

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000549



SITE DETAILS

Site: **Nestlé Waters Polska Nałęczowianka**
Address: Kolonia Bochoznica 5, 24-150, Nałęczów, POLAND
Contact Person: Agata Czarnecka
AWS Reference Number: AWS-000074
Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Core
Date of certification decision: 2023-Sep-12
Validity of certificate: 2026-Sep-12

AUDIT DETAILS

Audited Service(s): AWS Standard v2.0 (2019)
Audit Type(s): Re-Certification Audit
Audit Start Date: 2023-Jun-05
Lead Auditor: Neringa Pumputyte
Audit team participants:
Patrycja Romaniuk
Site Participants:
Małgorzata Harasim, Factory EHS Manager
Magdalena Blicharska, Other
Artur Mlotek, Other
Tomasz Semeniuk, Other

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ADDITIONAL INFO

Summary of Audit Findings: A total of 27 findings were raised during the certification audit: no major non-conformities, 8 minor non-conformities, 19 observations.

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 30 September 2023.

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

The audit team recommends re-certification of Nestlé Waters Nałęczówianka at Core level pending approval of the corrective actions plan.

CLOSURE OF FINDINGS AND CORRECTIVE ACTION PLAN:

The Client has successfully submitted the corrective action plans 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 recertification audit for assessing conformity of Nestlé Waters Polska Nałęczówianka against the AWS International Water Stewardship Standard Version 2.

Nestlé Waters is a Swiss multinational bottled water division of Nestlé, and its site Nestlé Waters Polska Nałęczówianka is a water bottling site producing mineral water. The site is located in the Eastern part of Poland, about 25 km to the West from the city of Lublin, next to a spa town Nałęczów. The site has three operational wells for withdrawing groundwater.

The site is located in the catchment of Bystra River. Bystra River, located in the Lubelskie Province of Poland, is a right bank tributary of the Vistula, and is 33 km long. The Vistula is the longest river in Poland and the ninth-longest river in Europe, at 1,047 kilometres (651 miles) in length. Geologically, most of the catchment area is composed of deep loess of up to 20 m. Agricultural land and forests dominate the Bystra catchment area. The agricultural land consists mostly of non-irrigated arable land.

The audit was conducted onsite on 06-08 June 2023. The onsite site visit included the facilities at Nestlé Waters Polska Nałęczówianka, located in Kolonia Bochoznica 5, 24-150, Nałęczów, including one of the site's wells located about a kilometer away (to the North-North-West) from the site, as well as the municipal wastewater treatment site and its discharge location.

The following external stakeholders were interviewed during the audit: director of the municipal water supply and wastewater treatment provider; representative of the Mayor of Nałęczów; fisheries association 'Fishing circle'.

FINDINGS

NUMBER OF FINDINGS PER LEVEL

Observation	19
Minor	8

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FINDING DETAILS

Finding No:	TNR-005027
Checklist Item No:	1.1.1
Status:	Open
Finding level:	Observation
Checklist item:	The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including: <ul style="list-style-type: none">- Site boundaries;- Water-related infrastructure, including piping network, owned or managed by the site or its parent organization;- Any water sources providing water to the site that are owned or managed by the site or its parent organization;- Water service provider (if applicable) and its ultimate water source;- Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies;- Catchment(s) that the site affect(s) and is reliant upon for water.
Findings:	The following improvements are expected or could be considered: <ul style="list-style-type: none">- A map where all 3 existing wells would be shown is missing (now different combinations of wells are available in different maps).- The wells recharge area needs to be updated with the new BH7 well, and the site is aware of this and is planning the update.
Finding No:	TNR-005028
Checklist Item No:	1.3.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Checklist item:	Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped
Findings:	Nestle analyses water balance in a specific way, and water losses is water that does not go to a product. Water balance in a usual approach (water withdrawn vs water discharged / water in product / water evaporated and leaked / changes in storage on site) is not fully completed.
Corrective action:	Water balance analyse will be adapt to Water Mapping template - expand the tool with the required details.

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Finding No:	TNR-005113
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:	Refer to the finding on 1.3.2 - the water balance should be updated to consider all elements, including the change in storage. The current quantification of the site water balance on site is affected by the changes in storage on site - these are not quantified as such but affect the total balance. A year's balance and its review is needed for a full compliance.
Corrective action:	Water balance analyse will be adapt to Water Mapping template - expand the tool with the required details.
Finding No:	TNR-005029
Checklist Item No:	1.3.7
Status:	Open
Finding level:	Observation
Checklist item:	Annual water-related costs, revenues, and a description or quantification of the social, cultural, environmental, or economic water-related value generated by the site shall be identified and used to inform the evaluation of the plan in 4.1.2.
Findings:	The value generated by the site is implicitly understood and elements of it are discussed, but not clearly identified. At the moment the site does not see much value in identifying the value generated by the site in a more concrete way, as the water stewardship plan is not evaluated by analysing cost and benefit ratio or using a similar analysis but it is primarily based on the progress on water regeneration pledge and stakeholders view of the site.
Finding No:	TNR-005030
Checklist Item No:	1.5.1
Status:	Open
Finding level:	Observation
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:	The site has done work on analysing and "dogesting" information contained in the various programs and initiatives. A summary of the initiatives, their goals, status and relevance for the site's WS activities, could be made to ensure the summary overview remains on site even if personnel changed.

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Finding No:	TNR-005032
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:	<p>There are several considerations that would be good for the site to take into account during the update of the study and in the future periods:</p> <ul style="list-style-type: none">- In the terms of reference for the new study, include a requirement for the consultant to provide information on the study area and how it was defined (including explanation about the relationship between surface waters and groundwater in the study area), data used, time periods analysed, areas where assumptions were made, and methods used. This is important for the correct interpretation of results and for helping inform the site if any considerations will need to be clarified in the future as part of the site's long-term risk management activities- Ensure the recharge area is update for the newly constructed well BH7 and for a possible location of a further new well the site is considering- If possible, seek that the study considers a longer time period and takes into consideration the trend and projections of increasing temperature and evapotranspiration to help the site assess future risks to the catchment balance. Alternatively, this can be analysed separately as follow up on the study.
Finding No:	TNR-005033
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:	<p>Information on IWRAs and their status is currently scattered between different documents: Antea study, infrastructure study, study analysing projects for water regeneration, site's own presentation. The status of these areas and threats to them are implicitly understood by the site but not clearly summarised or demonstrated to provide clear information on 'reference conditions' against which the value and benefit of the site's actions could be later evaluated.</p>
Corrective action:	<p>Prepare the excell list with all IWRAs</p> <p>Summarised information of the each IWRA status (including any threats to people or the natural environment) in one document.</p>

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Finding No: TNR-005036
Checklist Item No: 1.6.1
Status: In Progress - CA plan approved
Finding level: Minor
Checklist item: Shared water challenges shall be identified and prioritized from the information gathered.
Findings: Based on the discussions and documentation provided it appears the site understand a term 'water challenge' as an improvement direction rather than a description of a problematic situation or a concern. The key intent of AWS implementation is indeed identifying and then implementing improvement actions, and identifying and implementing actions is a strength at this site, yet there is still a value in describing the shared problems in a clearer way - this would help not just for stakeholders but also the public to understand why the site chose the project it chose, and in evaluating to what extent the projects helped improve the situation.
Due to this, clear evidence was not demonstrated that the site discussed with stakeholders not only the project ideas, but what are the shared challenges, to come up with a common shared view of the main problems in the catchment.
Corrective action: Extend the List of the Shared Water Challenges for more details regarding the main problems and related benefits. Updated document will be share will stakeholders.

