

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-000337



### SITE DETAILS

Site: **Nestlé Mossel Bay**

Address: Nestlé Mossel Bay (South Africa) (Pty) Ltd., 6500, 1 Depot Road Voorbaai, Mossel Bay, SOUTH AFRICA

Contact Person: Monique Botha

AWS Reference Number: AWS-000098

Site Structure: Single Site

### CERTIFICATION DETAILS

Certification status: Certified Core

Date of certification decision: 2022-Dec-22

Validity of certificate: 2025-Dec-22

### AUDIT DETAILS

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

Audit Type(s): Re-Certification Audit

Audit Start Date: 2022-Sep-12

Lead Auditor: Ruth Wandera

Audit team participants:

Mia Antoni-Naidoo

Site Participants:

Gavin Naidoo, Consultant

Patience Mlambo, Other

Khoa Huynh, Factory Manager

Sean Weavill, Factory Engineer

Malain Deal, Other

Georgia-Ann St Quintin, Other

Hoven Meyer, Other

Miriam Botha, SHE Manager

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### ADDITIONAL INFO

**Summary of Audit Findings:** A total of 45 findings were raised during the certification audit, 9 major non-conformities, 30 minor non-conformities, 6 observations. The major non-conformities were of sufficient concern to warrant the categorization of the non-conformity as major and related to Sustainable Water Balance, Good Water Quality Status and Important Water Related Areas.

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 14 December 2022.

The major non-conformities must be sufficiently addressed and evidence submitted to WSAS within 90 days of receipt of the report by 14 January 2023.

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

The audit team recommends re-certification of Nestle Mossel Bay 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.

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

Nestle Mossel Bay is located in the Mossel Bay Municipality which is in the Western Cape Province of South Africa. The nearest town is George located about 52km away by road. The company purchased the milk section of Langeberg on 1 September 1956 and started production of milk products Nespray, Lactogen and Klim on 30 June 1958. The factory currently has a staff complement of approximately 240 employees (including Agricultural Services). The number of employees varies year to year. Casuals are part of the daily crew, which varies as well. The factory produces shelf stable dairy products and Growing-up Milks and consists of two plants namely:

- Liquid Plant which manufactures Sweetened Condensed milk, Ideal Milk, Ideal Light, Caramel Treats and Dessert Creams
  - The Powder Plant manufactures Nespray, Kilm, Nido 1+, Full Cream Powder & Foamy Full Cream Powder
- The assessment included the above named plants as well as the Waste Water Treatment Plant.

The facility is located in the Breede Gouritz Catchment. The Breede Gouritz Water Management Area (BGWMA) is bounded by the Indian Ocean to the south, the Berg-Olifants WMA to the west, the Orange WMA to the north and the Mzimvubu-Tsitsikama WMA to the east. It largely falls within the Western Cape Province of South Africa with small portions of the upper catchment of the Olifants River falling in the Eastern Cape Province and tiny portions of the upper catchments of the Gamka and Groot Rivers falling in the Northern Cape Province.

There are two large rivers within the Water Management Area, the Breede and Gouritz Rivers: The Breede River with its main tributary the Riviersonderend River discharges into the Indian Ocean. The Gouritz has three main tributaries - the Groot, Gamka and Olifants Rivers. There are a number of other smaller rivers in the Water Management Area including the Touws-, Duivenhoks-, Goukou-, Hartenbos-, Great Brak-, Kaaimans-, Knysna- and Keurbooms Rivers as well as the Palmiet-, Kars-, Sout-, Uylenkraals-, Klein-, Onrus- and Bot-Swart Rivers.

The audit was conducted onsite on 12 to 15 September 2022.

The onsite site visit included the assessment of Liquid Plant, Powder Plant and Waste Water Treatment Plant.

The following external stakeholders were interviewed during the audit:

1. Mossel Bay Municipality - Wogan Duthie; Setchmor Rhodes; Gershwin Rock & Thys Van Zyl
2. Talbot - Msawayo Pereira; Ivan Dhevdath
3. Oceans Research - Emmanuel Mirenzheni
4. Rooiheuvel Farms Pty Ltd. - James Robertson
5. Department of Water and Sanitation - Wolwedans Dam - Cobus Visagie

## FINDINGS

### NUMBER OF FINDINGS PER LEVEL

<b>Observation</b>	6
<b>Minor</b>	30
<b>Major</b>	9

# CERTIFICATION REPORT

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### FINDING DETAILS

Finding No:	TNR-001515
Checklist Item No:	1.2.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Sep-13
Checklist item:	Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall: <ul style="list-style-type: none"><li>- Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people;</li><li>- Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies;</li><li>- Provide evidence of stakeholder consultation on water-related interests and challenges;</li><li>- Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups;</li><li>- Identify the degree of stakeholder engagement based on their level of interest and influence.</li></ul>
Findings:	<p>Process used for stakeholder identification has opportunity to be improved. Vulnerable, women, minority, and Indigenous people can be identified in the Stakeholder Mapping document.</p> <p>Stakeholder map indicated the physical distribution of stakeholders in the catchment which was adequate but more could be identified especially the vulnerable and minority groups. The stakeholder mapping should also show any linkages among stakeholders.</p> <p>There was no evidence of broader stakeholder consultation on water-related interests and challenges. The most engaged stakeholder was the Mossel Bay Municipality.</p>
Finding No:	TNR-001524
Checklist Item No:	1.3.3
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Sep-14
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:	There was a two year summary of water balance however no analysis of 2021 vs 2022 was presented or quantified.

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## Alliance for Water Stewardship (AWS)

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Finding No: TNR-001525  
Checklist Item No: 1.3.4  
Status: In Progress - CA plan approved  
Finding level: Minor  
Due date: 2023-Sep-14  
Checklist item: 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.

Findings: Water Quality results provided but no evidence of analysis of Quality results done against any guidelines in order to understand water-related challenges that would be a threat to good water quality status for people or environment. Since water quality-related challenge is identified (e.g. water quality exceeds or is close to a regulatory or other accepted quality limit), the site should quantify how the quality compares to limits (for relevant parameters) and clearly identify breaches and trends of concern.

Finding No: TNR-001526  
Checklist Item No: 1.3.6  
Status: In Progress - CA plan approved  
Finding level: Minor  
Due date: 2023-Sep-11  
Checklist item: On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.  
Findings: There was no evidence for 1.3.6 of the standard which states that 'On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.'  
Infrastructure on site e.g. Fat traps, amphi theater seen on site was not addressed in this section

Finding No: TNR-001655  
Checklist Item No: 1.3.7  
Status: Open  
Finding level: Observation  
Checklist item: Annual water-related costs, revenues, and a description or quantification of the social, cultural, environmental, or economic water-related value generated by the site shall be identified and used to inform the evaluation of the plan in 4.1.2.  
Findings: More accurate forecasting would be desirable. The cost analysis should consider, but not be limited to items such as: payment for experts, fees and levies, data collection, technical studies, capital investments and depreciations, risk mitigation actions, stakeholder engagement activities, external communications and staffing, being either 'one-time' actions or events, or operational expenses, and for ongoing monitoring, maintenance and management of water resources. For further details please address to the AWS Standard 2.0 Guidance.

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## Alliance for Water Stewardship (AWS)

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Finding No:	TNR-001656
Checklist Item No:	1.3.8
Status:	Open
Finding level:	Observation
Checklist item:	Levels of access and adequacy of WASH at the site shall be identified.
Findings:	The appropriate 'level of access' or 'adequacy' may depend on ground conditions, climate, local context, and cultural and behavioral traditions. An update to the study conducted in 2014 would be a prove of continuous improvement strategy from the site.
Finding No:	TNR-001657
Checklist Item No:	1.4.2
Status:	Open
Finding level:	Observation
Checklist item:	The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.
Findings:	Other outsourced services should be accessed. It is important to distinguish total water withdrawal from net water use (consumptive water use), the most relevant component.
Finding No:	TNR-001530
Checklist Item No:	1.5.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Sep-14
Checklist item:	Water governance initiatives shall be identified, including catchment plan(s), water-related public policies, major publicly-led initiatives under way, and relevant goals to help inform site of possible opportunities for water stewardship collective action.
Findings:	Municipality reports were provided with no extracts provided to indicate how the site intends to fulfil this requirement. The site should document its understanding of the above matters (see comment).
Finding No:	TNR-001531
Checklist Item No:	1.5.3
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Sep-14
Checklist item:	The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.
Findings:	No indication of annual and seasonal variance was provided nor the catchment water balance.

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## Alliance for Water Stewardship (AWS)

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Finding No:	TNR-001658
Checklist Item No:	1.5.6
Status:	Open
Finding level:	Minor
Due date:	2023-Oct-09
Checklist item:	Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.
Findings:	the site should provide a summary of the extent of water infrastructure, its general age and condition and percentage of catchment population served. It should report on any regular problems, on risks and include an overview of policies for upgrade (for example, to meet growing demand) or risk mitigation (for example from extreme events, such as drought). Where information cannot be obtained, an absence of information can present a risk.
Finding No:	TNR-001534
Checklist Item No:	1.5.7
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Sep-14
Checklist item:	The adequacy of available WASH services within the catchment shall be identified.
Findings:	Mosselbay Municipality document provided with no extract of how the information fulfills requirement 1.5.7. See the WASH guidance for more information. Although it is considered that all population has adequate access to WASH services, public information could be gathered to prove and consolidate the information regarding WASH status in the catchment.
Finding No:	TNR-001535
Checklist Item No:	1.6.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Sep-14
Checklist item:	Shared water challenges shall be identified and prioritized from the information gathered.
Findings:	The site should gather the information presented and identify clearly the shared challenges, and then should be listed and prioritized in terms of their significance and urgency. 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.

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Finding No: TNR-001536  
Checklist Item No: 1.6.2  
Status: Closed  
Finding level: Major  
Due date: 2022-Dec-13  
Checklist item: Initiatives to address shared water challenges shall be identified.  
Findings: There were no Initiatives to address shared water challenges because they were not identified.  
Corrective action: 1. Establish list of questions to be used during consultation with stakeholders  
2. Set up sessions with stakeholders to discuss shared water related challenges and efforts to address these.  
NGO's , Petrol SA, Langeberg Mall, Municipality, Local communities, Estuary forums  
3. Update information on shared water related challenges , and initiatives to collaborate.

Evidence of implementation: See Non Conform Report TNR-001536  
Attached Feedback from Stakeholder engagements  
Attached Stakeholder Questionnaire  
Attached Stakeholder Engagement Sharing

Finding No: TNR-001537  
Checklist Item No: 1.7.1  
Status: In Progress - CA plan approved  
Finding level: Minor  
Due date: 2023-Sep-14  
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: Risks were identified including likelihood and severity of impact. No timelines, potential costs and business impact were seen in the documents.

Finding No: TNR-001538  
Checklist Item No: 1.7.2  
Status: In Progress - CA plan approved  
Finding level: Minor  
Due date: 2023-Sep-14  
Checklist item: Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.  
Findings: Detailed information regarding how the site may participate, assessment and prioritization of potential savings, and business opportunities should be accessed and made available.

