

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000500

SITE DETAILS

Site: **Nalco Industrial Services (Nanjing) Co., Ltd.**

Address: No.89 Changfenghe Road Nanjing City Jiangsu Province China, 210047, Nanjing, Jiangsu, CHINA

Contact Person: Grant Shen

AWS Reference Number: AWS-000535

Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Core

Date of certification decision: 2023-May-07

Validity of certificate: 2026-May-06

AUDIT DETAILS

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

Audit Type(s): Initial Audit

Audit Start Date: 2023-Feb-01

Lead Auditor: Layla Chen (TUV Rheinland)

Audit team participants:

Lingyun Yu (TUV Rheinland)

Site Participants:

Yao Wanjun, Administrative Support

Ke Xiao, Maintenance Engineer

Shen Guozhong, SHE Engineer

Zhang Jian, SHE Manager

Xue Xueyong, SHE Engineer

Sun Chuanjun, SHE Engineer

Cheng Huxin, SHE Engineer

Ge Xingxing, Procurement Representative

Chu Chu, HR Supervisor

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ADDITIONAL INFO

Summary of Audit Findings: A total of 6 findings were raised during the certification audit, 0 major non-conformity, 6 minor non-conformities, 0 observation.

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

The audit team recommends certification of Nalco Industrial Services (Nanjing) Co., LTD. at Core level approval of the corrective actions plan.

Scope of Assessment: The scope of services covers the Initial certification audit for assessing conformity of Nalco Industrial Services (Nanjing) Co., LTD. against the AWS International Water Stewardship Standard Version 2. Nalco Industrial Services (Nanjing) Co., LTD. is located at No. 89, Changfenghe Road, Nanjing City, Jiangsu Province China. The site covers an area of 60209 m², with a total construction area of 18862 square meters. At present, the number of employees is about 93. The site is a manufacturer of water treatment agent etc. The total capability is 89000 ton/year. The facility is located in the Nanjing Section of Yangtze River Basin. The audit was conducted on 1st to 2nd February 2023. The site visit included the site visit covered production lines, wastewater treatment plant and chemical warehouse, stakeholder interviews and documents. A two-hours stakeholder interview was performed on 2nd February 2023. The following stakeholders were interviewed during the audit: Employee / Mr. Chen; Employee/Mr. Wu; Other subsidiaries of the Group/ Mr. Zhou; Industrial Park Section chief/Mr. Huan; Supplier/Mr. Ding and Mrs. Li and etc.

FINDINGS

NUMBER OF FINDINGS PER LEVEL

Minor	6
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FINDING DETAILS

Finding No: TNR-003447
Checklist Item No: 1.3.7
Status: In Progress - CA plan approved
Finding level: Minor
Checklist item: Annual water-related costs, revenues, and a description or quantification of the social, cultural, environmental, or economic water-related value generated by the site shall be identified and used to inform the evaluation of the plan in 4.1.2.
Findings: The water-related costs identified by the site include the cost of incoming water, the cost of water treatment facilities operation, and the cost of wastewater discharge, but the site has not identified its water management expenses (such as operating AWS, participating in water management related training, and carrying out joint actions with stakeholders), sludge disposal costs, wastewater testing costs, etc. The site has not identified its water-related benefits.
Corrective action: The site will divide its water-related costs and benefits in strict accordance with AWS standards. The site plans to identify and analyze the costs and benefits of sustainable water Stewardship around five sectors: water management, water balance, water quality, IWRA and WASH. It shall be updated annually.

Finding No: TNR-003448
Checklist Item No: 1.4.1
Status: In Progress - CA plan approved
Finding level: Minor
Checklist item: The embedded water use of primary inputs, including quantity, quality and level of water risk within the site’s catchment, shall be identified.
Findings: The site asked suppliers to provide water quality test reports by email, but only a small number of suppliers provided feedback. The site has not obtained the water quality information of its suppliers/service providers in the same basin.
Corrective action: The site plans to strengthen communication and cooperation with suppliers in the basin in water-related fields. And try to continuously track the water quality of suppliers in the basin through different channels, such as requiring suppliers to provide water quality test reports, visiting relevant environmental protection information disclosure platforms, etc

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Finding No:	TNR-003454
Checklist Item No:	3.7.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Checklist item:	Evidence of engagement with suppliers and service providers, as well as, when applicable, actions they have taken in the catchment as a result of the site's engagement related to indirect water use, shall be identified.
Findings:	Except sending AWS learning materials to suppliers by email, the site has no evidence of strong action to show that it has cooperated/acted with suppliers/service providers in certain areas (such as water balance, water quality, water management, compliance with water-related regulations, information disclosure, IWRA protection, etc.)
Corrective action:	The site will develop plans to carry out water management cooperation with suppliers. The site plans to collect the needs of suppliers in the field of water management during the annual supplier survey and seek cooperation with suppliers in the field of water management.
Finding No:	TNR-003732
Checklist Item No:	4.3.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Checklist item:	Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.
Findings:	The factory did not communicate with stakeholders about the performance of water stewardship plan at the site and had requested them to review and provide their written comments on the site's performance.
Corrective action:	The factory will take the questionnaire survey and telephone communication and etc. to obtain feedback from stakeholders.
Finding No:	TNR-003733
Checklist Item No:	5.2.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Checklist item:	The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.
Findings:	The site has only disclosed some water stewardship in company website, there way could not cover the characteristics of each stakeholder group.
Corrective action:	It is proposed to increase questionnaire survey to communication with various stakeholders.

