CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000887

WSAS WATER STEWARDSHIP ASSURANCE SERVICES

SITE DETAILS

Site: **Żabka Polska Sp. z o.o.**
Address: Matyi 8, 61-586 Poznań, POLAND
Contact Person: Milena Zieba
AWS Group Reference Number: AWS-G-000019
Site Structure: Multi Site

CERTIFICATION DETAILS

Certification status: Certified Core
Date of certification decision: 2024-Mar-28
Validity of certificate: 2027-Mar-28

AUDIT DETAILS

Audited Service(s): AWS Standard v2.0 (2019)
Audit Type(s): Initial Audit
Audit Start Date: 2023-Nov-28
Lead Auditor: Tanya Christensen

Audit team participants:
Patrycja Romaniuk
Tanya Christensen

Site Participants:
Patrycja Aremke, Environmental Team Manager
Marta Urbaniak, Head of Q&E Management/ ISO Officer, Żabka Polska
Michał Konieczny, Technical Team Manager
Sławomir Gorgolewski, Senior Technical Specialist
Marcin Frąckowiak, Technical Specialist
Małgorzata Lasko-Budzińska, Integrated Management System Manager
Milena Zięba, Junior Environmental Specialist
Joanna Kasowska, Head of Quality and Management Standard Żabka Group
Natalia Jankowiak, Senior Environmetal Specialist
Łukasz Wierski, Head of Technical Departament
Sławomir Biernat, Cold Store and Freezer Manager

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ADDITIONAL INFO

Summary of Audit Findings: A total of 2 Minor Non-conformities and 8 Observations were raised during the certification audit.

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 07/04/2024.

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

The audit team recommends certification Żabka Multisite 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 Initial certification audit for assessing conformity of Żabka Polska against the AWS International Water Stewardship Standard Version 2.

The Żabka Polska audit scope was for a multi-site consisting of two Distribution Centre, Plewiska and Kormoniki, that are located within 10km of each other, outside of Poznan, in Poland. The Plewiska and Komorniki sites have the same water use pattern and are almost identical in terms of water infrastructure, with Komorniki being a more modernised distribution facility having opened in 2020. Żabka leases both warehouse facilities and are only partially responsible for the on-site water infrastructure. The Plewiska and Komorniki Distribution Centres carry out the following activities:

- Acceptance of goods
- Unloading of goods and storage on the shop floor
- Washing of cargo containers
- Floor cleaning
- Preparing goods for shipment to the stores

The Żabka Polska distribution centres Plewiska and Komorniki are located in the Wirynka River Basin. The Wirynka catchment area is 101.1 km2 and it is located in the area of Wielkopolska province in the county of Poznań. It contains areas designated for the protection of habitats and species, including the Rogalinska Ostoja, the Ostoja Wielkopolska and the Wielkopolska National Park. The Wirynka catchment is almost entirely made up of sands and gravels of glacial-water accumulation. The Wirynka River catchment can be classified as a lowland catchment used for agriculture. Agricultural areas account for about 66% of the catchment area, mainly arable land and forests cover about 15% of the catchment area.

The audit was conducted onsite on the 28.11-01.12.2023.
The onsite site visit included the assessment of the Plewiska and Komorniki Distribution Centres and all relevant water-related infrastructure.

FINDINGS

NUMBER OF FINDINGS PER LEVEL

Observation	7
Minor	2

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Audit Number: AO-000887

WSAS
2 Quality StreetNorth Berwick, EH39 4HW, UNITED KINGDOM

FINDING DETAILS

Finding No:	TNR-009265
Checklist Item No:	0.2.1.1
Status:	In Progress - CA plan approved
Finding level:	Observation
Checklist item:	The Multisite operation shall nominate an "AWS Group Representative".
Findings:	It is recommended that Żabka Polska document and describe the details of the multisite, including who the nominated AWS Group Representative is and details of the sites under the multisite certificate.
Corrective action:	For the next audit, the aspect of plant scale will be documented and described in detail along with the indication of the AWS Group Representative. Details regarding certified plants will be described in detail.

Finding No:	TNR-007846
Checklist Item No:	1.3.8
Status:	In Progress - CA plan approved
Finding level:	Observation
Checklist item:	Levels of access and adequacy of WASH at the site shall be identified.
Findings:	It is recommended that Żabka compare their provision of WASH facilities onsite against the national regulations.
Corrective action:	For the next audit, a comparison of the sanitary background with national regulations will be conducted.

Finding No:	TNR-009021
Checklist Item No:	1.4.2
Status:	In Progress - CA plan approved
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:	It would be beneficial for Żabka to map the outsourced services on a regional map, to clearly show that they are located outside of the catchment.
Corrective action:	For the next audit, outsourced services will be mapped.

Finding No:	TNR-009022
Checklist Item No:	1.6.1
Status:	In Progress - CA plan approved
Finding level:	Observation
Checklist item:	Shared water challenges shall be identified and prioritized from the information gathered.
Findings:	In the next step, shared water challenges should be updated in consultation with stakeholders to demonstrate that they are indeed shared. The phrasing of water challenges should be more detailed to be explicitly linked with planned actions.
Corrective action:	For the next audit, in agreement with interested parties, common challenges will be updated and described in more detail.

Finding No:	TNR-009023
Checklist Item No:	1.7.1
Status:	In Progress - CA plan approved
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:	It will be of added value to provide more detailed information on potential costs, business impact, and specific timeframe
Corrective action:	For the next audit, information regarding potential costs, business impact, and timeframes will be detailed.

Finding No:	TNR-009024
Checklist Item No:	1.8.1
Status:	In Progress - CA plan approved
Finding level:	Observation
Checklist item:	Relevant catchment best practice for water governance shall be identified.
Findings:	Obtaining data from catchment governance policy documents (like the Catchment Management Plan required by the Water Framework Directive or the plan of conservation tasks for Natura 2000 sites present in the catchment) will contribute to the solid understanding of catchment governance and further alignment of future water stewardship activities.
Corrective action:	For the next audit, documents related to watershed management will be acquired and analyzed in terms of understanding watershed management and further adjusting future actions related to water management.

Finding No:	TNR-009025
Checklist Item No:	1.8.2
Status:	In Progress - CA plan approved
Finding level:	Observation
Checklist item:	Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.
Findings:	In the next iteration of best practices identification, it would be good to provide a list of data sources to verify whether data is up-to-date or whether other data sources could be included in the analysis.
Corrective action:	For the needs of the next audit, data sources will be provided.

