

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000349

SITE DETAILS

Site: **Ecolab Barueri Plant**

Address: Rod. Pres. Castello Branco, 216 - Jardim Belval, 06422-120, Barueri, São Paulo, BRAZIL

Contact Person: Anna Wertheim

AWS Reference Number: AWS-000470

Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Core

Date of certification decision: 2023-Mar-09

Validity of certificate: 2026-Mar-09

AUDIT DETAILS

Audited Service(s): AWS Standard v2.0 (2019)

Audit Type(s): Initial Audit

Audit Start Date: 2022-Sep-19

Lead Auditor: Claudia M. Jaime

Audit team participants:

Carla Oberdiek

Site Participants:

Jessica Almeida, Communication officer

Pitterri, Benedito, Factory Manager

Napoli, Carla, SHE Intern

Franco, Luana, SHE Manager

Wertheim, Anna, Sustainability Manager

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ADDITIONAL INFO

Summary of Audit Findings: A total of 4 major non-conformities, 10 minor non-conformities and 8 observations were raised during the certification audit. The major non-conformities were of sufficient concern to warrant the categorisation of the non-conformity as major and related to the 5 AWS outcomes of the STD.

The Client is requested to perform a root cause analysis and define corrective actions for each of the non-conformities and to submit these to WSAS within 60 days of receipt of the audit report by 08/02/2023.

The major non-conformities must be sufficiently addressed and evidence submitted to WSAS within 90 days of receipt of the report by 08/03/2023.

Minor non-conformities must be closed out by the time of the next annual audit.

The audit team recommends certification of Site at Core level pending approval of the corrective actions plan and closure of the major non-conformities.

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. Proof of implementation has been requested for the Minors and this will be evaluated during the Surveillance Audit.

Scope of Assessment: The scope of services covers the Initial certification audit for assessing conformity of ECOLAB Barueri against the AWS International Water Stewardship Standard Version 2.

Ecolab, located in the city of Barueri, in the state of São Paulo (Brazil), is a factory dedicated to the production of chemical solutions for cleaning and disinfection. The Barueri plant mainly uses the São Lourenço system, which draws water from the Cachoeira do França reservoir, located in the Ribeira de Iguape river basin, and obtains additional water, including potable, from the São Paulo Aquifer. Domestic and industrial effluents are sent to an outsourced industrial treatment facility before being discharged into the Tietê River and description of all facilities, process activities and outputs that were included in the assessment]. Ecolab is the global leader in water, hygiene and infection prevention solutions and services that help protect people, planet and business health. We deliver comprehensive science-based solutions, data-driven insights and world-class service to advance food safety, help maintain clean and safe environments, optimize water and energy use, and improve operational efficiencies and sustainability for customers throughout the world. Ultimate Water Source: Sao Lourenco System from Cachoeira do Franca reservoir (95% of water), Sao Paulo Aquifer (drinking water and supplemental process water), Rainwater. The audit was conducted onsite on 19-21 Sept. 2022. The onsite visit included the assessment of production area, chemical storage, shipping and catchment IWRA (potential).

FINDINGS

NUMBER OF FINDINGS PER LEVEL

Observation	8
Minor	10
Major	4

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FINDING DETAILS

Finding No: TNR-002317
 Checklist Item No: 1.2.1
 Status: In Progress - CA plan approved
 Finding level: Minor
 Due date: 2023-Sep-19
 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 should identify all relevant stakeholders and their water-related challenges. Including the process used for stakeholder identification. 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;

Corrective action: The site did not consider neighbours, such as other companies in the same industrial park, farmers and communities.
 1 - Completed the Socioeconomic (Environmental) Diagnosis considering the surrounding community (neighborhood, agriculture, local commerce...);
 2 - Update the Stakeholder Power, Interest and Engagement Matrix (Deadline 09/21/2023).

Evidence of implementation: Diagnosis Socioeconomic (Environmental).

Finding No: TNR-002318
 Checklist Item No: 1.2.2
 Status: Open
 Finding level: Observation
 Checklist item: Current and potential degree of influence between site and stakeholder shall be identified, within the catchment and considering the site’s ultimate water source and ultimate receiving water body for wastewater.

Findings: The Site should identify the degree of influence between site and stakeholders for new stakeholders (see 1.2.1), on their updated list of stakeholders.

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Finding No:	TNR-002319
Checklist Item No:	1.3.3
Status:	Open
Finding level:	Observation
Checklist item:	Site water balance, inflows, losses, storage, and outflows, including indication of annual variance in water usage rates, shall be quantified. Where there is a water-related challenge that would be a threat to good water balance for people or environment, an indication of annual high and low variances shall be quantified.
Findings:	The Site has presented a water balance that does not include rainwater in their water balance
Finding No:	TNR-002403
Checklist Item No:	1.4.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Sep-19
Checklist item:	The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be identified.
Findings:	The Site should present a list with primary inputs, including quantity, quality and level of water risk within the site catchment.
Corrective action:	1 - A new list of primary inputs and materials was carried out (2023); 2 - Linked the survey with current suppliers; 3 - Evaluated whether suppliers are in the same area of interest; 4 - Start communication between the interested parties in order to obtain the corresponding data (Deadline (09/21/2023)).
Evidence of implementation:	Spreadsheet with the list of new suppliers and presentation with the area of interest.

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Finding No: TNR-002406
Checklist Item No: 1.6.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Sep-19
Checklist item: Shared water challenges shall be identified and prioritized from the information gathered.
Findings: The Site should describe the linking between the water challenges identified by stakeholders with the site’s water challenges. Where shared water challenges are identified, it is important to understand their cause, in order to accurately prioritize, to develop appropriate mitigation actions, and to know whether collective action is appropriate.
Corrective action: 1 - A new communication (e-mail) was carried out with the stakeholders initially raised to validate the common challenges;
2 - Reviewed the Risk Assessment Worksheet on the Risk Mapping tab with the data obtained duly identified and prioritized (Deadline 09/21/2023).
Evidence of implementation: E-mail with validation of challenges shared with stakeholders (Sampling) and revised Risk Assessment Worksheet on Risk Mapping tab.

Finding No: TNR-002407
Checklist Item No: 1.6.2
Status: Open
Finding level: Observation
Checklist item: Initiatives to address shared water challenges shall be identified.
Findings: The Site shall address the initiatives described during the audit such as the collaboration with TNC

Finding No: TNR-002464
Checklist Item No: 1.7.1
Status: Closed
Finding level: Minor
Due date: 2023-Sep-19
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: There are three main types of risk to an organization: physical, regulatory and reputational. The site should list the water-related risks according with this classification.
Corrective action: The site has listed water-related hazards as per the Standard.
Evidence of implementation: Updated risk assessment worksheet.