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Finding No:	TNR-003734
Checklist Item No:	5.4.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Checklist item:	Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.
Findings:	Except for formal disclosure, the site did not communicate with stakeholders in a proactive and other understandable manner about their efforts to address shared water challenges.
Corrective action:	It is proposed to adopt a questionnaire survey to communication with stakeholder on disclose efforts to collectively address shared water challenges.

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Report Details

Report	Value
Report prepared by	Layla Chen (TUV Rheinland)
Report approved by	Mia Antoni-Naidoo
Report approved on (Date)	2 May 2023

Surveillance

Proposed date for next audit
2024-Feb-01

Stakeholder Announcements

Date of publication	Location
01/12/2022	https://a4ws.org/wp-content/uploads/2022/12/Stakeholder-Announcement-Template-20210902_TUV-Rheinland-Nalco-Industrial-Services-Nanjing-Co.-LTD.pdf
01/12/2022	https://www.tuv.com/content-media-files/greater-china/about-us/downloads/aws-stakeholder-announcement-tuvgd-nalco-industrial-services-(nanjing)-co.-Ltd%E7%BA%B3%E5%B0%94%E7%A7%91%E5%B7%A5%E4%B8%9A%E6%9C%8D%E5%8A%A1%EF%BC%88%E5%8D%97%E4%BA%AC%EF%BC%89%E6%9C%89%E9%99%90%E5%85%AC%E5%8F%B8.pdf
01/12/2022	https://www.ecolab.com.cn/news/2022/local/202211-ecolab-nalco-aws-announcement
07/12/2022	WSAS Website: https://watersas.org/wp-content/uploads/2022/12/Stakeholder-Announcement-Template-20210902_TUV-Rheinland-Nalco-Industrial-Services-Nanjing-Co.-LTD.pdf

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Catchment Information

Catchment Information

The plant used the water by the municipal water for domestic and production from the local water company and used recycle water from rainwater for production. The municipal water plant has one source (Yangtze River). The industry wastewater and domestic wastewater is treated by onsite wastewater treatment plant, after the onsite treatment, all the wastewater is discharged into a wastewater treatment plant (Nanjing Sembcorp Water Co. LTD.) and finally discharged into the Yangtze River. The rainwater is discharged into the municipal rainwater pipeline and then finally flows to Yangtze River.

Based on the location of water source and final discharge, the Outer Boundary of the factory is the Nanjing section of the Yangtze River.

The length of the Yangtze River in Nanjing is about 70 kilometers. The average width is 1230m. According to river channel characteristics, the Yangtze River system in Nanjing can be subdivided into four sub-river systems. From north to south, the Chuhe River system, the riverside water system of the Nanjing section of the Yangtze River, the Qinhuai River system, and the Shuiyang River system are in order.

Client Description and Site Details

Client/Site Background

Nalco Industrial Services (Nanjing) Co., LTD. is located at No. 89, Changfenghe Road, Nanjing City, Jiangsu Province China. The site covers an area of 60209 m², with a total construction area of 18862 square meters. At present, the number of employees is about 93. The site is a manufacturer of water treatment agent. The total capability is 125000 ton/year. The domestic water is used from municipal tap water, production water is from municipal tap water and recycle water from rainwater. The industry wastewater and domestic wastewater is treated by onsite wastewater treatment plant, after the onsite treatment, all the wastewater is discharged into a wastewater treatment plant (Nanjing Sembcorp Water Co. LTD.) and finally discharged into the Yangtze River. The rainwater is discharged into the municipal rainwater pipeline and then finally flows to Yangtze River.

Summary of Shared Water Challenges

Summary of Shared Water Challenges

Nalco faced with follow shared water challenges:

1. Priority as High, the river quality in the basin is poor;
2. Priority as medium, increased the risk of groundwater contamination;
3. Priority as medium, the quality of wastewater discharge has been raised;
4. Priority as low, reduction of water resources.

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

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1 STEP 1: GATHER AND UNDERSTAND		
1.1	<i>Gather information to define the site's physical scope for water stewardship purposes, including: its operational boundaries; the water sources from which the site draws; the locations to which the site returns its discharges; and the catchment(s) that the site affect(s) and upon which it is reliant.</i>	
1.1.1	<i>The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including:</i> <ul style="list-style-type: none">- Site boundaries;- Water-related infrastructure, including piping network, owned or managed by the site or its parent organization;- Any water sources providing water to the site that are owned or managed by the site or its parent organization;- Water service provider (if applicable) and its ultimate water source;- Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies;- Catchment(s) that the site affect(s) and is reliant upon for water.	 Yes
Comment	The site has developed a site and catchment background report. In this report, it contains following content: <ul style="list-style-type: none">- Site boundaries- Water-related infrastructure, including the pipe network, owned or managed by the site or its parent organization.- Water service provider and its ultimate water source.- Discharge points and wastewater service provider.- The catchment(s) that the Site affects and relies on for water.	
1.2	<i>Understand relevant stakeholders, their water related challenges, and the site's ability to influence beyond its boundaries.</i>	
1.2.1	<i>Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall:</i> <ul style="list-style-type: none">- Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people;- Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies;- Provide evidence of stakeholder consultation on water-related interests and challenges;- Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups;- Identify the degree of stakeholder engagement based on their level of interest and influence.	 Yes
Comment	Nalco has established a stakeholder engagement procedure, and has identified stakeholders such as the government, employees, NGOs, suppliers, infrastructures, and surrounding companies, and has established diversified communication channels with different stakeholders. For example, Nalco collects topics of concern and shared water challenges faced by surrounding enterprises through questionnaires, maintains communication with government departments through participation in meetings, visits, WeChat and phone calls, and understands employees' attention to water-related topics through meetings, satisfaction surveys, etc The degree of influence between Nalco and each stakeholder has also been identified.	
1.2.2	<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	The degree of influence between Nalco and each stakeholder has also been identified.	