Finding No: TNR-005037
Checklist Item No: 1.7.1
Status: In Progress - CA plan approved
Finding level: Minor
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 risk analysis needs further improvements:
- It is not clear what timeframe was considered for the likelihood of occurrence and severity of impact
- Potential costs and business impact are not assessed
- Evidence should be provided that the site considered risks stemming from projected climate change
- The potential emergency situations table includes more possible emergency situations that would include risks, such as flood or drought. But these are not included in the risks table.
- Based on interviews, the site is actually aware of some further possible future risks, e.g. risks stemming from looking for a new well (the inhabitants may consider that the new well further from the site is needed because the site actually exploited the existing wells), which have not yet been added to the risks register.
Corrective action: Extend the List of Site Water Risks for more details regarding the timeframe, potential costs and business impact, consider risks stemming from projected climate change, flood and drought, risks stemming from looking for a new well.

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Finding No:	TNR-005038
Checklist Item No:	1.8.1
Status:	Open
Finding level:	Observation
Checklist item:	Relevant catchment best practice for water governance shall be identified.
Findings:	Practices currently implemented or towards which the site is working, are identified. The list should be expended to identify further best practices.
Finding No:	TNR-005194
Checklist Item No:	1.8.4
Status:	Open
Finding level:	Observation
Checklist item:	Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.
Findings:	The site should continue looking at possible best practices not only as water regeneration ideas but also as other types of best practices that can help maintaining or enhancing the status of IWRA's
Finding No:	TNR-005195
Checklist Item No:	1.8.5
Status:	Open
Finding level:	Observation
Checklist item:	Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.
Findings:	The site should refer to the guidance document on WASH published by AWS and revisit this indicator.

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Finding No:	TNR-005196
Checklist Item No:	2.1.1
Status:	Open
Finding level:	Observation
Checklist item:	<p>A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:</p> <ul style="list-style-type: none">- That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes- That the site implementation will be aligned to and in support of existing catchment sustainability plans- That the site's stakeholders will be engaged in an open and transparent way- That the site will allocate resources to implement the Standard.
Findings:	<p>The wording of the commitment has similar meaning to the requirements but some commitments should be made clearer at the next iteration of the document: the commitment to disclose progress on WS Plan, that site implementation should be aligned to catchment plans, and that the site will allocate the necessary resources.</p>
Finding No:	TNR-005197
Checklist Item No:	2.2.1
Status:	Open
Finding level:	Observation
Checklist item:	<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.
Findings:	<p>The site should provide a description of the process of submissions to regulatory agencies.</p>
Finding No:	TNR-005114
Checklist Item No:	2.3.1
Status:	Open
Finding level:	Observation
Checklist item:	<p>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.</p>
Findings:	<p>The local strategy could be updated to refer not only to quality issues caused by agriculture but also quality issues from wastewater treatment, and shared water challenges could be worded somewhat more precisely.</p>

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Finding No:	TNR-005039
Checklist Item No:	2.3.2
Status:	Open
Finding level:	Observation
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:	<p>The site's water stewardship plan is structured by listing targets per each action, therefore targets often focus on actions (doing) rather than results the site wants to achieve by implementing those actions. The site actually has clear overall targets - primarily on water use ratio and on water regeneration objectives, and the structure of the plan could be amended to link actions to the overall targets. This would facilitate the evaluation of value created as the value could be evaluated for overall targets rather than separate actions.</p> <p>The links to best practices are not clear in the plan.</p>
Finding No:	TNR-005198
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>The risks analysis (indicator 1.7.1) needs strengthening, after which this indicator 2.4.1 needs revisiting.</p> <p>In a table with potential emergency situations, what is written as what the site can do to prevent the risk, is actually mostly monitoring activities to give a warning about the emergency/risk potentially happening but does not consider what preventive actions could be taken to minimise the probability of an emergency/risk occurring or its magnitude. The site should better link this table with the risks analysis to see if any risks also need a development of a plan to reduce the probability of a risk occurring or its magnitude.</p>
Corrective action:	<p>Extend the List of Potential Emergency Situation for more details regarding the preventive actions and mitigation. Link this table with the risk analysis.</p>

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Finding No:	TNR-005044
Checklist Item No:	3.4.1
Status:	Open
Finding level:	Observation
Checklist item:	Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.
Findings:	<p>It was noted that volumetric water benefit from the UV lamp project in Nalenczow is projected to be calculated for the total amount of treated effluent passing through the UV lamp but about 10 % of the effluent is Nestle's wastewater, which is mostly industrial wastewater and therefore very low in e-coli anyway. I.e. counting the volumetric water benefit for all of the WWTP's effluent would overestimate the benefit achieved. Overall, the site should carefully consider the correct application of the volumetric benefit methodology and keep the audit trail how all the requirements of the methodology were met, in order to ensure the benefits can be verified if Nestle Waters were challenged on this indicator in the future (at site or corporate level).</p>
Finding No:	TNR-005204
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:	<p>The site considers that their water regeneration project on improving the municipal WWTP's effluent quality is helping improve the status of IWRA's, but a clearer link is needed for this: a clear description of each IWRA status and threats, in order to see how the regeneration projects can enhance the status of specific IWRA(s).</p>
Corrective action:	See action plan for item 1.5.5 + Investigate issue related to WWTP in Kazimierz
Finding No:	TNR-005205
Checklist Item No:	3.7.1
Status:	Open
Finding level:	Observation
Checklist item:	Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.
Findings:	<p>The site should look at developing indirect water use targets.</p>

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Finding No:	TNR-005206
Checklist Item No:	3.9.4
Status:	Open
Finding level:	Observation
Checklist item:	Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.
Findings:	The site needs to identify further best practices and enhance actions on IWRAs.
Finding No:	TNR-005045
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:	Previous year's plan (completed and evaluated) still has many actions written as 'ongoing' - those are recurring yearly actions. For these, yearly performance should still be noted, e.g. whether that year's plan on river water quality monitoring (in terms of number of points and monthly frequency) was implemented.
Finding No:	TNR-005046
Checklist Item No:	4.1.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Checklist item:	Value creation resulting from the water stewardship plan shall be evaluated.
Findings:	The site did not evaluate the overall value created to the site from implementing the water stewardship activities. Instead, value is briefly described for each action: in the water stewardship plan, the column 'Benefit & Costs' is used to summarise the benefit of the action either to the site or to the catchment. Mostly it's a short sentence, as evaluating the value of each action is difficult.
Corrective action:	Extend the List of Benefits & Costs in Waters Stewardship Plan: for more details evaluating the value of each action (for the catchment, site, stakeholders, environment, public opinion etc.)

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Finding No:	TNR-005047
Checklist Item No:	4.1.3
Status:	Open
Finding level:	Observation
Checklist item:	The shared value benefits in the catchment shall be identified and where applicable, quantified.
Findings:	As indicated for 4.1.2, in the water stewardship plan, the column 'Benefit & Costs' is used to summarise the benefit of the action either to the site or to the catchment. Mostly it's a short sentence, as evaluating the value benefit of each action to the catchment is difficult. In auditors' view, the site has a unique opportunity to evaluate the shared value benefit from its water stewardship activities by using river quality monitoring data prior to and after the 'regeneration' projects implemented. This site will need to improve on this for future conformity
Finding No:	TNR-005051
Checklist Item No:	5.2.1
Status:	Open
Finding level:	Observation
Checklist item:	The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.
Findings:	Evidence was not found that a clearer plan (with confidential or too detailed parts taken out) was communicated to stakeholders but separate parts relevant to specific stakeholders are discussed in bilateral meetings and stakeholder interviews confirmed adequate stakeholder understanding of the site's plans.
Finding No:	TNR-005049
Checklist Item No:	5.3.1
Status:	Open
Finding level:	Observation
Checklist item:	A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.
Findings:	Quantified performance against targets is partially communicated: in a meeting with stakeholders, target and actual performance for specific projects is discussed, although total performance in a year against the target is not really included. Separate projects are reported in the media (see articles uploaded for earlier indicators) but overall performance against targets (e.g. against the regeneration pledge) is not disclosed to a wider audience.