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Finding No:	TNR-002408
Checklist Item No:	1.7.2
Status:	Closed
Finding level:	Minor
Due date:	2023-Sep-19
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 shall include the potential savings and business opportunities on their list of opportunities included in their WSP. Water stewardship is intended to be positive and constructive. It is equally as important to identify and benefit from opportunities as it is about mitigating risks.
Corrective action:	1 - Reviewed and identified opportunities related to water.
Evidence of implementation:	Updated Water Stewardship Plan (Barueri) wordksheet.
Finding No:	TNR-002415
Checklist Item No:	1.8.3
Status:	Open
Finding level:	Observation
Checklist item:	Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.
Findings:	The Site Measure and monitor and report "GSC Water Tool" shall include for Best practices only parameters or criteria that are not mandatory by law
Finding No:	TNR-002409
Checklist Item No:	2.3.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Sep-19
Checklist item:	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.
Findings:	The Site should identify and defines the overarching mission & vision of the organization towards good water stewardship in line with this AWS Standard.
Corrective action:	1 - Validation of the mission and vision with the site management; 2 - Disclosure to the Internal Public (Deadline 09/21/2023). 3 - Disclosure to the External Public (Deadline 09/21/2023).
Evidence of implementation:	Inclusion of the Mission and Vision.

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Finding No:	TNR-002410
Checklist Item No:	2.3.2
Status:	Closed
Finding level:	Major
Due date:	2023-Mar-08
Checklist item:	A water stewardship plan shall be identified, including for each target: <ul style="list-style-type: none">- 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 WSP of the Site should include a measure however not a monitoring financial budget and a monitoring for each goal. It should cover: target; measurement and monitoring method; actions; timeframe; budget; and responsible persons. Where possible, the links between a target and achievement of best practice should be shown.
Corrective action:	A list of pending costs was carried out for each goal, and for those that were not possible (such as social actions) hours dedicated to activities were considered.
Evidence of implementation:	Water Stewardship (Barueri) updated.
Finding No:	TNR-002411
Checklist Item No:	2.4.1
Status:	Closed
Finding level:	Major
Due date:	2023-Mar-08
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:	The Plan does not present any actions to mitigate or adapt to the shared risks identified in 1.6. In addition, no concrete actions have been linked with water-related public agencies.
Corrective action:	Revised worksheet to include public sector action plan.
Evidence of implementation:	Sabesp Resilient Strategies

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Finding No: TNR-002465
Checklist Item No: 3.3.1
Status: Open
Finding level: Observation
Checklist item: Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.
Findings: The site should show with an additional level of understanding what the targets are and how it has progressed towards them in a format that is clear and appropriate.

Finding No: TNR-002412
Checklist Item No: 3.5.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Sep-19
Checklist item: Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.
Findings: The Site must correct their WSP (see 2.3.2); and measure the status of progress of their targets for IWRA
Corrective action: 1 - Water Stewardship (Barueri) updated;
2 - Implement in 2023 the analyzes of surface water (surrounding stream) and underground (01/2025).
Evidence of implementation: Updated Water Stewardship Plan (Barueri) wordksheet., Performance management screens against targets

Finding No: TNR-002466
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: It is important to ensure that choices about switching suppliers are based on measurable water use data and not on theory or modelling.

Finding No: TNR-002416
Checklist Item No: 3.9.1
Status: Open
Finding level: Observation
Checklist item: Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.
Findings: The Site shall present actions conducted towards achieving bets practices related to water governance (referred at 1.8.1).

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Finding No: TNR-002417
Checklist Item No: 3.9.2
Status: Closed
Finding level: Minor
Due date: 2023-Sep-19
Checklist item: Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.
Findings: The Site should include the actions conducted towards achieving best practice related to targets in terms of water balance; referred on their WSP and/or 1.8.2.
Corrective action: 1- Water Stewardship (Barueri) updated;
Evidence of implementation: Updated Water Stewardship Plan (Barueri) wordksheet.

Finding No: TNR-002418
Checklist Item No: 3.9.3
Status: Closed
Finding level: Minor
Due date: 2023-Sep-19
Checklist item: Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.
Findings: The actions towards achieving best practice related to targets in terms of water quality (See WSP) are not achievable.
Corrective action: 1- Water Stewardship (Barueri) updated;
Evidence of implementation: Updated Water Stewardship Plan (Barueri) wordksheet.

Finding No: TNR-002419
Checklist Item No: 3.9.4
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Sep-19
Checklist item: Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.
Findings: The Site has described actions towards achieving best practice (WSP), related to targets in terms of the maintenance of IWRA that are not accountable in the way they are presented.
Corrective action: The site will reevaluate the actions they can take that reflect the best practices in the industry and catchment around maintaining a healthy status of IWRA. We will improve the actions to make sure they are actionable and accountable to our site.

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Finding No: TNR-002420
Checklist Item No: 3.9.5
Status: Open
Finding level: Observation
Checklist item: Actions towards achieving best practice related to targets in terms of WASH shall be implemented.
Findings: The Site shall review the WSP time frames and targets towards achieving best practice related to targets in terms of WASH.

Finding No: TNR-001592
Checklist Item No: 4.1.1
Status: Closed
Finding level: Major
Due date: 2023-Mar-08
Checklist item: Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.
Findings: The Site should evaluate the performance against targets in the site's water stewardship plan (particularly the targets that are completed).
Corrective action: 1 - Information regarding performance against targets in the Water Management Plan compiled;
2 - The goals defined by Ecolab are identified in the attached files, as follows:
2.1 - Annual target for reducing water consumption (5%) / Production = WI (Water Balance);
2.2 - 100% compliance with legal, corporate, auditing and certification requirements related to water (Good water governance);
2.3 - Potability (Good water quality status);
2.4 - Quality of Industrial Effluents (Healthy State of Important Areas Related to Water);
2.5 - WASH self-assessment tool (WASH).
Evidence of implementation: Water Stewardship Plan and Performance Management Screens against targets

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Finding No:	TNR-002421
Checklist Item No:	5.1.1
Status:	Closed
Finding level:	Major
Due date:	2023-Mar-08
Checklist item:	The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.
Findings:	The Site should disclose site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations.
Corrective action:	1 - Created the organizational chart; (Deadline 03/08/2023); 2 - Disclosure to the Internal Public (Deadline 09/21/2023); 3 - Disclosure to the External Public (Deadline 09/21/2023).
Evidence of implementation:	Updated with more clear leaders in our public case study

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Report Details

Report	Value
Report prepared by	Claudia M. Jaime
Report approved by	Lurdes Guerra
Report approved on (Date)	07/12/2022

Surveillance

Proposed date for next audit
2023-Sep-20

Stakeholder Announcements

Date of publication	Location
2022-Aug-15	AWS webpage
2022-Aug-15	WSAS webpage
2022-Aug-19	ECOLAB webpage

Catchment Information

Catchment Information
Ecolab, located in the city of Barueri, in the state of São Paulo (Brazil), is a factory dedicated to the production of chemical solutions for cleaning and disinfection. The Barueri plant mainly uses the São Lourenço system, which draws water from the Cachoeira do França reservoir, located in the Ribeira de Iguape river basin, and obtains additional water, including potable water, from the São Paulo aquifer. Domestic and industrial effluents are sent to an outsourced industrial treatment plant before being discharged into the Tietê River.

Client Description and Site Details

Client/Site Background
Ecolab is the global leader in water, cleaning and infection prevention solutions and services that help protect people, the planet and the health of businesses. We provide comprehensive science-based solutions, data-driven insights and best-in-class services to improve food safety, help maintain clean and safe environments, optimise water and energy consumption, and improve operational performance and sustainability for customers around the world.
The Site is a manufacturer of detergents for institutional and domestic use.