Finding No:	TNR-007878
Checklist Item No:	2.3.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Nov-30
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:	The current Water Stewardship Plan does not link its targets to the 5 AWS outcomes or shared water challenges.
Corrective action:	1. Review of the current Water Management Plan 2. Understanding the 5 AWS aspects and common water challenges 3. Linking goals to the 5 AWS outcomes and common water challenges 4. Documentation and communication of changes 5. Monitoring and evaluation 6. Preparation for the next AWS audit

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000887

Finding No:	TNR-007901
Checklist Item No:	4.1.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Nov-30
Checklist item:	Value creation resulting from the water stewardship plan shall be evaluated.
Findings:	Żabka Polska have not undertaken a meaningful value creation analysis.
Corrective action:	1. Understanding the value created by the water management plan 2. Review of the current water management plan 3. Conducting a value creation analysis 4. Documentation and communication of analysis results 5. Updating the water management plan 6. Monitoring and evaluation 7. Preparation for the AWS audit

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000887

WSAS WATER STEWARDSHIP ASSURANCE SERVICES

Report Details

Report	Value
Report prepared by	Tanya Christensen
Report approved by	Juan Carlos Ceron
Report approved on (Date)	06-03-2024

Surveillance

Proposed date for next audit
2024-Nov-25

Stakeholder Announcements

Date of publication	Location
29/11/2023	WSAS Website
29/11/2023	AWS Website
01/11/2023	Żabka ESG page

Comment WSAS missed out on issuing the Żabka Stakeholder announcement.

Catchment Information

1.1.1._wirynka_map.png

Catchment Information

The source of water for CL Plewiska and CL Komorniki is the Komorniki Municipal Services Company (PUK Komorniki). Both the extraction point (Warta River) and discharge point (Wirynka River) for the sites are located in the Wielkopolski National Park. Currently, PUK Komorniki manages six water supply and sewage infrastructure facilities, as well as 27 sewage pumping stations and 2 sewage pumping stations. Water supply is made possible by 5 Water Treatment Stations (abbreviated as SUW), located in Komorniki, Wira, Szreniawa and 2 in Plewiska, while sewage collection is made possible by a modern sewage treatment plant in Leczyca.

The Żabka Polska distribution centres Plewiska and Komorniki are located in the Wirynka River Basin.

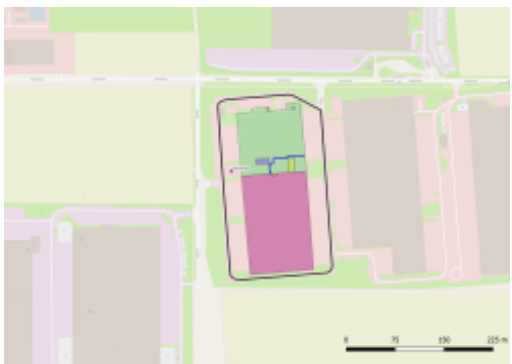
The Wirynka (Wirenka) River is a left-bank tributary of the Warta River, flowing into it at 257.7 km at the level of the village of Łęczyca. The river flows in Greater Poland in the municipalities of Komorniki and Dopiewo. The source of the river is located east of the village of Dabrowa. Its total length is 18.3 km. It has three larger tributaries: from Dopiewiec, from under Lusówka and from Dąbrowa, into which smaller flows flow from, among others, the area of Szreniawski Lake or from under Pokrzywnica. It has numerous shallows, and in the middle and lower reaches of the river the riverbed takes on a winding character. The river valley is wide and has gentle slopes suitable for development. The morphological formation of the river valley and its surroundings was directly influenced by the last Pleistocene glaciation (the North Pole glaciation). The river valley is dominated by arable land, and the river itself is a receiver of treated wastewater processed at
the sewage treatment plant in Łęczyca. No permanent water gauge observations have been and are not being carried out on the river.

The Wirynka catchment area is 101.1 km2 and it is located in the area of Wielkopolska province in the counties of Poznań. It contains areas designated for the protection of habitats and species, including the Rogalinska Ostoja (4.1% of the protected area in the catchment area), the Ostoja Wielkopolska (5.9%) and the Wielkopolska National Park (5.3%). The Wirynka catchment is almost entirely made up of sands and gravels of glacial-water accumulation. The average slope of the catchment is 1.63%o. The Wirynka River catchment can be classified as a lowland catchment used for agriculture. Agricultural areas account for about 66% of the catchment area, mainly arable land - 58%. Forests cover about 15% of the catchment area. Urban and suburban developments (including recreational areas) account for about 13%. The remaining 6% consists of roads and railroads, industrial facilities and large halls and construction sites.

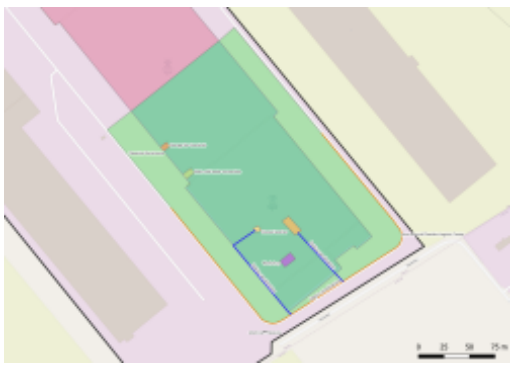
Client Description and Site Details

Logistics Centre Plewiska.png

Logistics Centre Komorniki.png



Logistics Centre Komorniki.png



Logistics Centre Plewiska.png

Client/Site Background
The Plewiska and Komorniki sites have the same water use pattern and are almost identical in terms of water infrastructure, with Komorniki being a more modernised distribution facility having opened in 2020

The source of water for CL Plewiska and CL Komorniki is the Komorniki Municipal Services Company Przedsiębiorstwo Usług Komorniki sp. z o.o, which is abbreviated as PUK Komorniki. PUK Komorniki operates a water supply network with a total length of 175.9 km and a sanitary sewer network with a length of over 146.3 km, they manages six water supply and sewage infrastructure facilities, as well as 27 sewage pumping stations and 2 sewage pumping stations. Water supply is made possible by 5 Water Treatment Stations (abbreviated as SUW), located in Komorniki, Wira, Szreniawa and 2 in Plewiska, while sewage collection is made possible by a modern sewage treatment plant in Leczyca.

