SITE DETAILS
Site: Nestlé Waters Bahrain - AlManhal Water Factory
Address: ALMUSALA, BLOCK 411, ROAD 1161, BUILDING 1493, MANAMA, BAHRAIN
Contact Person: Noor Alaradi
AWS Reference Number: AWS-000592
Site Structure: Single Site

CERTIFICATION DETAILS
Certification status: Certified Core
Date of certification decision: 2024-Apr-16
Validity of certificate: 2027-Apr-16

AUDIT DETAILS
Audited Service(s): AWS Standard v2.0 (2019)
Audit Type(s): Initial Audit
Audit Start Date: 2023-Dec-24
Lead Auditor: Rizwan Masood

Site Participants:
Mohamad Ratrout, Factory Manager
Diya Qablan, Production Head
Noor Alaradi, Water Engineer
Parikchit Gurung, Quality manager
Zahra Hashem, Factory Engineer
CERTIFICATION REPORT
Alliance for Water Stewardship (AWS)
Audit Number: AO-000933

ADDITIONAL INFO

Summary of Audit Findings: A total of 31 findings were raised during the certification audit, 3 major non-conformities, 19 minor non-conformities, 9 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 30 days of receipt of the audit report by 11/04/2024.

The major non-conformities must be sufficiently addressed and evidence submitted to WSAS within 90 days of receipt of the report by 10/06/2024.

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

The audit team recommends certification of Nestlé Waters Bahrain - AlManhal Water Factory at Core level pending approval of the corrective actions plan and closure of the major non-conformities.

CLOSURE OF FINDINGS AND CORRECTIVE ACTION PLAN:

The Client has successfully resolved the major non-conformity and submitted the corrective action plan addressing all findings.

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


The Al Manhal water factory is located about 6 km South-West of the Manama city center, in the northern part of the Kingdom of Bahrain, in Al Musalla area. Al Manhal water factory is involved in producing bottled drinking water. It has three water sources: ground water (saline water), fresh water supplied through tankers (by service provider) and municipal water connection. Ground water and freshwater (tankers) is used for production whereas municipal water supply is for social block use i.e. toilets hand washing etc.

The audit was conducted onsite on from 24 to 26 Dec 2023.

The onsite site audit included the review of documents, interviews of stakeholders, visit of water infrastructure at site.

FINDINGS

NUMBER OF FINDINGS PER LEVEL

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<td>Minor</td>
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CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000933

FINDING DETAILS

Finding No: TNR-008973
Checklist Item No: 1.1.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Dec-24

Checklist item: 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.

Findings:
Site has not documented discharge point for its sewerage discharge point(s). Also, the ultimate receiving water body for municipal and tanker discharges was not adequately identified. It is assumed that a portion of treated water (through external WWTP) is used for agriculture but no such correspondence with WWTP or other has been documented.

Corrective action:
- Reaching out to the appropriate authorities to assess the situation, determine the discharge points, identify the receiving water bodies,
- Establish proper documentation and communication with the WWTP or other relevant entities involved in the treatment and use of treated water for agriculture.
-
Audit Number: AO-000933

Finding No: TNR-008974
Checklist Item No: 1.2.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Dec-24

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

Findings: Site has not included local communities (indigenous people) and representative of ultimate receiving bodies. Also, Identification of the degree of stakeholder engagement was not shown during the audit.

Corrective action:
- Conducting stakeholder mapping exercise to identify all relevant stakeholders, including local communities and representatives of the ultimate receiving bodies
- Implement effective communication channels to facilitate engagement with local communities and representatives of the ultimate receiving bodies
- Educate site management and relevant staff on the importance of stakeholder engagement and the inclusion of local communities and representatives of the ultimate receiving bodies

Finding No: TNR-008975
Checklist Item No: 1.3.2
Status: Response received
Finding level: Observation
Checklist item:
Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped
Findings: Site has not clearly identified/ mapped the municipal wastewater discharge.
Corrective action: 
- Identify and map the municipal wastewater discharge
Finding No: TNR-008976
Checklist Item No: 1.3.4
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Dec-24
Checklist item: Water quality of the site’s water source(s), provided waters, effluent and receiving water bodies shall be quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be quantified.
Findings: Site has not presented quality monitoring plan or results of its sewerage discharge to municipal sewerage system.
Corrective action: 
- Establish a comprehensive quality monitoring plan for its sewage discharge
- Review and update the monitoring procedures to ensure they are effective in capturing accurate and reliable data

Finding No: TNR-008977
Checklist Item No: 1.3.7
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Dec-24
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: Site has not included the cost of wastewater treatment, water quality monitoring, water related licenses costs and cost of implementation of AWS initiatives.
Corrective action: Conduct a comprehensive financial analysis, thorough assessment of all costs associated with wastewater treatment, water quality monitoring, water-related licenses, and the implementation of AWS initiatives.