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1.3	<i>Gather water-related data for the site, including: water balance; water quality, Important Water-Related Areas, water governance, WASH; water-related costs, revenues, and shared value creation.</i>	
1.3.1	<i>Existing water-related incident response plans shall be identified.</i>	 Yes
Comment	The site has the following contingency plans: Emergency Environmental Response Plan; Emergency Environmental Response Plan of Industrial Park; Emergency Plan for Safety Production Accidents Special Emergency Plan for Water Pollution Incidents.	
1.3.2	<i>Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped</i>	 Yes
Comment	The site has recorded the income and input and output data via meter or estimation, and developed a water balance map based on the data. The water balance map reflected the water inflows, losses, storage and outflows.	
1.3.3	<i>Site water balance, inflows, losses, storage, and outflows, including indication of annual variance in water usage rates, shall be quantified. Where there is a water-related challenge that would be a threat to good water balance for people or environment, an indication of annual high and low variances shall be quantified.</i>	 Yes
Comment	Water balance calculation result and daily water supply are reviewed, the site could evaluates the variance in water usage rates.	
1.3.4	<i>Water quality of the site's water source(s), provided waters, effluent and receiving water bodies shall be quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be quantified.</i>	 Yes
Comment	The site monitors the following water quality data: - The WWTP discharge wastewater. The site has installed a online monitoring system to monitor the discharged wastewater in real time. The site will also sample the water and perform the internal testing daily, and entrust a third party lab to perform testing quarterly or annually. - Rain water is discharge to Yangtze River, the site monitors it internal, and sent it to a third party lab to perform testing at least quarterly. - Groundwater of the site is monitored by third party lab annually. - The water from water purification system. Internal testing will be performed to ensure the water quality meets the production requirement. - Direct drinking water. To ensure the safety of direct drinking water, the site entrust the third party lab to perform the testing of direct drinking water yearly. - Barreled drinking water. The factory asks the barreled drinking water supplier to provide the test report every year.	
1.3.5	<i>Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.</i>	 Yes
Comment	The site identifies actual and potential pollution sources, including chemical warehouse, hazardous waste warehouse, chemical tank, workshop, waste water treatment station and etc. The site also draws a layout map that illustrates the location of the potential sources of pollution.	
1.3.6	<i>On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.</i>	 Yes
Comment	According to the definition of IWRA, no IWRA is identified in the site. The site monitors the landscaping, soil and groundwater conditions of the site.	






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1.3.7	<i>Annual water-related costs, revenues, and a description or quantification of the social, cultural, environmental, or economic water-related value generated by the site shall be identified and used to inform the evaluation of the plan in 4.1.2.</i>	 in progress
Comment	Nalco identified the water-related costs, including the cost of incoming water, the cost of water treatment facilities operation, and the cost of wastewater discharge. Finding No: TNR-003447	
1.3.8	<i>Levels of access and adequacy of WASH at the site shall be identified.</i>	 Yes
Comment	The site installs water purification facilities in workshops and office areas, providing drinking water to employees. The water purification facilities were regularly maintained. The site also provides sufficient toilets to workers, and regular cleaning was conducted. Necessary equipment like handwash and tissue were also provided. The site performed the assessment of the WASH level as per WBCSD. The result is satisfied.	
1.4	<i>Gather data on the site's indirect water use, including: its primary inputs; the water use embedded in the production of those primary inputs the status of the waters at the origin of the inputs (where they can be identified); and water used in out-sourced water-related services.</i>	
1.4.1	<i>The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be identified.</i>	 in progress
Comment	Nalco has screened and identified the suppliers/service providers accounted for 80 percent of the cost (13 suppliers/service providers were included), and then sent the questionnaires to investigate their indirect water consumption (A total of 10 suppliers/service providers provided feedback). Moreover, by using WWF's map of water risk filter, Nalco also evaluated the water related risk level in the catchment where its suppliers are located. Nalco evaluates the water-related risks of suppliers/service providers based on suppliers' service providers' incoming water sources, water consumption, wastewater discharge. Finding No: TNR-003448	
1.4.2	<i>The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.</i>	 Yes
Comment	Nalco also collects the water consumption of its outsourced services such as hazardous waste unit through questionnaires. The data was also quantified.	
1.5	<i>Gather water-related data for the catchment, including water governance, water balance, water quality, Important Water-Related Areas, infrastructure, and WASH</i>	
1.5.1	<i>Water governance initiatives shall be identified, including catchment plan(s), water-related public policies, major publicly-led initiatives under way, and relevant goals to help inform site of possible opportunities for water stewardship collective action.</i>	 Yes
Comment	Water governance initiatives was identified in Catchment Background Survey Report by Nalco; The initiatives included national, provincial and local level, including the catchment development plan, industrial development plan, environmental and ecological conservation plan etc.	
1.5.2	<i>Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.</i>	 Yes
Comment	The site presents a matrix recording all legal actions, this document is used by the site to monitor the status of each of the site's legal obligations.	
1.5.3	<i>The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.</i>	 Yes