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## Alliance for Water Stewardship (AWS)

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Finding No: TNR-001540  
Checklist Item No: 1.8.4  
Status: Closed  
Finding level: Major  
Due date: 2022-Dec-13  
Checklist item: Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.  
Findings: No relevant catchment best practice for site maintenance of Important Water-Related Areas was identified to address this requirement. There was no link to literature provided that showed how requirement would be met.  
Corrective action: Update the performance evaluation area within the water stewardship plan, to include controls for evaluation change needed and lessons learned.

Finding No: TNR-001541  
Checklist Item No: 1.8.5  
Status: Closed  
Finding level: Major  
Due date: 2022-Dec-13  
Checklist item: Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.  
Findings: No relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services was identified. There was no link to literature provided that showed how requirement would be met.  
Corrective action: Update slide of best practice for WASH services  
  
Engage with local NGO and municipality on community WASH initiatives currently underway

See Non Conform Report TNR-001541

Finding No: TNR-001542  
Checklist Item No: 2.2.1  
Status: In Progress - CA plan approved  
Finding level: Minor  
Due date: 2023-Sep-14  
Checklist item: The system to maintain compliance obligations for water and wastewater management shall be identified, including:  
- Identification of responsible persons/positions within facility organizational structure  
- Process for submissions to regulatory agencies.  
Findings: 2.2.1 ZA - TP - MY - ENG - WI - 113 Effluent Monitoring section 6 indicates procedure to maintain compliance obligations for wastewater but none was available for water.

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## Alliance for Water Stewardship (AWS)

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Finding No:	TNR-001543
Checklist Item No:	2.3.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Sep-14
Checklist item:	<p>A water stewardship plan shall be identified, including for each target:</p> <ul style="list-style-type: none"><li>- How it will be measured and monitored</li><li>- Actions to achieve and maintain (or exceed) it</li><li>- Planned timeframes to achieve it</li><li>- Financial budgets allocated for actions</li><li>- Positions of persons responsible for actions and achieving targets</li><li>- Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.</li></ul>
Findings:	<p>Addressing shared water challenges and achievement of best practice is partly addressed in the attached document 'WATER STEWARDSHIP PLAN 2021-2022' however there is no specific mention to best practice or shared water challenges. The process to identify shared water challenges with other stakeholders in the catchment still remains a gap.</p>
Finding No:	TNR-001544
Checklist Item No:	2.4.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Sep-14
Checklist item:	<p>A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.</p>
Findings:	<p>A plan to mitigate and adapt to identified water risks is in place but no evidence of public sector or infrastructure agencies involvement</p>
Finding No:	TNR-001547
Checklist Item No:	3.2.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Sep-14
Checklist item:	<p>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.</p>
Findings:	<p>No evidence for water rights as part of legal and regulatory requirements, measures identified to respect the water rights of others including Indigenous peoples was provided at the time of the audit. This should be further investigated by the site.</p>

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## Alliance for Water Stewardship (AWS)

Audit Number: AO-000337

Finding No: TNR-001548  
Checklist Item No: 3.3.1  
Status: Closed  
Finding level: Major  
Due date: 2022-Dec-13  
Checklist item: Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.  
Findings: No evidence was provided on the status of progress towards meeting water balance targets set in the water stewardship plan.  
Corrective action: Update WSP to include the status of progress towards meeting water balance targets set in WSP, amend template

See Non Conform Report TNR-001548

Finding No: TNR-001549  
Checklist Item No: 3.3.2  
Status: In Progress - CA plan approved  
Finding level: Minor  
Due date: 2023-Sep-14  
Checklist item: 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.  
Findings: Water reduction projects were provided as evidence however no linkage was shown to the Water Stewardship Plan.

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## Alliance for Water Stewardship (AWS)

Audit Number: AO-000337

Finding No:	TNR-001550
Checklist Item No:	3.4.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Sep-14
Checklist item:	Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.
Findings:	<p>No water quality targets were identified in the Water Stewardship Plan and consequently progress could not be reported.</p> <p>Results were randomly looked at in greater detail and compared to permit requirements and the following discrepancies in water quality discharged were noted:</p> <p>August 2021 - Mineral oils, greases and waxes* mg/l for final wastewater was 81 permit requirement is 50mg/l;</p> <p>August 2022 - Mineral oils, greases and waxes* mg/l for final wastewater was 150 permit requirement is 50mg/l;</p> <p>February 2022 - Mineral oils, greases and waxes* mg/l for final wastewater was 56 permit requirement is 50mg/l;</p> <p>July 2022 - Chemical Oxygen Demand (Total) mg O<sub>2</sub>/l for final waste water was 3533 permit requirement is 3000mg/l; Mineral oils, greases and waxes* mg/l for final wastewater was 73 permit requirement is 50mg/l; pH at 25°C was 4.6 permit requirement was 6 to 11</p> <p>June 2022 - Chemical Oxygen Demand (Total) mg O<sub>2</sub>/l for final waste water was 3640 permit requirement was 3000mg/l;</p> <p>These exceedances were neither noted nor used to set targets.</p> <p>The permit lists metals to be analyzed but the analysis of metals was not provided in any of the Laboratory reports.</p>
Finding No:	TNR-001551
Checklist Item No:	3.4.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Sep-14
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:	<p>Shared water challenges were not discussed with stakeholders and consequently continual improvement to achieve best practice for the site's effluent could not be identified or quantified. There were also exceedances seen in the results indicated in section 3.4.1 but no effort to resolve the exceedances in permit requirements was observed.</p>

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## Alliance for Water Stewardship (AWS)

Audit Number: AO-000337

Finding No:	TNR-001552
Checklist Item No:	3.5.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Sep-14
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:	Improvement of IWRA was not included in the Water Stewardship plan.
Finding No:	TNR-001659
Checklist Item No:	3.6.1
Status:	Open
Finding level:	Observation
Checklist item:	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.
Findings:	The WASH Pledge Self-Assessment Tool - Mossel Bay South Africa is dated November 2014. This assessment could be updated.
Finding No:	TNR-001553
Checklist Item No:	3.6.2
Status:	Open
Finding level:	Minor
Due date:	2023-Sep-14
Checklist item:	Evidence that the site is not impinging on the human right to safe water and sanitation of communities through their operations, and that traditional access rights for indigenous and local communities are being respected, and that remedial actions are in place where this is not the case, and that these are effective.
Findings:	<p>Evidence shows that Nestle Mossel bay is clearly involved in community activities for the good of the communities surrounding them. However, the following are areas of concern:</p> <ol style="list-style-type: none"><li>1. No evidence of research into indigenous people.</li><li>2. Monthly Monitoring results for August 2021, February 2022, June 2022 and July 2022 do not meet the Effluent permit requirements for the site, these have not been addressed and therefore are a potential problem to water quality in the catchment.</li></ol>

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Finding No:	TNR-001613
Checklist Item No:	3.7.1
Status:	Open
Finding level:	Minor
Due date:	2023-Sep-28
Checklist item:	Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.
Findings:	Indirect water use targets are not clearly shown in the water stewardship plan neither are the targets quantified. However, there is an objective of stakeholder regenerative agriculture for individual farms to mitigate the high loss of water. This was not quantified.
Finding No:	TNR-001660
Checklist Item No:	3.7.2
Status:	Open
Finding level:	Observation
Checklist item:	Evidence of engagement with suppliers and service providers, as well as, when applicable, actions they have taken in the catchment as a result of the site's engagement related to indirect water use, shall be identified.
Findings:	There is opportunity for reaching out to more suppliers as actions provided is only limited to farmers.
Finding No:	TNR-001555
Checklist Item No:	3.9.1
Status:	Open
Finding level:	Minor
Due date:	2023-Sep-14
Checklist item:	Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.
Findings:	Actions towards achieving best practice, related to water governance was not in the Water Stewardship Plan. The site must firstly identify examples of best practice in water governance before it can evidence any actions towards achieving relevant targets.
Finding No:	TNR-001614
Checklist Item No:	3.9.2
Status:	Open
Finding level:	Minor
Due date:	2023-Sep-28
Checklist item:	Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.
Findings:	No best practice actions or clear targets were set in relation to water balance. The evidence provided for Project ZerEau was well noted but does not meet the requirement because it was not listed in the plan.

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## Alliance for Water Stewardship (AWS)

Audit Number: AO-000337

Finding No:	TNR-001615
Checklist Item No:	3.9.3
Status:	Open
Finding level:	Minor
Due date:	2023-Sep-14
Checklist item:	Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.
Findings:	The site has not supplied any evidence to demonstrate that they have identified any best practice for water quality improvement that is relevant to the sector at a local, catchment, regional or national level. The AWS Guidance document provides some examples for best practice in water use efficiency under indicator 1.8.3. The site must initially identify examples of best practice for water quality before it can evidence any actions towards achieving relevant targets.
Finding No:	TNR-001616
Checklist Item No:	3.9.4
Status:	Open
Finding level:	Minor
Due date:	2023-Sep-14
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:	Nestle demonstrated best practice in the storm water line estuary cleanup however this was not a planned activity with targets set in the site's maintenance of Important Water-Related Areas.
Finding No:	TNR-001521
Checklist Item No:	4.1.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Sep-14
Checklist item:	Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.
Findings:	'2022 SHE Water Monitoring and Evaluation' shows some evaluation against targets aimed towards achieving water stewardship outcomes however the evaluation for quality did not include the high effluent COD that was measured in August 2022 according to the following report; '3.9.3 02564_Nestle Mosselbay_Monthly Report_08_2022 WWTP' which indicated that the permit requirements were not being met.

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Finding No: TNR-001617  
Checklist Item No: 4.1.2  
Status: Closed  
Finding level: Major  
Due date: 2022-Dec-27  
Checklist item: Value creation resulting from the water stewardship plan shall be evaluated.  
Findings: Value Creation was not quantified to show progress in the water stewardship plan.  
Corrective action: Update the Water Stewardship Plan with the Value Creation information as Financial or other value.

Finding No: TNR-001520  
Checklist Item No: 4.1.3  
Status: In Progress - CA plan approved  
Finding level: Minor  
Due date: 2023-Sep-14  
Checklist item: The shared value benefits in the catchment shall be identified and where applicable, quantified.  
Findings: Shared value benefits were indicated in the attachment '4.1.1 AWS Performance against water stewardship plan' slide 7 and in '2.3.2 Water Stewardship Plan Nestle Mossel Bay1', however, the targets were not clear and therefore progress was not evaluated against a target.

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## Alliance for Water Stewardship (AWS)

Audit Number: AO-000337

Finding No:	TNR-001518
Checklist Item No:	4.2.1
Status:	Closed
Finding level:	Major
Due date:	2022-Dec-13
Checklist item:	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.
Findings:	The following management review document - '2022 REVIEW' discusses the incident on 4 January 2022 where the effluent drain overflowed onto the gravel road but does not evaluate the action plan as a result of this incident. There was no annual evaluation of all site incidents. The exceedance of permit requirements for COD as well as Mineral oils, greases and waxes, in July 2022 report for example should have been incidents to be recorded, mitigated against and evaluated however these were not recorded as incidents by the site.
Corrective action:	Previous management Review was in Feb 2022, thus information from July 2022 would have not been included, this will be discussed in the next annual management review.