Finding No: TNR-009346
Checklist Item No: 1.4.2
Status: Response received
Finding level: Observation
Checklist item: The embedded water use of outsourced services shall be identified, and where those services originate within the site’s catchment, quantified.
Findings: Embedded water use by truck cleaning company was not identified.
Corrective action: 
- Initiate communication and collaboration with the truck cleaning company to gather information about their water use practices
Finding No: TNR-008982
Checklist Item No: 1.5.4
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Dec-24
Checklist item: Water quality, including physical, chemical, and biological status, of the catchment shall be identified, and where possible, quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be identified.
Findings: Site has not collected data for chemical and biological quality status of catchment water. Also, site has not adequately identified the ultimate receiving body for its (externally treated) effluents and its quality status.
Corrective action: Our site have full chemical, microbiological & radiological analysis done for our water source (deep well) which is an indication of catchment water quality. We will approach the authorities to provide the required data if it's available. Add the ultimate receiving body for our effluent after discussion with WWTP. We will approach the relevant stakeholders to provide the required data if it's available.

Finding No: TNR-008985
Checklist Item No: 1.5.6
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Dec-24
Checklist item: Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.
Findings: Site has not identified existing and planned water-related infrastructure and their condition and potential exposure to extreme events.
Corrective action: we will approach the relevant authorities and stakeholders to gather more information related existing and planned water-related infrastructure and their condition and potential exposure to extreme events.
Finding No: TNR-008986
Checklist Item No: 1.7.1
Status: Response received
Finding level: Observation
Checklist item: Water risks faced by the site shall be identified, and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.
Findings: Some prominent water risks like spillage and contamination were not identified/documented. Also, timeframes used in the analysis were not indicated.
Corrective action: " - Perform a comprehensive water risk assessment that includes a thorough evaluation of potential risks, such as spillage and contamination. 
- Clearly indicate the timeframes used in the analysis to provide context and enable effective risk evaluation."

Finding No: TNR-008987
Checklist Item No: 1.8.4
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Dec-24
Checklist item: Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.
Findings: Site has identified catchment IWRAs and assessed the status and threats. However, site has not explicitly identified the best practices for maintenance or improvement of IWRAs.
Corrective action: Try to keep reaching out the governmental authorities and the relevant stakeholder to support us in our proposal of improvement and maintenance of IWRAs. If rejected again we will escalate it to higher authorities level.

Finding No: TNR-009348
Checklist Item No: 2.2.1
Status: Response received
Finding level: Observation
Checklist item: The system to maintain compliance obligations for water and wastewater management shall be identified, including:
- Identification of responsible persons/positions within facility organizational structure
- Process for submissions to regulatory agencies.
Findings: Process for submissions to regulatory agencies was not clearly identified.
Corrective action: Conduct training sessions to educate site personnel on the submission process and the importance of compliance with regulatory requirements.
CERTIFICATION REPORT
Alliance for Water Stewardship (AWS)
Audit Number: AO-000933

Finding No: TNR-009349
Checklist Item No: 2.3.2
Status: Response received
Finding level: Observation
Checklist item: 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.
Findings: Financial budget (cost) is identified for only one action/project.
Corrective action: Allocate financial resources accordingly to ensure a balanced and effective distribution of funds.

Finding No: TNR-008988
Checklist Item No: 2.4.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Dec-24
Checklist item: A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.
Findings: Site has presented its coordination with Electricity and Water Authority (EWA). However, the coordination is not focused on the water risks (identified in 1.7.1).
Corrective action: Meet with EWA to discuss the water risks in details and build a plan to mitigate the relevant issues.

Finding No: TNR-008991
Checklist Item No: 3.3.1
Status: Closed
Finding level: Major
Due date: 2024-Jun-10
Checklist item: Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.
Findings: Site has not set water balance improvement targets for 2023.
Corrective action: A new target was set starting from 2024-2026 aligning with water reduction strategy commitment from MENA.
Finding No: TNR-008993
Checklist Item No: 3.3.2
Status: Closed
Finding level: Major
Due date: 2024-Jun-10
Checklist item: Where water scarcity is a shared water challenge, annual targets to improve the site’s water use efficiency, or if practical and applicable, reduce volumetric total use shall be implemented.
Findings: Site has not set water balance improvement targets for 2023.
Corrective action: a new target was set starting from 2024-2026 aligning with water reduction strategy commitment from MENA.

Finding No: TNR-008994
Checklist Item No: 3.4.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Dec-24
Checklist item: Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.
Findings: Site has not set any water quality improvement targets in water stewardship plan.
Corrective action: please note that Nestle limits are more strict than regulatory limits. therefore, we will integrate the water quality improvement targets in water stewardship plan for the site to comply with compliance.

Finding No: TNR-008995
Checklist Item No: 3.4.2
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Dec-24
Checklist item: Where water quality is a shared water challenge, continual improvement to achieve best practice for the site’s effluent shall be identified and where applicable, quantified.
Findings: Site has not set any water quality improvement targets in water stewardship plan.
Corrective action: please note that Nestle limits are more strict than regulatory limits. therefore, we will integrate the water quality improvement targets in water stewardship plan for the site to comply with compliance.
Finding No: TNR-008989
Checklist Item No: 3.5.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Dec-24
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: Site has identified catchment IWRAs and assessed the status and threats. However, site has not explicitly identified practices in WSP, for maintenance or improvement of IWRAs.
Corrective action: Try to keep reaching out the governmental authorities and the relevant stakeholder to support us in our proposal of improvement and maintenance of IWRAs. If rejected again we will escalate it to higher authorities level.