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Comment	The Catchment Background Survey Report provides a detailed analysis of water balance for the catchment. The water balance in the catchment is analysed based on the rainfall (mm), precipitation (m3), surface water resources (m3), groundwater resources(m3), water diversion (m3), total water supply (m3) and total water consumption(m3). All the data is collected from government website and publishing report.	
1.5.4	<i>Water quality, including physical, chemical, and biological status, of the catchment shall be identified, and where possible, quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be identified.</i>	 Yes
Comment	The Catchment Background Survey Report provides a detailed analysis of water quality for the catchment. The site obtained the relate information from the government website. (Mainly from the Environmental and Ecological Bureau). The data includes the water quality of the water source, the final discharged water body, the water from municipal water plant. The data will be published monthly, therefore, the annual variances could be identified.	
1.5.5	<i>Important Water-Related Areas shall be identified, and where appropriate, mapped, and their status assessed including any threats to people or the natural environment, using scientific information and through stakeholder engagement.</i>	 Yes
Comment	The Catchment Background Survey Report lists the Important Water-Related Area of the catchment. The Important Water-Related Areas are collected from government published documents, including 'Jiangsu Province Ecological Red Line Regional Protection Plan' The status of the IWRAs is collected from the manage authorities.	
1.5.6	<i>Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.</i>	 Yes
Comment	The Catchment Background Survey Report lists the existing and planned water-related infrastructure including water supply, flood control and drainage, wastewater treatment, emergency response at provincial, catchment and city levels and water-related objectives. Based on the available information, the water-related infrastructure in the catchment is relatively good.	
1.5.7	<i>The adequacy of available WASH services within the catchment shall be identified.</i>	 Yes
Comment	The facility obtained the WASH status in Nanjing from Nanjing Statistical Yearbook for 2021, including the tap water penetration rate, wastewater treatment rate and other data. Overall, the WASH services is good in Nanjing City.	
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>	 Yes
Comment	The Catchment Background Report identifies the shared challenges within the catchment, including: 1.The river quality in the basin is poor; 2. Increased the risk of groundwater contamination; 3. The quality of wastewater discharge has been raised; 4. Reduction of water resources. Meanwhile, based on the analysis of relevance/rationale for stakeholders and relevance/rational for the site, the sites has prioritized the shared challenges.	

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1.6.2	<i>Initiatives to address shared water challenges shall be identified.</i>	 Yes
Comment	Initiatives to address shared water challenges are included in the Catchment Background Report identifies the shared challenges within the catchment.	
1.7	<i>Understand the site's water risks and opportunities: Assess and prioritize the water risks and opportunities affecting the site based upon the status of the site, existing risk management plans and/or the issues and future risk trends identified in 1.6.</i>	
1.7.1	<i>Water risks faced by the site shall be identified, and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.</i>	 Yes
Comment	Nalco has identified its water risks covering water governance, sustainable water balance and water quality. Based on risk analysis, Nalco has prioritized its water risks according to potential impact, likelihood within a given time and difficulty of detection. Meanwhile, corresponding response strategies to mitigate water risks are developed.	
1.7.2	<i>Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.</i>	 Yes
Comment	Water opportunities including government support, customer encouragement, self-improvement and cost savings are also identified.	
1.8	<i>Understand best practice towards achieving AWS outcomes: Determining sectoral best practices having a local/catchment, regional, or national relevance.</i>	
1.8.1	<i>Relevant catchment best practice for water governance shall be identified.</i>	 Yes
Comment	Nalco has identified relevant catchment best practice for water governance including: <ul style="list-style-type: none"> • Implement AWS management on the site and carry out AWS certification; • Implement ISO 14001:2015 management system on site and carry out certification; • A comprehensive water stewardship plan that is routinely reviewed and updated; • Training of all employees on the principles of water stewardship; • Engaging with peer organizations and stakeholders to promote water stewardship; • Communicating on its own water stewardship to set a leading example to others. 	
1.8.2	<i>Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.</i>	 Yes
Comment	Nalco has identified relevant sector and/or catchment best practice for water balance including: <ul style="list-style-type: none"> • Rainwater and condensate water recovery • Continuously track the water efficiency of unit product and set the goal of continuous improvement year after year. Continuously explore opportunities to improve water efficiency, such as improving production process, adopting reclaimed water reuse technology, etc • Perform water balance testing as per GBT 12452-2022 General Rules for Water Balance Testing of Enterprises • Undertake a detailed study on how water is used in the site and introduce water efficient technology into production process 	
1.8.3	<i>Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.</i>	 Yes

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Comment Nalco has identified relevant sector and/or catchment best practice for water quality, such as water quality for its intended purpose and discharging.
-Based on different uses, water is divided into the following categories:
• Use for production purpose: Tap water, filtered water, soft water, RO water and purified water
• Use for domestic purpose: Tap water
• Use for other purpose: Reuse water for toilet flushing, greenbelt irrigation and waste gas treatment tower spraying
-Monitoring frequency of main pollutant, and active disclosure of water monitoring information.
-Formulate internal control requirements that are stricter than the wastewater discharge permit

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


Yes

Comment The site has identified best practices related to onsite Important Water Related Areas (IWRA).
1. Continuously maintain and manage the greening and soil in the site
2. Domestic wastewater and industrial wastewater are transported through visual pipe network to avoid pollution of groundwater and soil
3. Regularly monitor the rainwater in the site
4. Regularly monitor the soil and groundwater in the site