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Finding No:	TNR-005050
Checklist Item No:	5.4.1
Status:	Open
Finding level:	Observation
Checklist item:	The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.
Findings:	The shared water related challenges are communicated in different wording for different audiences and in different media. See also observation on understanding the term 'challenge' at the site (indicator 1.6.1).

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Report Details

Report	Value
Report prepared by	Neringa Pumputyte
Report approved by	Mia Antoni-Naidoo
Report approved on (Date)	31 July 2023

Surveillance

Proposed date for next audit
2024-Jun-10

Stakeholder Announcements

Date of publication	Location
10/05/2023	By email
10/05/2023	
Comment	Stakeholder announcement was done by sending emails to stakeholders on the site's stakeholder list and placing announcements on notice boards next to the village halls in the catchment. Evidence of 17 letters was provided and a sample of one notice board. A sample of three letters is attached in the system and pictures of a notice board.

Catchment Information

Catchment Information
The site is in the valley of Bochoćniczanka stream. Bochoćniczanka flows to the river Bystra in the town of Nalęczów. The Bystra River is 33 km long and is the right tributary of the Vistula River. Bystra's catchment area is about 300 km². The Bystra River basin is a second order hydrographic unit. Vistula's catchment, reaching into three other nations, covers 193,960 km² (74,890 sq mi), of which 168,868 km² (65,200 sq mi) is in Poland. Therefore Vistula's catchment would be too large for the site's context, and Bystra's catchment is a suitable level of the catchment for the site, considering its water sources and effluent.



catchment.png

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Client Description and Site Details

Client/Site Background

The site has two wells in the area of the factory site. A new well BH7 is located on an additional small plot of land owned by the site less than 1 km away from the site. Small amount of water is supplied by a municipal water and wastewater service provider MZWik in Nałęczów. For them, the water source is also groundwater. The site's and municipal wells are located in the major groundwater basin no 406. The site is also considering a possibility of getting a further new well.

The site's stormwater and unused clean mineral water are discharged to the Bochońniczanka stream close to the site. The wastewater is discharged to the municipal wastewater network and is treated by MZWik's WWTP. The treated effluent is discharged to the Bystra river.



site2.png

Summary of Shared Water Challenges

Summary of Shared Water Challenges

The main shared water challenges are on catchment water quality: surface water bodies have poor condition due to a number of contributing factors including poor condition of wastewater pits at houses not connected to municipal wastewater treatment system, lack of bacteriological control of wastewater, pollution from agriculture, and other factors.

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.

 Obs.

Comment Maps with site boundaries and site's and MZWik's well and discharge locations are available. Several maps at different scales were provided to show all locations. It was noted a map where all 3 existing wells would be shown is missing - the new well was shown in a separate map and now could be added to the map with older wells to have a full overview. Schemes for water supply, wastewater and stormwater piping and related infrastructure were shown during the on-site audit.

The surface water catchment, Bystra river, is clearly defined and the map is available. A map of the major groundwater basin no 406 was not provided separately to the auditors but is included in a large study on water infrastructure commissioned by the site (INFRASTRUKTURA WODNA, Dec 2019). Overall, the infrastructure study contains detailed description of the catchment.

At a more local scale, the recharge area of the previous set wells is defined. With the new BH7 well, the recharge area will need to be re-defined, and this is planned to be done at the end of the year: the purchasing of the professional services has started.

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

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

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

 Yes

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Comment Stakeholder identification and engagement is carried out using Nestle's CRP process. The stakeholder list includes local authorities, the local district of the main water authority in Poland (Wody Polskie), water service provider, a competitor business in the area, local influencers like fishermen association, local agriculture advisory group, as well as neighbours.

The list names the stakeholder, provides the name of the contact person, a summary of the concerns/expectations vis-a-vis the site, rating of the influence of the stakeholder on the site, and rating of the site's influence on stakeholder.

In the stakeholder list, what is written as a concern is meant to represent a stakeholder challenge. In a number of cases what is written as a concern, is actually a project idea or project being implemented. There was some discussion between the site and the auditors what is a challenge or concern. The understanding is that if there is a stakeholder concern or challenge, there needs to be something planned in the CRP plan, therefore any concern would be in the plan. If a solution to a challenge has not been found, the CRP would at least contain a plan to meet with the stakeholder.

In terms of stakeholders related to the catchment - local authorities, municipal water supplier and wastewater service provider, and stakeholders of projects that the site wants to do for regeneration pledge are identified. A competitor factory (Cisowianka,) is included but the influence is rated as N/A. No other large user of the water was identified by the site from the information it gathered, including from the data it received from the main water authority Wody Polskie and the consultant hired for help with identifying projects for the water regeneration pledge.

Auditors noticed that there are no NGOs in the stakeholder list but the site maintains that there are no environmental NGOs in the area.

1.2.2 *Current and potential degree of influence between site and stakeholder shall be identified, within the catchment and considering the site's ultimate water source and ultimate receiving water body for wastewater.*


Yes

Comment The stakeholder list names the stakeholder, provides the name of the contact person, a summary of the concerns/expectations vis-a-vis the site, rating of the influence of the stakeholder on the site, and rating of the site's influence on stakeholder. The influence is rated using a defined method.

Every 2-3 years the site conducts interviews with selected stakeholders: 10 most important stakeholders are selected for that. The interviews include questions about water challenges. The interview results are recorded. A survey of inhabitants is also conducted to understand how the site is perceived locally. The most recent interviews and survey were done in May 2022. Both reports are attached.

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

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


Yes

Comment Regional crisis management process would be applicable for reputational water-related issues related to water extraction, bottled water bans, community issues, or local environment issues.

The site also has site-level response plans that were shown during the audit and the evidence for uploading on the platform was requested.

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


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Comment Nestle analyses water balance in a specific way, where water losses are defined as water that does not go to a product. Water balance in a usual approach (water withdrawn vs water discharged / water in product / water evaporated and leaked / changes in storage on site) is not fully completed.

The site now uses the e-Water tool from Aquassay to map the water balance at the site - essentially it maps water that does not go to a product. A picture from the tool is attached as evidence.

Finding No: TNR-005028


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 The site quantifies the water balance to the extent it is needed to track two metrics - water use ratio (liters withdrawn per liter bottled water) and water loss ratio (liters lost per liter of bottled water). Q1 2023, the site calculated its water balance (i.e. water use ratio) in Excel, although the balance for a year in this format was not provided as evidence. E-water tool implementation started in 2019 and finished in early 2023, so now the site has a software to track the site water inflows, outflows and main flows within the site. So far the system can show a balance for half a year as full year's data is not yet available in the system (see 'Site water map from eWater'). The current quantification is affected by the changes in storage on site - these are not quantified as such but affect the total balance. A year's balance and its review is needed for a full compliance.

Earlier the site did not have enough or suitable water meters, therefore they had to installed equipment that transmit the data. Now there are more meters that enable a closer tracking of the water use ration.


There is no water-related challenge that would be a threat to good water balance for people or environment, therefore annual high and low variances are not quantified.

Finding No: TNR-005113

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 Well water is tested frequently as it is key for the product quality. Wastewater (effluent) is tested every month (except iron is tested every 2nd month), and there were no exceedances in 2022 or 2023. Stormwater+spillwater receiving water is tested every month. Internal testing points: at the sedimentation basin, then in the ditch before going to Bochoznica. Suspended solids in March 2022 were above the limit and it was analysed, explanations obtained. Nitrogen was close to the limit (reading of 9.22 vs limit of 10 mg/l) in one month but no exceedances.