Żabka conduct commercial activities as part of an organised chain of Żabka self-service stores. The retail units operated by Agents are located throughout Poland and there are currently over 10,000 stores. The Plewiska and Komorniki Distribution Centres carry out the following activities:
- Acceptance of goods
- Unloading of goods and storage on the shop floor
- Washing of cargo containers
- Floor cleaning
- Preparing goods for shipment to the stores

The processes of washing cargo containers and cleaning the floor are associated with the generation of industrial wastewater. The transport containers are washed using tunnel washers, whereas the freezer containers are washed using a handheld pressure washers.

Summary of Shared Water Challenges

Summary of Shared Water Challenges
The site has identified two key shared water challenges:

- Drought
- Lack of awareness

Żabka Polska is also mindful that there is a large farming community within the catchment for both sites, with perceived links to the food products that they are distributing.
Farming is water intensive and polluting of waterways, so they will actively explore links to the farming community and identify shared water challenges with them.

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
Comment	The Żabka Polska Plewiska and Komorniki sites are located within 10km of each other and occupy the same Wirynka surface water catchment.	
0.1.1.2	*The scope of the proposed certification shall be under the control of a single management system.*	Yes
Comment	Both sites are under the control of a single central management system, including quality control, and operate under the same AWS documented 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.*	Yes
Comment	Both sites have a homogenous primary production system, consisting of product distribution warehouses.	
0.2	**Requirements for Multisite Operations**	
0.2.1	*Multisite Management Requirements*	
0.2.1.1	*The Multisite operation shall nominate an "AWS Group Representative".*	Obs.
Comment	The current AWS Group Representative is Natalia Jankowiak, but she will shortly be moving away from the Żabka Group. Milena Zięba will be the Representative for the multisite operations at the next surveillance audit. This was confirmed verbally during the audit, it is recommended that Żabka Polska record a statement on the multisite operations, formally sating the nominee and the details of the site under the multisite structure (0.2.1.2 requirements)	
0.2.1.2	*The name and location of each site within the proposed scope for certification of the Multisite operation shall be clearly defined.*	Yes
Comment	The multisite operation consists of two distribution warehouses, Plewiska and Komorniki, located within 10 km of each other. Please note the observation raised in 0.2.1.1.	
0.2.1.3	*Where a new site has been added to the multisite certificate, an onsite audit of the site was conducted prior to it being added to the certificate register.*	Yes
Comment	No new site has been added, this was the initial certification audit of the Plewiska and Komorniki sites.	
0.2.1.4	*All AWS claims made by the client are managed through the "AWS Group Representative".*	Yes
Comment	All AWS claims will be managed through the AWS Group Representative.	

1	STEP 1: GATHER AND UNDERSTAND

1.1 *Gather information to define the site's physical scope for water stewardship purposes, including: its operational boundaries; the water sources from which the site draws; the locations to which the site returns its discharges; and the catchment(s) that the site affect(s) and upon which it is reliant.*

1.1.1 *The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including:*
- Site boundaries;
- Water-related infrastructure, including piping network, owned or managed by the site or its parent organization;
- Any water sources providing water to the site that are owned or managed by the site or its parent organization;
- Water service provider (if applicable) and its ultimate water source;
- Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies;
- Catchment(s) that the site affect(s) and is reliant upon for water.

Yes

Comment

The site has prepared a range of maps, including the following: the 'map of Plewiska and Kormoniki' shows the two sites in relation to Poznan. Żabka rents both warehouse sites, and share the premises with other organisations, so they have management responsibility from some of the onsite water infrastructure, but the landlord is responsible for stormwater management and the building infrastructure. The landlord for Plewiska is Segro and Komorniki's landlord is Pannatoni.

The catchment 'Wirynka Map' shows the surface water catchment, defined by the Wirynka River. Surface water catchments are defined by Water Poland and the water supply to the site is from the surface water source, the Wirynka River. PUK Komorniki is the water supplier for both sites, and waste water from both sites goes to the Leczyca WWTP, which is discharged into the Wirynka river. The Warta River is the ultimate receiving water body and also recharges the groundwater aquafer (ID: PLGW600060).

The water supply chain consists of Aquanet, who is responsible for extracting the water and treating it. PUK Kormoniki are responsible for distributing it, the water supply infrastructure and commercial relationship with end users.

Stormwater management is the responsibility of the respective site owners, rather than Żabka. WSAS queried if Żabka have an understanding of how it is managed, they confirmed that there is a collection tank onsite at Plewiska but they didn't know if there was oil separators installed. With the volume of trucks going in/out of both sites, this could be a source of potential pollution.

Żabka supplied site boundary maps for both Plewiska and Komornik, as well as maps showing water-related infrastructure clearer than block lines.

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
Comment	The two Żabka Distribution Centres are only 5 km's from each other, so the stakeholders are the same for the multi-sites. The process of identifying relevant stakeholders was conducted by Żabka identifying potential stakeholders operating in the catchment, and that were water-related. Żabka focussed on any permitting stakeholders and they understood that a large part of the catchment is covered by forests, and water infrastructure (Aquanet). The site contacted potential stakeholders by email and tried setting up meetings. Evidence of this is recorded, but there is currently not a system in place for tracking engagement. Żabka have prepared a stakeholder list (1.2.1_en) that lists the stakeholders in the following structure: explanation of the stakeholder, their water challenges, initiatives taken with Żabka, impact on the facility. catchment and level of engagement. The stakeholders are representative and relevant to the activities undertaken by the site, representing the physical scope of both sites. Żabka have made a robust start in identifying and interacting with relevant stakeholders and some potential gaps were identified during the audit. Aquanet (water supplier) is on the list, but not PUK Kormoniki.	
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 '1.2.2en' document summarises the current and potential degree of influence of the current stakeholders. Żabka have also recorded this in the main stakeholder description document in 1.2.1.	
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

Żabka operate the same water-response plans for all their distribution centres. There are 4 procedures that are key and water-related. The procedures are summarised in the 'Internal plans for water-related events' document, and they consist of:

- T/I-21 Water control instructions
- CLT/P-07 Crisis and emergency situations (business continuity plans)
- CLT/IH-05 Safety when working with chemicals
- CLT/I-01 Rules for the use of sorbent material

The CLT/P-07 Crisis and emergency situations (business continuity plans) has 'Long-term lack/limited access to water' as a risk.

