

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)



Audit Number: AO-000377

SITE DETAILS

Site: **Nestle Waters - Dammam**

Address: 66th Street, Second Industrial City, 34325, Dammam, SAUDI ARABIA

Contact Person: Bader Banat

AWS Reference Number: AWS-000490

Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Core

Date of certification decision: 2023-Jun-12

Validity of certificate: 2026-Jun-12

AUDIT DETAILS

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

Audit Type(s): Initial Audit

Audit Start Date: 2022-Nov-01

Lead Auditor: Alicia Dauth

Audit team participants:

Rayan Mofareh, Local Auditor

Warrick Stewart, Other

Site Participants:

Hero Eduardo Salva, SSHE Officer

Ali Juma, Quality manager

Luay Al Jammal, Factory Manager

Bader Banat, Water Treatment Head

Tarik Busbate, Jadawell Water Factory

Homan AlAtrash, Production Head

Mohammad Abu Diah, FE

Shadi Al Absi, Supply Chain Head

Ahmad Allidani, Assistant Financial Controller

Saben Al Otaib, QA Engineer

AUDIT TIMES

Dates	Audit from	Duration	Auditor	Description
2022-Nov-01	00:00:00 - 00:00:00	00:00	Alicia Dauth	

WSAS

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

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ADDITIONAL INFO

Summary of Audit Findings: A total of 51 findings were raised during the certification audit: 5 major non-conformities and 30 minor non-conformities. Also 16 observations were raised.

The major non-conformities were of sufficient concern to warrant the categorisation of the non-conformity as major and related to

- Identification of all applicable water-related legal and regulatory requirements and verifying compliance with them;
- Clear quantifiable water balance targets given the water scarcity challenge;
- Identification of best practices to guide the site's water stewardship activities;
- key elements of disclosure and consultations in steps 4 (evaluate) and 5 (communicate and disclose).

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 02 April 2023.

The major non-conformities must be sufficiently addressed and evidence submitted to WSAS within 90 days of receipt of the report by 02 May 2023.

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

The audit team recommends certification of Nestle Waters - Dammam Food & Beverage Production 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-conformity and submitted the corrective action plan addressing all findings.

Proof of implementation has been requested for the Minors and this will be evaluated during the Surveillance Audit. The client is requested to upload evidence of implementation prior to the Surveillance Audit.

Scope of Assessment: The scope of services covers the Initial certification audit for assessing conformity of Nestle Waters Dammam, against the AWS International Water Stewardship Standard Version 2.0.

Nestle Waters Dammam, previously known as Springs Water Factory, is located in the Eastern Province of The Kingdom of Saudi Arabia, in the Second Industrial City, approximately 30 kilometers south of Dammam and 20 kilometers west of Al Khobar.

The Nestle Waters facility is a rented property with aged infrastructure requiring upgrades to facilitate the factory demands and increase the water efficiency throughout its services.

The water source for the second industrial city (where Nestle is situated) comes from the Dammam aquifer. The groundwater in these aquifers is non-renewable or 'fossil' water, which was formed approximately 10 to 32 thousand years ago.

The audit was conducted onsite on 1 - 3 November 2022.

The onsite site visit included the assessment of the Nestle Waters Dammam bottling facility that was visited onsite as part of the audit.

The following external stakeholders were interviewed during the audit: ICDOC, Modon and Jadwell Health Water Factory, directly next door to Nestle Waters.

FINDINGS

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NUMBER OF FINDINGS PER LEVEL	
Observation	16
Minor	30
Major	5

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FINDING DETAILS

Finding No:	TNR-003117
Checklist Item No:	1.1.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Checklist item:	The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including: <ul style="list-style-type: none">- Site boundaries;- Water-related infrastructure, including piping network, owned or managed by the site or its parent organization;- Any water sources providing water to the site that are owned or managed by the site or its parent organization;- Water service provider (if applicable) and its ultimate water source;- Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies;- Catchment(s) that the site affect(s) and is reliant upon for water.
Findings:	<ul style="list-style-type: none">- The site's identification of the relevant aquifer's sections or layers and their mapping is not sufficient, when this information needs to be clearly understood given the aquifer suffers from over-abstraction.- Surface water catchment has not been defined. Ultimate wastewater discharge points and ultimate receiving water body is unknown as the information was requested from ICDOC and has not been provided to Nestle waters or during the stakeholder meeting.
Corrective action:	Identify more relevant map to match the standard requirements. (Mapping will cover Both surface water and ground water, if the info was accessible)
Evidence of implementation:	Still on going. Planned to be completed before the surveillance audit.

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Finding No:	TNR-002897
Checklist Item No:	1.2.1
Status:	Open
Finding level:	Observation
Checklist item:	<p>Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall:</p> <ul style="list-style-type: none">- Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people;- Consider the physical scope identified, including stakeholders, representative of the site’s ultimate water source and ultimate receiving water body or bodies;- Provide evidence of stakeholder consultation on water-related interests and challenges;- Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups;- Identify the degree of stakeholder engagement based on their level of interest and influence.
Findings:	<p>Identified stakeholders are limited to local businesses and are all located in close vicinity. The site should expand stakeholder identification to consider regulators and other stakeholder groups. As the site's understanding of the ultimate receiving body as well as aquifer as the source of water expands, the site should also better consider stakeholders representative of these water bodies and catchments.</p>
Finding No:	TNR-002898
Checklist Item No:	1.3.1
Status:	Open
Finding level:	Observation
Checklist item:	<p>Existing water-related incident response plans shall be identified.</p>
Findings:	<p>The emergency response plan is insufficiently clear how the risks of water related incidents are captured.</p>

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Finding No:	TNR-003159
Checklist Item No:	1.3.3
Status:	In Progress - CA plan approved
Finding level:	Minor
Checklist item:	Site water balance, inflows, losses, storage, and outflows, including indication of annual variance in water usage rates, shall be quantified. Where there is a water-related challenge that would be a threat to good water balance for people or environment, an indication of annual high and low variances shall be quantified.
Findings:	The water balance does not include analysis of the annual variance. The water balance assumes that any water that does not go into product, is discharged as wastewater, however the site has a cooling tower where losses occur: losses in the cooling tower appear to be calculated but do not correctly feature in the balance.
Corrective action:	Update the water map - mass balance (water balance) to show all details of water consumption and out puts
Evidence of implementation:	Action still in progress, aquassay project on final stages.
Finding No:	TNR-002353
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:	There was no record available for us to view on the water related costs to include updates, water storage tanks and so on.
Corrective action:	Send annual water related costs & revenues. Awaiting the final report which was mentioned to have a description of the quantification of the social, cultural, environmental, or economic water related values generated by the site i.e. how they are ensuring their water is affordable to all as they take a large amount of deep well water and sell it for a profit.
Evidence of implementation:	This was discussed during the audit with WSAS audit team and Nestle Process of implementing the actions will be done by 1st of august.
Finding No:	TNR-002899
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:	There is no confidential way for employees to give their feedback on the adequacy of the WASH facilities (for example how can the female workforce provide any concerns if a mostly males in leadership roles)

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Finding No:	TNR-002900
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 embedded water for the plastic pellets or plastic bottles, caps, plastic cling film etc.. is not documented.
Corrective action:	Complete the data collection from all suppliers
Evidence of implementation:	Planned to be completed by October 2023 (from 3rd party) (Preform suppliers, Celling film, Carton, PET bottle Caps, layer pad, strap, handle applicator, stretch film, interlayer pad)
Finding No:	TNR-002354
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:	The understanding of embedded water use of services needs improvement: it is not clear if all outsourced services were considered whilst water use on site, even though it is not for production, should not be considered embedded water use.