As part of its water stewardship activities, the site started testing the river water quality (receiving water body) a couple of years ago and is expending it by adding more sampling points in line with its water stewardship activities. There is a map of testing points and testing is done monthly. Now the following points are tested: Wojciechow where Bystra is starting; Bystra before confluence with Bochoznyczanka and after the confluence with Bochoznyczanka (and after the park); treated Nalenczow WWTP effluent before UV lamp, then after the lamp, in the river after WWTP effluent; Bystra after Termy Celejow effluent; Bystra after effluent of Celejow hospital; Bystra after effluent of Wawolnyca, just before the mouth (confluence with Wisla). The monthly testing of the river water is a very strong aspect of the site's water stewardship activities.

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

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Comment	Map of chemicals storage and chemicals movement is provided. Storage of chemicals and spill kits were checked on site. Safety data sheets are kept.	
1.3.6	<i>On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.</i>	 Yes
Comment	There are no on-site IWRAs.	
1.3.7	<i>Annual water-related costs, revenues, and a description or quantification of the social, cultural, environmental, or economic water-related value generated by the site shall be identified and used to inform the evaluation of the plan in 4.1.2.</i>	 Obs.
Comment	A spreadsheet with water-related costs from 2019 to 2022 was provided. Data is collected annually, using data obtained from the site controlling. Not all costs have been updated for 2022. Value generated is meant to be in the water stewardship plan - there is a column in the plan called 'Benefit & Costs', it includes a short description of the value. The site is not using this data to evaluate the plan (i.e. the plan is not evaluated in terms of cost-benefit ratio), and this explains why value generated by the site is implicitly understood and elements of it are discussed, but not clearly identified.	
1.3.8	<i>Levels of access and adequacy of WASH at the site shall be identified.</i>	 Yes
Comment	The level of access and adequacy of WASH at the site is meeting the legal requirements and standards expected of a modern manufacturing facility.	
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>	 Yes
Comment	Primary inputs do not come from the same catchment. Preforms, caps, plastic come from outside the catchment. The site also asked the authorities (Wody Polskie) for data on groundwater water withdrawals from the catchment - although the data obtained is more relevant to support the information on catchment water balance. Data on 2021 was obtained and now waiting for the data on 2022.	
1.4.2	<i>The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.</i>	 Yes
Comment	The only service provider that uses water not on site but in the catchment, is supplier of water and wastewater treatment and the site obtained information on their water use. Car washing (just for a few pool cars) is done in car washes of Orlen, which is Poland-wide, therefore data on water use from the catchment cannot be obtained but in any case would indicate small volumes.	
1.5	<i>Gather water-related data for the catchment, including water governance, water balance, water quality, Important Water-Related Areas, infrastructure, and WASH</i>	
1.5.1	<i>Water governance initiatives shall be identified, including catchment plan(s), water-related public policies, major publicly-led initiatives under way, and relevant goals to help inform site of possible opportunities for water stewardship collective action.</i>	 Obs.

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Comment	<p>The site has a folder with information - various existing programs, plans and initiatives. Different authorities provided this information. The site analysed it and found that mostly plans are good on paper but do not work in reality. Problems are known but water issues are not a priority and plans get extended.</p> <p>The RBMP for the Wysla basin is included - it is a huge document at a too high level but it has some relevant information about Bystra.</p> <p>The main problems for the catchment: bacteriological pollution from wastewaters, status of water infrastructure (old piping).</p> <p>The site has done work on analysing and "digesting" information contained in the various programs and initiatives. A summary of the initiatives, their goals, status and relevance for the site's WS activities, could be made to ensure the summary overview remains on site even if personnel changed.</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>	 Yes
Comment	<p>The site keeps a list of applicable legal and regulatory requirements and is well aware of the requirements and conditions in its permits.</p>	
1.5.3	<i>The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.</i>	 Obs.

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Comment Several studies have been done and the site has started a purchase of professional services to update the balance.

The original study of the balance of the recharge area of the site's wells was done in 2015. In 2010, an update of the study was done - Antea report 'Nałęczowianka factory: Water balance update. Integration of data from 2015 to 2019'. It included an overview of the climatic data for the period 2015 to 2019 and assessed its possible impact on the water balance of the recharge area. An increasing temperature trend was observed along with increasing evapotranspiration and thus reducing groundwater recharge. With this trend, the conclusion was still that the Nestle's groundwater abstraction is less than 10% of the recharge. The study stressed that the data available was sparse and significant simplifications and extrapolations were necessary, and therefore the final result must be seen as an approximate figure. Among the lack of data was the data on surface water runoff - assumptions had to be done on it.

The study had these conclusions about the recharge:

- The recharge occurs mainly between December to May,
 - When comparing 2006-2019 and 2015-2019 periods, the monthly recharge decreases by 10% with drastic reduction in May,
 - Recharge is now nonexistent from May to October (0 mm) contrarily to the previous period.
- The distribution of the recharge across the different years is not uniform as well: recharge varies through years between 50 mm to 200 mm/m²/yr.

These are important considerations that may need looking at for future periods, taking into account the possible effects of climate change.

The recharge area of the wells is smaller than the groundwater aquifers from which the groundwater is abstracted. For a larger groundwater area, a quantitative status assessments is available from the public data. Quantitative status of major groundwater basin is currently noted as good, but total withdrawals plus buffer for unknown withdrawals, are ca. 67% of available resources, i.e. not as good picture as for the local recharge area of the wells.

The site also sought to obtain the balance for the Bystra catchment and contracted PolGeol for this. PolGeol provided a summary of Bystra catchment balance, although without providing the details on the basis (boundaries, data sources and methodology, and where assumptions were made). The results of PolGeol show no concerns on catchment water balance. The site also has piezometers around its wells to monitor groundwater levels. Their data shows groundwater levels are stable.

Based on the results of the studies, the site made a summary poster on the balance of groundwater and Bystra catchment.

In 2023, the site has started the process of commissioning another study to update both Bystra catchment balance and balance for the recharge area of the wells to account for the new well BH7. A communication with the possible service providers was shown during the on-site audit.



Overall, these studies indicate a positive catchment water balance. There are several considerations that would be good for the site to take into account during the update of the study and in the future periods:

- In the terms of reference for the new study, include a requirement for the consultant to provide information on the study area and how it was defined (including explanation about the relationship between surface waters and groundwater in the study area), data used, time periods analysed, areas where assumptions were made, and methods used. This is important for the correct interpretation of results and for helping inform the site if any considerations will need to be clarified in the future as part of the site's long-term risk management activities
- Ensure the recharge area is update for the newly constructed well BH7 and for a possible location of a further new well the site is considering
- If possible, seek that the study considers a longer time period and takes into consideration the trend and projections of increasing temperature and evapotranspiration to help the site assess future risks to the catchment balance. Alternatively, this can be analysed separately as follow up on the study.