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Summary of Shared Water Challenges

- Summary of Shared Water Challenges**
 Shared Water Challenges:
 Water Scarcity
 Poor Water Quality (incoming SABESP)
 Flooding
 Biodiversity
 Poor Water Quality (Outgoing)

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

0.1.1	<i>Eligibility Criteria</i>	
0.1.1.1	<i>The site(s) occupy one catchment OR an exception has been granted.</i>	 Yes
Comment	The Site occupies one catchment.	
0.1.1.2	<i>The scope of the proposed certification shall be under the control of a single management system.</i>	 Yes
Comment	The scope of the certification is under the control the Site with a single management system.	
0.1.1.3	<i>The scope of the proposed certification shall be homogeneous with respect to primary production system, water management, product or service range, and the main market structures.</i>	 Yes
Comment	The Site has a homogeneous production system.	

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.


Yes

Comment

- Site boundaries - plan showing the layout of the plant and its 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; contact - agreement
- Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies- evidence - plan with the discharge point
- Catchment(s) that the site affect(s) and is reliant upon for water.

Water Service Provider: The site gets its water for operations from SABESP (municipal water) (about 95% of water). The site also gets about ~5% of their water from Consumo Caminhão Pipa which gets its water from aquífero terciário Formação São Paulo. The site will also be getting a small amount of water through a new rainwater collection system being installed. The water for drinking water for employees come from purchased spring water from Aqua Vital which sources their water from the Sao Paulo aquífer.

Ultimate Water Source: Sao Lourenco System from Cachoeira do Franca reservoir (95% of water), Sao Paulo Aquífer (drinking water and supplemental process water), Rainwater.

Wastewater service provider: The water both industrial process water and other water is discharged to SABESP for treatment.

Ultimate Receiving Water Body: Tiete River.

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

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

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


in progress

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Comment Stakeholders_and_Outreach_(Barueri) - shows the process used to make the Ranking Level of Interest and Influence, identified stakeholders and contact with them. The assessment of stakeholders is in a list and prioritization.
Stakeholder-mapping - identified the degree of stakeholder engagement based on their level of interest and influence.
Stakeholders (from Sabesp), representative of the site's ultimate water source and ultimate receiving water body are identified.
The site did not consider neighbours, such as other companies in the same industrial park, farmers and communities.

Evidences: Excell Stakeholders and Outreach (Barueri), with criteria description of each level of interest and influence and the spreadsheet fulfilled with stakeholders names, contact details and the ranking level of interest and influence, outreach log with the objective.

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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.*

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Comment The Site has presented an evaluation of the degree of influence between site and stakeholder; however once the Site update their stakeholder list their identify the degree of influence between them for new stakeholders.

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 The Site has information on what to do in several emergencies including if there is a chemical spill which could in turn effect the water in the surrounding area. The Site has an emergency response plans are water in the event of a fire.
Risks: Water scarcity and others (arquivo salvo no item 1.6)
Existing water-related incident response plans shall be identified.
Findings: The Business Contingency Plan (Plano de Atendimento a Emergencia - PAE, PAM - Plano de Auxilio Mutuo) includes spills and fire.
Corrective action: add the information and action relate to the risk [drought and aquifer over abstraction into the [Contingency Plan]

DD38 - Diretriz da Cetesb quando ha algum risco de contaminacao do solo: Empresa Arcadis fez um estudo Analise para investigar a presenca de poluentes no solo, o relatorio esta previsto para terminar no final de outubro de 2022.
Em cada area existe kit de contencao ambiental contendo material para conter os vazamentos.

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

✓
Yes

Comment The Site has identified and mapped their Site water balance, including inflows, losses, storage, and outflows.
Evidences: Hydraulic Map (shows the flow of water in volume, begin in the hydrometer, go to reservoir, water treatment, than to the production utilization e end at the discharge point). Spreadsheet called 1.Gestao Consumo de Agua Barueri (fulfilled with de all the hydrometers and the volumes in the each fase of the process).

1.3.3 *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.*

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Obs.

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Comment	<p>The Site has presented a water balance; which include monthly variations and the amount of water used by month with the lowest usage month being P1 and the highest often being P7.</p> <p>Evidences: Spreadsheet called 1.Gestao Consumo de Agua Barueri (fulfilled with de all the hydrometers and the volumes in the each fase of the process). Water meter - Monthly Average (this cover more then 1 Year, that quantified the high and low variances). The variances in 2021 is because of some (basamentos) que foram sendo consertados e o grafico se tornou estavel.</p>	
1.3.4	<p><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></p>	<p>✔ Yes</p>
Comment	<p>The outgoing water quality is tested on a monthly basis and historical records can be found here under effluents and the month. From analysing data from the past two years there seems to be no significant seasonal variance with the outgoing water quality. Incoming water quality reports can be found here under the month and year.</p> <p>Evidences: There analyse the water quality monthly. The laboratory is Nalco Water.</p> <ul style="list-style-type: none">- ENU-Report of analysis- Outgoing water Quality Variance- abril21-effluent barueri.2.pdf (with the name of parameters analysed and the results)	
1.3.5	<p><i>Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.</i></p>	<p>✔ Yes</p>
Comment	<p>The Site has presented a list of raw materials and products kept on site and their general location.</p> <p>The tanks has contingency containers to keep eventual leak into this container (seen during the visit)</p> <p>These are the most likely to be pollutants. The Site presented also a map.</p> <p>Exhibits:</p> <ul style="list-style-type: none">- inventory list: RM. intermediates-map: Raw material, intermediates, finished goods.pdf	
1.3.6	<p><i>On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.</i></p>	<p>✔ Yes</p>
Comment	<p>The Site is located in an industrial complex in which they rent the space where their facilities are located; they have not identified IWRA on site.</p>	
1.3.7	<p><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></p>	<p>✔ Yes</p>
Comment	<p>The Site has presented their incoming Water Cost: (Municipal): \$0.08 R/m³, \$1.19 R/m³ for drinking water</p> <p>Wastewater Treatment Fee: (Municipal) \$0.22 R/m³</p> <p>Since Ecolab is a company that sells water treatment chemicals their jobs are water related value add jobs.</p> <p>Total Payroll: 8.469 M Real</p> <p>The total sales out of the plant is economic value to the local area (taxes).</p> <p>Exhibits:</p> <ul style="list-style-type: none">Water Costs - Edit.xlxs (water treatment and operation cost),Water Stewardship Plan Barueri.xlsxWater Net Zero Strategy - powerpoint page 16.	
1.3.8	<p><i>Levels of access and adequacy of WASH at the site shall be identified.</i></p>	<p>✔ Yes</p>