Include evaluation of all incidents and discuss in monthly management review MOR with actions and status feedback

Evidence of implementation:	Upload proof of incident reports into AWS system. Monthly Action tracker review of incident actions status, evaluation of implementation.
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Finding No:	TNR-001519
Checklist Item No:	4.3.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Sep-14
Checklist item:	Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.
Findings:	There was an email sent on 12th September 2022 midnight, informing stakeholders of the progress of Nestle Stewardship plan however there was no acknowledgement or feedback from the list of stakeholders contacted. The evaluation of stakeholder feedback was therefore not done.

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

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Finding No:	TNR-001523
Checklist Item No:	4.4.1
Status:	Closed
Finding level:	Major
Due date:	2022-Dec-13
Checklist item:	The site's water stewardship plan shall be modified and adapted to incorporate any relevant information and lessons learned from the evaluations in this step and these changes shall be identified.
Findings:	Although the plan has a column for performance evaluation, no modifications or adaptations were done to incorporate any relevant information or lessons learnt from the evaluation.
Corrective action:	Update the performance evaluation area within the water stewardship plan, to include controls for the evaluation change needed and lesson learned
Evidence of implementation:	Performance evaluation indicators have been updated.
Finding No:	TNR-001618
Checklist Item No:	5.1.1
Status:	Open
Finding level:	Minor
Due date:	2023-Sep-29
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 evidence revealed positions of those accountable for compliance with water-related laws and regulations however there was no evidence provided for disclosure or that it was publicly accessible.
Finding No:	TNR-001661
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:	The plan was communicated on 12 September 2022 at 12:15am which was the day of the audit.

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-000337

Finding No:	TNR-001556
Checklist Item No:	5.3.1
Status:	Open
Finding level:	Minor
Due date:	2023-Sep-14
Checklist item:	A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.
Findings:	The site's water stewardship performance was communicated but the performance was not quantified against targets.
Finding No:	TNR-001557
Checklist Item No:	5.4.1
Status:	Closed
Finding level:	Major
Due date:	2022-Dec-13
Checklist item:	The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.
Findings:	The site did not list all shared water challenges through consultation with other stakeholders; neither did they discuss stakeholder engagement efforts. The requirement to actively disclose this information to target audience(s) and actively communicate this information to interested stakeholders in a suitable format(s) was not met.
Corrective action:	<ol style="list-style-type: none"><li>1. Establish list of questions to be used during consultation with stakeholders</li><li>2. Set up sessions with stakeholders to discuss shared water related challenges and efforts to address these. NGO's , Petrol SA, Langeberg Mall, Municipality, Local communities, Estuary forums</li><li>3. Update information on shared water related challenges , and initiatives to collaborate.</li></ol> <p>See Non Conform Report TNR-001557</p>

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-000337



Finding No:	TNR-001619
Checklist Item No:	5.5.3
Status:	Closed
Finding level:	Major
Due date:	2022-Dec-29
Checklist item:	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.
Findings:	There was no evidence that exceedances of Chemical Oxygen Demand or Mineral oils, greases and waxes for August 2021, February 2022, June 2022 or July 2022 of waste water leaving the Nestle site was immediately communicated to relevant public agencies and disclosed.
Corrective action:	Update the evaluation of compliance Procedure. Update the roles and responsibilities Procedure. Routines to send information to municipality.
Evidence of implementation:	Monthly routine to send report from Talbot and 3rd party independent Lab results to Municipality key stakeholders

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

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### Report Details

Report	Value
Report prepared by	Carla Oberdiek
Report approved by	Lurdes Brandão Guerra
Report approved on (Date)	14 October 2023

### Surveillance

Proposed date for next audit  
2023-Sep-12

### Stakeholder Announcements

Date of publication	Location
2022-Jul-14	WSAS Website
2022-Jul-14	AWS Website
2022-Aug-24	Community Whatsapp Group
2022-Aug-16	Mossel Bay Municipality during a meeting
Comment	Documents provided Community WhatsApp group message Email communication
Comment	Stakeholder Registers are attached

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

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### Catchment Information

#### Catchment Information

Nestle Mosselbay is in the Breede-Gouritz Water Management Area (BGWMA).

BGWMA is bounded by the Indian Ocean to the south, the Berg-Olifants WMA to the west, the Orange WMA to the north and the Mzimvubu-Tsitsikama WMA to the east. It largely falls within the Western Cape Province in South Africa with small portions of the upper catchment of the Olifants River falling in the Eastern Cape Province of South Africa and tiny portions of the upper catchments of the Gamka and Groot Rivers falling in the Northern Cape Province of South Africa.

There are two large rivers within the WMA, the Breede and Gouritz Rivers. The Breede River with its main tributary the Riviersonderend River discharges into the Indian Ocean. The Gouritz has three main tributaries - the Groot, Gamka and Olifants Rivers.

There are a number of other smaller rivers in the WMA including the Touws-, Duivenhoks-, Goukou-, Hartenbos-, Great Brak-, Kaaimans-, Knysna- and Keurbooms Rivers as well as the Palmiet-, Kars-, Sout-, Uylenkraals-, Klein-, Onrus- and Bot-Swart Rivers.

Water services infrastructure for Mossel Bay consists of various raw water sources - Wolwedans Dam, Klipheuwel Dam, Hartebees Kuil Dam and Ernst Robertson Dam, as well as boreholes. Raw water pipelines convey untreated water to a total of seven water purification plants and one desalination plant with a 72.3 ML/day total design capacity. Treated water is then pumped via 30 Pump stations and 55 Reservoirs.



Dairy Farmer site visit.jpg



Dairy Farm site visit 2.jpg

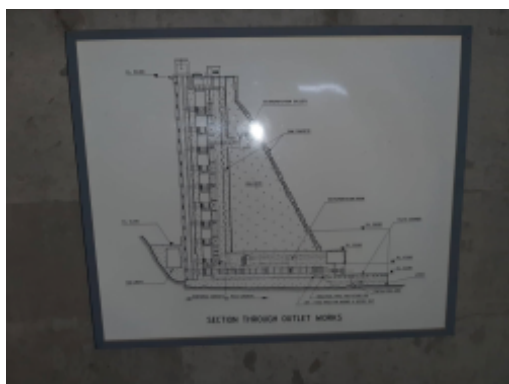
# CERTIFICATION REPORT

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Dairy Farm site visit 3.jpg



Wolwedans Dam 2.jpg



Wolwedans Dam wall.jpg

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

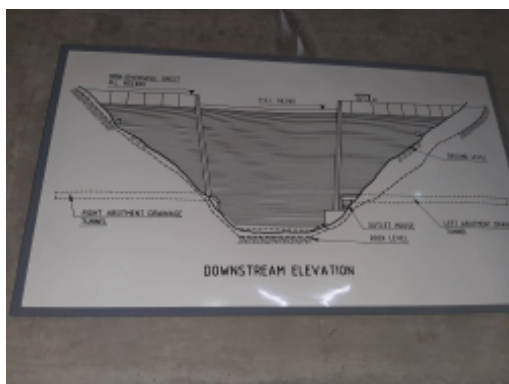
Audit Number: AO-000337



Moisture measurement unit at Dairy Farm.jpg



Site Visit Wolwedans Dam.jpg

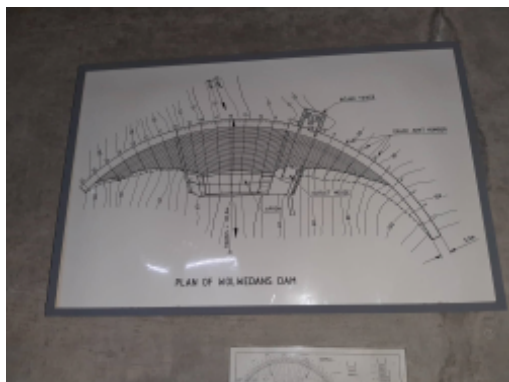


Wolwedans Dam 3.jpg

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

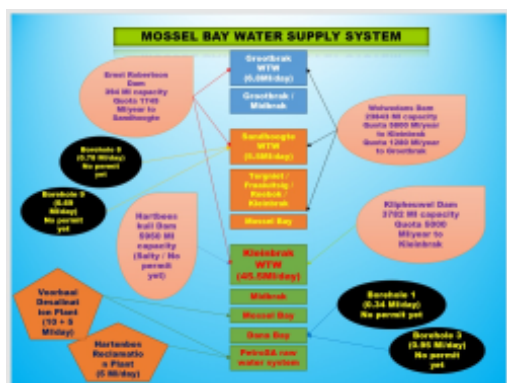
Audit Number: AO-000337



Wolwedans Dam 4.jpg



Dairy Farm visit.jpg



1.5.7 Water within the catchment.jpg



WSAS




2 Quality Street North Berwick, EH39 4HW, UNITED KINGDOM



# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

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

# CERTIFICATION REPORT

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### 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

Documents provided:  
MY 225-101 ALL SERVICES-ISO A1nestle new  
1.1 MY 225-001 MASTER SITE PLAN REV25  
Physical Layout  
my 225-632 plant drains and numbers  
1.1.3-5 Mapping of water sources and discharge  
MY 225-101 ALL SERVICES-ISO A1nestle

Comment:

The following maps were provided for site boundary - 1.1 MY 225-001 MASTER SITE PLAN REV25; Physical Layout  
Water-related infrastructure, including piping network, owned or managed by the site or its parent organization; - my 225-632 plant drains and numbers  
1.1.3-5 Mapping of water sources and discharge provided the following information  
Water service provider (if applicable) and its ultimate water source; - slides 1 & 2  
Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies; - slides 3 & 4  
Catchment(s) that the site affect(s) and is reliant upon for water. slides 1 to 5  
MY 225-101 ALL SERVICES-ISO A1nestle new document provides the following:  
- Portable water map provided  
- Incoming water locations from the municipality  
- Discharge of water clearly displayed on maps

**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.





No

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Comment	<p>Documents provided:</p> <p>1.2 AWS - stakeholder mapping-challenges and influencing</p> <p>Stakeholder Map</p> <p>Stakeholder session</p> <p>Comments:</p> <p>Process used for stakeholder identification was not fully consolidated. Efforts made by the site can be improved to further engagement and interaction, due to needed identification of some interest or 'stake' in the implementing organization's activities, and that can affect or be affected by the site (stakeholder definition, by default). A recommended approach is to undertake a stakeholder mapping exercise and create and maintain a table or database listing each stakeholder, how they are linked to the organization, any water-related concerns or challenges they face, and a summary of communications with them. For instance, vulnerable, women, minority, and Indigenous people can be further identified in this first overview.</p> <p>Stakeholder map indicated the physical distribution of stakeholders in the catchment which was adequate but more could be identified especially the vulnerable and minority groups. There was no evidence of broader stakeholder consultation on water-related interests and challenges. The stakeholder mapping should also show any linkages among stakeholders. The most engaged stakeholder was the Mosselbay Municipality. Of most relevance to water stewardship are stakeholders associated with water use and dependency, but engagement should not be limited to these. The section of this Guidance on stakeholders provides more detailed guidance on how to identify, understand, categorize and communicate with stakeholders.</p> <p>The following document '1.2 AWS - stakeholder mapping-challenges and influencing' has provided a column with 'Level of interest in water-related issues' for each stakeholder. Identify the degree of stakeholder engagement based on their level of interest and influence - The following document '1.2 AWS - stakeholder mapping-challenges and influencing' has provided a column with 'Level of influence / power (beyond the site) (↓)' and another with 'Level of interest in water-related issues' for each stakeholder. The scale of water challenges in a catchment can range from minimal to highly significant depending on local circumstances. This should be made clear in this stakeholder mapping-challenge.</p> <p><b>Finding No: TNR-001515</b></p>	
<b>1.2.2</b>	<i>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.</i>	 Yes
Comment	<p>Documents provided:</p> <p>1.2 AWS - stakeholder mapping-challenges and influencing</p> <p>Comments:</p> <p>Current and potential degree of influence between site and stakeholder has been identified, and seems to have considered the site's ultimate water source and ultimate receiving water body for wastewater.</p>	
<b>1.3</b>	<i>Gather water-related data for the site, including: water balance; water quality, Important Water-Related Areas, water governance, WASH; water-related costs, revenues, and shared value creation.</i>	
<b>1.3.1</b>	<i>Existing water-related incident response plans shall be identified.</i>	 Yes