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Finding No:	TNR-002902
Checklist Item No:	1.5.1
Status:	In Progress - CA plan approved
Finding level:	Minor
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:	Nestle is aware of national strategies and plans however, they have only referenced ICDOC for the existing governance. As ICDOC should align with national and regional strategies, the site needs to review governance holistically.
Corrective action:	Create water governance program to understand the potential impact, of any intended new plans and policies on our operations.
Evidence of implementation:	Water Governance needs huge efforts by the team and needs strong relation with governmental body. Our team is working to build the good connection with ministry of Environment, Water and Agriculture. We have done some, but full alignment needs time.

Note: we have referenced ICDOC (municipality), MODON (local authority) and we are adding NCEC and MEWA to the loop of water governance program.

Based on attached Saudi National Water strategy 2030 (available in Arabic only), standards created by MEWA to better control the water subject in the kingdom. I also attached standards and specifications for water which published by MEWA to align all water users with the National Strategy. "Water system" project also attached.

Finding No:	TNR-002355
Checklist Item No:	1.5.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Checklist item:	Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.
Findings:	Nestle need a better understanding of national water regulations to protect water bodies and conservation areas from pollution, there is only an understanding of ICDOC's requirements but how does this fit in to the National context for water related regulatory requirements (i.e. National Water Strategy and Water Law)? A list of environmental and/or water related articles as relevant to Nestle has not been provided.
Corrective action:	1- Documents already submitted showing that we have a full understanding of regulation requirements. 2- Review national water regulation and match it with our standards (refer to newly received Environmental Logbook). 3- More clarifications about environmental logbook (check page 17-40) regulations have been mentioned and clearly identified.
Evidence of implementation:	Documents are in place.

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Finding No:	TNR-002356
Checklist Item No:	1.5.3
Status:	Open
Finding level:	Observation
Checklist item:	The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.
Findings:	Given the apparent water scarcity in the aquifer, it is concerning that there is a poor understanding of the catchment's water balance. It is understood there is a challenge to obtain the data necessary for a better evaluation of the water balance but the site should continue to strive to do it.
Finding No:	TNR-002903
Checklist Item No:	1.5.4
Status:	In Progress - CA plan approved
Finding level:	Minor
Checklist item:	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.
Findings:	Surface water quality identification is insufficient: only lake Modon's physical parameters were made available without interpretation, and there was no identification of chemical or biological water quality in the lake.
Corrective action:	Collect Sample and send it for chemical & biological analysis
Evidence of implementation:	Actions was done during Antea study but not shared with auditor due to incompleteness of study report and others still planned.

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Finding No:	TNR-002357
Checklist Item No:	1.5.5
Status:	In Progress - CA plan approved
Finding level:	Minor
Checklist item:	Important Water-Related Areas shall be identified, and where appropriate, mapped, and their status assessed including any threats to people or the natural environment, using scientific information and through stakeholder engagement.
Findings:	IWRA identification, mapping and status assessment are incomplete: only lake Modon and ditches are identified as IWRAs but their status is not assessed - the status assessment is a major gap. There are most likely other IWRAs in the catchment as well – the identification needs to consider the catchment boundaries.
Corrective action:	Identify more IWRA and assess the current status of existed IWRA
Evidence of implementation:	<p>More clarifications, identifications and actions will be in place within this year plan.</p> <ul style="list-style-type: none">- Existence of water wells in the factories surrounding the Nestlé site are more than probable. As no access was possible and due to the restriction specified by MODON, no characteristics of these wells were obtained.- No public database with the well performances is consultable.- As deemed very sensitive, no documentation information will be shared by MODON on the wells existing within the Industrial City.- No measurements are available for water wells owned by private companies in the surrounding of the factory.
Finding No:	TNR-002954
Checklist Item No:	1.5.6
Status:	In Progress - CA plan approved
Finding level:	Minor
Checklist item:	Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.
Findings:	<p>There is just a generic description of water supply and wastewater-related infrastructure but no identification of its condition and potential exposure to extreme events. There is also no identification of infrastructure for stormwater.</p> <p>It is concerning that there is no plan on how the factory will mitigate existing infrastructure for extreme weather events to prevent contaminated surface runoff from entering the environment.</p>
Corrective action:	Engage more with the SH to get info on water related infrastructure and then build a plan "on how the factory will mitigate existing infrastructure for extreme weather events to prevent contaminated surface runoff from entering the environment"
Evidence of implementation:	We will work to develop the plan on catchment level.

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Finding No: TNR-002956
Checklist Item No: 1.5.7
Status: In Progress - CA plan approved
Finding level: Minor
Checklist item: The adequacy of available WASH services within the catchment shall be identified.
Findings: Information provided for this indicator by the site refers to generic information about infrastructure but provides very little information on adequacy of available WASH services in the catchment.
Corrective action: Build data base for infrastructure at the catchment level and follow WASH guidance.
Evidence of implementation: We will proceed with more data collection. So far, we can't get any info unless we have a permission for the government, or it's already published.

Finding No: TNR-002809
Checklist Item No: 1.7.1
Status: Open
Finding level: Observation
Checklist item: Water risks faced by the site shall be identified, and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.
Findings: The identification should further consider accounting for extreme events caused by climate change and the impact it could have on their business.

Finding No: TNR-003164
Checklist Item No: 1.8.1
Status: In Progress - CA plan approved
Finding level: Minor
Checklist item: Relevant catchment best practice for water governance shall be identified.
Findings: The best practice identification needs to be redone. There are clearly governance challenges at the aquifer level and at the surface water catchment level - what would be best practice at this catchment context in order to make this situation better?
Corrective action: 1- Add CRP 3.0 tool as an action to " Water governance best practice". We are using this tool to manage the relationship and water governance action plan on a yearly basis.
2- Identify the Water regeneration projects to address the water challenges at the catchment level. On this part, the team are working with governmental side to initiate project to save and manage the water balance at the catchment.
"Advocating for integrated water governance at the catchment level, including supporting coordination among relevant institutions"
Evidence of implementation: CRP 3.0 action plan list + WSP
New:
Meetings with MEWA and Sekaya

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Finding No:	TNR-003163
Checklist Item No:	1.8.2
Status:	Closed
Finding level:	Minor
Checklist item:	Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.
Findings:	Identified best practices only concern the site's water balance and only site's actions that have been implemented already. However, there is nothing about best practice for catchment water balance when there is a challenge of obtaining information and a clearer evaluation of the aquifer's quantitative status when it is known that the aquifer is overabstracted. The best practice identification for water balance needs to be redone - what would be best practice at this catchment in order to make this situation better?
Corrective action:	<p>1- Build water regeneration plan</p> <p>2- Add list of SHs with the plan to exchange experience (1.8.2)</p> <p>3- Train workers on how to improve efficiency in the work they do, and on basic daily activities and add the subject under "fit to win program" to improve their level of awareness (Under name of Water Stewardship Training).</p> <p>another new corrective actions uploaded.</p>
Evidence of implementation:	Water Balance best practices has been identified as water regeneration project for now, as mentioned in indicator 1.8.1. Plan also to identify more best practices in place.
Finding No:	TNR-003165
Checklist Item No:	1.8.3
Status:	Closed
Finding level:	Major
Checklist item:	Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.
Findings:	Identified best practices for water quality are limited and do not sufficiently reflect the information gathered in the rest of step 1. Findings raised earlier in step 1 also need to be considered when responding to this finding.
Corrective action:	<p>1- Project was planned in water regeneration journey: Enhancing wastewater management and reuse in industrial cities.</p> <p>2- Provide ICDOC or MODON processes against wastewater treatment. (https://modon.gov.sa/en/MediaCenter/publications/Pages/SustainabilityReports.aspx)</p> <p>New Actions: Summarize the current Water Quality Best Practices & Identify new ones.</p>
Evidence of implementation:	<p>- Plan in place</p> <p>- Water Quality best practices have been summarized</p> <p>- Proposal of planned best practice. (SCALBAN)</p>