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Comment	<p>The Site has presented maps including WASH facilities. The Site has 170 employees and 38 bathrooms on site and 7 potable drinking water stations onsite; which is considered under legal compliance with national law (NR-24 attached). The site has a nurse to attend their employees. The site has completed the WBCDS WASH Self Assessment and received the below score. We were not at full pledge compliance in 3 dimensions and plan on working on those areas. We have already started using the tool as a guide to improve our onsite. Additional information on our WASH efforts can be seen in indicator 3.9.5.</p>	
1.4	<p><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></p>	
1.4.1	<p><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></p>	 in progress
Comment	<p>The Site has presented an assessment of their top 5 raw materials suppliers and have identified that they are not produced in the same catchment. However, their list must include a list of their primary inputs including their containers, that are produced in the same catchment (Vasitex - IBC container at the same catchment).</p>	Finding No: TNR-002403
1.4.2	<p><i>The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.</i></p>	 Yes
Comment	<p>The Site has 2 outsourced services with embedded water use: uniform laundry and IBC containers washout (Vasitex). The Site uses less water in their laundry service due to the use of ECOLAB equipment; which is water efficient use. The detailed information from the two outsourced service with embedded water use, uniform laundry and IBC washouts. Our IBC washout service reports that the embedded water use they use is about 67 m3/month. The Site send about 1000kg of laundry a year equating to about 12.5m3 a year of outsourced water services.</p>	
1.5	<p><i>Gather water-related data for the catchment, including water governance, water balance, water quality, Important Water-Related Areas, infrastructure, and WASH</i></p>	
1.5.1	<p><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></p>	 Yes

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Comment

In Brazil there are several different bodies who oversee aspects of water resources. There is a federal law (No. 9,433/97) instituted that created the National System of Water Resources Management (SINGREH). This brings together the different government bodies and committees that work on the national water resources policy. The role of this collective is to promote the democratic and participatory management of water uses. Within this collective is the Water Resources National Council (CNRH), the Water Security Secretariat of the Ministry of Regional Development (SSH/ MDR), the National Waters Agency (ANA), the State Water Resources Council (CERH), the State Water Resources Management Bodies, River Basin Committees and Water Agencies.

This same law also created 5 different water resource management tools to help organize the integrated management at different levels of government (i.e. state and federal) through planning, supervision, disclosure of information and regulation.

The creation of ANA in 2000 helped drive the implementation of these water resource management tools throughout the country. The results have been captured in the Brazilian Water Resources Report since 2009. In 2006 the first National Water Resource Plan was made and there was significant analysis to it for improvements in 2017-2020. New guidelines are followed in 2021. States individually are also making their State Water Resource plans. River Basin committees (CBHs) in Brazil have existed since 1988. They are composed of committees that represent different sectors of society that are interested in basin management and have decision making ability. CBHs are also a part of SINGREH. The current CBH do not represent all basins in Brazil but rather ones that had quantitative or qualitative conflict for water usage.

Water consumption permits are issued on a state and federal level. Withdrawal without permits continues to be a problem or over withdrawal above permit allowance also continues to be a problem. In addition, more work to have better groundwater management plans especially when between different regions is another gap the management plan has. (Source: SDG Report)

In the state of Sao Paulo and on our municipality level water is controlled by SABESP.

There have been several public initiatives over the years to address the planning, management and efficiency of water and energy usage in Brazil. The COM+AGUA project was started in 2005 to address this especially where there is high water losses and low energy efficiency across the supply network. From 2014-2017 another program as a part of the Program for the Development of the Water Sector (INTERÁGUAS) was launched to strengthen institutions and methodologies around integrated water management to reduce losses and promote efficient use of electricity. The looked at varying sizes of service providers with water restrictions and had external and internal stakeholders participate in the training actions, technical work and management instruments.

There has been efforts to expand the amount of aquifers the Integrated Groundwater Monitoring Network (RIMAS) is monitoring. RIMAS formed in 2009 and this expansion initiative came about in 2015. In 2020 the total monitoring was up to 409 aquifers. (Conjecturas Report)

In regards to initiatives around sanitation and reuse, in 2018 the National Sanitation Secretariat of the Ministry of Regional Development (SNS/MDR) created guidelines for an Action plan to institute a Treated Sanitary Effluent Reuse Policy in Brazil. This proposed policy discusses quality standards, financial models, tariff subsidies, available technologies, and legal framework. The plan in 2016 identified reuse projects that could potentially produce up to 13 m³/s. The opportunity shows the great potential for expanding these efforts for industrial reuse in the Southeast region which encompasses our catchment in Sao Paulo.

In an effort of transparency, every year ANA published the Conjecturas report which talks about the state of water in Brazil. In the report they highlighted their projections that there will be an increase of 42% water removed over the next 20 years. This they highlighted as motivation to develop planning actions around water security and consideration of the effects of climate change on the water cycle. Most relevant to our site is the projections around the increased use of water in industry and plans around that.

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SABESP notes in their 2020 Sustainability Report that they have a goal to execute 984 thousand new water connections and 1.2 million new sewage connections from 2021 to 2025. Another stride being made is the mandatory connection of house to the water and sewage networks

1.5.2 *Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.* ✔
Yes

Comment The site uses an application of legal compliance for the site called "amblegis".
Evidence:1.5.2 Barueri (Requisitos Legais Relacionados a Água).
Human Consumption: Ordinance GM/MS No. 888, of May 4, 2021: This law provides the procedure and standard for monitoring potability and quality for drinking water. This includes action plans, monitoring, testing, surveillance and penalties.

Effluent: Decree 8468 art. 19A: This law governs the release of pollutants both to water, soil and air. It declares CETESB to be the body who governs this regulation including testing, norms, specification, prevention and control programs and more. The law also details the exact limits of different pollutants and how effluents should be treated. It discusses inspections and sanctions to enforce these standards and limits by CETESB.

Groundwater Collection: Resolution 1/16: This resolution enforces that in order to extract water from the ground you must have a grant through the administration. This includes the volume and the amount of time you are allowed to extract water.

NR 24 - Condições Sanitárias e de Conforto nos Locais de Trabalho: This law covers the requirements for WASH conditions on a work site.

Conclusion
- Water-related legal and regulatory requirements are identified and documented in a Legal Register, dates of expiry are tracked, and all requirements were met at the time of the audit.

1.5.3 *The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.* ✔
Yes

Comment The site presented an study that shows the catchment water balance. Evidence: file with the study called " Sou Lourenco System Balance".
The Site is not classified under scarcity.

1.5.4 *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.* ✔
Yes

Comment The Site has presented the public information for water quality in the Catchment, including annual seasonal high and low variances (pp. 4-18).
According to CETESB factors such as high concentrations of population, irregular occupations, low levels of sanitation and non-connection of the population to the collected network, they attribute 58% of the load released into the water.
Fundação SOS Mata Atlântica reports every year+, although it has decreased from 2019 to 2020 there is still much work to be done here (see Fig 11 graph p.12) .
Evidences:
Indicators Responses Barueri - shows reports from CETESB, SABESP, SOS Mata Atlantica.






1.5.5 *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.* ✔
Yes

Comment The Site has provided a document identifying the IWRAs, and has provided a description of the IWRAs. It includes maps of the sites.