Finding No: TNR-009350
Checklist Item No: 3.7.1
Status: Response received
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: Site is at initial certification stage, and it recently has started engaging with its suppliers and service providers on AWS agenda, progress against targets can been verified in coming surveillance audits.
Corrective action: maintains open communication with the auditing body and actively participates in the surveillance audits to ensure a thorough evaluation of its progress against targets. This will help drive continuous improvement and support the site’s journey towards achieving and maintaining certification in water stewardship.

Finding No: TNR-008990
Checklist Item No: 3.8.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Dec-24
Checklist item: Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.
Findings: Site has not identified existing and planned water-related infrastructure and their condition consequently concerns and coordination with owners of shared water infrastructure is not effective.
Corrective action: Gather more information related existing and planned water-related infrastructure and their condition and potential exposure to extreme events.
Finding No: TNR-008996
Checklist Item No: 3.9.3
Status: Closed
Finding level: Major
Due date: 2024-Jun-10
Checklist item: Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.
Findings: Site has not provided evidence that it has implemented practices that can be considered best practice related to water quality.
Corrective action: Share the full evidences and explanation for best practice which was done by the factory

Finding No: TNR-008997
Checklist Item No: 3.9.4
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Dec-24
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: Site has identified catchment IWRAs and assessed the status and threats. However, site has not explicitly identified/implemented the best practices for maintenance or improvement of IWRAs.
Corrective action: Try to keep reaching out the governmental authorities and the relevant stakeholder to support us in our proposal of improvement and maintenance of IWRAs. If rejected again we will escalate it to higher authorities level.

Finding No: TNR-009351
Checklist Item No: 4.1.2
Status: Response received
Finding level: Observation
Checklist item: Value creation resulting from the water stewardship plan shall be evaluated.
Findings: Site has identified only one project with potential value creation in its water stewardship plan, which started in Nov 2023. So, the value creation will be for year 2024.
Corrective action: try to identify more relevant projects
### Finding No: TNR-008998
#### Checklist Item No: 4.1.3
#### Status: In Progress - CA plan approved
#### Finding level: Minor
#### Due date: 2024-Dec-24
#### Checklist item: The shared value benefits in the catchment shall be identified and where applicable, quantified.
#### Findings: Site has not evaluated shared value benefits for the actions identified in its water stewardship plan.
#### Corrective action: Establish a structured framework or methodology to evaluate the shared value benefits of the water stewardship actions.
- Evaluate the potential shared value benefits associated with each water stewardship action identified in the plan.

### Finding No: TNR-008999
#### Checklist Item No: 4.3.1
#### Status: In Progress - CA plan approved
#### Finding level: Minor
#### Due date: 2024-Dec-24
#### Checklist item: Consultation efforts with stakeholders on the site’s water stewardship performance shall be identified.
#### Findings: No evidence provided that can be considered as consultation effort with stakeholders on the site’s water stewardship performance.
#### Corrective action: Build a meeting plan to connect and communicate with each stakeholder to discuss about water stewardship performance.

### Finding No: TNR-009001
#### Checklist Item No: 4.4.1
#### Status: Response received
#### Finding level: Observation
#### Checklist item: The site’s water stewardship plan shall be modified and adapted to incorporate any relevant information and lessons learned from the evaluations in this step and these changes shall be identified.
#### Findings: Site has not demonstrated that water stewardship plan has been modified and adapted to incorporate any relevant information and lessons learned from the evaluations.
#### Corrective action: regularly reviews and updates its water stewardship plan, considering new projects and initiatives that align with its objectives.
Finding No: TNR-009002
Checklist Item No: 5.1.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Dec-24
Checklist item: The site’s water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.
Findings: Site has not explicitly documented or disclosed the positions accountable for compliance with water-related laws and regulations.
Corrective action: Share the updated roles and responsibilities document and evidence of disclosure.

Finding No: TNR-009003
Checklist Item No: 5.2.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Dec-24
Checklist item: The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.
Findings: Site has not communicated stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, to relevant stakeholders.
Corrective action: Share the clear stewardship plan to the relevant stakeholders including how the water stewardship plan contributes to AWS Standard outcomes.

Finding No: TNR-009004
Checklist Item No: 5.3.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Dec-24
Checklist item: A summary of the site’s water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.
Findings: Site has not disclosed its water stewardship performance adequately.
Corrective action: Disclose the water stewardship performance in more clear and proper way.
CERTIFICATION REPORT
Alliance for Water Stewardship (AWS)
Audit Number: AO-000933

Finding No: TNR-009005
Checklist Item No: 5.4.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Dec-24
Checklist item: The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.
Findings: Site has disclosed summary of its water resource study on company website, which include information about the shared water challenges. However, efforts made to address these challenges not disclosed.
Corrective action: Disclose the efforts made to address shared water challenges on company website.