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Finding No:	TNR-002358
Checklist Item No:	1.8.4
Status:	In Progress - CA plan approved
Finding level:	Minor
Checklist item:	Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.
Findings:	No best practices related to IWRAAs was identified to support this indicator.
Corrective action:	1- Share the best practice that we apply at our IWRA (Deepwell) - Note that Catchment IWRA data was not shared by government " Confidential data and wasn't accessible ". 2- Monitor the water quality of MODON lake by taking samples to be analyzed on yearly basis.
Evidence of implementation:	Implementation has been summarized in the presentation. Part of MODON LAKE water analysis has been done during Antea study (Page 82)
Finding No:	TNR-003166
Checklist Item No:	1.8.5
Status:	Closed
Finding level:	Minor
Checklist item:	Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.
Findings:	The only best practice identified for WASH is an awareness session to Philippines secondary school by inviting them to the site, done in 2017. This does not cover the intent of best practice identification on WASH - please refer to the guidance.
Corrective action:	Align Current practices with new and innovative approaches..
Evidence of implementation:	will be submitted in surveillance audit.

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Finding No:	TNR-002359
Checklist Item No:	2.1.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Checklist item:	A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments: <ul style="list-style-type: none">- That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes- That the site implementation will be aligned to and in support of existing catchment sustainability plans- That the site's stakeholders will be engaged in an open and transparent way- That the site will allocate resources to implement the Standard.
Findings:	The commitment was posted on screens throughout the factory but has not been shared externally, therefore the requirement of public disclosure has not been met.
Corrective action:	1- Update SWP and SWAY presentation and disclose it with Stakeholders. 2- Collect the feedback from SH on WSP.
Evidence of implementation:	https://sway.office.com/GnmjCrJQDTSW36oj?ref=Link
Finding No:	TNR-002957
Checklist Item No:	2.2.1
Status:	Open
Finding level:	Observation
Checklist item:	The system to maintain compliance obligations for water and wastewater management shall be identified, including: <ul style="list-style-type: none">- Identification of responsible persons/positions within facility organizational structure- Process for submissions to regulatory agencies.
Findings:	Along with the review of applicable regulations, a clear description of the roles and responsibilities should be developed.
Finding No:	TNR-003167
Checklist Item No:	2.3.1
Status:	Open
Finding level:	Observation
Checklist item:	A water stewardship strategy shall be identified that defines the overarching mission, vision, and goals of the organization towards good water stewardship in line with this AWS Standard.
Findings:	The strategy would benefit from being more Damman-specific.

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Finding No:	TNR-003168
Checklist Item No:	2.3.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Checklist item:	<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.
Findings:	<ul style="list-style-type: none">- Whilst the actions have quantified estimated achievement and have timelines, the objectives are not quantified and their timelines are not indicated. E.g. there is an objective on improving the water ratio at the site but no indication of how much it should be improved and by when.- Target/estimated achievement and success criteria KPI do not match each other for part of the plan. <p>Quantification and timelines should be separated for objectives and for actions, especially where there are several actions contributing to an objective</p>
Corrective action:	<p>1- Target clearly identified in WSP and deadline</p> <p>2- Add Water Ratio targets</p>
Evidence of implementation:	WSP + Communication plan + Achievement Summary
Finding No:	TNR-003169
Checklist Item No:	2.4.1
Status:	In Progress - CA plan approved
Finding level:	Minor
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>There was no plan available for the mitigation of risks. Nestle has started brief discussion with ICDOC on mitigation and response for water related risks and emergencies however, this was not in the form of a plan.</p>
Corrective action:	<ul style="list-style-type: none">- Collect and submit the official procedure / Plan- Update Risk Assessment.- Push for public sector engagement.
Evidence of implementation:	<p>The requirement of the standard translated to different documents at our site to comply with local (MEWA) & International (ISO & Nestle) standards.</p> <ul style="list-style-type: none">- Water Quality Agreement with ICDOC.

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Finding No:	TNR-002361
Checklist Item No:	3.1.2
Status:	Open
Finding level:	Observation
Checklist item:	Measures identified to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be implemented.
Findings:	Nestle need to acquire a better understanding of water needs and rights. As a majority of woman are working in the HOD operations their water needs should be clearly understood.
Finding No:	TNR-002958
Checklist Item No:	3.2.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Checklist item:	A process to verify full legal and regulatory compliance shall be implemented.
Findings:	No legal and regulatory compliance tracker available. Nestle needs to look beyond what ICODC requires and understand the regional and national requirements and how operations of Nestle either comply or not with them.
Corrective action:	1- All documents submitted during the audit & we added more. 2- Add the tracker for legal and regulatory compliance to evidence under this indicator.
	New 1. Legal & Other Requirements Register: Make a new/separate legal register intended for water-related legal requirements (MEWA & NCEC) and any identified KSA Regulatory Agency (national, provincial, local). To include license/permit validity status of key legislation if applicable. 2. Verification of LOR Register: Make a new/separate LOR Verification Register intended for water-related legal requirements and to include the compliance/action plan by assessing the relevant legal requirements, regulations as mentioned in MEWA & NCEC to ensure that all identified requirements are evaluated and understood in terms of current legislation. 3. FQHSE-OP_61-03 Legal & other requirements procedure: Status of revision will be included on the new legal register. 4. Environmental Logbook 2022-2025 (Study): Logging system when it comes to updates of the above Saudi Arabia regulatory agency will be included in the register.
Evidence of implementation:	Tracker and procedure are clearly identified.

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Finding No: TNR-002959
Checklist Item No: 3.2.2
Status: Open
Finding level: Observation
Checklist item: 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.
Findings: Nestle to revisit once the legal and regulatory requirements are fully evaluated.

Finding No: TNR-002960
Checklist Item No: 3.3.1
Status: Closed
Finding level: Minor
Checklist item: Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.
Findings: The WSP has several objectives set to result in outcomes to achieve a good water balance. However these objectives are separate actions with the targeted savings for each separate action, whilst the overall target of what water use ratio or the total volume of water abstraction the site wants to achieve, is not clear in the WSP.
Corrective action: Add WR theoretical calculation by PTC and WR target for Dammam
Evidence of implementation: All documents are available now and summary presented as evidence.

Finding No: TNR-003170
Checklist Item No: 3.3.2
Status: Closed
Finding level: Major
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: The WSP does not have clarity on the overall target (and performance) on the water use ratio or the total water abstraction. As there is a clear water scarcity challenge, a clear quantified target is needed.
Corrective action: 1- Target clearly identified in WSP
2- Add Water Ratio targets to WSP
Evidence of implementation: All evidences are available now.

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Finding No: TNR-002362
Checklist Item No: 3.5.1
Status: In Progress - CA plan approved
Finding level: Minor
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: No practices set in the WSP to enhance the site's IWRAs
Corrective action: 1- Water resources study in place
2- Implement Online (Aquassay monitoring tool installed) to monitor well parameters.
Evidence of implementation: Objective number 19 and 2

Finding No: TNR-002961
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: Improvement required for WASH facilities to include needs of the female workers

Finding No: TNR-002363
Checklist Item No: 3.6.2
Status: In Progress - CA plan approved
Finding level: Minor
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: At this time there is no evidence to support this other than the water regeneration program which aims to 'replace' the water. Details to be specific and the report to be provided when available.
Corrective action: create standard or policy to cover Human rights to access safe water and sanitation
Evidence of implementation: no evidence available for now.