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1.5.6	<i>Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.</i>	 Yes
Comment	The Site has described all public infrastructure available and potential exposure to extreme events (flooding) pp 25-50.	
1.5.7	<i>The adequacy of available WASH services within the catchment shall be identified.</i>	 Yes
Comment	The site has compiled information about the available WASH services within the catchment in the document called "1.5 Barueri" pp 28 to 50.	
1.6	<i>Understand current and future shared water challenges in the catchment, by linking the water challenges identified by stakeholders with the site's water challenges.</i>	
1.6.1	<i>Shared water challenges shall be identified and prioritized from the information gathered.</i>	 in progress
Comment	<p>The Site presented documentation for their risk assessment, public initiatives, shared water challenges, risks and opportunities.</p> <p>Water Scarcity Poor Water Quality (incoming SABESP) Flooding Biodiversity Poor Water Quality (Outgoing)</p> <p>Exhibits: 1.6.1.7 Risk Assessment Barueri (a spreadsheet called Risk Mapping with the Risks, that are categorized if it is shared and-or site level, relation to AWS outcome, probability, Impact to site, prioritization.</p> <p>The Site should understand their cause that originates their identified shared water challenges, in order to accurately prioritize, to develop appropriate mitigation actions, and to know whether collective action is appropriate.</p> <p style="text-align: right;">Finding No: TNR-002406</p>	
1.6.2	<i>Initiatives to address shared water challenges shall be identified.</i>	 Obs.
Comment	The site identified the Associated Initiatives for public initiatives and associated initiatives in the document "stakeholder and outreach", in the tag "Associated Stakeholder Initiatives". The initiatives identified in this document is related to SABESP and ONG SOS Mata Atlântica. The site present also others initiatives, but didn't mention the initiative with TNC - The Nature Conservancy.	
1.7	<i>Understand the site's water risks and opportunities: Assess and prioritize the water risks and opportunities affecting the site based upon the status of the site, existing risk management plans and/or the issues and future risk trends identified in 1.6.</i>	
1.7.1	<i>Water risks faced by the site shall be identified, and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.</i>	 No
Comment	<p>The site identified, and prioritized the Water risks faced by the site, including likelihood and severity of impact, the evidence is in the document "1.6&_1.7_Risk_Assessment_Barueri".</p> <p>Exhibits: 1.6.1.7 Risk Assessment Barueri (a spreadsheet called Risk Mapping with the Risks, that are categorized if it is shared and-or site level, relation to AWS outcome, probability, Impact to site, prioritization, impact to stakeholders and to site, the stakeholders are not identified individually to connect to each risk).</p> <p>There are three main types of risk to an organization: physical, regulatory and reputational. The site should list the water-related risks according with this classification.</p> <p style="text-align: right;">Finding No: TNR-002464</p>	

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1.7.2	<i>Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.</i>	🔍 Obs.
Comment	<p>The Site has include in the WSP (column N) the list of opportunities they are linked to each objective of their WSP:</p> <ul style="list-style-type: none"> Social, Cultural, Health Impacts/Opportunities Raise water stewardship awareness, create local water partnerships Improve access to clean, abundant water around the globe Access to improved source of drinking water (quality and quantity) Transparency and reduce water withdrawal within water basin Raise water stewardship awareness, reduce water consumption, progress on our water goals Raise climate change awareness, create local water partnership Transparency and reduce water withdrawal within water basin. Employee Engagement around water stewardship Opportunity for collective action, shared water challenge, stakeholder engagement and good water stewardship Restore natural area, work with local people to raise awareness, increase WASH infrastructure to those in need Reduce water withdrawal within water basin More sustainable water withdrawal form, less stress on municipal water withdrawal More sustainable water usage and reduce water withdrawal Ensure good environmental stewardship with the surrounding community and health of the community The final water receptor is the water basin for many communities, pollution can affect their health However there is no reference of potential savings, and business opportunities. 	
1.8	<i>Understand best practice towards achieving AWS outcomes: Determining sectoral best practices having a local/catchment, regional, or national relevance.</i>	
1.8.1	<i>Relevant catchment best practice for water governance shall be identified.</i>	✅ Yes
Comment	<p>Best practices for water governance include participation in local practice sharing and/or collective action groups, participation in enterprise water accountability groups, public disclosure of goals and progress toward goals and water use.</p> <p>Ecolab has implemented a water management tool implemented by the site that gives best practices and scores for water governance, water balance and quality</p> <p>The Site has presented an initiative were they participate as lieder for:</p> <ul style="list-style-type: none"> Committee for Development Climate Change ECOLAB is a member of the Environment Commission of ABIQUIM, they have an active participation on that group of peers, WSAS auditors revised the Minutes of agreements and matters discussed at the virtual meeting held on 06 June 2022. Meeting held virtually on July 06, 2022 "All legal compliance will not be considered as best practice" 	
1.8.2	<i>Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.</i>	✅ Yes
Comment	<p>Ecolab has implemented a water management tool that gives best practices and scores for water governance, water balance and quality.</p> <p>ECOLAB has signed a collaboration with TNC to conduct activities focus on the water balance of the Catchment The collaboration will last 3 years.</p> <p>"All legal compliance will not be considered as best practice"</p>	
1.8.3	<i>Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.</i>	🔍 Obs.


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Comment Ecolab participate in the ABIQUIM Committee for the Sustainable development. ABIQUIM is the Brazilian Chemical Industry Association. Evidences: Nalco Water - Ecolab (best practices in the sector) - comparative document between the Performance Indicator for the Responsible Action Program - 2022 (base year 2021) of the Ecolab-Nalco in relation to the result of the general average of all ABIQUIM member companies that responded to the survey.
Ecolab has implemented a water management tool implemented by the site that gives best practices and scores for water governance, water balance and quality. Evidence: GSC_Water_Management_Tool_(Barueri).
The Ecolab process does not require drinking water quality water. Using a lower quality water can reserve higher quality water for essential purposes, and can result in saving on water treatment costs, and associated chemicals and energy requirements.
The proposal for a collaboration with SOS Mata Atlântica which conduct a project called Água Limpa.

The Row 5 of the Site Measure, monitor and report "GSC Water Tool" has a parameter that is incorrect for best practises.
Compliance with it's wastewater permit, is a legal request. Not accountable for Best practise.

1.8.4 *Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.* 
Yes

Comment Relevant best practices for IWRA would be engagement with local stewards and community around the IWRA within the catchment and caring for any IWRA and contributing time and resources to nature-based solutions within the catchment.

1.8.5 *Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.* 
Yes

Comment The Site offers more bathrooms than the law required (NR 24). The Site has 170 people and 38 bathrooms on site and 7 potable drinking water stations onsite.
The site has been working toward a better score on the WBCSD WASH assessment and is adopting to follow these best practices.
Exhibits:
WBCSD_Revised_WASH_Self_Assessment_Tool-final_PTBR
The company has invested in avoiding health problems.