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


Yes

Comment The site has identified relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services including:
• WBCSD self-assessment tool
• GB 5749 Sanitary Standard for Drinking Water
• GBZ 1-2010 Hygienic standards for the design of industrial enterprises

2 STEP 2: COMMIT & PLAN - Commit to be a responsible water steward and develop a Water Stewardship Plan	
2.1	Commit to water stewardship by having the senior-most manager in charge of water at the site, or if necessary, a suitable individual within the organization head office, sign and publicly disclose a commitment to water stewardship, the implementation of the AWS Standard and achieving its five outcomes, and the allocation of required resources.
2.1.1	<p>A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:</p> <ul style="list-style-type: none"> - That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes - That the site implementation will be aligned to and in support of existing catchment sustainability plans - That the site's stakeholders will be engaged in an open and transparent way - That the site will allocate resources to implement the Standard.
Comment	A water stewardship commitment to follow all the AWS core criteria has been signed by President of the Ecolab Group in Greater China, Mr. Christina Kong. The commitment has been displayed on Ecolab group's website.
2.2	Develop and document a process to achieve and maintain legal and regulatory compliance.
2.2.1	<p>The system to maintain compliance obligations for water and wastewater management shall be identified, including:</p> <ul style="list-style-type: none"> - Identification of responsible persons/positions within facility organizational structure - Process for submissions to regulatory agencies.
Comment	Nalco has established a procedure to ensure the operation of the site to meet the provisions of relevant laws, regulations and other requirements.
2.3	Create a water stewardship strategy and plan including addressing risks (to and from the site), shared catchment water challenges, and opportunities.
2.3.1	A water stewardship strategy shall be identified that defines the overarching mission, vision, and goals of the organization towards good water stewardship in line with this AWS Standard.
Comment	<p>The parent company, Ecolab Group, has formulated a 2030 water management strategy. Relying on the group's water management strategy, Nalco has formulated a stewardship strategy plan for 2022-2025:</p> <ul style="list-style-type: none"> -50% reduction in fresh water consumption per unit product (taking 2022 as the baseline year); -100% industrial wastewater is recycled; -Continue to operate AWS sustainable water management system to continuously improve its water management capability; -Carry out broader cooperation with stakeholders inside and outside the basin to achieve sustainable management of water resources. <p>Nalco also develops an annually Water Stewardship Plan, which specifies targets, required actions, measurement, cost and benefit, accountable and responsible person, deadline, etc.</p>
2.3.2	<p>A water stewardship plan shall be identified, including for each target:</p> <ul style="list-style-type: none"> - How it will be measured and monitored - Actions to achieve and maintain (or exceed) it - Planned timeframes to achieve it - Financial budgets allocated for actions - Positions of persons responsible for actions and achieving targets - Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.

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Comment Nalco has developed a Water Stewardship Plan (Year 2022), which specifies targets, required actions, measurement, status, effectiveness evaluation, accountable and deadline, etc.

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.*



Yes

Comment Nalco has coordinated with the management committee of the industrial park where it is located to develop an emergency plan for environmental emergencies, water related topics were also included, and the plan was registered with the local environmental protection department with the registration number of 320117-2021-172-M
After communicating with the water supply infrastructure, in order to adapt to the risk of water supply interruption, Nalco formulated a response plan to deal with water supply interruption and set up industrial water storage tanks
Through communication with stakeholders, including the public sector and infrastructure institutions, Nalco identified shared water challenges and water-related risks, and formulated corresponding implementation measures

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3 STEP 3: IMPLEMENT - Implement the site's stewardship plan and improve impacts		
3.1	<i>Implement plan to participate positively in catchment governance.</i>	
3.1.1	<i>Evidence that the site has supported good catchment governance shall be identified.</i>	✔ Yes
Comment	<p>Nalco actively cooperates with the government supervision department to conduct supervisory inspections and visits.</p> <p>Under the initiative of the local government, Nalco and some local enterprises actively promote corporate social responsibility and carry out actions in the fields of environment, safety and occupational health</p>	
3.1.2	<i>Measures identified to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be implemented.</i>	✔ Yes
Comment	<p>Nalco is located in the industrial zone and has obtained the pollution discharge permit. According to the requirements of pollution discharge permit, Nalco has installed an online monitoring device at its wastewater discharge outlet to monitor COD in real time, and regularly entrusts a third-party agency to test its wastewater.</p> <p>Nalco has established a procedure to ensure the operation of Nalco to meet the provisions of relevant laws, regulations and other requirements. And conducts compliance evaluation on laws and regulations every year and keeps records.</p>	
3.2	<i>Implement system to comply with water-related legal and regulatory requirements and respect water rights.</i>	
3.2.1	<i>A process to verify full legal and regulatory compliance shall be implemented.</i>	✔ Yes
Comment	<p>Nalco has established a procedure to ensure the operation of Nalco to meet the provisions of relevant laws, regulations and other requirements. And conducts compliance evaluation on laws and regulations every year and keeps records.</p>	
3.2.2	<i>Where water rights are part of legal and regulatory requirements, measures identified to respect the water rights of others including Indigenous peoples, shall be implemented.</i>	✔ Yes
Comment	<p>The water rights are respected under legal and regulatory mechanisms, and there is no indigenous people in the catchment area.</p>	
3.3	<i>Implement plan to achieve site water balance targets.</i>	
3.3.1	<i>Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.</i>	✔ Yes
Comment	<p>Nalco develops water stewardship plans every year. By reviewing the water stewardship of 2022 provided by the site, we found separate targets, required actions, measurement, status, effectiveness evaluation, accountability and deadline, etc. has been defined.</p> <p>Several projects to improve water balance have been implemented which were linked to the targets in the water stewardship plan, such as: collect and use rainwater as production water, reuse process wastewater to improve the utilization efficiency of fresh water, wastewater reuse, etc.</p> <p>Nalco has set the target of water consumption per unit product and evaluated its performance every month. At the same time, the site also continues to track the progress of water balance targets in its water stewardship plan.</p>	