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Audit Number: AO-000377

Finding No:	TNR-002364
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:	Little evidence on engagement with suppliers and services providers of indirect water use (only looked into the car wash providers) but also to create a list of suppliers who may be relevant for indirect water use consideration
Corrective action:	To engage with service provides and suppliers on how they account and understand indirect water use.
Evidence of implementation:	still planned. The list here from the suppliers who already responded.
Finding No:	TNR-002365
Checklist Item No:	3.8.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Checklist item:	Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.
Findings:	No evidence of engagement and key messages on concerns on shared water-related infrastructure.
Corrective action:	Create the key message about the concerns on share water related infrastructure.
Evidence of implementation:	Planned but we have submitted evidences of engagement with SH
Finding No:	TNR-002962
Checklist Item No:	3.9.1
Status:	Open
Finding level:	Observation
Checklist item:	Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.
Findings:	Antea study results to be summarized and shared with stakeholders. This indicator is to be revisited after best practice identification is revised.
Finding No:	TNR-002963
Checklist Item No:	3.9.2
Status:	Open
Finding level:	Observation
Checklist item:	Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.
Findings:	This indicator is to be revisited after best practice identification is revised.

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Finding No:	TNR-002964
Checklist Item No:	3.9.3
Status:	Open
Finding level:	Observation
Checklist item:	Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.
Findings:	Monitoring of sampled effluent to be tracked and reviewed annually to ensure Nestle compliance. This indicator is to be revisited after best practice identification is revised.
Finding No:	TNR-002367
Checklist Item No:	3.9.4
Status:	In Progress - CA plan approved
Finding level:	Minor
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:	No best practice evidence for IWRA maintenance was provided.
Corrective action:	Initiate best practice of IWRA maintenance.
Evidence of implementation:	Still Planned
Finding No:	TNR-002368
Checklist Item No:	3.9.5
Status:	In Progress - CA plan approved
Finding level:	Minor
Checklist item:	Actions towards achieving best practice related to targets in terms of WASH shall be implemented.
Findings:	No best practice evidence for WASH was provided other than the upgrades of the facilities. There is also a limited way for ladies to communicate their concerns relating to WASH so it needs to be improved to have a confidential way for them to communicate their concerns.
Corrective action:	Identify WASH best practices to align with the new WASH guidance and share the communication channel with ladies
Evidence of implementation:	Planned
Finding No:	TNR-002965
Checklist Item No:	4.1.1
Status:	Open
Finding level:	Observation
Checklist item:	Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.
Findings:	The performance evaluation needs to show clearer quantification in line with the set KPIs.

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Audit Number: AO-000377

Finding No:	TNR-002369
Checklist Item No:	4.1.3
Status:	In Progress - CA plan approved
Finding level:	Minor
Checklist item:	The shared value benefits in the catchment shall be identified and where applicable, quantified.
Findings:	The shared value benefits in the catchment will require implementation. Everything that is happening currently is on a site basis. The site has a lot of work to do in the catchment across all indicators in terms of contributing to best practice/shared water challenge.
Corrective action:	Water Regeneration Project will allow us to address this indicator (Project will be defined on catchment level)
Evidence of implementation:	planned
Finding No:	TNR-002370
Checklist Item No:	4.2.1
Status:	In Progress - CA plan approved
Finding level:	Minor
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:	No information has been provided on the actual environment incidents from 2021 other than the violation from ICDOC
Corrective action:	To enhance the water incident form to respond a preparedness plan to consider the environmentally based emergencies
	Note: Information has been provided to the auditor , please check evidence of implementation attachments.
Evidence of implementation:	Planned

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Audit Number: AO-000377

Finding No:	TNR-002371
Checklist Item No:	4.3.1
Status:	Closed
Finding level:	Major
Checklist item:	Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.
Findings:	No evidence has been provided of consultation efforts with stakeholders on the site's water stewardships performance
Corrective action:	1- Update WSP , performance and SWAY presentation and disclose it with Stakeholders. 2- Collect the feedback from SH on WSP and performance.
Evidence of implementation:	SWAY Presentation including QR code for their feedback was sent recently. (Collect feedback from SH is in progress) we still waiting the feedback from stakeholders on our stewardship performance. (The attached Presentation has screenshot of email sent to considered person + QR code + line to SWAY) the email body text already shows that we need their feedback on our performance.
Finding No:	TNR-002821
Checklist Item No:	4.4.1
Status:	Open
Finding level:	Observation
Checklist item:	The site's water stewardship plan shall be modified and adapted to incorporate any relevant information and lessons learned from the evaluations in this step and these changes shall be identified.
Findings:	The WSP is new and will require a system to ensure it is updated on a regular basis
Finding No:	TNR-002372
Checklist Item No:	5.1.1
Status:	Closed
Finding level:	Minor
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 request to disclose has been done but disclosure has not happened yet.
Corrective action:	Update the Sway presentation and send it to SH for disclosure purposes
Evidence of implementation:	Shared with SH and publicly disclosed (https://www.nestle-mena.com/en/water-stewardship-performance)

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Finding No:	TNR-002143
Checklist Item No:	5.2.1
Status:	Closed
Finding level:	Major
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 WSP was not shared with the relevant stakeholders. It was only communicated to the stakeholders at a high level what the AWS standard is but the discussion on how this would be achieved, what are the targets and actions, and who are the contacts within Nestle was not disclosed.
Corrective action:	Communicate the WSP to the relevant stakeholders.
Evidence of implementation:	Emails has been sent to SHs and SWAY presentation has been created to allow us to share our progress with SHs.
Finding No:	TNR-002145
Checklist Item No:	5.3.1
Status:	Closed
Finding level:	Major
Checklist item:	A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.
Findings:	No summary of the site's water stewardships performance was disclosed, this information is in the WSP and it was discussed during the audit that the sensitive data could be fleshed out and the remaining data of the stewardship performance could be disclosed.
Corrective action:	Disclose the relevant summary performance to stakeholders (even if the implementation is new) to show transparency.
Evidence of implementation:	WSP Achievement and Tracking + communication plan + WSP https://www.nestle-mena.com/en/water-stewardship-performance (06/06/2023) -- Public disclosure evidence
Finding No:	TNR-003171
Checklist Item No:	5.4.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Checklist item:	The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.
Findings:	The shared challenges and efforts made to address them have been only discussed with some stakeholders but have not been disclosed.
Corrective action:	Update the Sway presentation and send it to SH for disclosure purposes. New Corrective Action: Plan to hold annual meeting to share water challenges at catchment level with our community.
Evidence of implementation:	Evidences attached

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Finding No:	TNR-002146
Checklist Item No:	5.5.1
Status:	Closed
Finding level:	Minor
Checklist item:	Any site water-related compliance violations and associated corrections shall be disclosed.
Findings:	The violation of effluent quality and associated corrections have not been disclosed. Nestle to disclose their effluent water quality if they exceed or if correction is not managed.
Corrective action:	Already disclosed and correction action submitted and shared with relevant SH

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Report Details

Report	Value
Report prepared by	Alicia Dauth
Report approved by	Neringa Pumputyte
Report approved on (Date)	1 February 2023

Surveillance

Proposed date for next audit
2023-Nov-01

Stakeholder Announcements

Date of publication	Location
27/10/2022	Modon
27/10/2022	ICDOC
27/10/2022	Jadwell
28/09/2022	AWS and WSAS Websites

Comment All interviews were in person at the offices of the stakeholders. NCEC and MEWA were also contacted for stakeholder interviews but did not respond to the email request.