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2 STEP 2: COMMIT & PLAN - Commit to be a responsible water steward and develop a Water Stewardship Plan	
2.1	Commit to water stewardship by having the senior-most manager in charge of water at the site, or if necessary, a suitable individual within the organization head office, sign and publicly disclose a commitment to water stewardship, the implementation of the AWS Standard and achieving its five outcomes, and the allocation of required resources.
2.1.1	A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments: <ul style="list-style-type: none"> - That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes - That the site implementation will be aligned to and in support of existing catchment sustainability plans - That the site's stakeholders will be engaged in an open and transparent way - That the site will allocate resources to implement the Standard.
Comment	The Site has a public document that meets the requirements of this indicator and the document is signed by the Site plant Manager. Additionally ECOLAB has a commitment that is publicly available: https://es-es.ecolab.com/stories/ecolabs-barueri-brazil-plant-certifying-as-water-stewardship-leader Evidences: Document Water Stewardship Commitment, signed may1st 2022.
2.2	Develop and document a process to achieve and maintain legal and regulatory compliance.
2.2.1	The system to maintain compliance obligations for water and wastewater management shall be identified, including: <ul style="list-style-type: none"> - Identification of responsible persons/positions within facility organizational structure - Process for submissions to regulatory agencies.
Comment	The Site maintains compliance obligations Exhibits: - Responsibility_Matrix_-_Barueri (listed the Activities and the responsible for executing and responsible for manage, legal responsible). - Amblegis - mapped their regulatory obligations (laws)
2.3	Create a water stewardship strategy and plan including addressing risks (to and from the site), shared catchment water challenges, and opportunities.
2.3.1	A water stewardship strategy shall be identified that defines the overarching mission, vision, and goals of the organization towards good water stewardship in line with this AWS Standard.
Comment	The Site presented a document called Water_Stewardship_Strategy_Barueri_2022. This document shows the goals; however the document does not include the Site vision & mission. Exhibits: -Water Stewardship Barueri 2022

Yes

Yes

in progress


Finding No: TNR-002409

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



No

Comment The Water Stewardship Plan of Barueri - contains 27 goals, their plan contains: Each goal includes a measure however not a monitoring link to each one. The WSP includes actions to achieve. The WSP includes time frames to achieve each goal. The WSP does not include financial budget for each goal. The WSP includes staff responsible for actions and achieving targets. The WSP includes a link with the AWS outcomes.

Finding No: TNR-002410

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.*


No

Comment The Site has included a public sector plan 2.4.1 (on their Risk Assessment Barueri) However, the plan does not identify concrete actions that involve public sector

Exhibit:
 File: 1.6_1.7_Risk_Assessmet_Barueri - spreadsheet public sector Plan 2.4.1, with plan reaction and mitigation techniques, Spreadsheet Public Initiatives.

Finding No: TNR-002411

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

3.1 *Implement plan to participate positively in catchment governance.*

3.1.1 *Evidence that the site has supported good catchment governance shall be identified.*



Yes

Comment

The Site has done stakeholder outreach with a variety of different stakeholders showing good catchment governance. The Site connected with their suppliers, public agencies, other local companies, and NGOs to discuss shared water challenges and discuss collective action. The Site has a remarkable conversation with SABESP (water provider) to increase their engagement as well as the up and coming WRC Sao Paulo local chapter. Ecolab Brazil is an active member of the The Brazilian Business Council for Sustainable Development (CEBDS). CEBDS is a non-profit civil association that promotes sustainable development through articulation with governments and civil society, in addition to disseminating the most current concepts and practices on the subject. The Site has contributed to a project with The Nature Conservancy Sao Paulo Water Fund to address shared water challenges near the headwaters of the Alto Tiete River basin. This project will protect at least 220 hectares of forest land within the municipalities of Mogi das Cruzes and Salesópolis, allowing for water replenishment in the watershed. Project partners will begin by engaging with rural landowners, mapping existing forests that need to be conserved and restored, and identifying improvements to be made to rural sanitation. They will then negotiate voluntary conservation agreements with landowners, which align with Municipal Water Conservation Policies that already exist in the municipalities. Once signed, these agreements will pay these rural landowners to conserve their forested lands. This project also preserves the natural biodiversity in the area and maintains carbon sequestration. We have continued to promote that drive with our stakeholders as well to garner wider engagement and action for the project. From a broader perspective, Ecolab (parent company) has created a water coalition that will set science based local water targets for all members of the alliance (targeting other multinationals). The Site has spoken with a number of public organizations (I.e. P&G, TrueCost) and NGOs (WRI, UN CEO Water Mandate) to get involved and have 25 organizations signed on. Together the Site is working on evaluating projects as well as looking into basin evaluations to best address the shared water challenges in the basin through collective action. Ecolab is a big supporter of water stewardship and aims to be the best practice in all 5 outcomes of AWS. We are also committed to implementing and seeking certification at all of our top 15 high water risk sites by 2030. have also been able to contact other companies within our catchment for collaboration and alignment on shared water challenges, however we have not heard back from any. ECOLAB has registered their commitment with AWS on the Water Action Hub so others seeking collaboration opportunities or knowledge sharing can contact ECOLAB through that platform. The Site is also a part of Ecolab's Global Supply Chain Horizontal Process Network which is a collaboration between all global supply chain sites with a focus on high risk and high-water using sites to share best practices, knowledge, tools and align on long term goals.

3.1.2 *Measures identified to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be implemented.*



Yes

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Comment - Water is readily available to all citizens, including WASH facilities (e.g., at restaurants, neighbourhood etc.).
The site is in a region that is supplied by potable water treated by SABESP. The surface water source for the site is only from SABESP, not consuming water from the streams in the region. The amount of water withdrawn from the wells is granted by the body responsible for determining the distribution of rights to use groundwater without conflicts of use.
- The site provides best practice WASH facilities for its employees and visitors.
- No rights of external parties that need to be considered beyond internal site WASH requirements were identified by the site or audit team.
Conclusion:
The site is not restricting access to water for others.

3.2 *Implement system to comply with water-related legal and regulatory requirements and respect water rights.*

3.2.1 *A process to verify full legal and regulatory compliance shall be implemented.*



Yes

Comment The site has a tool called Amblegis to access the regulatory demands and to check its compliance.
See 2.2.1 for document regarding testing requirements and information on who is in charge of what. In addition our compliance can be seen with our permit here and in our Legal Matrix.

3.2.2 *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.*



Yes

Comment In Sao Paulo there exists two primary indigenous communities: The Guarani Mby'a and Guarani Nhandeva who have been living in this area of Brazil since as early as 1500. The United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) and the International Labour Organization Indigenous and Tribal Peoples Convention of 1989 are two organizations that seek to strengthen relationships with the native communities in Brazil with the residing civilians. These organizations try to protect the indigenous communities' land and water by implementing stricter regulations in areas with denser populations of indigenous people. This protected area covers multiple municipalities along the floodplains of the Tiete river. The aim of this protected area is to protect and recover the river and its surroundings to minimize flooding, effects of erosion and siltation processes caused by urbanization and protect local plants and animals.
Recently, many indigenous communities have been able to gain access to improved water rights through the help of the International Water Law Project run by Gabriel Eckstein. The goal of organizations like these are to be an advocate for indigenous communities and ensure that the government is honouring the significance of their history and land. The agreement on the Guarani aquifer entered into effect during November of 2020. The article states "The realization of the international project implementation of the Guarani Aquifer Strategic Action program: Enabling Actions—with the participation of the four countries, the Global Environmental Facility as Financier, and UNESCO as the executive agency, and with technical support from the Regional Center for Groundwater Management (known as CeReGAS)—can encourage the Guarani States to implement the agreement and establish the commission."
The Barueri plant withdraws approximately 38,157 cubic m annually predominantly from the São Lourenço system and discharges 70.8% after use. The water is treated before its discharge into the Tiete River. The São Lourenço provides about 201,830,400 m3 per year to the area making the Barueri plant .0002% of the total water withdrawal in the basin. We source our drinking water from the Sao Paulo aquifer via our supplier which averages about 46m3 a year. From that you can see the impact the site has on the main water source is minimal.
The Site is using water form wells they are respecting the rights of all peoples including Indigenous in the catchment.