The 'CLT P-07 Z-01 - List of contact persons and procedure to be followed in emergency and crisis situations' document, summarises key emergency situations and their corresponding procedures, signposting the readier to the emergency contact for the relevant incident. The document covers all relevant water emergencies: Leaked chemicals and identification of a spill of unknown origin, failure of water supply and sewage network, long-term lack/limited access to water (new addition), oil leakage, glycol leakage.

Overall, Żabka have a robust set of water-related incident response plans in place for all their distribution centres.

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

Yes

Comment

Żabka Polska have identified the components of a site water balance, which is applicable to both the Plewiska and Komorniki sites. They both have simplified water use patterns, with no in-product water use and no water storage onsite, of either incoming or outflows. All 'technical process' water is for washing the storage/transport boxes, either through an automated washing tunnel or a manual pressure wash process. The washing areas are an enclosed environment and there are no losses, all water goes into the drain as industrial waste water, the site uses cleaning agents as part of the washing process.

Żabka has therefore identified inflow, outflows, losses and storage for both distribution centres. Żabka uploaded simplified water maps for both sites (against 1.1.1) post-audit, that shows the on-site water-infrastructure (washers), water supply point (inflows) and where the waste water exits the site. Although the documents supplied are simplified, they do broadly meet the requirements of the indicator.

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.*

Yes

Comment

The 'monitoring water and wastewater consumption' spreadsheet, has a tab for Plewiska and Komorniki. A team of technical specialists collects data on resource consumption, including water and Żabka have collected water use data for all sites. The spreadsheet contains data from 2021, 2022 and up to April 2023 and there are monthly values for water in and wastewater. There is also data for the following onsite water components: tunnel washer, pressure washer, onsite sanitation wastewater (the three columns in Polish).

The water balance for both sites is balanced, as there are no losses in their current water use. For the Komorniki site the 2022 data appears to be quarterly cumulative figures, rather than monthly, and Żabka will look into this further. Both sites have a very simple onsite water balance and the table is sufficient, in terms of quantifying the onsite water balance.

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	The site sends samples to external accredited test labs, in accordance with regulations. Incoming water is tested annually for both chemical and biological parameters, to check whether there are any issues with the supply infrastructure. Waste water is tested twice a year, which consist of samples being taken every two hours over a 24hr period and amalgamated into a single result. Wastewater is only tested across chemical parameters, in line with regulatory requirements. Test reports were supplied for both sites and they were compliant across all parameters.	
1.3.5	*Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.*	Yes
Comment	The Plewiska and Komorniki Distribution Centres both have two potential onsite sources of pollution: office where cleaning products are stored, and a workshop that stores technical chemicals, including chemicals for the cold store. Maps of both sites have been supplied, identifying the potential sources of pollution. The site has supplied a List of cleaning and disinfecting agents that are stored onsite, as well as the technical chemicals, they are identical for both sites. All chemical stores/workshops have sorbent stations, to address any chemical spills.	
1.3.6	*On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.*	Yes
Comment	There are no onsite IWRA's at either Plewiska or Komorniki, this was verified during the site tours.	
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.*	Yes
Comment	Żabka have prepared a spreadsheet, that records water cost data for both sites for 2022. The landlord for both sites maintains the onsite water meters, so water-related maintenance costs are included in the site rent. Żabka does conduct some minor water testing and this will be included in the annual water related cost spreadsheet at the surveillance audit. Żabka will also include the cost of implementing any WSP projects, in the years ahead. The company have also written a paper, exploring the social, cultural, environmental and economic value associated with the water generated by their facilities.	
1.3.8	*Levels of access and adequacy of WASH at the site shall be identified.*	No
Comment	There is adequate access to WASH at both Komorniki and Plewiska, which was verified during the site tour. There are no drinking stations at either site, as employees can drink the tap water safely. Żabka have benchmarked their onsite WASH facilities (levels) and supplied the evidence against 3.6.1. but these have not been benchmarked against national WASH requirements. ***Finding No: TNR-007846***	
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.*	Yes

Comment

The Żabka warehouses are distribution centres and do not immediately have any primary inputs, as there is no manufacturing or production taking place at either site. However, Żabka do have Private Label Suppliers that are in effect primary inputs, as they supply products for distribution under Żabka's name and specifications.

Żabka supplied a statement, outlining their intent to conduct LCA of their Private Label Suppliers and stated that a list would be supplied post-audit, breaking down their PLS members with an address and whether they are located in the catchment. Żabka did supply a map of Poland, with the location of their PLS members marked on the map after the audit and an additional empty map of the catchment, indicating that there are no PLS members in it.

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

Obs.

Comment

Żabka have identified the following outsourced services for both sites:
- consulting/legal services
- IT services
- logistics services
- telecommunications services
- shipping services

Żabka supplied a list of addresses post-audit, for the outsourced services listed above. It would be beneficial to locate the services on an map, in line with 1.4.1 to demonstrate that they are not located in the catchment.

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.*

Yes

Comment

There is a Drought Mitigation Plan for the Wirynka Catchment Area and Żabka have identified a range of water governance documents that apply to both distribution centres. These are:

• Water Resources Law: obtaining a water law permit in accordance with the applicable law and fulfilling the requirements contained therein.
• Water Framework Directive/Water Management Plans: designation of the water bodies where Żabka Polska (ŻP) logistics centres are located.
• Water Framework Directive / National Water and Environment Programme — defining a set of basic and supplementary measures aimed at achieving good ecological status and good chemical status of waters by the balance catchment area.
• Drought Mitigation Plan: determining a list of actions for water bodies to prevent drought.
• Wastewater Directive and the National Urban Wastewater Treatment Programme: the objective is to build, expand and update municipal sewage treatment plants and sanitary sewer systems to reduce discharges of inadequately treated wastewater and protect the aquatic environment.
• Nitrates Directive and the Programme for the Prevention of Pollution of Waters by Nitrogen Compounds of Agricultural Origin, which aims to designate areas particularly vulnerable to nitrates of agricultural origin, develop and implement action plans and specify good practices.
• Environmental Protection Programme for the Municipality of Komorniki for 2021–2024 with an outlook for 2025-2028, which aims to have the local government units implement environmental protection policy in accordance with the assumptions of the most important strategic and program documents at the national, provincial and district levels.
• Agenda 2030: Global Development Strategy up to 2030. It contains 17 Sustainable Development Goals (SDGs) including: Clean Water and Sanitation, Responsible Consumption and Production, Life Below Water.