Finding No: TNR-009353
Checklist Item No: 5.4.2
Status: Response received
Finding level: Observation
Checklist item: Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.
Findings: Efforts made by the site to engage stakeholders are not clearly identified.
Corrective action: "
- Conducting stakeholder mapping exercise to identify all relevant stakeholders, including local communities and representatives of the ultimate receiving bodies
- Implement effective communication channels to facilitate engagement with local communities and representatives of the ultimate receiving bodies
- Educate site management and relevant staff on the importance of stakeholder engagement and the inclusion of local communities and representatives of the ultimate receiving bodies"
## Report Details

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<tr>
<td>Report prepared by</td>
<td>Rizwan Masood</td>
</tr>
<tr>
<td>Report approved by</td>
<td>Naoya Ogawa</td>
</tr>
<tr>
<td>Report approved on (Date)</td>
<td>11 March 2024</td>
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## Surveillance

**Proposed date for next audit**

2024-Dec-16

**Comment**

Annual surveillance is recommended.

## Stakeholder Announcements

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<th>Location</th>
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<tr>
<td>22/11/2023</td>
<td>Company Website (PUBLIC STAKEHOLDER ANNOUNCEMENT</td>
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</table>

**Comment**

Stakeholder announcement was published on company website in English only. Nestle global has imposed restrictions on external communication in regard of Palestine war and site got special permission to publish stakeholder announcement but it was only 5 weeks before the audit.
Al-Manhal Water factory is located in the Kingdom of Bahrain which is covered by Tertiary rocks and Quaternary sediments. The sedimentary rock sequence is sub-divided (from oldest to youngest) into the Umm er Radhuma, Rus, and Dammam formations. These formations are covered by recent Tertiary (Neogene) deposits and by a Quaternary overburden made of sands, gravels, aeolian formations. In general, the geological formations are dipping gently towards the northeast (towards the Arabian Gulf). Two main aquifer systems exist in Bahrain: the Dammam aquifer system and the Rus-UER aquifer system which is the highest part of the Umm Er Radhuma aquifer. Both aquifers also extend over Saudi Arabia and Qatar. Al Manhal Water Factory is abstracting water from the Rus-UER aquifer for its production which is the basis of identification of the catchment as well. Mostly, the aquifer area is undersea and recharged with sea water. As a sub catchment, whole Bahrain country area is identified, as this has also been supported by the local governance structure.
Client/Site Background
The Al Manhal water factory is located about 6 km South-West of the Manama city center, in the northern part of the Kingdom of Bahrain, in Al Musalla area. Al Manhal water factory is involved in producing bottled drinking water. It has three water sources: ground water (saline water), fresh water supplied through tankers (by service provider) and municipal water connection. Ground water and freshwater (tankers) is used for production whereas municipal water supply is for social block use i.e. toilets hand washing etc.

Site Also has three discharges: through disposal well, wastewater tanker and municipal sewerage system. Site is mostly depending on ground water reverse osmosis (RO) and all the RO reject and backwash water is disposed through onsite disposal well. The water used for CIPs is considered as contaminated water and stored in a pit at site, which is sent to external wastewater treatment company through tankers. And social block wastewater goes into municipal sewerage system.

Summary of Shared Water Challenges
Site has identified shared water challenges with consultation of stakeholders. The identified shared water challenges in the catchment include:
- Declined water level in the aquifer as a result of increased over abstraction and negative water balance in the catchment.
- Ground water quality deterioration as a result of water level decline, rises in temperature and evapotranspiration.
- Over irrigation that is contributing to more ground water use
- Low water use efficiency
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.
Comment Yes Site has one catchment

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

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.
Comment Yes. The scope of the certification is homogeneous with respect to primary production system, water management, product or service range, and the main market structures
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.

Comment
The Al Manhal water factory is located about 6 km South-West of the Manama city center, in the northern part of the Kingdom of Bahrain, in Al Musalla area. Al Manhal water factory is involved in producing bottled drinking water. It has three water sources: ground water (saline water), fresh water supplied through tankers (by service provider) and municipal water connection. Ground water and freshwater (tankers) is used for production whereas municipal water supply is for social block use i.e. toilets hand washing etc.

Site Also has three discharges: through disposal well, wastewater tanker and municipal sewerage system. Site is mostly depending on ground water reverse osmosis (RO) and all the RO reject and backwash water is disposed through onsite disposal well. The water used for CIPs is considered as contaminated water and stored in a pit at site, which is sent to external wastewater treatment company through tankers. And social block wastewater goes into municipal sewerage system.

Site has documented its layout, physical and geographical location in maps. Site has a source deep well and a disposal well. Site has also documented its onsite water infrastructure including, process diagrams, well locations.

However, Site has not documented discharge point for its sewerage discharge point(s). Also, the ultimate receiving water body for municipal and tanker discharges was not adequately identified. It is assumed that a portion of treated water (through external WWTP) is used for agriculture but no such correspondence with WWTP or other has been documented.

Site has conducted a hydrological study on its source aquafer and identified its catchment area. Site is abstracting water from the Rus-UER aquifer, and the identified catchment encompasses the whole country. The service providers are also abstracting the water from ground in the same catchment.

Finding No: TNR-008973

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.

Comment Site is using company CSR tool to identify and priorities its stakeholders. Site has identified water related stakeholders like governance body, water related services providers, regulatory body etc. However, Site has not identified local communities (indigenous people, vulnerable, minorities, women) and representative of ultimate receiving bodies, as stakeholders. Also, Identification of the degree of stakeholder engagement was not shown during the audit. Site has identified shared water challenges with consultation of stakeholders.

Finding No: TNR-008974

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.