Catchment Information

Catchment Information

Nestle is situated in Dammam, KSA (Eastern Province). Dammam has access to fossil groundwater in sand and limestone formations which are between 150m-1500m (Dammam aquifer), this water source is non renewable but at this time is the sole water resource of raw water for Nestle.

Dammam is on the East coast of KSA and The Arabian Gulf is approximately 25 kilometers East from the second industrial area where Nestle is located. However, Half Moon Bay is less than 20 kilometers away to the South East. Half Moon Bay is located new Khobar city. ICDOC does not discharge into the sea, all effluent water from the industrial area is treated and redistributed for irrigation or industrial operations which can operate with recycled water. Effluent is also treated and used for Modon Lakes, which is the largest industrial lake in KSA.

ICDOC did briefly mention that in the near future a pipe for effluent to the sea may happen but this is pending approval from NCEC who is the environmental regulatory agency in KSA.

The second industrial area does have storm water provisions for any surface runoff, and stormwater discharge is directed to the near nearest ICDOC wastewater treatment plant. ICDOC confirmed they have 4 plants within the industrial area.

Comment It was clear that there is limited understanding of the capacity of the deep well fossil water and risks that can comprise this precious water resource.

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Client Description and Site Details

Client/Site Background

Nestle Waters, formerly known as Springs Waters, is based in the Second Industrial area of Dammam, KSA. Nestle waters provides purified drinking water in 0.2 Liters, 0.6 Liters, 0.33 Liters, 600 mL, 1.5 Liters and 18.9 Liters HOD (Home office delivery) plastic bottles. The water is purified with multiple onsite Reverse Osmosis (RO) treatment systems, utilizing source water from the supplier ICDOC, which withdraws water from the fossil water aquifer via a deep well.

The site is a rented facility of aged infrastructure which does require upgrades to maintain it's current production. Upgrades are required for water efficiency and water loss and WASH.

Summary of Shared Water Challenges




Summary of Shared Water Challenges

The identified shared water challenges are the quality of water from ICDOC to meet production needs and the sustainable use of the fossil water from the deep well.

Comment Nestles water source comes from the deep well aquifer provided from ICDOC. Nestle have an access point to the deep well from their site however, this is likely to be closed and all water distribution will come directly from ICDOC.

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

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.



in progress

Comment

Physical scope total area is 31940 m2. Nestle leases the land & infrastructure which is aged and requires upgrades to sustain the facilities needs, such as the ladies washrooms are not sufficient for the number of female staff.

Nestle has a map of their site boundary to include their one point of wastewater discharge to infrastructure which leads to ICDOC before it is either used for irrigation or is recycled and provided to other industrial factories that can use recycled wastewater. ICDOC would not explain which plants received effluent water from Nestle and little detail was given during the interview on how they manage the industrial area's effluent.





The site is reliant upon water from the deep well provided by the service provider ICDOC but if water can not be sourced from them then Nestle can tap directly into their deep well. However, this may be at risk due to the closure of 'personal' wells. The service provider ICDOC sources water from the deep well (fossil water) only - after ensuring it meets the water quality standards of the client. For example, Nestle had to complain to ICDOC that one of the physical parameters of the provided water was not suitable for their plant so ICDOC had to ensure it met Nestle's expectations by extra filtering. Nestle's own well and ICDOC's well abstract water from the same fossil water aquifer. Dammam aquifer is large and has different sections. The site's identification of the relevant aquifer's sections or layers and their mapping is not sufficient, whilst this information needs to be clearly understood given the aquifer suffers from over-abstraction.

Surface water catchment has not been defined. Ultimate wastewater discharge points and ultimate receiving water body is unknown as the information was requested from ICDOC and has not been provided to Nestle waters or during the stakeholder meeting.

Finding No: TNR-003117

1.2

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

1.2.1	<p><i>Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall:</i></p> <ul style="list-style-type: none"> - <i>Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people;</i> - <i>Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies;</i> - <i>Provide evidence of stakeholder consultation on water-related interests and challenges;</i> - <i>Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups;</i> - <i>Identify the degree of stakeholder engagement based on their level of interest and influence.</i> 	 Obs.
Comment	<p>Using the CRP 3.0 platform Nestle is able to map and weight their stakeholder relevance which is the process they followed to identify the 6 stakeholders.</p> <p>No mapped evidence of the physical scope identified include sites ultimate water source and ultimate receiving water body. Nestle communicated that the ultimate receiving water body location has not been disclosed by ICDOC.</p> <p>ICDOC stated that 75% is for landscaping and 25% for recycled water back into the industrial operators. There was no evidence to support these numbers but this is what was communicated during the stakeholder meeting.</p> <p>Nestle communicated that many initial stakeholders identified were not interested in participating with Nestle and their AWS journey.</p>	
1.2.2	<p><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></p>	 Yes
Comment	<p>The CRP 3.0 platform was used to determine the relevancy of the stakeholders. The number value assigned to each stakeholder was based on their engagement with Nestle.</p>	
1.3	<p><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></p>	
1.3.1	<p><i>Existing water-related incident response plans shall be identified.</i></p>	 Obs.
Comment	<p>Water related risk scenarios for each department but no overall emergency preparedness and response plan available. The site is tracking what has actually happened but each team has their own response plans.</p> <p>The site has also presented an aspect impact register with activities, their aspects and risks; Crisis management product recall procedure document F1HSE-OP-91-01-2.</p> <p>The emergency response plan does not clearly capture the risks of water related incidents.</p>	
1.3.2	<p><i>Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped</i></p>	 Yes
Comment	<p>WaterMap NQAQA SA Dammam shows water flows. Pareto chart is used to show the locations of where water losses occurred.</p> <p>Nestle have targets, which are set every year on the water ratio and the water usage at the factories.</p> <p>The target for the year 2022 is 10,000 m3 saving water. 5 water saving projects have been identified, all having targets of their own reaching a total of 12,462 m3.</p>	

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- 1.3.3** *Site water balance, inflows, losses, storage, and outflows, including indication of annual variance in water usage rates, shall be quantified. Where there is a water-related challenge that would be a threat to good water balance for people or environment, an indication of annual high and low variances shall be quantified.* in progress

Comment SHEPM - Indicators for water and environment tracking system indicators to show consumption year by year
There was no comparison for the water ratios at the end of 2021 and 2022 - there is no sheet compiling 2021 and 2022 data to understand trends, each year is taken separately and is not compared, there is no analysis of the annual variance. This does not allow tracking performance.

The water balance assumes that any water that does not go into product, is discharged as wastewater, however the site has a cooling tower where losses occur: losses in the cooling tower appear to be calculated but do not correctly feature in the balance.

Finding No: TNR-003159

- 1.3.4** *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.* Yes

Comment Water quality of the deep well has been monitored (2017-2021 data for the deep well samples was provided) but there are no historical results for the quality of effluent. Effluent has recently been tested. As more tests are done, data will be compared - this is not available yet.

- 1.3.5** *Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.* Yes

Comment Source of pollution map is available. Routine inspection by the team is carried out to identify any secondary containments which may be comprised (and is noted on a daily basis). List of hazardous chemicals and reagents is available.

- 1.3.6** *On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.* Yes

Comment Deep well is identified as an IWRA on site. A description of its status is available.