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

Comment The site has a permit for waste water, that the site has to report against and conduct testing of incoming and outgoing water. Żabka has to undertake water management reporting to Water Poland twice a year. There is also an Environmental Protection Agency in Poland but Żabka do not have to report to them, as they have no EPA permits. All warehouse sites have integrated managemnet system certification: ISO 14001. 9001.

1. Water Law: This is the main legal act regulating the management of water resources in Poland. The Water Law defines the rules of water management, protection of water from pollution, and the rules of use of surface and groundwater. The main areas are:
- Water resources management, including water management planning at local, regional and national levels.
- Protecting water from pollution, including setting water quality standards and monitoring compliance with them.
- Regulation of water use, including water abstraction for domestic, agricultural, industrial and energy purposes.
- Determining water use fees and imposing penalties for violations of the Water Law.
- Protection against floods and drought, including flood planning and construction and maintenance of flood control infrastructure.
- Protection of the aquatic environment, including protection of aquatic habitats, species of fish and other aquatic organisms.
- Regulation of water-related activities, such as the construction and maintenance of hydraulic facilities, land reclamation or water waste management.

2. European Union Directives: As a member of the European Union, Poland must comply with EU water regulations, such as the Water Framework Directive (WFD) and the Flood Risk Assessment and Management Directive. The WFD aims to protect and improve the quality of surface and groundwater within the EU, while the Floods Directive aims to manage and minimize the risk of flooding.
3. Law on Waste: This law regulates waste management, including water waste, its collection, transportation, processing, treatment and disposal. These regulations are designed to ensure adequate protection of the environment and human health.
4. Law of February 3, 1994 on nature protection (Dz.U. 1994 No. 16 item 64).
5. Act of April 27, 2001. Environmental Protection Law (Dz.U. 2001 No. 62 item 627)
6. Act of July 18, 2001 on real estate management (Journal of Laws 2001 No. 115 item 1229)
7. Law of March 8, 2013 on spatial planning and development (Journal of Laws 2013 item 647).

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

Comment The Institute of Metrology and Water Managemnet have prepared a catchment water balance for the Wirynka River basin for the year 2022. Agricultural areas account for about 63% of the catchment area, this is a water intensive and water polluting industry, but nitrate/water quality has not been identified as a potential shared water challenge, nor any stakeholders identified.

The catchment water balance is a good first pass at the indicator and takes into account almost everything listed in the AWS Guidance document, apart from water abstraction for consumption in the surface water catchment. Overall, this is robust initial catchment water balance, that shows the catchment being in a deficit of -413.6 mm for 2022, which was a very dry year.

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	Data obtained from WIOŚ and Polish Waters detailed poor water quality emerging as a potential shared water challenge to be discussed with stakeholders. Żabka doesn't yet have the data on water quality from the water source and water discharge - to be obtained. So far, it was the first year of collecting detailed data, so trends are yet to be observed. Water sources and discharge are close to each other and in the Wielkopolska National Park area.	
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.*	Yes
Comment	Important Water-Related Areas are identified and mapped. The majority of IWRAs overlap; an integrated map is desirable and was supplied by Żabka post-audit. Żabka analysed challenges for themselves so far, and a joint analysis with stakeholders is planned.	
1.5.6	*Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.*	Yes
Comment	Żabka identified existing water-related infrastructure in a document uploaded against indicator 1.1.1 (Opis) describing the sewage network and WWTP at Leczyca, as well as the water supply network. Potential threats to water-related infrastructure and their condition is further explained in the 1.5.6 document. Żabka uploaded the 'Development Strategy for the Komorniki Municipality 2021-2030', which also outlines planned water-related infrastructure, amongst other public-sector infrastructure.	
1.5.7	*The adequacy of available WASH services within the catchment shall be identified.*	Yes
Comment	The adequacy of available WASH services within the catchment is well identified, including information on the percentage of the catchment population with access to suitable WASH and data sources (regional sanitary authorities).	
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.*	Obs.
Comment	The site provided a list of their water challenges (in an Excel file). Since the site has just undertaken the first steps in communication with its stakeholders, it is not yet a shared water challenges list. Still, it is convergent with challenges faced by stakeholders and identified by the site via desk research (data available from public sources, like IMGW - Institute of Meteorology and Water Management) and stakeholder meetings. The sites have begun the process of verifying their water challenges with their stakeholders, in order to formally classify them as shared water challenges. This was also verified through the stakeholder interview process.	
1.6.2	*Initiatives to address shared water challenges shall be identified.*	Yes
Comment	Initiatives to address shared water challenges are identified and implemented. These include initiatives proposed by stakeholders and implemented in cooperation with them. More activities focused on shared water challenges in the catchment are already being planned in cooperation with stakeholders. Evidence of activities undertaken by the site was well demonstrated.	
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.*	Obs.
Comment	Water risks, including physical, regulatory and financial, faced by the site are identified and prioritised, including likelihood and severity of impact. Potential costs and business impact are present but provide little detail. A specific timeframe is yet to be added to the water risk analysis and water-related risks other stakeholders face.	
1.7.2	*Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.*	Yes
Comment	Water-related opportunities are identified in a table, including how the site may participate, assessment and prioritisation of potential savings, and business opportunities. It includes a description of how the site could participate in these opportunities and an assessment of potential savings and business opportunities. However, at this initial stage, the document is focused on the opportunities related to the site, and according to the information gathered during the audit, the site is in the process of identification with stakeholders. The site can participate in these wider opportunities.	
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.*	Obs.
Comment	The site has researched what practices would be good to implement in the catchment and presented detailed and structured results. Żabka have also identified a number of best practices undertaken within Żabka Polska, to complement the catchment practices.	
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.*	Obs.
Comment	The site has provided a description of the best practices for both facilities and the catchment.	
1.8.3	*Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.*	Yes
Comment	The site has provided a description of the best practices for both facilities and the catchment. The data source for the catchment is provided.	
1.8.4	*Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.*	Yes
Comment	The reported data on catchment best practices for site maintenance of Important Water-Related Areas comes exclusively from one stakeholder - Wielkopolski National Park; however, it is detailed and relevant for the site's IWRAs. It also provides evidence of the site's engagement in joint activities with the park.	
1.8.5	*Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.*	Yes
Comment	Relevant sector and/or catchment best practices for site provision of equitable and adequate WASH services are identified and well documented, including data sources. The site landlord Plewiska is going for BREEAM In-Use excellent status, including upgrading wash facilities onsite.	