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3.3	<i>Implement plan to achieve site water balance targets.</i>	
3.3.1	<i>Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.</i>	🔍 Obs.
Comment	The main key performance indicators the site tracks are water intensity, production, water and effluent. In 2021 Barueri increased their water usage intensity by 3% from 2020. Production increased by 23.5% and effluent increased by 32%. Exhibit: Water Stewardship Plan Barueri, that shows status for some targets.	
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	The enterprise targets for the Site water balance annually is a 2% reduction in water usage intensity (water withdrawn/product produced). The country level goal for the site was a 7% reduction. The site met the enterprise goal even though it fell short of the country level goal. The regional goal for 2022 is to have a 5% reduction in water usage intensity. Exhibit: SH&T e PS - 2022 with graphics from water consumption.	
3.3.3	<i>Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.</i>	✅ Yes
Comment	The Site has presented their project with Nature Conservancy.	
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>	✅ Yes
Comment	The Site is working toward improving water quality targets. The Site is working on automation on their effluent treatment which will help create engineering controls to ensure their pH is in compliance with effluent environmental guidelines. The Site is currently in compliance with their wastewater permits which is their stated best practice for water quality. The Site is also in compliance with the Ecolab Global Supply Chain Environmental policy.	
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>	✅ Yes
Comment	See 3.4.1, The Site is planning to continue to stay within their wastewater discharge permit and continue to add improvements related to their effluent water quality to our water stewardship plan the site measure the water quality and act when it is out the quality desired. See the water stewardship plan for how the Barueri plant is working toward improving water quality targets. The Site is working on automation on their effluent treatment which will help create engineering controls to ensure their pH is in compliance with effluent environmental guidelines. The Site is currently in compliance with their wastewater permits. We are also in compliance with the Ecolab Global Supply Chain Environmental policy..	
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>	🚀 in progress

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Comment The Site includes in their WSP:
 -Collaborate with The Nature Conservancy on scoping and funding a water replenishment project to replenish water to the Upper Tiete Watershed Gallons of water replenished 2021
 2021
 -Complete necessary testing and adjustments to waste streams and water sources to meet requirements of WW provider and laws Number of violations Plant establishment Ongoing
 However the WSP doesn't have monitoring aspects; as well as the time frame is not possible to keep as ongoing; because it will be not possible to identify when a target has been achieved.

Finding No: TNR-002412

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

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

Comment The Site has identified and quantified the provision fo adequate access to safe drinking water, effective sanitation and protective hygiene.
 Exhibits:
 -Maps of site
 -WBCSD_Revised_WASH-Self_Assessment_Tool-Barueri

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

Comment The Site discharges treated water to a secondary treatment center and maintains the legal compliance with the effluent.
 The Barueri plant withdraws approximately 38,157 cubic m annually predominantly from the Sao Laureco system and discharges 70.8% after use. The water is treated before its discharge into the Tiete River. The Sao Laureco provides about 201,830,400 m3 per year to the area making the Barueri plant .0002% of the total water withdrawal in the basin. The Site sources their own drinking water from the Sao Paulo aquifer via their supplier which averages about 46m3 a year. From that reason The Site considers their impact on the main water source is minimal. Through the Site stakeholder engagement they have been in contact with their suppliers to understand the measures they are taking for sustainability. The Site is involved in projects that benefit the overall water like their water replenishment project with The Nature Conservancy. Therefore, the Site considers they are respecting the rights of all peoples including Indigenous in the catchment.

3.7 *Implement plan to maintain or improve indirect water use within the catchment:*

3.7.1 *Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.* 🔍 Obs.

Comment The Site did not include any target related to indirect water use.




3.7.2 *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.* ✔ Yes

Comment See indicator 1.4.1. The Site has also have been in contact with our laundry service provider and IBC washout company to inquire about their sustainability practices and shared water challenges.
 The Site has evidence of requesting detailed information to their service providers.

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3.8	<i>Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have.</i>	
3.8.1	<i>Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.</i>	 Yes
Comment	The site don't have shared water-related infrastructure.	
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>	 Obs.
Comment	Ecolab has implemented a water management tool implemented by the site that gives best practices and scores for water governance, water balance and quality The Site has described in 1.8.1 the following best practises: - Best practices for water governance include participation in local practice sharing and/or collective action groups, participation in enterprise water accountability groups, public disclosure of goals and progress toward goals and water use. Exhibit: ABIQUIM - Association for the Chemical industry in Brazil - the ECOLAB participate in the Atuacao responsible Programm with others chemicals companies, in monthly meetings. Email with Minuta de instrucao Normativa. - The Site has presented an initiative were they participate as lider for: Committee for Development Climate Change - ECOLAB is a member of the Environment Commission of ABIQUIM, they have an active participation on that group of peers, WSAS auditors revised the Exhibit: Minutes of agreements and matters discussed at the virtual meeting held on 06 June 2022. Meeting held virtually on July 06, 2022 "All legal compliance will not be considered as best practice"	
3.9.2	<i>Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.</i>	 No
Comment	Ecolab has implemented a water management tool that gives best practices and scores for water governance, water balance and quality. The Site WSP includes actions taken towards sustainable water balance: As an example of the analysis of the activities presented in the WSP: Ecolab has set the target of 50% positive water impact in local watersheds of 15 identified high risk watersheds. This includes site efficiency projects to decrease withdrawal as well as replenishment projects financed by Ecolab in the region to restore water to the watersheds. -The limitation to account the progres for this activity is that the time frame is Ongoing, and the budget has not been determined. Collaborate with The Nature Conservancy on scoping and funding a water replenishment project to replenish water to the Upper Tiete Watershed -The time frame for this activity was planned for 2021; which means that the activity for that year is completed; however the description of the activities implemented is not available. It is also relevant to mention that the agreement with TNC and ECOLAB is applicable for both sites; which means each site must consider half of the budget for each year (or consider any other adjustment to avoid the double accountability of the same investment). Water management in production - washing vessels - The activity will be completed at he end of 2022; however no budget has been determined for this activity. The list of activities continue, the former are just example of the uncompleted description of the implemented best practices related to water balance.	

Finding No: TNR-002417

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3.9.3 *Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.*  No


Comment The Site WSP toward improving water quality targets presents the following activities:
 Ensure facility is in compliance with corporate standards around waste water, waste and other discharge and global environmental standards
 -Not possible to measure progress since the time frame said ongoing and the budget is N/A

Complete necessary testing and adjustments to waste streams and water sources to meet requirements of WW provider and laws
 -Not possible to measure progress since the time frame said ongoing and the budget is as needed

The Site has referred that they are currently in compliance with our wastewater permits which is our stated best practice for water quality.
 All legal compliance is not accountable for Best Practice.
 The Site is in compliance with the Ecolab Global Supply Chain Environmental policy.
 The Site continue to discuss this shared water challenge with our stakeholders to continue take collective action in the catchment


Evidences:
 - Water_Stewardship_Plan_Barueri, where the site shows the goals and actions.
 Document attached in 1.5.4 (called 1.5 Barueri).