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- 1.5.4** *Water quality, including physical, chemical, and biological status, of the catchment shall be identified, and where possible, quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be identified.* 
Yes
- Comment Water quality situation in the catchment is well described in a summary presentation 'Bystra Catchment'. The status of surface water bodies is poor according to the official classification but not much further analysis or more detailed data is available publicly. As part of its water stewardship activities, the site started testing the river water quality in 2020 and is expanding the testing by adding more sampling points in line with its water stewardship activities. The testing is done monthly. Now the following points are tested: Wojciechow where Bystra is starting; Bystra before confluence with Bochoťnyczanka and after the confluence with Bochoťnyczanka (and after the park); treated Nalenczow WWTP effluent before UV lamp, then after the lamp, in the river after WWTP effluent; Bystra after Termy Celejow effluent; Bystra after effluent of Celejow hospital; Bystra after effluent of Wawolnyca, just before the mouth (confluence with Wisla). The monthly testing of the river water is a very strong aspect of the site's water stewardship activities.
- A particular issue was noted by the site's testing activities - bacteriological contamination, as it is not regulated for the wastewater treatment. For those testing points where testing has been done since the start of 2022, there are colour-coded excel tables with monthly results on bacteriological parameters (file 'Liniowka River'). It indicates the bacteriological contamination is especially high during the warm season. As more data becomes available, more analysis of monthly fluctuations will be done.
- 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

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Comment The following areas are considered as IWRAs by the site:

- Spa and a spring in it
- Kazimierski landscape park
- Spring in Wolwolnica
- Natura 2000 area in Kazimierski park
- Natura 2000 area near the mouth of Bystra

The following documentation was provided on IWRAs:

- A part of the water resources study ('Resource Assessment - IWRAs') provides a short information on the values of the Spa and the Kazimierski Park. It does not include information on their status or threats as the study looked at these areas from the perspective whether the site's new wells could or could not be located in the protection and buffer zones of these areas.
- 'Kazimierski Park Krajobrazowy - PGW rzeki Wisły' extracts information on the status of surface water bodies in Bystra to the tributary from Wąwolnica and Bystra from the tributary from Wąwolnica to the estuary. It is suitable as supporting evidence for the Kazimierski landscape park.
- Presentation 'Water infrastructure of the catchment of the Bystra River' provides an overview of the Bystra catchment, its natural and artificial infrastructure. The presentation provides an overview of how many different features exist but does not really include information on IWRAs mentioned by the site, their status or threats to them.
- A full report of the infrastructure study. It provides a detailed overview of the infrastructure but without highlights or summary of extracted relevant information, it is not clear where in the study the status and threats to IWRAs are described.
- A report commissioned to suggest projects for the site's water regeneration pledge (Water regeneration study). It includes a section 'Important water related areas' and provides a map of Natural 2000 sites in the catchment, although without a description of their status and threats - it is understood this was not a specific subject of the study. The study includes a good summary of the shared water challenges and ideas to address them, including specific project ideas. As part of the identified project ideas, it provides some further information on part of the IWRAs - e.g. on Natural 2000 area near the mouth of Bystra. The site later visited the area and is collecting information on its status.
- Excel 'badania źródełek - wyniki' provides data on spring water quality - these are results of the tests undertaken by Nestle. During stakeholder meetings the site collected information on which springs are valuable to the local population and tested their quality to understand the status.

Information on IWRAs, their location map and their status is currently scattered between different documents: Antea study, infrastructure study, water regeneration study, and site's own presentation. The status of these areas and threats to them are understood by the site but not clearly summarised or demonstrated to provide clear information on 'reference conditions' against which the value and benefit of the site's actions on IWRAs could be later evaluated.

Finding No: TNR-005033

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


Yes

Comment There was a long study commissioned to analyse infrastructure in 2019 by PolGeol. It covered description of the natural features of the catchment and man-made infrastructure. Then water regeneration study was commissioned and completed in February 2022 that lists project ideas, including on problematic infrastructure. This study first lists shared water challenges that among them indicate that overall there is poor status of infrastructure. The study does not specifically list condition and potential exposure to extreme events of separate infrastructures but presents a summary of shared challenges which are all related to infrastructure suggests and suggests ideas for improvement projects at problematic water infrastructure cases. I.e. the study goes straight to improvement ideas that are based on the analysis of infrastructure status.

1.5.7 *The adequacy of available WASH services within the catchment shall be identified.*


Yes

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Comment Statistical information on connections to municipal water supply and municipal water treatment facilities was provided but this shows the share of houses connected to municipal systems. As the catchment area is mostly rural, individual houses have their individual water supply and individual wastewater treatment. The impact of the connection to the municipal systems is more on water quality because some of the wastewater is not adequately treated in individual systems. Statistics on WASH access for the households is not available as it is generally considered and known to be adequate.

1.6 *Understand current and future shared water challenges in the catchment, by linking the water challenges identified by stakeholders with the site's water challenges.*

1.6.1 *Shared water challenges shall be identified and prioritized from the information gathered.*

 in progress

Comment Shared water challenges as listed in a table on shared water challenges are written in generic wording, e.g. 'Improve the catchment water quality' or 'Water management excellence'. More concretisation is available in the identified actions to address the challenges, which are prioritised.

Antea study on water regeneration also listed shared water challenges (in section 4) and those are worded in a clearer way to understand what are the problems in the catchment. The study then proposed project ideas that could help address the listed challenges. The site just considers that the challenges and projects listed in the study are not yet prioritised: the site has been choosing priority actions from this study and will prioritise those challenges and actions.

Overall based on the discussions and documentation provided it appears the site understand a term 'water challenge' as an improvement direction rather than a description of a problematic situation or a concern. The key intent of AWS implementation is indeed identifying and then implementing improvement actions, and identifying and implementing actions is a strength at this site, yet there is still a value in describing the shared problems in a clearer way - this would help for stakeholders to understand why the site chose the project it chose, and in evaluating to what extent the projects helped improve the situation.

Based on the explanations provided, the shared water challenges were identified by taking into account information gathered from stakeholder engagement. Based on auditing team's interviews with stakeholders, it is clear the site takes into account information provided or suggested by stakeholders - again, mainly project or action ideas. I.e., project ideas are 'shared ideas'. However, clear evidence was not demonstrated that the site discussed with stakeholders what are the shared challenges and how they should be worded.

Finding No: TNR-005036

1.6.2 *Initiatives to address shared water challenges shall be identified.*

 Yes

Comment The initiatives to address shared water challenges are identified in the documents described above for the indicator 1.6.2.

1.7 *Understand the site's water risks and opportunities: Assess and prioritize the water risks and opportunities affecting the site based upon the status of the site, existing risk management plans and/or the issues and future risk trends identified in 1.6.*

1.7.1 *Water risks faced by the site shall be identified, and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.*

 in progress

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Comment	<p>Potential emergency situations were analysed in 'Zakladowa lista potencjalnych sytuacji awaryjnych_2023 ZLEWNIA'. The current operational risks are then analysed and described in the risk table. The risk analysis needs further improvements:</p> <ul style="list-style-type: none"> - It is not clear what timeframe was considered for the likelihood of occurrence and severity of impact - Potential costs and business impact are not assessed - Evidence should be provided that the site considered risks stemming from projected climate change - The potential emergency situations table includes more possible emergency situations that would include risks, such as flood or drought. But these are not included in the risks table. - Based on interviews, the site is actually aware of some further possible future risks, e.g. risks stemming from looking for a new well (the inhabitants may consider that the new well further from the site is needed because the site actually exploited the existing wells), which have not yet been added to the risks register. 	
		Finding No: TNR-005037
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	Wider opportunities are listed in a separate opportunities table. More detailed opportunities go into water stewardship plan.	
1.8	<i>Understand best practice towards achieving AWS outcomes: Determining sectoral best practices having a local/catchment, regional, or national relevance.</i>	
1.8.1	<i>Relevant catchment best practice for water governance shall be identified.</i>	Obs.
Comment	Practices currently implemented or towards which the site is working, are identified. The list should be expended to identify further best practices.	
1.8.2	<i>Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.</i>	Yes
Comment	Same observation as for 1.8.1. There is best practice sharing in regional meetings (on projects to reduce water loss ratio).	
1.8.3	<i>Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.</i>	Yes
Comment	Expanding the sampling locations for water quality monitoring in the catchment is the key best practice, with monthly monitoring that will help the site further analyse the water quality problems, have reference conditions for their improvement projects, and later help the site demonstrate the effect of improvement actions.	
1.8.4	<i>Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.</i>	Obs.
Comment	The study on water regeneration and the projects it identified are considered best practice. On IWRAs, the site should continue looking at possible best practices not only as water regeneration ideas but also as other types of best practices that can help maintaining or enhancing the status of IWRAs.	
1.8.5	<i>Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.</i>	Obs.