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.* ✓ Yes
Comment	Żabka Polska have developed an organisational document for the whole group. which can be located on the organisations ESG page: https://Żabkagroup.com/esg/our-policies/ The declaration meets the requirements of the indicator, and was amended post-audit to state that their water stewardship plan is aligned with the objective (outcomes) of the AWS Standard. The Declaration has been signed by the Head of Quality and Environmental Management
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.* ✓ Yes
Comment	According to Polish law, Żabka Polska is required to obtain a water law permit. An external company (RLG) is responsible for auditing Żabka Polska across all their sites to assess that they are complying with their water law permit. The procedure for obtaining the water law permit has been explained by Żabka. The Head of Quality and Environmental Management is responsible for this process. The Head of Logistics Centre also has power of attorney to sign the water law permit and a copy was supplied as evidence.
2.3	*Create a water stewardship strategy and plan including addressing risks (to and from the site), shared catchment water challenges, and opportunities.*
2.3.1	*A water stewardship strategy shall be identified that defines the overarching mission, vision, and goals of the organization towards good water stewardship in line with this AWS Standard.* ✓ Yes

Comment

There are elements of the water stewardship strategy in the 'Water Resources Policy' but the purpose of the Water Resources Policy is to set out the rules relating to the reduction of water use and the protection of water resources. It applies to the present and future suppliers of Own Brand Products and other brand products, as well as Żabka Polska Franchisees.

The Water Resources Policy sets out the key rules relating to water resources management which are
meant to ensure universal and fair access to drinking water, improve the quality of water by preventing
contamination, limit the use of hazardous chemical substances and improve the water-use efficiency
across all sectors. As such, it contains a mission and vision, with some detailed rules (gals) set out in section 5.

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.

in progress

Comment

The site's WSP is the Water Management Plan and it is currently split into 4 Goals:

- Provide good quality water:
- minimize water consumption:
- Ensure stakeholder participation:
- Responsible management of water resources

The actions/tasks listed in the WSP are robust and apply to both the Plewiska and Komorniki sites. The plan outlines monitoring methods, the time frame for the task, budget, responsible persons and the benefits of the tasks e.g. environmental and economic benefits. There are current gaps in the plan, in terms of meeting the requirements of the indicator and these are: listing the actions to achieve the targets (tasks) and how they link to the 5 AWS outcomes and shared water challenges.

Finding No: TNR-007878

2.4

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

2.4.1

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

Yes

Comment

The site has listed their water risks and developed actions on how to mitigate and adapt to them (2.4.1_en). The water risks span the following categories: regulatory, process, social and emergency situations. The risks have been extracted from the wider list supplied in 1.7.1.

Żabka supplied a 'List of contact persons and procedure to be followed in emergency and crisis situations' procedure, which outlines their approach to 'long term lack/limited access to water' risk. In effect a simplified Business Continuity Plan, but it does not link it to public-sector or infrastructure agencies. The site has subsequently been in contact with Aquanet (water supply company) and submitted the email trail as evidence. Aquanet stated that Żabka have identified the general water risks and adaptation strategies.

3	STEP 3: IMPLEMENT - Implement the site's stewardship plan and improve impacts

3.1 *Implement plan to participate positively in catchment governance.*

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

Comment: Żabka have been actively engaging with the State Forest and the Wielkopolski National Park, which was confirmed through the stakeholder interviews. Evidence has been supplied of the engagements, including project briefs, event pictures and emails. Żabka Polska undertook seed collection and tree planting activities, contributing toward forest renewal and meadows creation. Żabka also engages the Institute of Meteorology and Water Management, to assist with their catchment water balance and to understand hydrology issues.

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.* ✓ Yes

Comment: Poland does not have a typical indigenous population, as is the case in some other countries. The issue of indigenous peoples' water rights is therefore not directly applicable in the Polish context.

In terms of access to water and management of water resources, Poland is obliged to comply with European Union and national environmental, water management and water quality legislation. These regulations aim to ensure adequate drinking water quality and the protection of water resources for all citizens, regardless of their ethnic or national origin.

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.* ✓ Yes

Comment: Żabka Polska have a summary spreadsheet of all regulatory, legal and agreement obligations, with a tab for each site, this was seen by the audit team during the audit. The spreadsheet lists all specific requirements for each Żabka site and the 'Legal Requirements Register' can be accessed by all sites, but they have no editing rights. Żabka has a water law permit in place for both distribution warehouses.

Żabka uses an external company (R.L.G.) to check for regulatory compliance and to undertake annual compliance audits of all their distribution centres. The 2022 complaince report was supplied for both sites, Komorniki and Plewiska. A document was also supplied, that summarises the process in place to verify full legal and regulatory compliance.

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.* ✓ Yes

Comment

Poland does not have a typical indigenous population, as is the case in some other countries. Therefore, the issue of indigenous peoples' water rights is not directly applicable in a Polish context.

Poland, as a member of the European Union, is obliged to comply with EU regulations on environmental protection, water management and water quality. These regulations aim to ensure adequate drinking water quality and the protection of water resources for all citizens, regardless of their ethnic or national origin.

In conclusion, indigenous peoples' water rights are not part of the legal requirements in Poland. Nevertheless, the rights of national and ethnic minorities are protected by Polish law, and access to water and the management of water resources are regulated by both national and EU legislation.

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.*

Yes

Comment

The site has set an overarching goal in their WSP to 'Minimize water consumption' and this has been reached, and evidenced in the attached presentation. Żabka also intend to undertake an analysis of private label product suppliers in terms of the amount of water used and whether located in water stressed areas,.

During the site tour, it came to light that both warehouses are introducing a new protocol on their crate washing process. Previously, both sites washed 100% of all transport boxes, whereas now they do a visual check to see if washing is required. This is already leading to fewer tunnel washing cycles. Once this has been running for a few months, then ZP will have better data on the impact of the changes. At the Plewiska site the landlord is going for BREEAM Excellent status, which means that some of the sanitary facilities will be upgraded and slightly improve the sites overall water balance.