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3.3.2	<i>Where water scarcity is a shared water challenge, annual targets to improve the site's water use efficiency, or if practical and applicable, reduce volumetric total use shall be implemented.</i>	 Yes
Comment	<p>Nalcot has formulated the 2022 water management implementation plan to achieve its Water Stewardship targets, which includes a number of implementation projects to improve the water efficiency of the site, such as:</p> <ul style="list-style-type: none"> - Collect and use rainwater as one of the water sources for production - Through the renovation of the rainwater transmission network, the site drains the rainwater from different areas to the rainwater collection tank to facilitate the collection and utilization of more rainwater - Reuse process wastewater to improve the utilization efficiency of fresh water - Wastewater reuse - Set the target of water consumption per unit product and conduct performance assessment every month <p>Nalco also continues to track the progress of water balance targets in its water stewardship plan.</p>	
3.3.3	<i>Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.</i>	 Yes
Comment	<p>No legally-binding documentation is issued by local government authorities to Nalco for the re-allocation of water to social, cultural or environmental needs.</p>	
3.4	<i>Implement plan to achieve site water quality targets</i>	
3.4.1	<i>Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.</i>	 Yes
Comment	<p>Water quality targets are set in the water stewardship plan of the site, such as:</p> <ul style="list-style-type: none"> - Test the wastewater according to the frequency and parameters specified in the wastewater self-monitoring plan. - The drinking water quality 100% meets the requirements, production water (such as softened water and RO pure water) 100% meets the internal quality control requirements. - And the wastewater quality meets the internal control objectives. <p>A series of water stewardship plans are implemented to achieve its water quality targets:</p> <ul style="list-style-type: none"> • The site adjusted the RO water preparation process, changed the original preparation of RO water directly from municipal water to soft water, thus improving the preparation efficiency of RO water and the quality of RO water. • The site has developed a water quality monitoring plan to regularly test the hardness of soft water and the conductivity of RO pure water • The site has formulated wastewater treatment management specifications, NNJ-EP-28-2019, and operated and maintained wastewater treatment facilities as required. • Nalco checks the water quality of the ETP system every day to ensure the normal operation of the ETP, and has developed a monitoring plan for wastewater discharge to ensure that the quality of wastewater discharged meets the internal control requirements. <p>Nalco tracks the progress of its Water Stewardship targets every month.</p>	
3.4.2	<i>Where water quality is a shared water challenge, continual improvement to achieve best practice for the site's effluent shall be identified and where applicable, quantified.</i>	 Yes

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- Comment
- Wastewater is transported through visual pipe network to avoid environmental pollution caused by potential wastewater leakage
 - The site introduced a wastewater reuse system in 2022, which uses RO membrane treatment device to treat the wastewater and then reuse it to the production process to reduce the discharge of wastewater
 - For internal control, Nalco has defined the stricter discharge limits for COD and T-P emission concentration of wastewater pollutants, COD: emission permit 500ppm; Internal control index: 480ppm
T-P: emission permit 5ppm; Internal control index 4.5ppm
 - The site has installed an online monitoring system to monitor the COD concentration of discharged wastewater in real time
 - Every 100m³ of waste water is discharged, the factory will conduct internal monitoring on the main pollutants (such as COD, T-P, N-NH₃, PH) in it (about twice a day)

3.5 *Implement plan to maintain or improve the site's and/or catchment's Important Water-Related Areas.*

3.5.1 *Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.*



Yes

Comment

The site entrusted a property management company to manage and maintain the greening in the site area and signed a contract with it.

The site regularly monitors the rainwater in the site (a third-party laboratory is entrusted to sample and test the rainwater every month), and samples and tests the rainwater outlet on its own every time it rains.

Use the pipe network over the ground to transport domestic wastewater and industrial wastewater, which is visible and easy to detect the leak, to avoid pollution of groundwater and soil.

Entrust a third-party laboratory to regularly monitor the groundwater in the site (IWRA within site).

Regularly collected the information and monitor the status of water source and discharged body. (IWRA within catchment).

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

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



Yes

Comment

The site entrusts a third-party cleaning service unit to carry out the daily cleaning and maintenance of the site, and the site evaluates the performance of cleaning personnel every month.

The site entrusts the supplier to regularly maintain the water dispenser, including inspection, disinfection, filter element replacement, etc. The site also conducts drinking water testing in 2022, and the testing results are all in compliance.

Nalco also conducts WBCSD self-assessment to evaluate the level of onsite WASH.

Nalco investigates the distribution of drinking water points and toilet facilities within the site, and analyses the adequacy of these facilities based on the standards WBCSD and "GBZ1-2010Hygienic standard for the design of industrial enterprises"

The site collects employees' feedback on their work environment and WASH adequacy through various channels. For example, the site carries out "HUMU Engagement Survey" for all employees every year to collect feedback from employees and follow up the feedback content accordingly.

