

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)



Audit Number: AO-000941

SITE DETAILS

Site: **Ecolab: Lerma, Mexico**

Address: Km. 52.5 Carretera México-Toluca, Parque Industrial, 52004, Lerma, Mexico State, MEXICO

Contact Person: Alejandro Montano

AWS Reference Number: AWS-000270

Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Core

Date of certification decision: 2024-Jul-18

Validity of certificate: 2027-Jul-17

AUDIT DETAILS

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

Audit Type(s): Re-Certification Audit

Audit Start Date: 2024-Jan-23

Lead Auditor: Ricardo Salas Colunga

Audit team participants:

Claudia M. Jaime

Ricardo Salas Colunga, Lead Auditor

Site Participants:

Alejandro Montaña,

Sergio Aparicio Aguilar, SHE Manager

Andrés Alberto Muñoz Ramírez, improvement engineer

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000941

ADDITIONAL INFO

Summary of Audit Findings: A total of 14 findings were raised during the certification audit, 1 major non-conformities, 6 minor non-conformities, 7 observations. The major non-conformities were of sufficient concern to warrant the categorisation of the non-conformity as major and related to governance.

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 26/04/2024.

The major non-conformities must be sufficiently addressed and evidence submitted to WSAS within 90 days of receipt of the report by 26/06/2024.

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

The audit team recommends re-certification of Ecolab Lerma at Core level pending approval of the corrective actions plan and closure of the major non-conformity.

CLOSURE OF FINDINGS AND CORRECTIVE ACTION PLAN:

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

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

Scope of Assessment: The scope of services covers the re-certification audit for assessing conformity of Ecolab Lerma México against the AWS International Water Stewardship Standard Version 2.

Ecolab Lerma's supply chain is made up of suppliers, manufacturing, distribution and customers. The plant has an installed capacity of 86 thousand tons per year, including location Lerma- Toluca; México 5 km to nearest Toluca city and description of all facilities have installed: 8 blenders, 7 reactors, 1 repackaging area, 1 dry blender, laboratory, wastewater treatment plant. The facility is located in the The Toluca Valley aquifer is located in the State of Mexico, within the Upper Lerma River basin, located south of the Mexican Altiplano and limited to the north by the Atlacomulco aquifer.

The audit was conducted onsite on 22-25 February 2024.

The onsite site visit included the assessment of warehouse areas, production, finished products, boilers, hazardous waste deposit, dining room, IWRA and wastewater treatment plant as part of the audit.

FINDINGS

NUMBER OF FINDINGS PER LEVEL

Observation	7
Minor	6
Major	1

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000941

FINDING DETAILS

Finding No:	TNR-009128
Checklist Item No:	1.1.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Mar-26
Checklist item:	<p>The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including:</p> <ul style="list-style-type: none">- Site boundaries;- Water-related infrastructure, including piping network, owned or managed by the site or its parent organization;- Any water sources providing water to the site that are owned or managed by the site or its parent organization;- Water service provider (if applicable) and its ultimate water source;- Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies;- Catchment(s) that the site affect(s) and is reliant upon for water.
Findings:	<p>The site does not include information on the pouring points, only one of the plans includes the location of the well, but does not explicitly describe it. The map with geographical coordinates is of poor quality and does not accurately indicate the point to which the coordinates correspond.</p>
Corrective action:	<p>The site will provide an updated map and site diagram detailing the location of the well, coordinates, and pouring points.</p>

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000941

Finding No:	TNR-009129
Checklist Item No:	1.2.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Mar-26
Checklist item:	<p>Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall:</p> <ul style="list-style-type: none">- Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people;- Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies;- Provide evidence of stakeholder consultation on water-related interests and challenges;- Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups;- Identify the degree of stakeholder engagement based on their level of interest and influence.
Findings:	<p>The site does not present sufficient evidence about the identification of indigenous groups in the municipality of Lerma.</p>
Corrective action:	<p>The site will research and identify any indigenous groups in the municipality of Lerma, if applicable and available. These groups, if applicable, will be added to the stakeholder list.</p>
Finding No:	TNR-009138
Checklist Item No:	1.3.4
Status:	Open
Finding level:	Observation
Due date:	2025-Mar-26
Checklist item:	<p>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.</p>
Findings:	<p>The site presents as evidence the report of its water sanitation operator with the results of an annual cycle from December 2021 to November 2022. The site could extract the information on maximum and minimum values to present them as evidence.</p>