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

Both Żabka distribution centres are in the process of changing their water use pattern for cleaning the crates. Żabka will amend the next iteration of their WSP and include a volumetric reduction target on the site's water use efficiency.

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

Neither site reallocates water, but if there is any surplus food from the distribution warehouses then it is donated for redistribution. Żabka supplied an explanation of their food reallocation programme.

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.*

Yes

Comment

One of the goals in the WSP for the Plewiska and Komorniki centres was 'to Provide good water quality' which have all been implemented and completed. The initial three tasks/targets are seen as 'business as usual' and Zabka will explore additional opportunities to address water quality issues in the catchment, particularly as agriculture contributes significantly to water quality degradation. The site will update the next iteration of their WSP and have supplied an explanation of what they will include.

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 There are no WWTP facilities at either Plewiska or Komorniki, but the cleaning optimisation project will reduced the overall amount of effluent being discharged by the site. Żabka have outlined activities that they undertake to improve water quality.

As a result of the catchment water balance exercise it became clear that agriculture is the main industry on the catchment, with the associated potential negative impact on catchment water quality.

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

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

Comment Under Goal 4 'Ensure stakeholder participation' there are activities to interact with the State Forest the National Park. Żabka have developed conservation projects with these two catchment IWRAs, the State Forest in Poznan and the Wielkopolski National Park. Żabka Group runs an employee volunteer program, and have mobilised staff to partake in conservation activities. The stakeholder interviews confirmed the interactions between ZP and their IWRA stakeholders.

Żabka launched the "Forest Project" campaign in 2023, this is in cooperation with the Regional Directorate of State Forests in Poznań and the Konstantynowo Forest District. On the 30.03.23 the employees planted 2,000 trees in a forest near Mosina (Poznań).

Żabka Polska partnered with the Wielkopolski National Park. On the 8.11.2023 ZP staff took part in the collection of seeds of: wild carrot, yarrow and St. John's wort, which will be dried, shelled and then used to create a flower meadow, whose role is to retain moisture in the soil and increase biodiversity.

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 Żabka have benchmarked the provision of WASH facilities for both sites and supplied picture evidence. This was also verified during the site tour of both facilities. The landlord at Plewiska is going for BREEAM In-Use excellent status, they will improve some WASH facilities. ZP is responsible for all provision of WASH but would need permission to change and improve equipment.

Żabka provides free female hygiene products in all women's toilets. And there is evidence of pro-active maintenance activities, such as inspection of plumbing facilities by company Chochlik, at the Komorniki Plant.

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

Żabka Polska's facilities do not violate people's rights to safe water and sanitation through their operations. This was evidenced when Żabka Polska obtained the necessary environmental documentation to start its operations, specifying the impact of these activities on the environment, human health and life, and access to sanitation facilities. In Poland, entrepreneurs are required to carry out various environmental procedures, depending on the type and scale of the planned activity. Here are some of the most important documents obtained by Żabka Polska:

- Decision on environmental conditions (environmental decision): An environmental decision is issued by a competent public administration body (e.g., mayor, mayor). This decision specifies the conditions to be met in the implementation of the project in order to minimize its impact on the environment.
- Water Law Permit: A water permit is required if a project involves the use of water or the introduction of wastewater into water or water facilities. This permit is issued by the relevant water authority and specifies the conditions for the use of water resources and protection against pollution. One of the attachments to the application for a water permit is an operative report, which specifies both the extent and type of impact and use of water, as well as the impact of the activity on groundwater and surface water, and no negative impact is found (operative reports, along with the permits obtained, are added in another section).

In summary, the impact of activities on access to safe water and sanitation is verified both at the stage of obtaining the necessary environmental permits when designing investments. This can be confirmed by the CSO's indicator of the % of households with access to basic sanitation and water supply, which was 97.6% in 2020 (read more: https://sdg.gov.pl/statistics_glob/1-4-1/).

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.*

Yes

Comment

Żabka conducted a survey and analysis of their Private Label Suppliers for water consumption and pollution. This activity was included in the WSP for the multi-sites and the results of the survey are attached to the indicator.

Żabka also held a workshop for their PLS to increase awareness of water managemnet, linked to their survey. Żabka have their Water Resource Policy in place with additional requirements for their PLS's that are located in water stressed areas. There are two conditions for sites in water stressed areas; that they use significant amount of water or discharge their wastewater directly into the environment. According to their analysis there is one plant located in a high water stress area and two plants that consume large amounts of water (500,000 m3). The plant located in the water stressed area will have to obtain water managemnet certification.

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

Comment

Żabka conducted a training event for their PLS on the 18.04.23 on 'Sustainable management of water, wastewater and waste management systems at production plants'. There were 43 participants for the 2.5 hr training event, out of 50 suppliers. All PLS companies have to sign an agreement, stating that they will meet the requirements of the Żabka Water Policy.

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

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

Yes

Comment	The site has engaged with a number of public sector stakeholders, such as: The Institute of Meteorology and Water Management; Krysztof Szymanski and State Forest: Katarzyna Mackowiak. Żabka shared three types of email that they use in their engagement process: General introduction to the AWS process and standard, Sharing Water Policy and Sharing WSP. These engagements contribute towards many parts of the standard, but misses out on the intent of 3..8 which is to engage with owners of any share water-related infrastructure. Examples of this are: landlords, Aquanet and the municipality. Żabka did this post-audit and supplied evidence of this.
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.* ✓ Yes
Comment	The site has highlighted their implementation of the ISO 14,001 standard as this is perceived by Żabka to be an additionality rather than business as usual. Żabka have also adopted a comprehensive Water Policy, and have required their Private Label Suppliers to sign up to the Water policy and water certification for high risk sites. Żabka has also proactively engaged with the State Forest and the National Par, and engaged the Institute of Meteorology and Water Managemnet on understanding their catchment.
3.9.2	*Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.* ✓ Yes
Comment	The landlords at the Plewiska and Kormoniki Disribution Centres both have a rainwater harvesting system in place, which is used for irrigation. Żabka has instigated a process optimisation project on the cleaning of transport crates, will have a significant impact on both sites' water balance#, as most of their use is tied up with the leaning of transport crates. Żabka use environmentally friendly best engineering solutions: reuse of the tunnel washing water, the last rinse of the previous cycle is reused for the 1st cleaning cycle on the next batch. There is a collection chamber in the tunnel washer, where the water is collected.
3.9.3	*Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.* ✓ Yes
Comment	The water optimisation project for transport crate cleaning, will reduce the volume of waste water discharged by the site. Żabka are looking into future catchment projects that could impact water quality issues, particularly on how to interact with the farming community in the catchment. It was discussed during the audit that the wastewater testing, in line with regulatory requirements, is considered business as usual rather than best practice.
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.* ✓ Yes