- 1.3.7** *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.* No

Comment A partial identified of the costs, revenues and value generated by the site has been provided. It does not include revenue generated from selling of the product (water). The site considers that using the deep well has no costs so when it is being used it is free of cost, however there are costs associated with using it.

Finding No: TNR-002353

- 1.3.8** *Levels of access and adequacy of WASH at the site shall be identified.* Obs.

Comment WASH pledge and Self Assessment Tool for Evaluation access to water, sanitation at the workplace were provided as evidence. The self-assessment resulted in a high score of WASH adequacy. Under 3.6.1 to show the water dispenser station and toilets layouts. Women work only during the day, so a large number of ladies are using during toilets during the day.

The assessor found low grade WASH facilities - not suitable or sufficient for the site and the capacity of the female work force. Photos have been added for reference. However it was evident the site was addressing the issues and planning upgrades, which were about to commence.

1.4	<i>Gather data on the site's indirect water use, including: its primary inputs; the water use embedded in the production of those primary inputs the status of the waters at the origin of the inputs (where they can be identified); and water used in out-sourced water-related services.</i>	
1.4.1	<i>The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be identified.</i>	in progress
Comment	<p>SIPOC diagram - Indirect water used. Nestle indirect embedded water sheet was combined together but did not include a comprehensive list of inputs having embedded water use. E.g. packaging (bottles, cartons, plastic sleeves etc.) were not identified as having embedded water.</p> <p>Nestle mentioned that crates for storage (of input materials) and final products are all steel, not wood or plastic.</p> <p>Nestle do not understand the embedded water in their plastic delivery crates, wooden pallets or purchasing of goods which they use on site.</p> <p style="text-align: right;">Finding No: TNR-002900</p>	
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>	Obs.
Comment	<p>The site has provided indirect and embedded water excel sheet for this indicator. It lists embedded water and indirect water use but this does not account for all outsourced services or raw materials.</p> <p>Bottle washing and domestic use of water on site were included on the list as indirect water use but this is not embedded water - it is direct water use by the site.</p> <p>Nestle enquired from local suppliers for car washing services to understand how they can reduce their water consumption from washing of fleet vehicles. Quotation from car washing service center was issued to Nestle to understand the volumes needed to wash their fleet and the options available for the service depending on the volume of water needed to carry out these frequent services.</p>	
1.5	<i>Gather water-related data for the catchment, including water governance, water balance, water quality, Important Water-Related Areas, infrastructure, and WASH</i>	
1.5.1	<i>Water governance initiatives shall be identified, including catchment plan(s), water-related public policies, major publicly-led initiatives under way, and relevant goals to help inform site of possible opportunities for water stewardship collective action.</i>	in progress
Comment	<p>Water Governance Initiatives are being tracked on the CRP 3.0 which manages stakeholders and neighbors for site and catchment level</p> <p>Water regeneration projects documented by Nestle to do projects in the catchment to save water commitment by Nestle by 2025 is essentially focused to "return all back" and focus on saving water. Nestle to fund projects to save water - Report to come out soon to determine benefactors outlining the projects Nestle will fund to make this happen.</p> <p>Projects that the site could implement are being investigated (Water Regeneration), but no external catchment governance initiatives have been identified (e.g., policies, plans). There has been a recent change in environmental institutional and legal framework, therefore this must be updated and referenced accordingly, but not known in any detail by the site – needs attention to understand the status quo.</p> <p style="text-align: right;">Finding No: TNR-002902</p>	
1.5.2	<i>Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.</i>	in progress

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Comment New contract with ICDOC to ensure water is delivered to Nestle within good quality standards to reduce need for RO.

Regulatory of water all under the government has not been consolidated

Sub consulting work out for their legal framework to understand Nestle's legal obligations - need to collate the legal framework

No permit for deep well for Nestle

ICDOC sends email on when they can not use the well

Modon and ICDOC regulation comes from them and permission to take deep water must come from them

Finding No: TNR-002355

- 1.5.3

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

Q
Obs.
- Comment

The study based on limited data, extrapolations and assumptions, indicates a negative balance. Water levels in the Damman aquifer have been dropping, the aquifer is overexploited. There is a challenge to obtain data necessary for a full quantitative evaluation of the water balance. The study provides details to the lack of information provided (Report 98-110) for the water scarcity to be quantified.
- 1.5.4

Water quality, including physical, chemical, and biological status, of the catchment shall be identified, and where possible, quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be identified.

✗
No

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Comment

The site has an impact on Modon lake via surface water runoff. Modon lake's water has been sampled (not by Nestle), and the test report on physical parameters (pH, TDS and conductivity) was made available to Nestle. However, there is no interpretation what the test results show about the quality and the testing is limited to physical parameters. Biological or chemical water quality for Modon Lake was not provided by Nestle or Modon, further water analysis was required by WSAS during the interview but the information could not be disclosed. Nestle should continue to request Modon lake water quality reports so they can track trends with the overall water quality within Modon.

The Modon lake was constructed from our understanding, to accommodate the surface water retention from the Sabkhas and is supported with canals around the industrial area, the lake was built in 2015 (<https://modon.gov.sa/en/SocialResponsibility/Pages/ModonLake.aspx>) and is used a leisure center for the community.

It would be beneficial if Nestle could propose and implement initiatives with Modon to promote recycling of plastic bottles therefore, reducing plastic waste into surface water which could otherwise pollute the environment. The stakeholder engagement between Modon and Nestle could be strengthened.

High evaporation rates within the Eastern province reduce the chance of water staying on the surface of the site for long. The site is predominantly comprised of impermeable surfaces and Nestle had mentioned that no washing of the floors with pressure washers or hoses is permitted, only cleaning with mops was allowed. Observations of small pools of water (around moto pool) during the physical site overview were recorded therefore, it was assumed that washing or dumping of bucket water is occurring in the site which was a concern for areas where surface contamination for hydrocarbons was noticed. The water could flow to the effluent manholes so could potentially contaminate the effluent water of Nestle.

At the site, no other water quality testing has been done besides raw and product water from Nestle but the initiation of water testing for Nestle's effluent has had it's first test report conducted by Aces.

If further analysis of ultimate receiving body reveals discharge to a water body, its water quality will need to be understood as well.

Finding No: TNR-002903

1.5.5

Important Water-Related Areas shall be identified, and where appropriate, mapped, and their status assessed including any threats to people or the natural environment, using scientific information and through stakeholder engagement.

 in progress

Comment

The information provided is actually a description of the IWRA, not its status, and only lake Modon and ditches are identified as IWRAs - this does not sufficiently consider the catchment.

It is understood ICDOC have not responded to Nestle concerning where water is discharged after it leaves Nestle - this information would be needed for identification of IWRAs. Half Moon bay is the nearest outfall location within the marine environment so it should be understood if Nestle has any influence on marine outfall points.

Finding No: TNR-002357

1.5.6

Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.

 in progress

Comment

The site provided a generic description of water supply and wastewater-related infrastructure but no identification of its condition and potential exposure to extreme events. There is also no identification of infrastructure for stormwater.






Nestle have to get approval from Modon before any modifications to Nestles infrastructure is made as Nestle is only renting the site and the Infrastrucure is old and may not be efficient in energy consumption.

