakeholders to enrich our ambition to relate to local communities, and to better understand their views on water resource issues, and on our site's performance in this area." No commentary on performance is provided on the stakeholders engagement.

Finding No: TNR-000530

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

5.4.1 *The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.*



No

Comment The communication explained above includes the description of the site's engagement under the framework of SAGE GTI. More shared water challenges were presented to the auditors than are described in this communication. Other documents uploaded under that point include the invitation of several stakeholders to the "world water day" in 2020, the communication brochure to the suppliers, and a power point listing all press releases and references to the Website.

<https://www.nestle-waters.fr/nos-engagements/gestion-durable-ressources-eau/proteger-les-sources/preserver-ressource-vittel>

Finding No: TNR-000600

5.4.2 *Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.*



Obs.

Comment The documents uploaded are: the engagement of NWSE with the CLE (local water commission) / The invitation letter to exchange around water challenges for the world water day / list of the stakeholders invited to the event (local authorities and companies: thermal bath, golf and cheese factory).

It seems that the engagement with stakeholders is done mainly through the engagement with the CLE, also except the invitation to the world water day which was also addressed to several companies (thermal bath, golf and cheese factory), other communications are rather targeted towards local authorities.

5.5 *Communicate transparency in water-related compliance: make any site water-related compliance violations available upon request as well as any corrective actions the site has taken to prevent future occurrences.*

5.5.1 *Any site water-related compliance violations and associated corrections shall be disclosed.*



Yes

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Comment In the public space there have been accusations that the site does not have environmental authorisation for part of its wells. Communication to internal staff was done following the site management's participation in the parliamentary committee inquiry and the media reportage "A sec : La grande soif des multinationales". The site maintains that it has the environmental authorisations and is updating them where the update is needed (in conjunction with the planned redistribution of authorised withdrawal volumes). The legal action by Collectif 88 against the site has not been solved yet.

A presentation with snippets of actions implemented to work on the boreholes authorization updates has also been provided to the auditors.

Essentially as the site maintains there is no non-compliance, such information is not disclosed publically.

5.5.2 *Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.*

Q
Obs.

Comment Currently no corrective actions are applicable. However, please see the finding for 1.3.4.

5.5.3 *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.*

✓
Yes

Comment There has not been a significant water related violation over the audited period according to the site and no indication was seen by the auditors of a possible violation posing significant risk. The legal case against the site related to complete/timely environmental authorisation, has not been resolved.

Photographic Evidence from Audit

✓
Yes

Comment A photo of the river Vair restoration information board is attached.



River Vair restoration project info board
20220405_185106 resized.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 audit.