Comment Site has identified the degree of influence and interest between site and identified stakeholders using company CRP tool.

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.

Comment Site has documented its emergency response plan which includes responses to water related incidents like Spill of chemicals/potential pollutants. Site also has response plan in case of wastewater treatment plant failure.

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

Comment Site has mapped its water in flows, losses, Storages and out flows in water balance map. However, the municipal discharge is not identified/mapped adequability.

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.

Comment Site has developed water balance over the one-year time step (Jan to Dec 2023). It has been noted that inflow values are measured values. Site has installed adequate instrumentation on water lines and area wise water consumption is being monitored and recorded. Site has also presented annual high low variance in its water consumption depending on operations, measurements for different sections of the site.
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.

Comment Site has developed a water quality monitoring plan which define water frequency of quality monitoring of different types of water including source water, product water and process (CIP) effluents. Results of last water quality monitoring were reviewed (attached) and found compliant with applicable standards. Reports of raw water quality monitoring by Nestlé Quality Assurance Center VITTEL, are attached.

Finding No: TNR-008976

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

Comment Site has identified chemicals, fuel storage tanks, and hazardous waste as potentials sources of pollutions and also mapped these on the site layout. Site also has maintained the list of chemicals used or stored on site.

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

Comment Site has identified privately owned deep wells as on-site important water related areas (IWRAs), but these can be considered as on-site water infrastructure. Site don't have any onsite important water related areas (IWRAs).

1.3.7 Annual water-related costs, revenues, and a description or quantification of the social, cultural, environmental, or economic water-related value generated by the site shall be identified and used to inform the evaluation of the plan in 4.1.2.

Comment Site has documented annual water related costs for year 2023. These costs include costs for water extraction and processing. Site also has presented its water related revenues in 2023. However, site has not included the cost of wastewater treatment, water quality monitoring, water related licenses costs and cost of implementation of AWS initiatives. Site has identified only one project with potential value creation in its water stewardship plan, which started in Nov 2023. So, the value creation will be for year 2024. See 4.1.2. Site has not identified shared value benefits for the actions identified in its water stewardship plan. See 4.1.3.

Finding No: TNR-008977

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

Comment The site has adequate arrangements to ensure access to safe drinking water, sanitation and hygiene (WASH) for all workers. Site is also using a self-assessment tool for evaluating access to water sanitation and hygiene (WASH) at workplace. Update 2023 sheet is attached. It covers the workplace facilities related to water supply, sanitation and hygiene.

Site has maintained separate toilets for males and females also evaluated the adequacy of number of toilets for each gender.

1.4 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.
1.4.1 The embedded water use of primary inputs, including quantity, quality and level of water risk within the site’s catchment, shall be identified.

Comment Site explained that being a water drinking water producer it has very few suppliers. These includes Raw water suppliers, packing material suppliers and processing chemicals suppliers. Most of the supplies are coming from foreign countries and not located within catchment. However, raw water suppliers are located in the catchment. Site has engaged with them to quantify their water use and level of water risk within the catchment.

1.4.2 The embedded water use of outsourced services shall be identified, and where those services originate within the site’s catchment, quantified.

Comment Site has identified service providers; those lies in the catchment. These include laundry service provider and trucks cleaning services provider. Site has provided the evidence of engagement with them and quantified their water consumption. However, embedded water use by truck cleaning company was not disclosed to the site.

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

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

Comment Site has adequately identified the Water governance initiatives in the catchment. Kingdom of Bahrain has set Sustainable Development Goals (DSG) and target for 2030. Goal # 6 od DSG is availability and sustainable management of water and sanitation for all. Site also provided the agriculture water related initiatives.

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

Comment Site has identified water related legal and regulatory requirements. These includes.
- Bahrain Labor law Title -VX (Occupational safety and health and working Environment)
- Regulation of Occupational Health and Safety 2013
- Environmental standard (AIR & Water) 2011

There is no stakeholder-verified customary water rights identified. The site is located in a country with high level of gvernence structue and any such rights are covered in legal requirements.

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

Comment Site has conducted a hydrological study on its source aquifer and identified its catchment area. Site is abstracting water from the Rus-UER aquifer, and the identified catchment encompasses the whole country. The hydrological study also includes the catchment water balance and its evident that which catchment water extraction is higher than its recharge, which is causing in drop in ground water levels. Site also has presented monthly distribution of total recharge (infiltration and lateral inflow) and groundwater abstraction from the local aquifer (multi-year average data).

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.

in progress
Comment Site has conducted intense quality monitoring on all the water sources at site. This includes physical, chemical and biological analysis. Site also has collected the water quality data for different locations in the catchment which shows variance in TDS and conductivity across catchment. It is prominent that the catchment has very high TDS and conductivity. However, Site has not collected data for chemical and biological quality status of catchment water. Also, site has not adequately identified the ultimate receiving body for its (externally treated) effluents and its quality status.

Finding No: TNR-008982

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.

Comment Site has identified and mapped important water-related areas in the catchment. These include:
- Ain Adhari (Spring)
- Tubli Bay

Site also has assessed the status and threats to identified IWRAs.

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

Comment Site has identified some planned water-related infrastructure project. However, Site has not identified existing and planned water-related infrastructure and their condition and potential exposure to extreme events.