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Comment	Document provided: 1.3.1 ZA -TP- MY- GEN- PRO - 104 Site Emergency Procedure	
	Comment: The organization needs to be aware of water-related emergencies and be prepared to react to them. This indicator requires the site to identify any existing emergency-response plan it has that addresses waterrelated risks and events. Section 6.9 addresses hazardous materials/chemical spills Section 6.15 addresses product spillage namely milk, oil, ammonia	
1.3.2	<i>Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped</i>	 Yes
Comment	Document provided: 1.3.2 WATER LAYOUT Meters Water Daily Readings 1.3.3 and 1.3.4 Water Balance 2022 Updated Rev 2 Incoming Municipal Water 2022	
	Comment: The water balance is an equation based on an assessment of water inflows, outflows, onsite water storage and changes in storage. A diagram was provided. Checked the raw data for July 2022 in the document '1.3.3 and 1.3.4 Water Balance 2022 Updated Rev 2' compared to 'Water Daily Readings' and the incoming water readings matched. Losses, storage, and outflows have been identified and mapped.	
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>	 No
Comment	Documents Provided: 1.3.3 and 1.3.4 Water Balance 2021 1.3.3 and 1.3.4 Water Balance 2022 Updated Rev 2 Raw Water Readings Sample	
	Comment: The water balance equation must balance and so is useful for verifying that water volumes and flows are reliably measured and accounted for. Two years of data has been provided. For 2022, the data is until August 2022 No water-related challenge that would be a threat to good water balance for people or environment was provided because there was no analysis of trends between the two years. No data for May & June 2021 because there was an upset to the system due to change of contractors from Veolia to Talbot. The new contractor, Talbot started 3 July 2021. No analysis of variances was seen or quantified.	
	<b>Finding No: TNR-001524</b>	
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>	 No

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## Alliance for Water Stewardship (AWS)




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Comment	<p>Documents Provided:</p> <p>1.3.3 and 1.3.4 Water Balance 2021</p> <p>1.3.3 and 1.3.4 Water Balance 2022 Updated Rev 2</p> <p>1.3.4 ZA - TP - MY - ENG - WI - 113 Effluent Monitoring</p> <p>Autosampler results from WWTP</p> <p>Comment:</p> <p>Water quality information is important for understanding risks to and from the organization, as well as showing whether the organization's wastewater has a negative impact. Water Quality results provided (Water quality results for drinking water) but no evidence of analysis of Quality results done against any guidelines in order to understand water-related challenges that would be a threat to good water quality status for people or environment.</p> <p>Since water quality-related challenge is identified (e.g. water quality exceeds or is close to a regulatory or other accepted quality limit), the site should quantify how the quality compares to limits (for relevant parameters) and clearly identify breaches and trends of concern. This analysis must be done by the site to fully comply with the requirements for this indicator.</p> <p>For its own water sources and wastewater discharges, the organization will usually collect its own samples on a regular basis for laboratory analyses. External service providers can usually provide water quality data. If not already publicly available, the organization should request it.</p> <p><b>Finding No: TNR-001525</b></p>	
<b>1.3.5</b>	<p><i>Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.</i></p>	 Yes
Comment	<p>Documents provided:</p> <p>1.3.5 MSDS Index Listing</p> <p>1.3.5 POLLUTION SOURCE MAPPING</p> <p>Comment:</p> <p>The organization has a responsibility (usually legal, but also ethical) to avoid causing pollution of the natural environment, including water bodies. It is recommended to use an expert to identify actual and potential pollution sources, and the risks they present. In the context of water stewardship, it is especially important to identify pollution sources that present a risk to water bodies and water abstraction points.</p> <p>Potential sources of pollution were mapped including chemicals used or stored on site.</p>	
<b>1.3.6</b>	<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>	 No
Comment	<p>Comments:</p> <p>Important Water Related Areas (IWRAs) are defined in the Glossary and a special subject section. Each onsite IWRA feature should be listed, with a description of what it is, its status (including indigenous cultural value if applicable) and any water-related risks. This was not covered by the site. Infrastructure on site e.g. Fat traps, amphi theater not addressed in this section.</p> <p><b>Finding No: TNR-001526</b></p>	
<b>1.3.7</b>	<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>	 Obs.

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Comment	Document provided 1.3.7 Annual Water Related Cost. 2022	
	Comment: Water-related costs are often broader than initially perceived; they include more than just procurement of water and treatment of water. They include all costs related to understanding and managing water stewardship. The site should be aware of the scope, for both short-term and long-term investments and be able to demonstrate it has the financial commitment and resources to support them. Budget allocations were less than the actual cost, more accurate forecasting would be desirable. Corporate tax was included	
<b>1.3.8</b>	<i>Levels of access and adequacy of WASH at the site shall be identified.</i>	 Obs.
Comment	Documents provided 1.3.8 WASH Pledge Self-Assessment Tool - Mossel Bay South Africa 2022 1.3.8 Nestle.SA.(Pty) Ltd.A14995.HFA.LA.SIGNED-KWB R3676 - S17845 FULL SANS - KLEINBRACK Jun 2022 Water coolers distribution	
	Comment: Very detailed assessment but the Self Assessment date was November 2014. Water quality results for drinking water were provided. Drinking water distribution points were provided. Overall the nature of the drinking water and sanitation facilities on site is adequate.	
<b>1.4</b>	<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>	
<b>1.4.1</b>	<i>The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be identified.</i>	 Yes
Comment	Documents provided: 1.4 Indirect Water Use Mapping 1.4 Indirect water use EskomGenerationDivMapREV81	
	Comment: Indirect water use is the water used within an organization's supply chain. That is, the water used in the creation, processing and transportation of goods and services supplied to the organization. Primary inputs were identified, estimated quantities as well as level of water risk within the site's catchment.	
<b>1.4.2</b>	<i>The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.</i>	 Obs.

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Comment

Documents provided:  
1.4 Indirect Water Use Mapping  
1.4 Indirect water use  
EskomGenerationDivMapREV81

Comment:

Indirect water use is the water used within an organization's supply chain. That is, the water used in the creation, processing and transportation of goods and services supplied to the organization. The embedded water use of outsourced services was identified as well as where those services originated within the site's catchment. Estimated quantities were provided for electricity.

However only 2 outsourced services were identified. The organization should identify its primary inputs and services and undertake an assessment to understand for each one, the following (as far as reasonably feasible), ideally in a table. This is most important for goods and services that originate from within the same catchment as the implementing organization:

- Annual water use (for the proportion of the goods the organization receives),
- Principal origin of goods (country, region, catchment),
- Where water is used,
- For what water is used,
- Water intensity for the goods/services,
- For goods/services originating from the same catchment, the origin of the water (e.g. the water body).

It is important to distinguish total water withdrawal from net water use (consumptive water use), the most relevant component.

1.5

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

1.5.1

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



Comment

Documents provided:  
1.5.1 BGCM APP 2021-2022  
WASH for Mossel bay

Comment:

Water governance refers to how water supply, wastewater, water resources and the associated natural environment are managed by government agencies, institutions and other organizations. It includes water resources management, protection, allocation, monitoring, quality control, treatment, regulation, policy and distribution. A starting point is the water-related organizations with which the site already has contact, such as a municipal water supplier or water resources regulator. The Breede-Gouritz Catchment Management Agency Annual Performance Plan (App) For the Fiscal Year 2021/2022 was provided.

Municipality reports were provided with no extracts provided to indicate how the site intends to fulfil this requirement.

The site should document its understanding of the above matters.

**Finding No: TNR-001530**

1.5.2




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



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## Alliance for Water Stewardship (AWS)




Audit Number: AO-000337

Comment	Document Provided: 1.5.2 Effluent Permit 2021	
	Comment: Water-related legal and regulatory requirements applicable to the site should be understood and complied with regardless of any stewardship commitment. This document provides the permit requirements for the effluent discharged by Nestle Mossel Bay.	
<b>1.5.3</b>	<i>The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.</i>	 No
Comment	Documents provided: 1.5.1 AWS Opening Presentation 2022	
	Comment: The water balance of a catchment is an assessment of water inflows, throughflows and outflows, and water storage within the water body. It is a similar principle to a site water balance (1.3.2), but on a much larger scale, and likely more complex. Slide 16 of the attached presentation provides sources of water in the catchment, quantities as well as WWTP quantities. WSAS acknowledges the effort of the site in gathering the information presented, but recognizes the need to have a deep level of information of the site to fully comply with this indicator in the future. A water balance is defined in a basic equation: (Water outflow) = (Water inflow) + (Change in storage volume) and this can be conducted by the site to further understand this balance. Additionally, the site must understand and should be aware of the catchment water balance. It is commonly done on a one-year timescale. It may also be appropriate to calculate it for shorter timescales, if there is significant seasonal variability in availability and/or demand. No indication of annual and seasonal variance was provided nor the catchment water balance. This information should be gathered by the site to gain deep knowledge on the catchment which it belongs.	
	<b>Finding No: TNR-001531</b>	
<b>1.5.4</b>	<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	Documents Provided: Gouritz River Estuary Draft EMP_2021 R3676 - S17845 FULL SANS - KLEINBRAK Jun 2022 1.5.4 Water Quality river water quality	
	Comment: Knowledge of catchment water quality helps an organization to understand any risks it may face, and its own potential to impact on catchment water quality. Analysis of the Municipal water was done by Nestle Mosselbay (R3676 - S17845 FULL SANS - KLEINBRAK Jun 2022) to indicate if there is a potential for water-related challenge that would be a threat to good water quality status for people or environment. The publicly available data found in the following document attached '1.5.4 Water Quality river water quality' indicates 'high risk water' but no values to support this.	
<b>1.5.5</b>	<i>Important Water-Related Areas shall be identified, and where appropriate, mapped, and their status assessed including any threats to people or the natural environment, using scientific information and through stakeholder engagement.</i>	 Yes