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Comment Identifying further WASH best practices is not considered by the site to be applicable to European sites. There is evidence the site does consider best practices in specific circumstances such as provision of bottled water in cases of bacterial contamination of water supply.
The site should refer to the guidance document on WASH published by AWS and revisit this indicator.

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Audit Number: AO-000549

2STEP 2: COMMIT & PLAN - Commit to be a responsible water steward and develop a Water Stewardship Plan		
2.1	Commit to water stewardship by having the senior-most manager in charge of water at the site, or if necessary, a suitable individual within the organization head office, sign and publicly disclose a commitment to water stewardship, the implementation of the AWS Standard and achieving its five outcomes, and the allocation of required resources.	
2.1.1	A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments: <ul style="list-style-type: none">- That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes- That the site implementation will be aligned to and in support of existing catchment sustainability plans- That the site's stakeholders will be engaged in an open and transparent way- That the site will allocate resources to implement the Standard.	 Obs.
Comment	<p>Site-level commitment. The wording has similar meaning to the requirements but some commitments should be made clearer at the next iteration of the commitment: the commitment to disclose progress on WS Plan, that site implementation should be aligned to catchment plans, and that the site will allocate the necessary resources.</p> <p>The commitment is presented to stakeholders (example of presentation) and at the site it is regularly presented on screens, also in Warsaw office. On the website, a different wording is presented - more in marketing way.</p>	
2.2	Develop and document a process to achieve and maintain legal and regulatory compliance.	
2.2.1	The system to maintain compliance obligations for water and wastewater management shall be identified, including: <ul style="list-style-type: none">- Identification of responsible persons/positions within facility organizational structure- Process for submissions to regulatory agencies.	 Obs.
Comment	<p>There is a system managed as part of environmental management system to maintain compliance obligations. The results are recorded in the spreadsheet. The organisational structure on water management is identified.</p> <p>Data required for submissions to regulatory agencies is tracked and recorded on the site water quality data spreadsheet. The latest report from the regulatory agency Wody Polskie confirms the site is complying with the requirements. The site should provide a description of the process of submissions to regulatory agencies.</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	<p>Global Nestle Waters strategy on water stewardship is applicable. There is also a local strategy which indicates that water quantity is not a challenge now but water quality is. It could be updated to refer not only to quality issues caused by agriculture but also quality issues from wastewater treatment, and shared water challenges could be worded somewhat more precisely.</p>	
https://www.nestle.pl/stories/woda-kluczowe-dobro-naleczowa		

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2.3.2	<i>A water stewardship plan shall be identified, including for each target: - How it will be measured and monitored - Actions to achieve and maintain (or exceed) it - Planned timeframes to achieve it - Financial budgets allocated for actions - Positions of persons responsible for actions and achieving targets - Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.</i>	 Obs.
Comment	<p>The site maintains a detailed water stewardship plan (WSP) that covers regular actions for compliance purposes and water stewardship actions for improvements. For the evaluation against AWS standard, the improvement actions are considered by the audit team.</p> <p>The plan is structured by listing targets per each action, therefore targets often focus on actions (doing) rather than results the site wants to achieve by implementing those actions (results). The site actually has clear overall targets - primarily on water use ratio and on water regeneration (they are tracked in the site's operational management plan OMP), and the structure of the plan could be amended to link actions to the overall targets. This would facilitate the evaluation of value created as the value could be evaluated for overall targets rather than separate actions.</p> <p>The links to best practices are not clear in the plan.</p>	
2.4	<i>Demonstrate the site's responsiveness and resilience to respond to water risks</i>	
2.4.1	<i>A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.</i>	 in progress
Comment	<p>In the current analysis of risks, initiatives being implemented by the site are briefly mentioned and no plan as such or a need for a plan is noted. However, the risks analysis needs strengthening, after which this indicator 2.4.1 needs revisiting.</p> <p>Potential emergency situations were analysed in 'Zakladowa lista potencjalnych sytuacji awaryjnych_2023 ZLEWNIA'. In this table, what is written as what the site can do to prevent the risk, is actually mostly monitoring activities to give a warning about the emergency/risk potentially happening but does not consider what preventive actions could be taken to minimise the probability of an emergency/risk occurring or its magnitude. The site should better link this table with the risks analysis to see if any risks also need a development of a plan to reduce the probability of a risk occurring or its magnitude.</p>	

Finding No: TNR-005198

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Audit Number: AO-000549

3	STEP 3: IMPLEMENT - Implement the site's stewardship plan and improve impacts	
3.1	<i>Implement plan to participate positively in catchment governance.</i>	
3.1.1	<i>Evidence that the site has supported good catchment governance shall be identified.</i>	 Yes
Comment	The site maintains a close cooperation with the mayor and local institutions: regular meetings are held to discuss the water challenges and coordinate projects that aim to address those shared challenges. The site's sharing of the data on water quality in the river (from samples taken and analysed by the site) is improving the local authorities' understanding of the local water challenges.	
3.1.2	<i>Measures identified to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be implemented.</i>	 Yes
Comment	As the site is a water bottling site, the main way to respecting the water rights of others is by analysing the water balance in the catchment, monitoring the groundwater level at piezometric wells, and associated measures to ensure the right of others in the catchment to have sufficient amount of good quality water is not compromised. This is covered by the whole AWS implementation process at the site and therefore specific measures for this indicator are not identified.	
3.2	<i>Implement system to comply with water-related legal and regulatory requirements and respect water rights.</i>	
3.2.1	<i>A process to verify full legal and regulatory compliance shall be implemented.</i>	 Yes
Comment	The site conducts yearly compliance evaluation and records results in the attached spreadsheet. The main water authority, Wody Polskie, conducts regulatory evaluations (latest one was in June 2020) and no issues have been raised. Their visits are planned based on risks.	
3.2.2	<i>Where water rights are part of legal and regulatory requirements, measures identified to respect the water rights of others including Indigenous peoples, shall be implemented.</i>	 Yes
Comment	The requirements meant to respect the water rights of others are integrated in the permits issued to the site. No other specific legal and regulatory requirements on water rights are applicable.	
3.3	<i>Implement plan to achieve site water balance targets.</i>	
3.3.1	<i>Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.</i>	 Yes

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Comment The site has a target on water loss ratio that is tracked at the OMP level by the management team, and the data on this indicator is also available in the sheet 'KPI' of the water stewardship plan. The water loss ratio achieved in 2021 was 0.65 L/L. In 2022, the target was 0.88 L/L to account for the new planned well and associated testing but actual achieved was less, 0.68 L/L. For 2023, the target is 0.74 and the YTD value of the indicator is 0.93 because of two reasons: lower production volumes and start of operations of the new well (water is being withdrawn but not bottled yet).

To help track the progress on this target and also to help control and manage the site water balance, the site has started using e-Tool. Water saving projects implemented in previous years are delivering benefits. In addition, the site is undertaking testing to see if one of the water treatment stations can be switched off to avoid both water treatment stations running at minimum capacity all the time (currently this is required for quality purposes). Other possibilities under investigation current include CIP optimization and the possibility of parallel operation of two wells and water mixing for the needs of bottling lines.

Training on water on site was conducted. The site also conducts awareness raising activities on encouraging water savings, e.g. posters in Nalenczow park.