Finding No: TNR-008985

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

Comment The site explained that the WASH conditions in the catchment. The about 98.98% of people using safely managed drinking water services and 99% of population using basic sanitation resources.

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.

Comment Site has identified shared water challenges with consultation of stakeholders. The identified shared water challenges in the catchment include:
- Declined water level in the aquifer as a result of increased over abstraction and negative water balance in the catchment.
- Ground water quality deterioration as a result of water level decline, rises in temperature and evapotranspiration.
- Over irrigation that is contributing to more ground water use
- Low water use efficiency

Site also has prioritized the shared water challenges.

1.6.2 Initiatives to address shared water challenges shall be identified.

Comment Yes
Comment
Site has identified the initiatives to address the shared water challenges in the catchment. These include:
- Water supply authorities established a number of programs to increase water efficiency and control demand.
- Adoption of modern irrigation and agricultural methods.
- The Ministry of Works, Municipalities Affairs and Urban Planning has launched a number of programs to rationalize groundwater use while maintaining agricultural lands and increasing agricultural production.
- Water efficiency improvement projects at site
- Site is engaged with electricity and water authority (EVA) to have collaborative work, to overcome shared water challenges.

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.

Comment
Site has identified the water related risks and prioritized them. Some of the identified risk are:
- Water Losses at factory level
- Unstable supplied water quantity from water source
- Unstable supplied water quality from water source
- Increase price of third party supplied water
- Discharged Water Quality Management
- Deep well permit withdrawal from authorities

However, some prominent risks like spillage and contamination were not identified. Also, timeframes used in the analysis were not indicated.

1.7.2 Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.

Comment
Site is actively looking for opportunities to improve on its water risks. Some of opportunities identified are
- Install AQUASSAY system to insure good management at the site level of water flow
- Sign contract with EWA (electricity and water authority) to supply municipal desalinated water to the factory.
- Water saving projects to reduce the total water consumption in the factory.
- Sign a contract with external lab to do the analysis on monthly basis

1.8 Understand best practice towards achieving AWS outcomes: Determining sectoral best practices having a local/catchment, regional, or national relevance.

1.8.1 Relevant catchment best practice for water governance shall be identified.

Comment
Site has identified catchment best practices to improve catchment water governance. These include:
- Water supply authorities established a number of programs to increase water efficiency and control demand.
- Adoption of modern irrigation and agricultural methods.
- The Ministry of Works, Municipalities Affairs and Urban Planning has launched a number of programs to rationalize groundwater use while maintaining agricultural lands and increasing agricultural production.
- National Sustainable Development Goals (DSG) and target for 2030.
1.8.2  Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.

Comment  Site has identified catchment best practices to improve catchment water balance. These include:

- Water supply authorities established a number of programs to increase water efficiency and control demand.
- Adoption of modern irrigation and agricultural methods.
- The Ministry of Works, Municipalities Affairs and Urban Planning has launched a number of programs to rationalize groundwater use while maintaining agricultural lands and increasing agricultural production.
- Water efficiency improvement projects at site

1.8.3  Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.

Comment  Site has identified catchment best practices to improve water quality of supplied water and effluents. These include:

- Upgradation of Tubli wastewater treatment plant
- Rehabilitation of Ras Abu Jarar RO desalination plant

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

Comment  Site has identified catchment IWRAs and assessed the status and threats. However, site has not explicitly identified the best practices for maintenance or improvement of IWRAs.

Finding No: TNR-008987

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

Comment  Kingdom of Bahrain has set Sustainable Development Goals (DSG) and target for 2030. Goal # 6 of DSG is availability and sustainable management of water and sanitation for all. Site also has identified some ongoing WASH related projects as best practices.
2  
**STEP 2: COMMIT & PLAN - Commit to be a responsible water steward and develop a Water Stewardship Plan**

2.1  
Commit to water stewardship by having the senior-most manager in charge of water at the site, or if necessary, a suitable individual within the organization head office, sign and publicly disclose a commitment to water stewardship, the implementation of the AWS Standard and achieving its five outcomes, and the allocation of required resources.

2.1.1  
A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:
- That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes
- That the site implementation will be aligned to and in support of existing catchment sustainability plans
- That the site’s stakeholders will be engaged in an open and transparent way
- That the site will allocate resources to implement the Standard.

Comment  
The factory has established commitment which is endorsed by Factory Manager Mr. Mohamad Ratrout. The commitment statement is covering almost all aspects of alliance for water stewardship standard. The commitment has been disclosed in nestle waters MENA website.

2.2  
Develop and document a process to achieve and maintain legal and regulatory compliance.

2.2.1  
The system to maintain compliance obligations for water and wastewater management shall be identified, including:
- Identification of responsible persons/positions within facility organizational structure
- Process for submissions to regulatory agencies.

Comment  
The site has established a system for identification and maintenance of its compliance obligations. Site has identified the role and responsibilities for site legal compliance. Applicable legal requirements are also documented in site legal register. However, process for submissions to regulatory agencies was not clearly identified.

2.3  
Create a water stewardship strategy and plan including addressing risks (to and from the site), shared catchment water challenges, and opportunities.

2.3.1  
A water stewardship strategy shall be identified that defines the overarching mission, vision, and goals of the organization towards good water stewardship in line with this AWS Standard.