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








Yes

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Comment	No evidence is showed that the site is impinging on the human right to safe water and sanitation of communities through their operations according to the interviews with Nalco's employees, local community and local government authorities.	
3.7	<i>Implement plan to maintain or improve indirect water use within the catchment:</i>	
3.7.1	<i>Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.</i>	 Yes
Comment	<p>Indirect water use targets have been set in the water stewardship plan. Nalco has carried out actions to improve the water management ability of suppliers to achieve Nalco's indirect water use targets. Nalco tracks the achievement status of its targets, and actions are quantified.</p> <p>Nalco has screened and identified the suppliers/service providers accounted for 80 percent of the cost (13 suppliers/service providers were selected), and then sent the questionnaires to investigate their indirect water consumption (10 of them have already given feedback). Moreover, by using WWF's map of water risk filter, Nalco also evaluated the water related risk level in the catchment where its suppliers are located.</p> <p>Nalco evaluates the water-related risks of suppliers/service providers based on their incoming water sources, water consumption, wastewater discharge.</p> <p>Nalco sent AWS learning materials to its suppliers/service providers by email, requiring them to study AWS standards by themselves, and requiring them to complete the examination. A total of 5 suppliers replied to the exam.</p>	
3.7.2	<i>Evidence of engagement with suppliers and service providers, as well as, when applicable, actions they have taken in the catchment as a result of the site's engagement related to indirect water use, shall be identified.</i>	 in progress
Comment	<p>Nalco sent AWS learning materials to its suppliers/service providers by email, requiring them to study AWS standards by themselves, and requiring them to complete the examination. A total of 5 suppliers replied to the exam.</p> <p style="text-align: right;">Finding No: TNR-003454</p>	
3.8	<i>Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have.</i>	
3.8.1	<i>Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.</i>	 Yes
Comment	<p>Nalco actively cooperates with the government supervision department to conduct supervisory inspections and visits.</p> <p>Nalco keeps close contact with local water-related infrastructure owners through many ways such as Wechat, e-mail or phone call.</p>	
3.9	<i>Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.</i>	
3.9.1	<i>Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.</i>	 Yes
Comment	<ul style="list-style-type: none"> • Implement AWS management on the site and carry out AWS certification; • Implement ISO 14001:2015 management system on site and carry out certification • A comprehensive water stewardship plan that is routinely reviewed and updated 	
3.9.2	<i>Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.</i>	 Yes

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Comment	<p>Nalco has identified relevant sector and/or catchment best practice for water balance including:</p> <ul style="list-style-type: none"> • Rainwater and condensate water recovery • Wastewater reuse • Perform water balance testing as per GBT 12452-2022 General Rules for Water Balance Testing of Enterprises • Undertake a detailed study on how water is used in the site and introduce water efficient technology into production process <p>Nalco develops water stewardship plans every year. By reviewing the water stewardship of 2022 provided by the site, we found separate targets, required actions, measurement, status, effectiveness evaluation, accountable and deadline, etc. has been defined.</p> <p>Several projects to improve water balance have been implemented which were linked to the targets in the water stewardship plan, such as: collect and use rainwater as production water, reuse process wastewater to improve the utilization efficiency of fresh water, wastewater reuse, etc.</p> <p>Nalco has set the target of water consumption per unit product and evaluated its performance every month. At the same time, the site also continues to track the progress of water balance targets in its water stewardship plan.</p>	<p> Yes</p>
3.9.3	<p><i>Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.</i></p>	<p> Yes</p>
Comment	<ul style="list-style-type: none"> • Wastewater is transported through visual pipe network to avoid environmental pollution caused by potential wastewater leakage • The site introduced a wastewater reuse system in 2022, which uses RO membrane treatment device to treat the wastewater and then reuse it to the production process to reduce the discharge of wastewater • For internal control, Nalco has defined the stricter discharge limits for COD and T-P emission concentration of wastewater pollutants, COD: emission permit 500ppm; Internal control index: 480ppm T-P: emission permit 5ppm; Internal control index 4.5ppm • The site has installed an online monitoring system to monitor the COD concentration of discharged wastewater in real time • Every 100m³ of waste water is discharged, the factory will conduct internal monitoring on the main pollutants (such as COD, T-P, N-NH₃, PH) in it (about twice a day) 	<p> Yes</p>
3.9.4	<p><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></p>	<p> Yes</p>
Comment	<p>The site entrusted a property management company to manage and maintain the greening in the site area, and signed a contract with it</p> <p>Domestic wastewater and industrial wastewater are transported through visual pipe network to avoid pollution of groundwater and soil</p> <p>The site regularly monitors the rainwater in the site (a third party laboratory is entrusted to sample and test the rainwater every month), and samples and tests the rainwater outlet on its own every time it rains</p> <p>Regularly monitor the soil and groundwater in the site (entrust a third party laboratory)</p>	<p> Yes</p>
3.9.5	<p><i>Actions towards achieving best practice related to targets in terms of WASH shall be implemented.</i></p>	<p> Yes</p>

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Comment The site entrusts a third-party cleaning service unit to carry out the daily cleaning and maintenance of the site, and the site evaluates the performance of cleaning personnel every month.

 The site entrusts the supplier to regularly maintain the water dispenser, including inspection, disinfection, filter element replacement, etc. The site also conducts drinking water testing in 2022, and the testing results are all in compliance.

 Nalco also conducts WBCSD self-assessment to evaluate the level of onsite WASH.