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Comment	Documents provided: 1.5.5 Important Water Related Areas 1.5.5 IWRAAs  Comments: Research should be undertaken to identify Important Water Related Areas (IWRA) and features within the catchment and to define their value. Information provided is mapped, and their status assessed using various information sources.	
1.5.6	<i>Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.</i>	 No
Comment	For organizations relying on municipal water supply, the status of the infrastructure may be a critical risk. If the organization uses only private water sources, the status of catchment infrastructure (for water and wastewater) remains relevant to understanding the water challenges of stakeholders.  Comment: Status of each identified as well as concerns. The site should provide a summary of the extent of water infrastructure, its general age and condition and percentage of catchment population served. It should report on any regular problems, on risks and include an overview of policies for upgrade (for example, to meet growing demand) or risk mitigation (for example from extreme events, such as drought). Where information cannot be obtained, an absence of information can present a risk.  <b>Finding No: TNR-001658</b>	
1.5.7	<i>The adequacy of available WASH services within the catchment shall be identified.</i>	 No
Comment	Documents provided 1.5.7 Water within the catchment 1.5.7 WASH for Mosselbay 1.5.7 Adequacy of available WASH services within the catchment  Comment: This indicator has some overlap with 1.5.6. The organization should identify the percentage of the catchment population with access to good water and wastewater services. It is not required to do its own research, but can usually get the information from other sources, such as government agencies or NGOs. Although it is considered that all population has adequate access to WASH services, public information could be gathered to prove and consolidate the information regarding WASH status in the catchment. Mosselbay Municipality document provided with no extract of how the information fulfills requirement 1.5.7.  <b>Finding No: TNR-001534</b>	
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>	 No

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## Alliance for Water Stewardship (AWS)






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Comment	Document provided Shared Water Challenges KLIENBRAK EAF MEETING MINUTES - 06 May 2022 FINAL DRAFT Great Brak EAF Agenda & Minutes - 06 May 2022 DRAFT Shared Water Challenges_Breede Gouritz WMA	
	Comment: Shared challenges provide an opportunity for collective action in the catchment and to guide the water stewardship plan. There was no solid evidence of discussion of shared water challenges with stakeholders. The site should gather the information presented and identify clearly the shared challenges, and then it should be listed and prioritized in terms of their significance and urgency. 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.	
	<b>Finding No: TNR-001535</b>	
<b>1.6.2</b>	<i>Initiatives to address shared water challenges shall be identified.</i>	 closed
Comment	Document provided Shared Water Challenges	
	Comment: No initiatives observed in the document provided	
	<b>Finding No: TNR-001536</b>	
<b>1.7</b>	<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>	
<b>1.7.1</b>	<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	Documents provided 1.7 ZA - TP - MY - SHE - RSK - 033 Water KeyProcesses Rev 02 BIA_Factory_New_Mbay2020	
	Comment: Risks were identified including likelihood and severity of impact. No timelines, potential costs and business impact were seen in the documents.	
	<b>Finding No: TNR-001537</b>	
<b>1.7.2</b>	<i>Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.</i>	 No
Comment	Documents provided 1.7.2 Energy Optimization Projects v2 Energy	
	Comment: 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. The following opportunities were identified; - Reduce municipal intake by optimization of condensate return. - Capacity of Grey Water tank for boiler use. - Grey water treatment for boiler use. - Assessment of opportunities is not effectively captured.	
	<b>Finding No: TNR-001538</b>	
<b>1.8</b>	<i>Understand best practice towards achieving AWS outcomes: Determining sectoral best practices having a local/catchment, regional, or national relevance.</i>	

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<b>1.8.1</b>	<i>Relevant catchment best practice for water governance shall be identified.</i>	 Yes
Comment	Documents provided Water-Best-Practice-Guide Guidance_catchment-based-water-management  Comment: Documents provided meet the relevant catchment best practice for water governance.	
<b>1.8.2</b>	<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	Documents provided Best Practices Best Practice Water Stewardship _ Nestle Best Practices Globally 1 JRC118627_FDM_Bref_2019_published Comment: Documents provide various options for best practice through water efficiency and/or less total water use.	
<b>1.8.3</b>	<i>Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.</i>	 Yes
Comment	Document provided 1.8 02566_Nestle Mosselbay_Alliance Water Stewardship Comment: The attached is an analysis tool for water quality parameters that is capable of long term trends and forecasting. The tool uses actual monitoring data from the WWTP	
<b>1.8.4</b>	<i>Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.</i>	 closed
Comment	The site has not supplied any evidence to demonstrate that they have identified any best practice for Important Water Related Areas that is relevant to the sector at a local, catchment, regional or national level. The AWS Guidance document provides some examples for best practice in on and offsite IWRAs.	
<b>Finding No: TNR-001540</b>		
<b>1.8.5</b>	<i>Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.</i>	 in progress
Comment	The site has not supplied any evidence to demonstrate that they have identified any best practice for providing adequate WASH that is relevant to the sector at a local, catchment, regional or national level. The AWS Guidance document provides some examples for best practice in providing adequate WASH.	
<b>Finding No: TNR-001541</b>		

2	STEP 2: COMMIT & PLAN - Commit to be a responsible water steward and develop a Water Stewardship Plan	
2.1	<i>Commit to water stewardship by having the senior-most manager in charge of water at the site, or if necessary, a suitable individual within the organization head office, sign and publicly disclose a commitment to water stewardship, the implementation of the AWS Standard and achieving its five outcomes, and the allocation of required resources.</i>	
2.1.1	<i>A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:</i> <ul style="list-style-type: none"> <li>- That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes</li> <li>- That the site implementation will be aligned to and in support of existing catchment sustainability plans</li> <li>- That the site's stakeholders will be engaged in an open and transparent way</li> <li>- That the site will allocate resources to implement the Standard.</li> </ul>	 Yes
Comment	<p>Documents provided</p> <p>2.1.1 creating-shared-value-sustainability-report-2021-en page 23, 30,31,33</p> <p>2.1.1 Nestle Mossel Bay Factory AWS Leadership Commitment 2022</p> <p>2.1.1 Policy Stewardship Nestle International</p> <p>2.1.1 Signed Commitment to AWS - 2019</p> <p>2 photographs of AWS commitment displayed on site</p> <p>Comment:</p> <ul style="list-style-type: none"> <li>- That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes requirement was fulfilled by</li> <li>*I will support the site's efforts to achieve the outcomes of water stewardship a defined in the AWS standard</li> <li>*Lastly I commit to disclosing material on water-related information to all relevant audiences in an appropriate format</li> </ul> <p>- That the site implementation will be aligned to and in support of existing catchment sustainability plans is fulfilled by the following statement:</p> <p>Nestle believes that Governments have to take the lead in establishing over-arching water policies within which Nestle and other water users can operate.</p> <p>Nestle is willing to assist in this process, is committed to develop its business in a way that facilitates effective water stewardship in the geographies that it sources from and operates within, and is committed to focus upon measures that are cost effective and relevant within a watershed</p> <p>- That the site's stakeholders will be engaged in an open and transparent way was fulfilled by the following statement:</p> <p>*I commit that the site will attempt to engage relevant stakeholders throughout its efforts in an open and transparent manner and that the site will comply with all water related legal and regulatory requirements</p> <p>- That the site will allocate resources to implement the Standard was fulfilled by the following statement:</p> <p>*I will support the site's efforts to continually improve and adapt its water stewardship actions and plans as well as ensure that there is sufficient organizational capacity to implement the AWS Standard successfully.</p> <p>Signed and publicly disclosed site statement - On the website is a global commitment, 2.1.1 creating-shared-value-sustainability-report-2021-en page 23, 30,31,33 indicates Global commitment to net zero &amp; water quality</p> <p>Additionally, attached are photographs of what is displayed on site.</p>	

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**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:*  
*- Identification of responsible persons/positions within facility organizational structure*  
*- Process for submissions to regulatory agencies.*

  
No

Comment

Documents provided:

2.2.1 Appointment - Environmental Officer - Monique Botha Rev 01

2.2.1 ZA - TP - MY - SHE - WI - 110 Evaluation of Compliance

2.2.1 ZA -TP- MY- GEN - PRO - 102 Communication, Participation and Consultation

2.2.1 ZA-TP-MY-GEN-RL-002 Legal-Mandatory Register Rev. 11

2.2.1 ZA - TP - MY - ENG - WI - 113 Effluent Monitoring section 6

2.2Tracking of Water - SHE PM

Comments:

- Identification of responsible persons/positions within facility organizational structure is indicated in the following document; Letter of appointment for Myriam as Environmental Officer dated 1 August 2022.

- Process for submissions to regulatory agencies

'2.2.1 ZA -TP- MY- GEN - PRO - 102 Communication, Participation and Consultation' in section 5

Tracking of permits is on CR360 is demonstrated by the following evidence attached -

2.2Tracking of Water - SHE PM

2.2.1 ZA - TP - MY - ENG - WI - 113 Effluent Monitoring section 6 indicates procedure to maintain compliance obligations for wastewater but none was available for water.

**Finding No: TNR-001542**

**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.*

  
Yes

Comment

Document provided

2.3.1 Nestle Mossel Bay Factory Water Stewardship Strategy

Comment

The difference between strategy and plan is the degree of detail. They are distinct documents but can be combined. The strategy is at the level of vision and mission around stewardship, with overarching goals. The strategy seems to address the overarching mission, vision, and goals of the organization towards good water stewardship in line with this AWS Standard.

**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

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Comment	Document provided 2.3.2 Water Stewardship Plan Nestle Mossel Bay WATER STEWARDSHIP PLAN 2021-2022
	<p>Comment:</p> <p>The plan details the targets associated with goals (defined in the strategy), and specifics as defined in the Standard. AWS recommends that the plan be structured around the five AWS outcomes.</p> <ul style="list-style-type: none"> <li>- How each target will be measured and monitored - Target Column</li> <li>- Actions to achieve and maintain (or exceed) it - The plan lists quantifiable action points for each objective - done</li> <li>- Planned timeframes to achieve it - The plan provides Timeline ( end date)</li> <li>- Financial budgets allocated for actions - The plan includes a column for Cost</li> <li>- Positions of persons responsible for actions and achieving targets - The plan has a column of responsible persons/positions</li> <li>- Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes. - addressing shared water challenges and achievement of best practice is partly addressed in the attached document 'WATER STEWARDSHIP PLAN 2021-2022' although there is no specific mention to best practice or shared water challenges. The process to identify shared water challenges with other stakeholders in the catchment still remains a gap.</li> </ul> <p style="text-align: right;"><b>Finding No: TNR-001543</b></p>

### 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	Documents provided 2.4.1 BIA_Factory_New_Mbay2020 2.4.1 ZA - TP - MY - SHE - RSK - 033 Water Key Processes Rev 02
	<p>Comment:</p> <p>This indicator is additional to the requirements highlighted in Criteria 1.7 (understanding the site's water risks and opportunities). This indicator applies mainly to how the site will plan to address external risks outside of the site's direct control or responsibility, and particularly for those risks associated with dependence on public infrastructure. A plan to mitigate and adapt to identified water risks is in place but no evidence of public sector or infrastructure agencies involvement.</p> <p style="text-align: right;"><b>Finding No: TNR-001544</b></p>

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3 STEP 3: IMPLEMENT - Implement the site's stewardship plan and improve impacts		
3.1	Implement plan to participate positively in catchment governance.	
3.1.1	Evidence that the site has supported good catchment governance shall be identified.	 Yes
Comment	<p>Documents Provided:</p> <p>3.1.1 Municipality Stakeholder Nestle Water Stewardship - Meeting</p> <p>3.1.1 Signed MOU Copy</p> <p>3.1.1 ZA -TP- MY- GEN- PRO - 104 Site Emergency Procedure</p> <p>3.1.1 MOU Bayview River</p> <p>3.1.1 SITE VISIT REGARDING BAYVIEW RIVER</p> <p>3.1 Re Effluent spillage overflow incident 4 Jan 2021 - Part MOU - saved as 2021 but incident was for 2022</p> <p>Comment:</p> <p>The organization should describe how it has supported or contributed to good catchment governance. For example, it may have engaged with relevant authorities and can demonstrate support for improved water governance and water management policies. Signed MOU provides details of monitoring for compliance and Nestle's role in ensuring compliance is achieved. The evidence as stipulated in agreement signed in 2016 is as follows:</p> <ul style="list-style-type: none"> <li>- Email for Effluent spillage overflow incident 4 Jan 2022</li> <li>- 1.3.3 and 1.3.4 Water Balance 2022</li> <li>- section 3.3 of the MOU stipulates Estuary management plan( BEMP Plan) the following email messages are evidence</li> <li>- 3.1.1 MOU Bayview River</li> <li>- 3.1.1 SITE VISIT REGARDING BAYVIEW RIVER</li> </ul>	
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.	 Obs.
Comment	<p>Documents provided</p> <p>3.1.2 Appels</p> <p>3.1.2 Great Brak Presentation Nestlé Mossel Bay 2022</p> <p>3.1.2 Great Brak Primary School Visit</p> <p>3.1.2 School up on Waste</p> <p>Comment</p> <p>This indicator refers to water rights not already covered by legal and regulatory mechanisms as captured in 3.2.2. No evidence of research of indigenous people. Theses should be considered at the site analysis.</p> <p>3.1.2 Great Brak Presentation Nestlé Mossel Bay 2022 involving other stakeholders and children in puzzles for the school.</p>	
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.	 Obs.