Comment  
The site has documented its water stewardship strategy. This defines the overarching mission, vision, and goals of the organization towards good water stewardship in line with this AWS Standard.

2.3.2  
A water stewardship plan shall be identified, including for each target:
- How it will be measured and monitored
- Actions to achieve and maintain (or exceed) it
- Planned timeframes to achieve it
- Financial budgets allocated for actions
- Positions of persons responsible for actions and achieving targets
- Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.
Comment: Site has developed Water Stewardship Plan. This includes action items (initiatives), targets, responsibilities, budget (cost), time frame. These initiatives cover both the actions related to site and the catchment. The initiatives are focused on shared water challenges and AWS standard outcomes. However, financial budget (cost) is identified for only one action/project.

2.4

Demonstrate the site’s responsiveness and resilience to respond to water risks

2.4.1

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

Comment: Site has presented its coordination with Electricity and Water Authority (EWA). However, the coordination is not focused on the water risks (identified in 1.7.1).

Finding No: TNR-008988
STEP 3: IMPLEMENT - Implement the site’s stewardship plan and improve impacts

3.1 Implement plan to participate positively in catchment governance.

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

Comment: Site has conducted Water Resources Study (WRS) for the catchment, which include hydrological information, water balance and water quality information. The outcomes of study have been publicly disclosed on company website. Also, Site has engaged with catchment water governance body (EWA) on governance related initiatives.

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

Comment: Site has been involved in supplying free water in holy places and holy occasions. As well as studying the feasibility of providing water stations in the road for labors. These actions are not company’s obligations but to respect the water rights of others including Indigenous people.

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

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

Comment: Site has established and implemented a system for identification and maintenance of its compliance obligations. Site has identified the role and responsibilities for site legal compliance.

Water related compliances were verified during the audit. This includes effluent quality monitoring, approvals and licenses form regulatory bodies and WASH requirements.

No legal or regulatory noncompliance was observed.

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

Comment: The site is location in a country with high level of governance structure and any water rights are covered in legal requirements.

3.3 Implement plan to achieve site water balance targets.

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

Comment: Site has identified actions to improve site water balance and estimated water savings after implementation. Site is also tracking the progress and water saving against actions identified in water stewardship plan. Targets for water ratio and water savings in m3 is set and communicated from global office for each country, which cascade in respective factories.

However, Site has not set water balance improvement targets for 2023.

Finding No: TNR-008991

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.
Comment: It has been noted that site is located in a catchment having significant negative balance. As explained in 3.3.1, Site has not set water balance improvement targets for 2023.

Finding No: TNR-008993

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

Comment: No such legal requirement is applicable.

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.

Comment: Site has implemented water quality monitoring plan which includes quality monitoring of different types of water including source water, drinking water, process water and wastewater and its product water. Results of last water quality monitoring were reviewed and found compliant with applicable standards. However, Site has not set any water quality improvement targets in water stewardship plan. On discussion with site it’s currently following the legal limits and company standards as target. But legal limits are obligation not improvement targets and site has not elaborated if any company standard that can demonstrate improvement from legal limits.

Finding No: TNR-008994

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.

Comment: Site has implemented water quality monitoring plan which includes quality monitoring of different types of water including source water, drinking water, process water and wastewater and its product water. Results of last water quality monitoring were reviewed and found compliant with applicable standards. However, Site has not set any water quality improvement targets in water stewardship plan. On discussion with site its currently following the legal limits and company standards as target. But legal limits are obligation not improvement targets and site has not elaborated if any company standard that can demonstrate improvement from legal limits.

Finding No: TNR-008995

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

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

Comment: Site has identified catchment IWRAs and assessed the status and threats. However, site has not explicitly identified practices in WSP, for maintenance or improvement of IWRAs.

Finding No: TNR-008989

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.

Comment: Yes
The site has adequate arrangements to ensure access to safe drinking water, sanitation and hygiene (WASH) for all workers. Site is also using a self-assessment tool for evaluating access to water sanitation and hygiene (WASH) at workplace. Update 2023 sheet is attached. It covers the workplace facilities related to water supply, sanitation and hygiene.

Site has maintained separate toilets for males and females also evaluated the adequacy of number of toilets for each gender.

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.

Comment: There is no evidence that site is impinging on the human right to safe water and sanitation of communities through its operations. Site has been involved in supplying free water in holy places and holy occasions. As well as studying the feasibility of providing water stations in the road for labors. These actions are not company's obligations but to respect the water rights of others including Indigenous people.

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.

Comment: As explained in 1.4.1, Site has engaged with its suppliers and service providers and has quantified their water use and level of water risk within the catchment. Site also has set indirect water use targets in its WSP. However, site is at initial certification stage, and it recently has started engaging with its suppliers and service providers on AWS agenda, progress against targets can been verified in coming surveillance audits.

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.

Comment: Site has identified its indirect water users in the catchment. These include raw water suppliers, laundry service provider and trucks cleaning services provider. Site has provided the evidence of engagement with them and quantified their water consumption.

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

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

Comment: As mentioned in 1.5.6, Site has not identified existing and planned water-related infrastructure and their condition consequently concerns and coordination with owners of shared water infrastructure is not effective. Site has presented its coordination with Electricity and Water Authority (EWA). However, the coordination is not focused on the water risks (identified in 1.7.1).