Comment	Neither site has any onsite IWRA's but they are actively engaged in improving catchment IWRA's. Żabka Polska has partnered with the Wielkopolski National Park. On 8.11.2023, employees of Żabka Polska took part in the collection of seeds of plants: wild carrot, yarrow and St. John's wort, which will be dried and shelled and then used to create a flower meadow, whose role is to retain moisture in the soil, maintain small retention and increase biodiversity. The Żabka Group, as part of its employee volunteer program, launched the "Forest Project" campaign, which it carries out in cooperation with the Regional Directorate of State Forests in Poznań and the Konstantynowo Forest District. In its first stage, which took place on March 30 2023, the organization's employees planted 2,000 trees in a forest near Mosina, near Poznań.	
3.9.5	*Actions towards achieving best practice related to targets in terms of WASH shall be implemented.*	Yes
Comment	Żabka provides female hygiene products in all toilets, at both sites. There are aerators and dual flush mechanisms installed in the toilets. Żabka operates on the Principles of Good Practice Compliance - Hygiene. The audit team observed a lot of good processes and procedures for keeping the buildings and all the people clean, personal hygiene.	

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.*

Yes

Comment: The site has fully implemented their inaugural WSP and have delivered agaisnt all the targets. The next version of the WSP will be clearly linked to AWS Outcomes and shared water challenges. The current sections of the WSP could be broadly linked to the AWS Outcomes:

Provide good water Quality - Good water quality status
Minimise water consumption - Sustainable water balance
Ensure stakeholder participation - Good water governance
Responsible managemnet of water resources - Important water related areas

The full WSP is available in indicator 2.3.2 and Żabka have prepared two presentations that evaluate their actions on 'minimising water consumption' and 'provide good water quality'. Żabka have therefore conducted an evaluation of their performance against targets in their WSP and how they contribute to the spirit of the AWS outcomes'. The next iteration of the Żabka WSP will be more clearly linked to the five AWS Outcomes as well as shared water challenges.

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

in progress

Comment: The site has prepared a document looking at the potential social, environmental and economic benefits from implementing the WSP. But this does not meet the requirements of the indicator of a financial cost-benefit component from any of the actions. The Water Management Plan outlines the budget allocated for implementing actions in the Water Stewardship Plan, but it does not record any value creation or water cost-benefit component.

Finding No: TNR-007901

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

Yes

Comment: The site had prepared a robust document that identified some general shared value benefits that could result from improved water stewardship, rather than specific benefits arising from the targets in their current WSP. Żabka submitted an new document post-audit called 'Benefits resulting from the activities included int he Water Managment Plan in 5 areas'. The document clearly breaks down shared value benefits across the 5 AWS outcomes.

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

Comment: There have been no water related incidents at either site, which Żabka confirmed in a basic written statement.

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	The site is actively engaging with their stakeholders in developing water stewardship projects and have sent stakeholders their WSP and asked for them to become involved in activities to address shared water challenges. Żabka supplied a significant volume of stakeholder consultation documents. The final step, whereby Żabka consults their stakeholder on how they performed against their WSP was missing at the time of the certification audit. Żabka approached their stakeholders post-audit and have supplied evidence of these activities. Żabka will develop a process, possible an annual workshop where they are consulted on performance, going forward.	
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 water management plan has been implemented in terms of: • Ensuring good quality water. • Minimizing water consumption. • Ensuring stakeholder participation - an attempt to contact stakeholders was made (as the plan called for). • Responsible management of water resources. The Water Policy is currently being updated, which will also be followed by modifications to the Water Management Plan. Modifications to the Plan will take place in early 2024 and will include the following: • AWS certification of more locations and improvements at CL Plewiska and CL Komorniki. • Indirect water footprint resulting from production and outsourced services. • Next steps with stakeholders. Żabka supplied a statement on how the water stewardship plan has been modified post-audit.	

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 Declaration on the ESG website lists everyone that is responsible for delivering the AWS scheme. The Head of Quality and Environmental Managment is accountable for compliance with water-related laws and regulations, but it is not clear in the Declaration that this is the case. Żabka supplied an amended Declaration post-audit that makes this clear, please reference '5.1.1. deklaracja'. An organisational structure was also supplied, to demonstrate the lines of authority going up the organisation.

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.* ✓ Yes

Comment: The site has shared their WSP with the stakeholders that have indicated that they want to work with the site on water-related issues. Żabka have amended The site has amended their WSP to clearly link actions with the 5 AWS Outcomes. Żabka have also prepared a summary document on their water stewardship activities, that can be shared with stakeholders. Examples of communication efforts with stakeholders are uploaded against 4.3.1.

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

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

Comment: Żabka has published a 'water resources management summary' on the ESG page, which states that they will meet 100% of the targets in 2023, which they have. Żabka have uploaded a number of water stewardship documents on their ESG page, promoting full transparency. This can be accessed here: https://Żabkagroup.com/esg/our-policies/

Going forward Żabka will prepare a file that is focussed on the targets in the WSP and how they have performed against these, across all the sites under certification.

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

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

Comment: The site has prepared a document '3.8.1 activities' that clearly outlines the site's shared water-related challenges and the efforts made to address them. Żabka have also prepared a 'Summary of actions to address common water challenges' document that is accessible to all in the ESG web page.

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

Comment	There is a good level of evidence to show how site has engaged with stakeholders and public-sector agencies. Żabka has supplied a summary document listing the efforts and evidence to support the statement have been uploaded across numerous indicators.	
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.*	Yes
Comment	There have been no compliance violations and Żabka stated so in indicator 4.2.1. The site is also audited annually by RLG to review if there have been any compliance violations.	
5.5.2	*Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.*	Yes
Comment	Please see 5.5.1	
5.5.3	*Any site water-related violation that may pose significant risk and threat to human or ecosystem health shall be immediately communicated to relevant public agencies and disclosed.*	Yes
Comment	Please see 5.5.1	
	Photographic Evidence from Audit	
		Yes