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Comment	<p>Documents Provided</p> <p>Permit requirements document - 1.3.4 Effluent Permit 2021 to 2022</p> <p>Procedure for evaluating compliance - 2.2.1 ZA - TP - MY - SHE - WI - 110 Evaluation of Compliance</p> <p>4 Jan 2022 Effluent Drain Overflow next to truck wash area Rev 2</p> <p>Monthly-SHE-legislation-update-Jan-2022-1</p> <p>Monthly-SHE-legislation-update-July2022-1</p> <p>Monthly-SHE-legislation-update-June2022</p> <p>Monthly-SHE-legislation-update-May2022 (1)</p> <p>Re Effluent spillage overflow incident 4 Jan 2022</p> <p>Re Root cause(incident 05092022) WWTP balance tank blockage</p> <p>RE_ Proof of 3_2_1 Point 6</p> <p>SHE-Legislation-Update-Feb-2022</p> <p>SHE-legislation-update-Mar-2022</p> <p>ZA-TP-MY-GEN-RL-002 Legal-Mandatory Register Rev. 11</p> <p>Comment:</p> <p>The organization should provide, or reference, the documentation demonstrating legal compliance and provide documentation of any violations or corrective actions taken to address violations. Documentation may be in the form of authorizations, auditor records, compliance submissions, etc.</p> <p>Compliance submissions to the Municipality to show adherence to the wastewater permit requirements was provided in the attachment named 'RE_ Proof of 3_2_1 Point 6'. The results from December 2021 to June 2022 were only sent to the Municipality on Thursday, August 11, 2022</p>	
3.2.2	<p><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></p>	<div>✗ No</div>
Comment	<p>No water rights of external parties were identified by the site or audit team as being legal and regulatory requirements that the site can influence or is responsible to implement. This should be further investigated by the site.</p> <p><b>Finding No: TNR-001547</b></p>	
3.3	<p><i>Implement plan to achieve site water balance targets.</i></p>	
3.3.1	<p><i>Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.</i></p>	<div>✓ closed</div>
Comment	<p>No evidence provided.</p> <p><b>Finding No: TNR-001548</b></p>	
3.3.2	<p><i>Where water scarcity is a shared water challenge, annual targets to improve the site's water use efficiency, or if practical and applicable, reduce volumetric total use shall be implemented.</i></p>	<div>✗ No</div>
Comment	<p>Documents provided:</p> <p>3.3.2 Water reduction projects and targets 2022</p> <p>Comment:</p> <p>Water reduction projects were provided as evidence however no linkage was shown to the Water Stewardship Plan.</p> <p><b>Finding No: TNR-001549</b></p>	
3.3.3	<p><i>Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.</i></p>	<div>✓ Yes</div>

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Comment Document provided  
3.3.3 AWS Opening Presentation 2022

Comment:  
Where the organization re-allocates water savings for external benefits or uses, then it should demonstrate this action is legally compliant and has appropriate regulatory approval, where applicable. The organization should take such actions in consultation with catchment authorities and key stakeholders.  
Evidence of providing a drinking water supply to a small local community using Nestle tankers is part of the attached presentation. The community activities were mostly done in collaboration with the Mossel Bay Municipality.

### 3.4 Implement plan to achieve site water quality targets

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

  
No

Comment Documents provided  
Water Stewardship Plan  
August 2021 analysis results  
August 2022 analysis results  
February 2022 analysis results  
July 2022 analysis results  
June 2022 analysis results

Comment:  
For each water quality target, the evidence should show: the water body or feature it applies to, the target water quality and planned timescale to achieve it. The organization should show how it is progressing against this plan. No water quality targets were identified in the plan.  
Results were randomly looked at in greater detail and compared to permit requirements and the following discrepancies in water quality discharged were noted:  
August 2021 - Mineral oils, greases and waxes\* mg/l for final wastewater was 81 permit requirement is 50mg/l;  
August 2022 - Mineral oils, greases and waxes\* mg/l for final wastewater was 150 permit requirement is 50mg/l;  
February 2022 - Mineral oils, greases and waxes\* mg/l for final wastewater was 56 permit requirement is 50mg/l;  
July 2022 - Chemical Oxygen Demand (Total) mg O<sub>2</sub>/l for final waste water was 3533 permit requirement is 3000mg/l; Mineral oils, greases and waxes\* mg/l for final wastewater was 73 permit requirement is 50mg/l; pH at 25°C was 4.6 permit requirement is 6 to 11  
June 2022 - Chemical Oxygen Demand (Total) mg O<sub>2</sub>/l for final waste water was 3640 permit requirement is 3000mg/l;  
The permit lists metals to be analyzed but the analysis of metals was not provided in any of the Laboratory reports.

**Finding No: TNR-001550**




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

  
No

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Comment	Documents provided Talbot results for August 2021 to August 2022 0181.QA.HAC.000003 - Water HACCP study Free chlorine levels Free Chlorine Results Potable Water Quality Results RE results send to Municipality  Comment: As a minimum, effluent quality should be legally compliant. Best practice will mean ensuring it is of the highest quality feasible (beyond compliance), especially for regions where wastewater regulations are weak or non-existent. Continual improvement to achieve best practice for the site's effluent was not seen as there were exceedances seen in the results indicated in section 3.4.1 but no efforts to resolve the exceedances in permit requirements were observed. Continual improvement is necessary in this case. <b>Finding No: TNR-001551</b>	
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>	 No
Comment	Documents provided 3.5 Onsite IWRAs 3.5.1 Storm water line to Estuary clean up 3.5.1 Improve IWRA  Comment: Currently there are no actions in the water stewardship plan to maintain or enhance the IWRAs. <b>Finding No: TNR-001552</b>	
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>	 Obs.
Comment	Documents provided Site Photographs 3.6.1 Onsite WASH 3.6.1 WASH Pledge Self-Assessment Tool - Mossel Bay South Africa 2022 Water coolers distribution 3.6 Wash clinic checklists 3.6 Start of Upgrade project Ablutions and Canteen(Construction in Progress) 3.6 Have your Say! Help us Transform the Workplace  Comment: The WASH Pledge Self-Assessment Tool - Mossel Bay South Africa is dated November 2014. All evidence shows the site's provision of adequate access to safe drinking water, effective sanitation and protective hygiene (WASH) for all workers is identified and quantified.	
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>	 No

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Comment Documents provided  
3.6.2 Human rights not impending  
3.6.2 Storm water line to Estuary clean up  
Brandwacht

Comment  
Nestle Mossel bay is clearly involved in community activities for the good of the communities surrounding them. However, the following are areas of concern:  
1. No evidence of research into indigenous people.  
2. Monthly Monitoring results for August 2021, February 2022, June 2022 and July 2022 do not meet the Effluent permit requirements for the site, these have not been addressed and therefore are a potential problem to water quality in the catchment.

**Finding No: TNR-001553**

**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.*

  
No

Comment Document provided  
Water Stewardship Plan

Comments:  
It is important to ensure that choices about switching suppliers are based on measurable water use data and not on theory or modelling. Indirect water use targets are not clearly shown in the water stewardship plan neither are the targets quantified. However, there is an objective of stakeholder regenerative agriculture for individual farms to mitigate the high loss of water. This was not quantified.

**Finding No: TNR-001613**

**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.*

  
Obs.

Comment Documents provided  
02 GEORGE KAYLUR\_D4\_FINAL  
FW Request for water usage information - NAMPAK  
FW Request for water usage information- Sugar  
RE ESAR Regenerative Agriculture - Soil Moisture Readers story  
RE Water Footprint for CanSmart

Comment  
The following have been engaged:  
Dairy Farmers  
Sugar - Illovo  
Can Smart  
There is opportunity for reaching out to more suppliers as actions provided is only limited to farmers.

**3.8** *Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have.*




**3.8.1** *Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.*

  
Yes

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Comment	Documents provided: 3.8.1 Request for increased pipe diameter Re_ Application to request for increased pipe diameter outflow for Nestle	
	Comment: The intent of the engagement is to address common risks, in part as defined in 2.4.	
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>	 No
Comment	Comment Actions towards achieving best practice, related to water governance was not in the Water Stewardship Plan and therefore was not achieved. The answer to indicator 1.8.1 also applies to this indicator. WSAS supports the project, but this does not meet the criteria for a water governance project. The AWS Guidance for indicator 1.8.1 provides some examples for best practice in water governance. The site must firstly identify examples of best practice in water governance before it can evidence any actions towards achieving relevant targets. This criterion regards the progress towards implementing and achieving best practices. In the spirit of continual improvement, core indicators 3.9.1 to 3.9.5 address actions towards achieving best practice implementation, realizing there will be some elapsed time before full implementation is realized.	
	<b>Finding No: TNR-001555</b>	
3.9.2	<i>Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.</i>	 No
Comment	Document provided Re_ Point 3_9 NESTLÉ EAST AND SOUTHERN AFRICA (ESAR) UNLOCKING THE POWER OF FOOD BY INNOVATING BEYOND THE ASK - Innovations Of The World	
	Comment: No best practice actions or clear targets were set in relation to water balance however the evidence provided for Project ZerEau - the plant's water-saving operation seeks to REDUCE and REPURPOSE water from its dairy operations, by simply re-using the water recovered from the milk evaporation process. The site has not supplied any evidence to demonstrate that they have identified any best practice for water balance that is relevant to the sector at a local, catchment, regional or national level. The AWS Guidance document provides some examples for best practice in water use efficiency under indicator 1.8.2. The site must initially identify examples of best practice in water balance improvement before it can evidence any actions towards achieving relevant targets.	
	<b>Finding No: TNR-001614</b>	
3.9.3	<i>Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.</i>	 No