 Nalco investigates the distribution of drinking water points and toilet facilities within the site, and analyses the adequacy of these facilities based on the standards WBCSD and "GBZ1-2010Hygienic standard for the design of industrial enterprises"

 The site collects employees' feedback on their work environment and WASH adequacy through various channels. For example, the site carries out "HUMU Engagement Survey" for all employees every year to collect feedback from employees and follow up the feedback content accordingly.

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4 STEP 4: EVALUATE - Evaluate the site's performance.		
4.1	<i>Evaluate the site's performance in light of its actions and targets from its water stewardship plan and demonstrate its contribution to achieving water stewardship outcomes.</i>	
4.1.1	<i>Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.</i>	✔ Yes
Comment	<p>The site specifies the requirements of evaluating site performance and its contribution to achieving water stewardship results based on the objectives of the water stewardship plan.</p> <p>The water management plan states that each objective can be associated with several main outcomes of the standard. Each objective has defined good practices, actions, targets, cost/benefit, desired outcomes, responsible party, partners, start date, end date, status and priority. This design makes it possible to identify the progress of each objective, and as it is updated every year, it is possible to identify its contribution and compare it with the established deadlines.</p>	
4.1.2	<i>Value creation resulting from the water stewardship plan shall be evaluated.</i>	✔ Yes
Comment	<p>The site analysed its value creation resulting from the implementation of water stewardship plan, especially the implementation of water-saving projects.</p> <p>For example, rainwater reuse project, this project may save water 11550 tons/year, and save about 35000 RMB per year.</p>	
4.1.3	<i>The shared value benefits in the catchment shall be identified and where applicable, quantified.</i>	✔ Yes
Comment	<p>1. Provide knowledge sharing to supply chain in and outside the catchment to pay attention to or carry out AWS, enhance their understanding of AWS, and provide support for suppliers in AWS management activities.</p> <p>2. From 2019 to 2021, the amount of water consumed per unit product was gradually reduced, so the available water amount of outside water use units is increased.</p>	
4.2	<i>Evaluate the impacts of water-related emergency incidents (including extreme events), if any occurred, and determine the effectiveness of corrective and preventative measures.</i>	
4.2.1	<i>A written annual review and (where appropriate) root-cause analysis of the year's emergency incident(s) shall be prepared and the site's response to the incident(s) shall be evaluated and proposed preventative and corrective actions and mitigations against future incidents shall be identified.</i>	✔ Yes
Comment	<p>The site presents its emergency response procedure and plan identifying proposed preventive and corrective actions, as well as measures to mitigate future incidents.</p> <p>No water-related emergencies and extreme events occurred at the site in recent years.</p>	
4.3	<i>Evaluate stakeholders' consultation feedback regarding the site's water stewardship performance, including the effectiveness of the site's engagement process.</i>	
4.3.1	<i>Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.</i>	✎ in progress
Comment	<p>The factory did not communicate with stakeholders about the performance of water stewardship plan at the site and had requested them to review and provide their written comments on the site's performance.</p>	

Finding No: TNR-003732

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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.*



Yes

Comment Nalco has developed a 'AWS Management Manual', which specifies that its water stewardship plan shall be modified and adapted to incorporate any relevant information and lessons learned from the evaluations annual.

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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.* ✔ Yes

Comment The site disclosed the site's internal governance in relation to water, communication on sustainable water management issues on its company website: <https://www.ecolab.com.cn/-/media/ecolab/ecolab-home/images/news/gc-2023/enterprise-water-management-commitment.pdf>

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.* 🚩 in progress

Comment The site disclosed the site's water stewardship in following ways:
Company website: <https://www.ecolab.com.cn/-/media/ecolab/ecolab-home/images/news/gc-2023/enterprise-water-management-commitment.pdf>

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5.3 *Disclose annual site water stewardship summary, including: the relevant information about the site's annual water stewardship performance and results against the site's targets.*

5.3.1 *A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.* ✔ Yes

Comment The site disclosed the water stewardship performance annually, including quantified performance against targets on the company website: <https://www.ecolab.com.cn/-/media/ecolab/ecolab-home/images/news/gc-2023/enterprise-water-management-commitment.pdf>

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

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

Comment The site disclosed the effort to address shared water challenges on the company website: <https://www.ecolab.com.cn/-/media/ecolab/ecolab-home/images/news/gc-2023/enterprise-water-management-commitment.pdf>

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

Comment Except for formal disclosure, the site did not communicate with stakeholders in a proactive and other understandable manner about their efforts to address shared water challenges.




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

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5.5.1	<i>Any site water-related compliance violations and associated corrections shall be disclosed.</i>	 Yes
Comment	A procedure to manage non-conformance and related corrective action is developed, there is no e water-related compliance violation identified in past few years.	
5.5.2	<i>Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.</i>	 Yes
Comment	A procedure to manage non-conformance and related preventive action is developed, there is no e water-related compliance violation identified in past few years.	
5.5.3	<i>Any site water-related violation that may pose significant risk and threat to human or ecosystem health shall be immediately communicated to relevant public agencies and disclosed.</i>	 Yes
Comment	A procedure to manage non-conformance and related corrective action is developed, any site water-related violation that may pose significant risk and threat to human or ecosystem health is required to immediately communicated to relevant public.	

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Photographic Evidence from Audit

✔
Yes



Rain water discharge point.JPG



Purifera water system flow chart.JPG



Purifera water system (4).JPG

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Water meter.JPG



Wastewater treatment plant.JPG



Purifera water system (3).JPG



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Waste water discharge point.jpg