Finding No: TNR-008990

3.9 Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.

3.9.1 Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.
Site has conducted Water Resources Study (WRS) for the catchment, which include hydrological information, water balance and water quality information. The outcomes of study has been publicly disclosed on company website. Also, Site has engaged with catchment water governance body (EWA) on governance related initiatives.

**3.9.2** Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.

Comment: Site has implemented many initiatives to improve site water balance which can be considered as sectoral best practices. These initiatives include:
- Reduce the backwash water of the degasser project. To reduce wastewater% in the factory and total net water consumption by 5.7%
- Recover final rinse water from the washer to reduce wastewater% in the factory and total net water consumption by 17%
- Increasing the recovery of 1st pass RO from 70% to 75% and this will reduce the wastewater% in the factory and total net water consumption by 16%

**3.9.3** Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.

Comment: Site has not provided evidence that it has implemented practices that can be considered best practice related to water quality.

Finding No: TNR-008996

**3.9.4** Actions towards achieving best practice, related to targets in terms of the site’s maintenance of Important Water-Related Areas shall be implemented.

Comment: Site has identified catchment IWRAs and assessed the status and threats. However, site has not explicitly identified/implemented the best practices for maintenance or improvement of IWRAs.

Finding No: TNR-008997

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

Comment: The site has adequate arrangements to ensure access to safe drinking water, sanitation and hygiene (WASH) for all workers. Site has maintained separate toilets for males and females also evaluated the adequacy of number of toilets for each gender, which is compliant with local regulatory requirements.

Site has been involved in supplying free water in holy places and holy occasions. As well as studying the feasibility of providing water stations in the road for laborers. These actions are not company’s obligations but to respect the water rights of others including Indigenous people.

(Ref. attachments in 1.3.8, 3.1.2 and 3.2.2)
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.

Comment: Site is continuously tracking its water stewardship plan actions and evaluating progress against targets. The performance is reviewed in OMP review meeting. The performance against WSP for 2023 has been reviewed and performance report generated as attached.

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

Comment: Site water stewardship plan is not focused on cost saving but company SDGs. Site has identified only one project with potential value creation in its water stewardship plan, which started in Nov 2023. So, the value creation will be for year 2024. WSP with performance attached.

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

Comment: Site has not evaluated shared value benefits for the actions identified in its water stewardship plan.

Finding No: TNR-008998

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.

Comment: Site explained that any such incidents are discussed in management review meetings. there was no real time emergency incident in last year and this topic was discussed in the management review meeting.

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.

Comment: Site is at initial certification stage and has recently evaluated performance of its first ever WSP. However, no evidence provided that can be considered as consultation effort with stakeholders on the site’s water stewardship performance. The blurred copy of WSP plan has been uploaded on website which doesn't suffice the requirement.

Finding No: TNR-008999

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.

Comment Site is at initial certification stage and has recently developed and implemented its first ever WSP. However, Site has not demonstrated that water stewardship plan has been modified and adapted to incorporate any relevant information and lessons learned from the evaluations.
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.

Comment Site has documented and disclosed water-related internal governance and roles and responsibilities on company website. (https://sway.cloud.microsoft/MoSLgSw5BvjMRYyJ?ref=Link). However, Site has not explicitly documented or disclosed the positions accountable for compliance with water-related laws and regulations.

Finding No: TNR-009002

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.

Comment Site has communicated the website link to stakeholders, where water stewardship plan has been disclosed. But it has been noted that only a blurred copy of WSP plan has been uploaded on website which doesn’t suffice the requirement.

Finding No: TNR-009003

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.

Comment It has been noted that only a blurred copy of WSP plan has been uploaded on website which doesn't suffice the requirement.

Finding No: TNR-009004

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.

Comment Site has disclosed summary of its water resource study on company website, which include information about the shared water challenges. However, efforts made to address these challenges not disclosed.

Finding No: TNR-009005

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

Comment Nestlé Waters is committed to regenerate 100% of its water use across the different watershed by 2025. For identification of such project site has coordination with Electricity and Water Authority (EWA). However, efforts made by the site to engage stakeholders are not clearly identified.
5.5 Communicate transparency in water-related compliance: make any site water-related compliance violations available upon request as well as any corrective actions the site has taken to prevent future occurrences.

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

Comment: No water related noncompliance has been reported, confirmed by interviews, previous correspondences with regulator and valid licenses.

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

Comment: No water related noncompliance has been reported, confirmed by interviews, previous correspondences with regulator and valid licenses.

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

Comment: No water related noncompliance has been reported, confirmed by interviews, previous correspondences with regulator and valid licenses.
CERTIFICATION REPORT
Alliance for Water Stewardship (AWS)
Audit Number: AO-000933

Photographic Evidence from Audit

Hand Wash Area.jpeg

Yes
CERTIFICATION REPORT
Alliance for Water Stewardship (AWS)
Audit Number: AO-000933

Spillage Kit.jpeg

Deep Water Well (Source).jpeg
Audit Number: AO-000933

Fork Lift Area.jpeg

Disposal Well.jpeg

Drinking Water Station.jpeg