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Comment	Documents Provided 3.9.3 02564_Nestle Mosselbay_Monthly Report_08_2022 CWRO 3.9.3 02564_Nestle Mosselbay_Monthly Report_08_2022 WWTP  Comment: Talbot's new digital system provided monitoring results with analyzed trends which highlighted that the plant was not meeting Effluent permit requirements for COD for most of August 2022. This issue was not taken up by Nestle as an action item causing concern on the quality of water discharged to the Municipality. Please see attachment 3.9.3 02564_Nestle Mosselbay_Monthly Report_08_2022 WWTP. The site has not supplied any evidence to demonstrate that they have identified any best practice for water quality improvement that is relevant to the sector at a local, catchment, regional or national level. The AWS Guidance document provides some examples for best practice in water use efficiency under indicator 1.8.3. The site must initially identify examples of best practice for water quality before it can evidence any actions towards achieving relevant targets.	
	<b>Finding No: TNR-001615</b>	
<b>3.9.4</b>	<i>Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.</i>	 No
Comment	Documents provided: 3.9.4 Storm water line to Estuary clean up Comment: Nestle demonstrated best practice in the storm water line estuary cleanup however this was not a planned activity with targets set in the site's maintenance of Important Water-Related Areas.	
	<b>Finding No: TNR-001616</b>	
<b>3.9.5</b>	<i>Actions towards achieving best practice related to targets in terms of WASH shall be implemented.</i>	 Yes
Comment	Documents Provided 2.3.2 Water Stewardship Plan Nestle Mossel Bay1 Photo of Drinking water point at Nestle Mosselbay Photos of new Toilet facilities on site Photo of Canteen on site. Comment: The Water Stewardship Plan lays out improvement of WASH on site as an objective with the following targets 1. Upgrade of Men and Women ablution block 2. Upgrade of Canteen facilities Photos and site visit at the time of the audit show that these are in progress with a target date of Quarter 4 of 2022.	

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4 STEP 4: EVALUATE - Evaluate the site's performance.	
4.1	<i>Evaluate the site's performance in light of its actions and targets from its water stewardship plan and demonstrate its contribution to achieving water stewardship outcomes.</i>
4.1.1	<i>Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.</i>
Comment	<p>Documents provided 2022 SHE Water Monitoring and Evaluation 2022 REVIEW 4.1.1 AWS Performance against water stewardship plan</p> <p>Comment: The organization should list the targets for action and improvement from its water stewardship plan, and report on to what extent they are being, or have been met. It should also report on how it has contributed to achieving each of the five AWS Outcomes. '2022 SHE Water Monitoring and Evaluation' shows some evaluation against targets aimed towards achieving water stewardship outcomes however the evaluation for quality did not include the high effluent COD that was measured in August 2022 according to the following report; '3.9.3 02564_Nestle Mosselbay_Monthly Report_08_2022 WWTP' which indicated that the permit requirements were not being met.</p> <p style="text-align: right;"><b>Finding No: TNR-001521</b></p>
4.1.2	<i>Value creation resulting from the water stewardship plan shall be evaluated.</i>
Comment	<p>This indicator refers to value creation for the implementing organisation. The organization should aim to provide a financial water cost-benefit component and report on its financial investment in water stewardship and the services and benefits achieved. For example, improved water efficiency will result in some costs savings Value Creation was not quantified to show progress in the water stewardship plan.</p> <p style="text-align: right;"><b>Finding No: TNR-001617</b></p>
4.1.3	<i>The shared value benefits in the catchment shall be identified and where applicable, quantified.</i>
Comment	<p>Documents provided 4.1.1 AWS Performance against water stewardship plan 2.3.2 Water Stewardship Plan Nestle Mossel Bay1</p> <p>Comment Where identified, the organization should report on the value benefit to the catchment and/or catchment stakeholders, preferably with quantified contributions. Shared value benefits were indicated in the attachment '4.1.1 AWS Performance against water stewardship plan' slide 7 and in '2.3.2 Water Stewardship Plan Nestle Mossel Bay1', however, the targets were not clear and therefore progress was not evaluated against a target.</p> <p style="text-align: right;"><b>Finding No: TNR-001520</b></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>

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Comment Document Provided  
2022 REVIEW

**Comment:**

The organization should report at least annually on any significant or emergency water-related events, its response, actions and outcome. It should aim to understand the cause of events, and where appropriate, implement new actions or modify its water stewardship plan. The following management review document -'2022 REVIEW' discusses the incident on 4 January 2022 where the effluent drain overflowed onto the gravel road but does not evaluate the action plan as a result of this incident. There was no annual evaluation of all site incidents. The exceedance of permit requirements for COD as well as Mineral oils, greases and waxes, in July 2022 report for example should have been incidents to be recorded, mitigated against and evaluated however these were not recorded as incidents by the site.

**Finding No: TNR-001518**

**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.

  
No

Comment Document Provided:  
4.3.1 RE Nestle Water Stewardship Plan communication

**Comments:**

The organization should report on its consultation efforts, the means of communication, and any feedback. The site should engage stakeholders at least once every year to review its water stewardship performance and provide written commentary from identified stakeholders on the site's performance. There was an email sent on 12th September 2022 informing stakeholders of the progress of Nestle Stewardship plan however there was no acknowledgement or feedback from the list of stakeholders contacted. The evaluation of stakeholder feedback was therefore not done.

**Finding No: TNR-001519**

**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 Document provided  
2.3.2 Water Stewardship Plan Nestle Mossel Bay1

**Comment:**




Continual improvement is a fundamental principle of the AWS Standard, and criteria 4.4 provides for the mechanism to ensure the plan is evaluated and updated periodically to ensure it is current and progressing positively. Although the plan has a column for performance evaluation, no modifications or adaptations were done to incorporate any relevant information or lessons learnt from the evaluation.

**Finding No: TNR-001523**

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5	STEP 5: COMMUNICATE & DISCLOSE - Communicate about water stewardship and disclose the site's stewardship efforts	
5.1	Disclose water-related internal governance of the site's management, including the positions of those accountable for legal compliance with water-related local laws and regulations.	
5.1.1	The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.	 No
Comment	<p>Documents provided</p> <p>5.1.1 Accountable persons communication with Municipality in Aug 2022</p> <p>Comments:</p> <p>Water-related governance is ultimately focused on responsibility and accountability of water-related matters at the site. It is about having a clear line of authority in order to ensure that preventative measures are in place, as well as immediate corrective actions when things go wrong. The evidence revealed positions of those accountable for compliance with water-related laws and regulations however there was no evidence provided for disclosure or that it was publicly accessible.</p> <p style="text-align: right;"><b>Finding No: TNR-001618</b></p>	
5.2	Communicate the water stewardship plan with relevant stakeholders.	
5.2.1	The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.	 Obs.
Comment	<p>Documents provided</p> <p>5.2.1 RE Nestle Water Stewardship Plan communication</p> <p>Comment:</p> <p>Communication should be of a level of detail, language and format most relevant to each relevant stakeholder group. The plan was communicated on 12 September 2022 at 12:15am which was the day of the audit.</p>	
5.3	Disclose annual site water stewardship summary, including: the relevant information about the site's annual water stewardship performance and results against the site's targets.	
5.3.1	A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.	 No
Comment	<p>Document Provided</p> <p>5.2.1 &amp; 5.3.1 RE Nestle Water Stewardship Plan communication</p> <p>Comments:</p> <p>This aspect of disclosure should be a summary of the results (and/or efforts) the site has achieved in addressing its water-related challenges by making references to the site's water-related targets, as well as the site's commitment. The disclosure of water stewardship performance needs to be accessible in a suitable format for the target audience(s) with results that pertain to material issues for the target audience; No quantification of performance against targets was provided.</p> <p style="text-align: right;"><b>Finding No: TNR-001556</b></p>	
5.4	Disclose efforts to collectively address shared water challenges, including: associated efforts to address the challenges; engagement with stakeholders; and co-ordination with public-sector agencies.	

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<b>5.4.1</b>	<i>The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.</i>	 closed
Comment	<p>The site did not list all shared water challenges through consultation with other stakeholders; neither did they discuss stakeholder engagement efforts. The requirement to actively disclose this information to target audience(s) and actively communicate this information to interested stakeholders in a suitable format(s) was not met.</p> <p style="text-align: right;"><b>Finding No: TNR-001557</b></p>	
<b>5.4.2</b>	<i>Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.</i>	 Obs.
Comment	<p>Documents Provided Municipality Stakeholder Nestle Water Stewardship - Meeting 5.4.2 Request for a collaboration meeting with Nestle</p> <p>Comment: In addition to formal disclosure, sites are required to communicate efforts to address shared water challenges to relevant stakeholders in a manner that is both active and accessible. Evidence of Engagement with Department of Water &amp; Sanitation and Mossel Bay Municipality was provided however minutes of meetings were not provided.</p>	
<b>5.5</b>	<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>	
<b>5.5.1</b>	<i>Any site water-related compliance violations and associated corrections shall be disclosed.</i>	 Yes
Comment	<p>Document provided 5.5.1 Re_ Effluent spillage overflow incident 4 Jan 2022</p> <p>Comment: A summary of compliance may be provided, but any and all significant water-related violations should be made available. It is helpful to provide the context for such violations to allow others to understand why/how they occurred and how they might be prevented in the future. Evidence provided was for 4 Jan 2022 when the Effluent drain overflowed onto the gravel road and continued to overflow in the municipal ground road area next to the factory due to sand blockage in the pipeline. A corrective and preventive action plan was also provided.</p>	
<b>5.5.2</b>	<i>Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.</i>	 Yes
Comment	<p>Documents provided 5.5.2 4 Jan 2022 Effluent Drain Overflow next to truck wash area Rev 2 5.5.2 Gemba visit Card Ash contamination incident 5.5.2 Re Root cause(incident 05092022) WWTP balance tank blockage</p> <p>Comment: The site needs to also disclose what corrective actions it took to address the items raised in 5.5.1. Requirements were met, Nestle has indicated that actively communicating such violations could cause undue attention and therefore heighten reputational water risks.</p>	
<b>5.5.3</b>	<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>	 closed

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Comment      Document provided  
5.5.1 Re\_ Effluent spillage overflow incident 4 Jan 2022

**Comment:**

“Significant” water-related violations are any that heavily (materially) affect the company’s finances, the freshwater ecosystems surrounding the site, or local people’s use and enjoyment of fresh water. Evidence attached is Nestle Mossel Bay's correspondence to Mossel Bay Municipality indicating the upset they had on site due to drain overflow caused by blockage.

There was no evidence that exceedances of Chemical Oxygen Demand or Mineral oils, greases and waxes for August 2021, February 2022, June 2022 or July 2022 of waste water leaving the Nestle site was immediately communicated to relevant public agencies and disclosed.