Finding No: TNR-002418

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.*  in progress






Comment The Site has mention at 1.8.4:
 Relevant best practices for IWRA would be engagement with local stewards and community around the IWRA within the catchment and caring for any IWRA and contributing time and resources to nature-based solutions within the catchment
 However, the implemented activities are not described.
 The Site WSP includes the following activities for IWRA:
 -Collaborate with The Nature Conservancy on scoping and funding a water replenishment project to replenish water to the Upper Tiete Watershed
 The activity was completed in 2021 and the activities are not described
 - Complete necessary testing and adjustments to waste streams and water sources to meet requirements of WW provider and laws
 The activity has an ongoing time frame and the budget said as needed. Is not possible to achieve the progress of their activities.
 "All legal compliance will not be considered as best practice"

Finding No: TNR-002419

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

Comment The Site plans to continue to improve their WASH conditions. Through stakeholder engagement we seek to understand more of the community WASH status and needs.
 The site donate Chlorine to help the municipality in the Covid period (e-mail from Benedito).
 Evidences:
 - Stewardship Plan Barueri (volunteer to increase water access to vulnerable communities - Action: employees volunteer to build filters for communities in the Amazon, campaign to celebrate world handwashing day - Action: create a awareness campaign in schools about proper handwashing)
 "All legal compliance will not be considered as best practice"


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






4.1	<i>Evaluate the site's performance in light of its actions and targets from its water stewardship plan and demonstrate its contribution to achieving water stewardship outcomes.</i>	
4.1.1	<i>Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.</i>	 No
Comment	<p>The WSP of the Site has inconsistencies the time frames are described as ongoing, the budget is not determined (see 2.3.2). The plan has activities that involve the 5 outcomes of the AWS STD.</p> <p>Evidences: - Water stewardship Plan, with some evaluations, but for most of them the evaluation is missing.</p> <p style="text-align: right;">Finding No: TNR-001592</p>	
4.1.2	<i>Value creation resulting from the water stewardship plan shall be evaluated.</i>	 Yes
Comment	<p>The Site average annual reduction in water usage from 2018-2021 was 1.2 million gallons equating to \$185,000 USD in annualized in risk adjusted savings from incoming water reduction and from an overall decrease 24.5% of effluent from 2018-2021. Exhibit: Barueri_Water_Risk_Monetizer - Facility Report</p>	
4.1.3	<i>The shared value benefits in the catchment shall be identified and where applicable, quantified.</i>	 Yes
Comment	<p>As water scarcity is one of the Site's shared water challenges any water reduction, alternative water collection and water replenishment they have is value for the catchment. Through our partnership with The Nature Conservancy 29.4 million gallons per year over 10 years (2023-2032) will be replenished to the catchment. The same is true for water quality, as it is a shared water challenge. The Site will maintain best practices or improve upon best practices will be valuable for the catchment.</p>	
4.2	<i>Evaluate the impacts of water-related emergency incidents (including extreme events), if any occurred, and determine the effectiveness of corrective and preventative measures.</i>	
4.2.1	<i>A written annual review and (where appropriate) root-cause analysis of the year's emergency incident(s) shall be prepared and the site's response to the incident(s) shall be evaluated and proposed preventative and corrective actions and mitigations against future incidents shall be identified.</i>	 Yes
Comment	<p>The site analyse the root-cause and propose corrective actions. The Site review of all the emergency incidents that occurred and report on them.</p>	
4.3	<i>Evaluate stakeholders' consultation feedback regarding the site's water stewardship performance, including the effectiveness of the site's engagement process.</i>	
4.3.1	<i>Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.</i>	 Yes
Comment	<p>The Site is conducting initial certification; they have not conduct a consultation of the performance of their WSP.</p>	
4.4	<i>Evaluate and update the site's water stewardship plan, incorporating the information obtained from the evaluation process in the context of continual improvement.</i>	

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4.4.1	<i>The site’s water stewardship plan shall be modified and adapted to incorporate any relevant information and lessons learned from the evaluations in this step and these changes shall be identified.</i>	 Yes
Comment	The Site WSP is a living document that they continue to amend as they complete projects, engage in new projects and set new goals and evaluate feasibility of existing projects as well as engage with their stakeholders and learn about their best practices and initiatives.	

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>	 No
Comment	The Site disclosed a document called "Governanca da água" (Water governance), but the site don't include position of those accountable for compliance with water-related laws and regulations. Also the document is not publicly available.	Finding No: TNR-002421
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>	 Yes
Comment	The Site has presented the WSP including the AWS standard outcomes has been communicated to relevant stakeholders. Evidences: -email to Semae with the PowerPoint presentation AWS Stewardship Strategy Barueri 2022. -presentation has Plano de Gestão hidrica, metas de sustentabilidade para 2030, sustentabilidade: projetos (water net zero).	
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
Comment	The Site disclosed annually reports at his website (2019, 2018, 2020, 2021): https://www.responsibilityreports.com/Company/ecolab-inc - ECOLAB 2021 corporate Report - Water is in the page 33 up to page 40.	
5.4	<i>Disclose efforts to collectively address shared water challenges, including: associated efforts to address the challenges;engagement with stakeholders; and co-ordination with public-sector agencies.</i>	
5.4.1	<i>The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.</i>	 Yes
Comment	See the Site's case study posted to https://www.ecolab.com/corporate-responsibility/environment/water-stewardship Evidences: - challenges are disclosed in the presentation (igual para Barueri e Suzano) -email from SOS Mata Atlântica (august2022)	
5.4.2	<i>Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.</i>	 Yes
Comment	https://www.ecolab.com/stories/ecolabs-barueri-brazil-plant-certifying-as-water-stewardship-leader . as well as our Stakeholder Engagement log for extensive attempts at stakeholder communication	


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5.5	<i>Communicate transparency in water-related compliance: make any site water-related compliance violations available upon request as well as any corrective actions the site has taken to prevent future occurrences.</i>	 Yes
5.5.1	<i>Any site water-related compliance violations and associated corrections shall be disclosed.</i>	 Yes
Comment	The site has received no compliance related violations this year. https://www.ecolab.com/stories/ecolabs-barueri-brazil-plant-certifying-as-water-stewardship-leader	
5.5.2	<i>Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.</i>	 Yes
Comment	The site has received no compliance related violations this year. https://www.ecolab.com/stories/ecolabs-barueri-brazil-plant-certifying-as-water-stewardship-leader	
5.5.3	<i>Any site water-related violation that may pose significant risk and threat to human or ecosystem health shall be immediately communicated to relevant public agencies and disclosed.</i>	 Yes
Comment	The site has received no compliance related violations this year. https://www.ecolab.com/stories/ecolabs-barueri-brazil-plant-certifying-as-water-stewardship-leader	

Photographic Evidence from Audit

Comment	The Site has been taking the photographic evidence form the audit. However did not share the pictures with the Audit team.	 Yes
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