Finding No: TNR-002954

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1.5.7	<i>The adequacy of available WASH services within the catchment shall be identified.</i>	
		in progress
Comment	Information provided for this indicator by the site refers to generic information about infrastructure but provides very little information on adequacy of available WASH services in the catchment. The site approached ICDOC for information and did not obtain it but this information should be sought from other sources - please refer to AWS guidance on WASH. Finding No: TNR-002956	
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	Shared water challenges are described in the presentation provided by the site. Jadwal, Waraq, NALCO, have been identified by Nestle as neighbors who identify with shared water challenges.	
1.6.2	<i>Initiatives to address shared water challenges shall be identified.</i>	
		Yes
Comment	The site has identified existing external initiatives and own initiatives to address shared water challenges.	
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>	
		Obs.
Comment	Water risks have been identified in the presentation provided by the site. The identification should further consider accounting for extreme events caused by climate change and the impact it could have on their business.	
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	DM Factory Opportunities have been identified in the presentation provided by the site.	
	Notes: Forward report for catchment opportunities for November 2022 Water regeneration project (to be shared in full when available) Application of good practices from Nestle sites to replicate other Nestle good practices GSTD a tool used to share performance within all Nestle sites (Goal See think do) GSTD replication initiatives Opportunities have been identified through Nestle Target received from Nestle management, monthly meeting for the water resources team Weekly meeting to check progress of big projects Water risks slide to improve the impact of the risks - for this year 3 opportunities not related to risks Next 2 years will be focused on the water regeneration project Pledge Gaps and Needs document	
1.8	<i>Understand best practice towards achieving AWS outcomes: Determining sectoral best practices having a local/catchment, regional, or national relevance.</i>	

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1.8.1	<i>Relevant catchment best practice for water governance shall be identified.</i>	 in progress
Comment	The site provided information on what kind of actions that have been implemented, can be regarded as best practices. However, the best practice identification exercise is needed to understand what would be best practice at the catchment, for the site to then consider how it can work to contribute to those best practices.	
	Finding No: TNR-003164	
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>	 closed
Comment	Same as 1.8.1 - please see comment there. Identified best practices for water balance only concern the site's water balance. However, there is nothing about best practice for catchment water balance when there is a challenge of obtaining information and a clearer evaluation of the aquifer's quantitative status.	
	Finding No: TNR-003163	
1.8.3	<i>Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.</i>	 closed
Comment	Similar to as 1.8.1 - please see comment there. Identified best practices for water quality are limited and do not sufficiently reflect the information gathered in the rest of step 1.	
	Finding No: TNR-003165	
1.8.4	<i>Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.</i>	 in progress
Comment	The only best practice identified on IWRA is water resources study but it is understood the water resources study aimed to understand the water balance and did not cover IWRAs. No other information was provided to support this indicator.	
	Finding No: TNR-002358	
1.8.5	<i>Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.</i>	 closed
Comment	The only best practice identified for WASH is an awareness session to Philippines secondary school by inviting them to the site, done in 2017. This does not cover the intent of best practice identification on WASH - please refer to the guidance.	
	Finding No: TNR-003166	

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. 	 in progress
Comment	The commitment was posted on screens throughout the factory but has not been shared externally.	
	Finding No: TNR-002359	
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. 	 Obs.
Comment	<p>At the site Nestle comply with location regulations (ICDOC) environmental log book, environmental permits from local authorities. There was no evidence to suggest that a specific person/position is responsible for maintaining regulatory compliance. Currently Nestle Waters is only complying with ICDOC standards which is a good start but is not enough context to understand the regulatory parameters for the Eastern Province or KSA. Nestle have not kicked off team meetings for the AWS team yet. Nestle AWS team do not work together to word towards the AWS /WSP at this time as it is newly implemented into their operations. AWS team announcement September 2022 published no direct criteria roles communicated with each member of the AWS team.</p>	
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.	 Obs.
Comment	Water stewardship strategy was provided. It is essentially a Nestle-wide strategy. .	
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. 	 in progress

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Comment The water stewardship plan was provided and covers most requirements. However:

- Whilst the actions have quantified estimated achievement and have timelines, the objectives are not quantified and their timelines are not indicated. E.g. there is an objective on improving the water ratio at the site but no indication of how much it should be improved and by when.
- Target/estimated achievement and success criteria KPI do not match each other for part of the plan.

Finding No: TNR-003168

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

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



in progress

Comment There was no plan available for the mitigation of risks. Nestle has started brief discussion with ICDOC on mitigation and response for water related risks and emergencies however, this was not in the form of a plan.

Other notes:

- Water side related risks slide to distinguish the potential scenarios
- Aquassay process to help mitigation risks at site
- For quantity and quality have signed a contract with ICDOC to ensure water is supplied
- Only ICDOC supplies the water to Nestle at the moment no tankers are allowed to provide water to any customers within the industrial area
- Recent contract with ICDOC agreement contract to provide service between the provider and the client for the industrial area in Dammam Section 3
- 2021 contract related to water quality with ICDOC.
- Higher conductivity was higher than Nestle could accept and ICDOC had agreed to decrease the conductivity with increase of payment

Finding No: TNR-003169

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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

Stakeholder engagement has been active with Modon and ICDOC and on occasion with Jadwell and the catchment governance table has assigned which stakeholders should be part of specific actions. Other actions taken by Nestle to ensure good governance at a catchment level includes a spreadsheet with actions, goals and responsibilities assigned with target dates. For example the Water Resource study undertaken by Nestle Dammam concludes that a water regeneration program to regenerate 100% of its water use by 2025.

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

Nestle does not specifically track actions or have a policy that respect traditional water rights of stakeholders such as monitoring water reserves, reducing depletion of water resources however, the water resource study does recommend to develop and implement a water right system and establish water resources records and monitoring and control mechanisms.

Other notes:

- Toilets identified and mapped
- Drinking water dispensers located and mapped
- Assessment and checklist of manufacturing best practice which is tracking all things related to WASH and it's facilities
- On an annual basis a swat analysis is performed where staff provide feedback - Consolidated SWOT Factory - Quality is taking care of such things and is being tracked on a monthly basis (not enough time to do it every month)
- Nestle says everyone has the right to water within the facility

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.*



in progress

Comment

The site's understanding of full legal and regulatory compliance is too limited.

Finding No: TNR-002958

3.2.2 *Where water rights are part of legal and regulatory requirements, measures identified to respect the water rights of others including Indigenous peoples, shall be implemented.*



Obs.

Comment

Nestle are not managing water rights as Modon is supplying water to the industrial areas.

Nestle had previous incidents of high TDS from effluent, which was due it running its own deep well. Corrective action was to stop using the deep well and getting water only from ICDOC. This would ensure that high TDS would not be distributed do stakeholders from ICDOC - Violation action 1.

3.3 *Implement plan to achieve site water balance targets.*

3.3.1 *Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.*








Obs.