**Finding No: TNR-001619**

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### Photographic Evidence from Audit



Moisture measurement unit at Dairy Farm.jpg

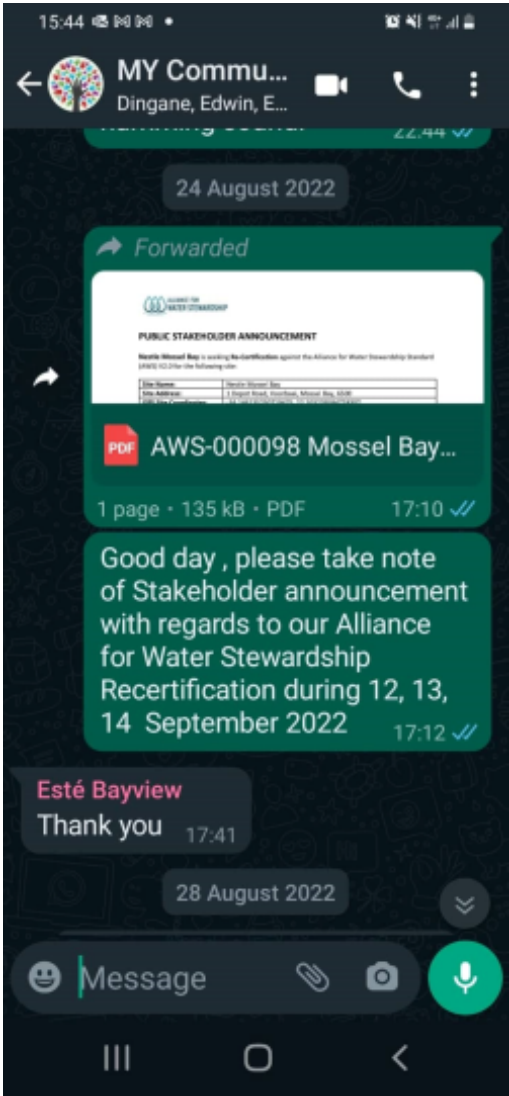


Dairy Farm site visit 3.jpg

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Stakeholder announcement.jpg

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Fat trap 2.jpg



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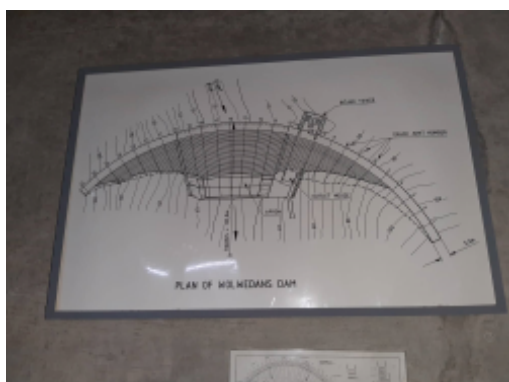
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Wolwedans Dam wall.jpg



Wolwedans Dam 4.jpg

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Fat trap at Nestle Mosselbay site.jpg



New toilet facilities.jpg



Site Visit Wolwedans Dam.jpg

✓  
Yes

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### Comment

The following attached photographs are from the site visit. Some have been named for ease of reference



Chemical store.jpg

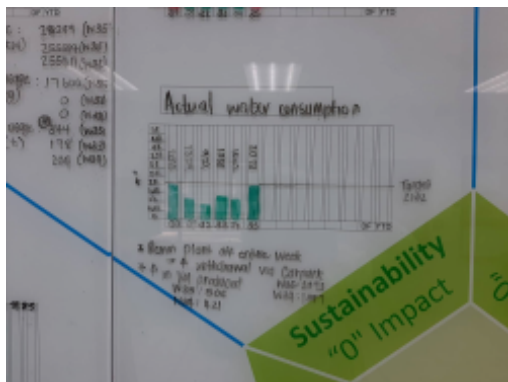


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306511124\_483130123474873\_1102967759256208399\_n.jpg

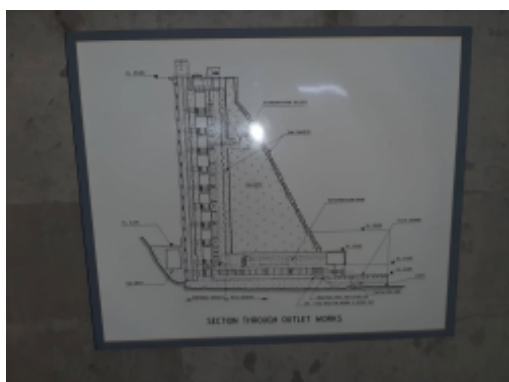
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Wolwedans Dam 2.jpg



306128485\_1283505102464260\_8387881902974491007\_n.jpg

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Chemical store and oil spill kit.jpg

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Diesel tank on site.jpg

WSAS

2 Quality Street North Berwick, EH39 4HW, UNITED KINGDOM

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Chemical storage on site.jpg



Chemical storage at WWTP.jpg

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Dairy Farm site visit 2.jpg



WWTP at Nestle Mosselbay.jpg

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Drinking water point at Nestle Mosselbay.jpg



Wolwedans Dam.jpg

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Incoming water meter (3).jpg

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# CERTIFICATION REPORT

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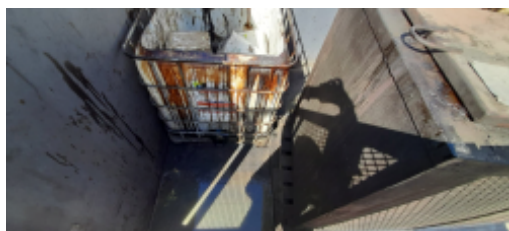
Chemical cleanup kits.jpg



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Amphi Theater at Nestle Mosselbay.jpg



WSAS

2 Quality Street North Berwick, EH39 4HW, UNITED KINGDOM

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Waste disposal on site.jpg



WWTP chemical storage.jpg



Toilet facility on site 2.jpg

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New Toilet facilities 2.jpg



Toilet facility on site.jpg



Incoming water meter.jpg

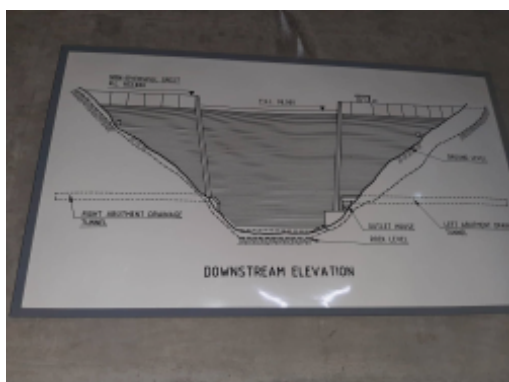
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Composite sampler at WWTP on site.jpg



Wolwedans Dam 3.jpg

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Incoming water meter (2).jpg



Dairy Farm visit.jpg

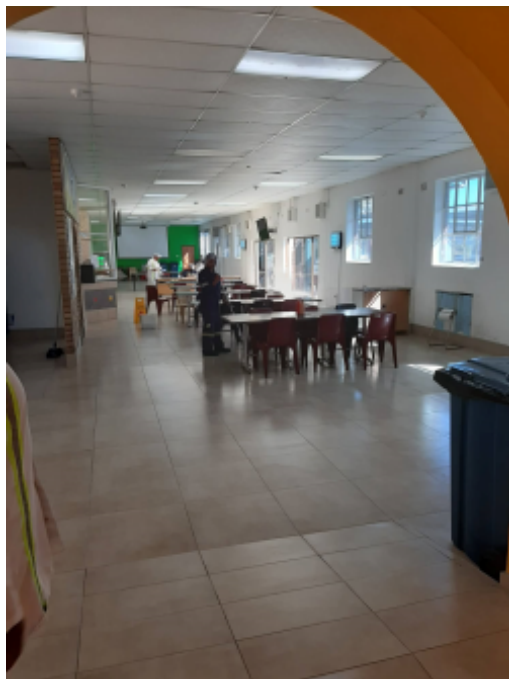
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Dairy Farmer site visit.jpg

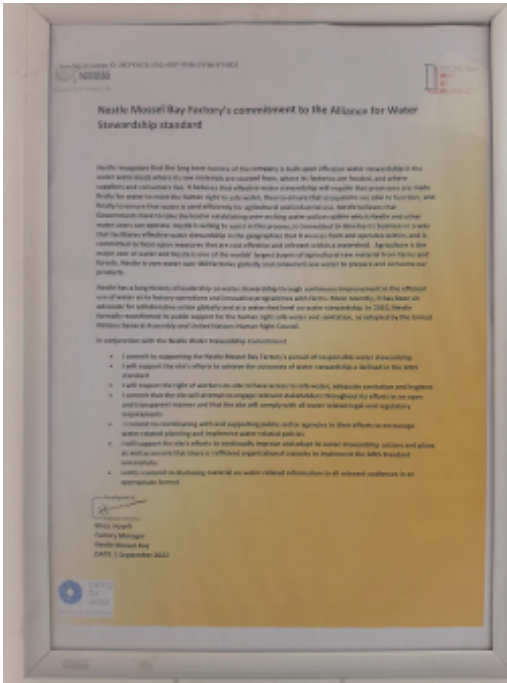


Canteen at Nestle Mosselbay.jpg

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AWS commitment displayed on site.jpg



AWS commitment displayed on site (2).jpg

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Incoming water meter (4).jpg

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Acid Tank Nestle Mosselbay.jpg



WWTP RO unit.jpg

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## Alliance for Water Stewardship (AWS)

Audit Number: AO-000337

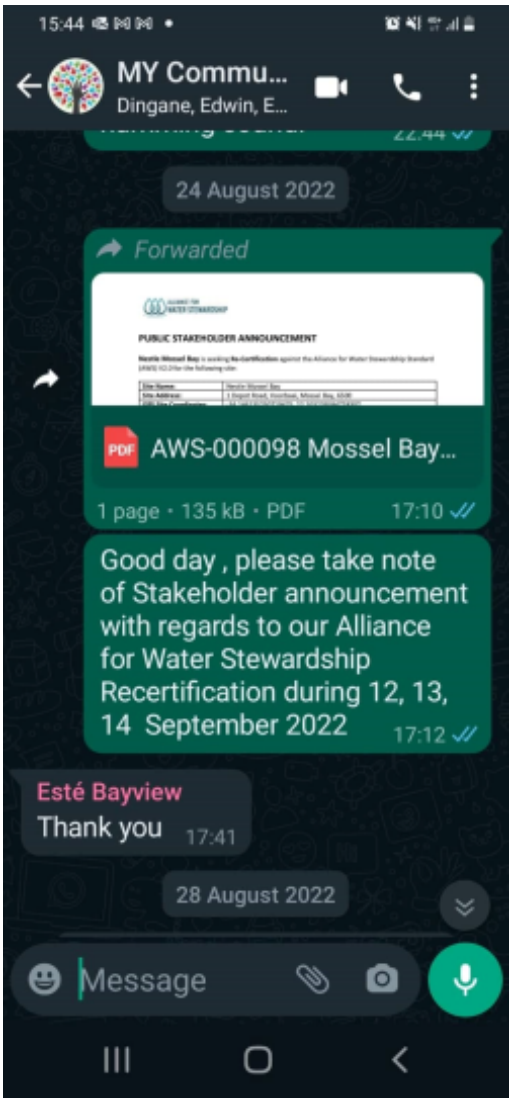


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Previous Findings		
	<i>All non-conformities raised in the previous audit have been satisfactorily closed.</i>	<div>✔</div> <div>Yes</div>
Comment	<div>Document provided: SGS - Aviv Alliance for Water Stewardship Surveillance Report 2021</div> <div>Comment: All findings from the 2021 Surveillance audit were satisfactorily closed according to the attached SGS report.</div>	