3.3.2 *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.* 
Yes

Comment Water scarcity is not a shared challenge but the site has a target on water loss ratio (liters of water withdrawn but not bottled, per liter of water bottled) - see description above. The water loss ratio has slightly increased in 2022 compared to 2021, and in 2023 it is so far also increasing - all associated with the new BH7 well.

3.3.3 *Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.* 
Yes

Comment No re-allocation of water to social, cultural or environmental needs is applicable at the site.

3.4 *Implement plan to achieve site water quality targets*

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

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Comment The site has an overall water regeneration target - by 2025, to regenerate the same amount of water that the site withdraws. The progress against this target is tracked in the site's OMP. All water regeneration projects implemented or proposed by the site are on improving water quality in the catchment. Although the KPI for this target used at Nestle is called cubic meters of water regenerated, it is actually cubic meters of volumetric water benefit delivered (progress worldwide is also communicated in terms of m3 of volumetric water benefit delivered). Actions on separate regeneration projects are included and tracked at the water stewardship plan. Based on the interviews, WRI's methodology 'Volumetric Water Benefit Accounting' is used to calculate water benefit. The correct application of the methodology was not assessed as the data verification is not part of the scope of AWS certification, although several considerations were looked at briefly.

The main water quality improvement projects implemented or undergoing implementation and contributing to the regeneration target:

1) UV lamp project in Nalenczow. The reason the project was proposed, is that bacterial contamination (presence of e-coli) was noted in the treated effluent of the municipal WWTP. Bacteriological parameters of the effluent are not controlled (they are controlled for the water supply though). A UV lamp was installed on the effluent before its discharge to the river, to treat bacteriological contamination. The project was completed in Nov 2022, and the water benefit started to be counted from Dec 2022. The site had effluent quality data before the project and now effluent quality after the project is monitored. The benefit is not counted for months when it was not found to be present in the effluent prior to the project. However, the auditors noted that water benefit is projected to be calculated based on total amount of treated effluent passing through the UV lamp but about 10 % of the effluent is Nestle's wastewater, which is mostly industrial wastewater and therefore very low in e-coli anyway. I.e. counting the volumetric water benefit for all of the WWTP's effluent would overestimate the benefit achieved.

2) Replacement of pipes in Wawolnica area where old pipes are with asbestos. This project was suggested to Nestle by the water treatment plan in Wolwolnica. Nestle's support is for part of the project (part of the piping) – for stage 1. Project was completed in 2021 and benefit was counted for the whole year of 2022. The details of how the benefit was counted were not looked at during this audit.

3) Connection to municipal sewerage network for Cynkow village. Before the project, water quality in Bochońniczanka was poor and the site wanted to understand why. It contacted Environmental protection office and they sent their information on water quality but it was generic and did not point to where the problems were. With the Fishermen association, the site were analysing the situation on site at Bochońniczanka river and saw pipes leading to the river. Then the site discussed the situation with the municipality, which indicated that officially, each house has a septic tank but in reality these tanks are often in poor condition. The municipality had an idea to build the wastewater collection network. The site financed the materials, the municipality provided human resources (workers). Construction started in 2021. The municipality calculated that about 7000 m3/year of wastewater would be connected to the municipal wastewater treatment plant and properly treated once all households are connected. There was some delay in implementing the project and currently about one third of the households are connected.

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



Yes






Comment During the interview with the municipal wastewater treatment plant, it was confirmed that in terms of physicochemical parameters, the treated effluent is of higher quality than the river water. The effluent was high in bacteriological contamination but the bacteriological contamination has been highly reduced with the UV lamp project.

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

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3.5.1	Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.		in progress
Comment	<p>The site considers that their water regeneration project on improving the municipal WWTP's effluent quality is helping improve the status of IWRAs, but a clearer link is needed for this: a clear description of each IWRA status and threats, in order to see how the regeneration projects can enhance the status of specific IWRA(s).</p> <p>Other actions that are related to IWRAs:</p> <ul style="list-style-type: none">- The site is testing water quality at springs. First results do not indicate problems with the spring water quality but the site will be checking monthly. Monitoring activity is a data gathering activity to better understand the status but is not on its own a practice to enhance the IWRA.- Cooperation with Fishermen association - the association takes care of the pond in the Nalenczow spa.- Bystra is used for fly fishing and trout fishing. Although Bystra river as such is not identified as IWRA, projects that benefit the water quality of Bochoznica and Bystra, also improve the status of Bystra. <p>There is also a project idea on WWTP effluent ditch that discharges to Natural 2000 area - this is under investigation currently, so it could be considered for future improvement of the IWRA but not yet for the indicator on implemented actions.</p>		
Finding No: TNR-005204			
3.6	Implement plan to provide access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers at all premises under the site's control.		
3.6.1	Evidence of the site's provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers onsite shall be identified and where applicable, quantified.		Yes
Comment	The site's provision of adequate access to WASH on site was confirmed during the onsite visit.		
3.6.2	Evidence that the site is not impinging on the human right to safe water and sanitation of communities through their operations, and that traditional access rights for indigenous and local communities are being respected, and that remedial actions are in place where this is not the case, and that these are effective.		Yes
Comment	<p>No issues found or raised by Wody Polskie (regulatory institution), cooperation with the Mayor, municipality and the municipal water and wastewater treatment provider. Favourable view of the site's contribution to the wastewater treatment and water supply in the area.</p> <p>At the catchment level, when bacteriological contamination was found in water supply in one of the villages, the site donated bottled water until the water supply issue was resolved.</p>		
3.7	Implement plan to maintain or improve indirect water use within the catchment:		
3.7.1	Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.		Obs.
Comment	There are no indirect water use targets.		
3.7.2	Evidence of engagement with suppliers and service providers, as well as, when applicable, actions they have taken in the catchment as a result of the site's engagement related to indirect water use, shall be identified.		Yes

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Comment	As part of the site's sustainability work the site is collecting answers to sustainability questionnaire from its suppliers that also includes a question on practices implemented related to water savings and water resources protection.	
3.8	<i>Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have.</i>	
3.8.1	<i>Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.</i>	 Yes
Comment	The site not only communicates concerns to the owner of the municipal wastewater treatment plant but developed and supported implementation of a project to address concerns. See description of the UV lamp project in Nalenczow.	
3.9	<i>Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.</i>	
3.9.1	<i>Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.</i>	 Yes
Comment	Close cooperation with the municipality, water supply and wastewater service providers, including development of projects to address shared water challenges. The site shares the data on water quality from its monthly monitoring at selected locations.	
	There is a plot of land nearby the site, the owner of which is planning a petrol station on that land. The site cooperated with that owner and piezometers were installed in his plot to provide baseline monitoring data (for later comparison with the situation after the petrol station is installed).	
3.9.2	<i>Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.</i>	 Yes
Comment	The site expended its water metering and/or changed them and installed data transmitters in order to get a real-time data on the e-Water tool. The first data analysis on the online system is now being done - the online data was seen during the audit. Continual analysis and implementation of water recovery and water saving projects.	
3.9.3	<i>Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.</i>	 Yes
Comment	The monthly sampling and analysis of river water quality at various locations in the catchment can be highlighted as best practice. Water regeneration study with its project ideas can also be considered as best practice implemented.	
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>	 Obs.
Comment	Testing of spring water to monitor its water quality to ensure it is safe for residents to use is considered as best practice implemented. This is considered as a rather weak best practice on IWRAs. The site needs to identify further best practices and enhance actions on IWRAs.	
3.9.5	<i>Actions towards achieving best practice related to targets in terms of WASH shall be implemented.</i>	 Yes
Comment	Donation of bottled water to the households where municipal water supply was found to be with bacteriological contamination.	