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Comment	The WSP has outlined the status with start and end date for selected AWS outcomes. The WSP has several objectives set to result in outcomes to achieve a good water balance. However these objectives are separate actions with the targeted savings for each separate action, whilst the overall target of what water use ratio or the total volume of water abstraction the site wants to achieve, is not clear in the WSP.	
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>	 closed
Comment	As sustainable use of fossil water is a shared challenge (the aquifer as overabstraction), the site needs to have a clear annual target on improving its water use efficiency or reduce the volumetric total use. The data on water use ratio and total water use from 2016 indicates the total water use has been growing, the water use ratio has struggled to improve after 2018: 2021 ratio was the same as 2018, the ratios in the years in between were higher, and the 2022 YTD ratio at the time of the audit was 1.44 compared to 1.45 in 2018. The WSP lacks clarity on the overall target and performance on these metrics.	
	Finding No: TNR-003170	
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	Water regeneration project - to be supplied by Nestle once study completed.	
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	ICDOC has not had any complaints of the effluent discharge from Nestle other than 1 incident which was swiftly managed by Nestle. ICDOC does not notify Nestle of their effluent discharge quality unless it exceeds limits but Nestle has since conducted their own sampling to maintain data of their effluent for their overall understanding of their effluent quality.	
3.4.2	<i>Where water quality is a shared water challenge, continual improvement to achieve best practice for the site's effluent shall be identified and where applicable, quantified.</i>	 Yes
Comment	All factories within the catchments share the same water challenge of purchasing water from ICDOC They do not have previous effluent data to support any analysis to show annual trends or improvement of water quality.	
3.5	<i>Implement plan to maintain or improve the site's and/or catchment's Important Water-Related Areas.</i>	
3.5.1	<i>Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.</i>	 in progress
Comment	No implementation has take place yet therefore, there is no evidence. The study which will be confirmed for the water regeneration.	
	Finding No: TNR-002362	
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>	

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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	A wash pledge assessment tool (self assessment tool for evaluation access to water, sanitation and hygiene) at the workplace is in process.	
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>	 in progress
Comment	Water regeneration program.	
	At this time there is no evidence to support this other than the water regeneration program which aims to 'replace' 100% of water resources taken from fossil water.	
	Finding No: TNR-002363	
3.7	<i>Implement plan to maintain or improve indirect water use within the catchment:</i>	
3.7.1	<i>Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.</i>	 Yes
Comment	There are no indirect/embedded water use targets in the water stewardship plan.	
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	To engage more with service providers and suppliers on how to reduce and achieve indirect water use.	
	Finding No: TNR-002364	
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>	 in progress
Comment	No evidence for this.	
	Masterplan signed by Modon for the firefighting system requiring upgrades.	
	Finding No: TNR-002365	
3.9	<i>Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.</i>	
3.9.1	<i>Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.</i>	 Obs.
Comment	Nestle has initiated the use of the Aquassy tool for water efficiency measuring	
	Have the plan on the SHEPM which has a tracking on a monthly basis for the effluent water quality - Dashboard on the site for water quality, quantity, water type.	
	Limited initiation of how they can implement their targets with AWS.	
3.9.2	<i>Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.</i>	 Obs.

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Comment	Nestle has assigned 11 best practices to achieve water governance, water quality, water balance and IWRA. The water stewardship plan has several actions that would contribute to water use efficiency. This indicator is to be revisited after best practice identification is revised.	
3.9.3	<i>Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.</i>	 Obs.
Comment	No best practice for water quality was provided for effluent water quality. The attachment is the sampling and analysis for the water quality	
3.9.4	<i>Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.</i>	 in progress
Comment	Sampling of the deep well for production quality purposes does occur but no other actions on IWRAs.	
		Finding No: TNR-002367
3.9.5	<i>Actions towards achieving best practice related to targets in terms of WASH shall be implemented.</i>	 in progress
Comment	WASH assessment is being followed and action is taken. However WASH lacks on best practice in terms of facilities provided. There is also a limited way for ladies to communicate their concerns relating to WASH so it needs to be improved to have a confidential way for them to communicate their concerns.	
		Finding No: TNR-002368

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4		STEP 4: EVALUATE - Evaluate the site's performance.	
4.1	Evaluate the site's performance in light of its actions and targets from its water stewardship plan and demonstrate its contribution to achieving water stewardship outcomes.		
4.1.1	Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.		 Obs.
Comment	The Stewardship Plan shows % completion for each objective (action) however the evaluation does not always provide the KPI or quantification in accordance with the quantification/metric stated in the plan. Planning to have measures of achievement		
4.1.2	Value creation resulting from the water stewardship plan shall be evaluated.		 Yes
Comment	Value creation evaluation - all monitored and controlled by Nestle. The value creation has been identified for financial and environmental benefits. The process of projects saving evaluation is usually done through SHE-PM platform. The evaluation done by SSHE manager and factory manager and at higher level the MENA SSHE manager. Sometimes, the project could be audited (reviewed) by "nestle Corporate Engineer, Thermal and Water Technologies Lead".		
4.1.3	The shared value benefits in the catchment shall be identified and where applicable, quantified.		 in progress
Comment	Currently there is no added value in the catchment level. Everything which is happening currently is on a site basis only. 2025 plan with Nestle to recover 100% of water withdrawal by the site <div>Finding No: TNR-002369</div>		
4.2	Evaluate the impacts of water-related emergency incidents (including extreme events), if any occurred, and determine the effectiveness of corrective and preventative measures.		
4.2.1	A written annual review and (where appropriate) root-cause analysis of the year's emergency incident(s) shall be prepared and the site's response to the incident(s) shall be evaluated and proposed preventative and corrective actions and mitigations against future incidents shall be identified.		 in progress
Comment	Actual incidents at the site to include actual incidents on the site. No current response plans to account for any emergency water related incident(s). Will engage with crisis team to understand these risks. <div>Finding No: TNR-002370</div>		
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.		 closed
Comment	The commitment letter to be shared with the stakeholders. No evidence of engagement of performance.		

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Finding No: TNR-002371

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.





Q
Obs.

Comment This will need work as the WSP is new and will require a system to ensure it is updated on a regular basis.

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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.	 closed
Comment	<p>Water Treatment Section Head is responsible for water treatment and resources in compliance with Nestle and location regulations</p> <p>This has not been disclosed externally (publicly) yet therefore, the Nestle site staff and their relevant roles are not communicated to stakeholders.</p> <p>Nestle Dammam request on 26 October to have Nestle publish the announcement on the site - AWS public announcement Media section.</p> <p style="text-align: right;">Finding No: TNR-002372</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.	 closed
Comment	<p>This will be created through a Microsoft Sway presentation which will be uploaded to the Nestle site with a link for stakeholders to engage with.</p> <p>Nestle Dammam are still working towards a way of disclosing the WSP with stakeholders.</p> <p>Nestle only shows what is relevant to them but have not shared their WSP plans.</p> <p style="text-align: right;">Finding No: TNR-002143</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.	 closed
Comment	<p>Water Stewardship Plan completion rate tracking is included in Monthly Operations Review to track the progress of the plan completion.</p> <p>At the end of the year will be included on AWS newsletter as part of communication plan.</p> <p>Stewardship plan has not been shared or performance.</p> <p style="text-align: right;">Finding No: TNR-002145</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.	
5.4.1	The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.	 in progress
Comment	<p>No disclosure of shared water challenges has been shared however, Nestle have discussed with Jadwell as they have shared access to the deep well and both require this resource to operate their business. As Jadwell is a competitor it is difficult to be transparent on shared water challenges if there is a cost element to it.</p>	

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Finding No: TNR-003171

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

Comment Yes, there is email communication to show Nestle have attempted/ or communicated with stakeholders.


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

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


Comment 1 Violation from ICDOC from 16 June 2020 regarding the high TDS within the effluent and it was not disclosed. They did not inform their neighbors within the catchment or stakeholders.

Corrective actions to stop using own well as it was the cause of the high TDS levels.

Finding No: TNR-002146

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

Comment They will not use the deep well for their process operations which resulted in their violation of high TDS (7.100) in effluent.

5.5.3 *Any site water-related violation that may pose significant risk and threat to human or ecosystem health shall be immediately communicated to relevant public agencies and disclosed.* 
Yes

Comment There has been no water related violation that may pose significant risks and threat the human or ecosystems. It should be mentioned that all secondary containments should be repaired or sufficient to manage any waste from entering the stormwater/effluent discharge drains.

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Photographic Evidence from Audit

✔

Yes

Comment Photos have been attached.



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Supplementary photos

20221101_090236.jpg

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