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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 At the start of each year, the site analyses what happened last year and plan next year. Meetings are held at the site and with the zone (regional function of Nestle Waters). Projects, monitoring, and targets are discussed. At site level, evaluation is done based on the OMP. At evaluation with regional function, review acceptability index, feedback from stakeholders, costs and benefit - go line through line of the water stewardship plan and update it. So this is evaluation per action.

Previous year's (2022) water stewardship plan was reviewed and it was noted that it had a number of actions noted as 'ongoing' - those are recurring yearly actions. For these, instead of noting 'ongoing', yearly performance could be noted, e.g. whether the year's plan on river water quality monitoring was implemented (in terms of number of sampled sites and whether all months were monitored).

For the overall targets on water loss ratio and water regeneration (which is actually volumetric water benefits), the evaluation is done in OMP and yearly evaluation is done at the management review (slide 11).

4.1.2 *Value creation resulting from the water stewardship plan shall be evaluated.*

 in progress

Comment The site did not evaluate the overall value created to the site from implementing the water stewardship activities. Instead, value is briefly described for each action: in the water stewardship plan, the column 'Benefit & Costs' is used to summarise the benefit of the action either to the site or to the catchment. Mostly it's a short sentence, as evaluating the value of each action is difficult.

Finding No: TNR-005046

4.1.3 *The shared value benefits in the catchment shall be identified and where applicable, quantified.*

 Obs.

Comment As indicated above, in the water stewardship plan, the column 'Benefit & Costs' is used to summarise the benefit of the action either to the site or to the catchment. Mostly it's a short sentence, as evaluating the value benefit of each action to the catchment is difficult. In auditors' view, the site has a unique opportunity to evaluate the shared value benefit from its water stewardship activities by using river quality monitoring data prior to and after the 'regeneration' projects implemented.

4.2 *Evaluate the impacts of water-related emergency incidents (including extreme events), if any occurred, and determine the effectiveness of corrective and preventative measures.*

4.2.1 *A written annual review and (where appropriate) root-cause analysis of the year's emergency incident(s) shall be prepared and the site's response to the incident(s) shall be evaluated and proposed preventative and corrective actions and mitigations against future incidents shall be identified.*

 Yes

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Comment The site maintains a list of what it considers incidents - there were no water-related incidents. This was also confirmed by the site manager (email attached).
As the auditors noted one exceedance of suspended solids in stormwater+overflow discharged to the local stream, it was discussed during the audit whether this would be considered incident or compliance violation. As the stormwater+overflow needs to be monitored every second month but the site monitors it monthly, two readings in a sequence would be considered a breach of permit conditions. Nevertheless, the site analysed why the high suspended solids happened and if anything should be done to prevent re-occurrence.

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.*



Yes

Comment At the start or end of each year, the EHS manager calls stakeholders. Monthly meetings are held with those stakeholders with which common projects are planned or are being implemented. On the World Water Day, the site invited all stakeholders to a joint meeting to discuss water stewardship performance.

4.4 *Evaluate and update the site's water stewardship plan, incorporating the information obtained from the evaluation process in the context of continual improvement.*

4.4.1 *The site's water stewardship plan shall be modified and adapted to incorporate any relevant information and lessons learned from the evaluations in this step and these changes shall be identified.*



Yes

Comment The site maintains yearly versions of the plan, although a number of actions in the plan are ongoing. Other part of actions though differ for different years.

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5	STEP 5: COMMUNICATE & DISCLOSE - Communicate about water stewardship and disclose the site's stewardship efforts	
5.1	Disclose water-related internal governance of the site's management, including the positions of those accountable for legal compliance with water-related local laws and regulations.	
5.1.1	The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.	Yes
Comment	The governance is described on the website: https://www.nestle.pl/stories/woda-kluczowe-dobro-naleczowa	
5.2	Communicate the water stewardship plan with relevant stakeholders.	
5.2.1	The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.	Obs.
Comment	Main elements of the plan were explained during the meeting with stakeholders on the occasion of the World Water Day. Evidence was not found that a clearer plan (with confidential or too detailed parts taken out) was communicated to stakeholders but separate parts relevant to specific stakeholders are discussed in bilateral meetings and stakeholder interviews confirmed adequate stakeholder understanding of the site's plans.	
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.	Obs.
Comment	<p>The site uses the following means:</p> <ul style="list-style-type: none"> - Bilateral meetings with stakeholders, where water stewardship issues relevant for those stakeholders are discussed - Picnic for neighbourhood and employees, where water stewardship actions are presented - Email to all stakeholders with a summary of activities. - Boards in the park on selected activities. - World Water Day meeting with stakeholders, where a presentation was shown. Target and actual performance for specific projects were discussed. Actual performance is not always on the slides but was reportedly explained, and based on interviews with the stakeholders, they have a realistic understanding. <p>Quantified performance against targets is partially communicated: in a meeting with stakeholders, target and actual performance for specific projects is discussed, although total performance in a year against the target is not really included. Separate projects are reported in the media (see articles uploaded for earlier indicators) but overall performance against targets (e.g. against the regeneration pledge) is not disclosed to a wider audience.</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.	Obs.
Comment	The shared water related challenges are communicated in different wording for different audiences and in different media. See also observation on understanding the term 'challenge' at the site.	

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5.4.2	<i>Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.</i>	 Yes
Comment	There was multiple evidence on efforts made by the site to engage, coordinate and support public sector agencies - see descriptions of earlier indicators.	
5.5	<i>Communicate transparency in water-related compliance: make any site water-related compliance violations available upon request as well as any corrective actions the site has taken to prevent future occurrences.</i>	
5.5.1	<i>Any site water-related compliance violations and associated corrections shall be disclosed.</i>	 Yes
Comment	There were no compliance violations - see comment for the indicator 4.2.1.	
5.5.2	<i>Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.</i>	 Yes
Comment	No corrective actions had to be disclosed.	
5.5.3	<i>Any site water-related violation that may pose significant risk and threat to human or ecosystem health shall be immediately communicated to relevant public agencies and disclosed.</i>	 Yes
Comment	There were no compliance violations.	

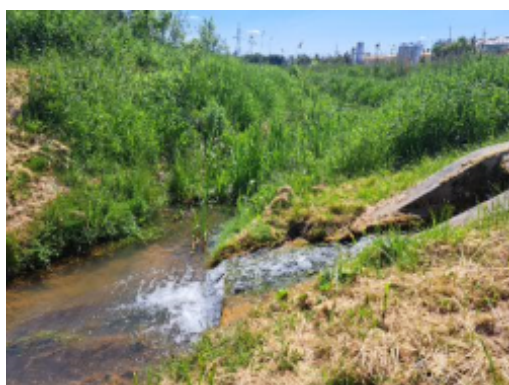
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Photographic Evidence from Audit

✓
Yes



Discharge from settling pond.jpg



WWTP

IMG_5242.jpeg



WWTP

IMG_5238.jpeg

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WWTP

IMG_5245.jpeg



Chemicals storage on site.jpg



Piezometer.jpg

WSAS

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

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WWTP

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WWTP

IMG_5244.jpeg



Bottling line.jpg

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Well BH3.jpg



Well BH7.jpg

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WWTP

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Well BH1.jpg

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Bochohniczanka after discharge.jpg



WWTP

IMG_5237.jpeg



Cooling tower.jpg

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Fire pond.jpg



New well BH7.jpg



WWTP
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Settling pond.jpg



WWTP

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WWTP

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Piezometers.jpg

Previous Findings		
	<i>All non-conformities raised in the previous audit have been satisfactorily closed.</i>	<div><div></div><div>Yes</div></div>
Comment	No non-conformities were raised at the previous audit.	