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000941

Finding No:	TNR-009150
Checklist Item No:	1.5.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Mar-26
Checklist item:	Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.
Findings:	The site does not present evidence on customary rights.
Corrective action:	There are no customary water rights for the site. All water-related legal & regulatory requirements were identified at the time of the audit.
Finding No:	TNR-009184
Checklist Item No:	1.6.1
Status:	Open
Finding level:	Observation
Due date:	2025-Mar-26
Checklist item:	Shared water challenges shall be identified and prioritized from the information gathered.
Findings:	The evidence presented by the site contains some errors. Please refer to the checklist's item 1.6.1 for examples.
Finding No:	TNR-009185
Checklist Item No:	1.7.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Mar-26
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:	For the identified risk, the site has not identified: a given timeframe, potential costs and business impact.
Corrective action:	For the identified risk, the site will add a given timeframe, potential cost, and business impact as applicable.
Finding No:	TNR-009186
Checklist Item No:	1.8.2
Status:	Open
Finding level:	Observation
Due date:	2025-Mar-26
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:	The best practices identified for water balance by the site are not clearly presented in the sustainable water management plan.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000941

Finding No:	TNR-009192
Checklist Item No:	2.1.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Mar-26
Checklist item:	<p>A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:</p> <ul style="list-style-type: none">- That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes- That the site implementation will be aligned to and in support of existing catchment sustainability plans- That the site's stakeholders will be engaged in an open and transparent way- That the site will allocate resources to implement the Standard.
Findings:	<p>The evidence submitted by the site does not include:</p> <ul style="list-style-type: none">- That the implementation of the site will support and conform to the existing sustainability plans of the catchment(s);- That site stakeholders will be involved in an open and transparent manner; and- That the site will allocate resources to implement the Standard. <p>The site indicates where the charter was published</p>
Corrective action:	<p>Rewrite the document, clearly placing each of the items indicated in the standard, place it in the document and disseminate it again.</p>

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000941

Finding No:	TNR-009195
Checklist Item No:	2.3.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Mar-26
Checklist item:	<p>A water stewardship plan shall be identified, including for each target:</p> <ul style="list-style-type: none">- How it will be measured and monitored- Actions to achieve and maintain (or exceed) it- Planned timeframes to achieve it- Financial budgets allocated for actions- Positions of persons responsible for actions and achieving targets- Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.
Findings:	<p>The 2024 sustainable water management plan has several inconsistencies:</p> <ul style="list-style-type: none">- Some shared challenges are expressed generically as "water balance", "water quality". Another shared challenge is "increase green areas in the community" but this shared challenge was not identified during the audit.- For some objectives and actions there are no associated metrics, As they do not have an objective value it is not possible to identify the progress in meeting the objective, For example: "Pollinators help keep ecosystems healthy. Healthy ecosystems are more resilient to environmental changes, such as climate change, that can lead to water scarcity." "Benefit the community with a social responsibility activity" "Give talks to the community about correct water care" "Participate in government and NGO initiatives for water governance" "Collect eggshells to deliver them to NGOs. Eggshells can absorb minerals and residues that are harmful to the water"
Corrective action:	<p>We are going to come together as a team and ensure that each WSP objective has measurable and quantifiable tracking metrics, in addition to eliminating inconsistencies such as shared water challenges included in the plan by identifying the relationship between what we uploaded in the previous indicators and what we are writing in the WSP, and we will do this with each item that we will present in the WSP.</p>
Finding No:	TNR-009196
Checklist Item No:	3.1.2
Status:	Open
Finding level:	Observation
Due date:	2025-Mar-26
Checklist item:	<p>Measures identified to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be implemented.</p>
Findings:	<p>The site provided its environmental policy as evidence for this indicator, however it is generic and it is not clear how this policy shows measures to respect the water rights of others.</p>

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000941

Finding No: TNR-009536
Checklist Item No: 3.7.1
Status: Open
Finding level: Observation
Due date: 2025-Mar-26
Checklist item: Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.
Findings: The site could identify and set indirect water use targets in the water stewardship plan

Finding No: TNR-009213
Checklist Item No: 3.9.3
Status: Open
Finding level: Observation
Due date: 2025-Mar-26
Checklist item: Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.
Findings: The objectives should have specific goals to be able to measure the impact on water management in the catchment.

Finding No: TNR-009208
Checklist Item No: 3.9.5
Status: Open
Finding level: Observation
Due date: 2025-Mar-26
Checklist item: Actions towards achieving best practice related to targets in terms of WASH shall be implemented.
Findings: The site could link the actions related to WASH in the water stewardship plan to the AWS outcome (WASH)

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)



Audit Number: AO-000941

Finding No:	TNR-009214
Checklist Item No:	5.2.1
Status:	Closed
Finding level:	Major
Due date:	2024-Jun-25
Checklist item:	The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.
Findings:	The site has not presented evidence of communication with relevant stakeholders about the sustainable water management plan, including how the sustainable water management plan contributes to the outcomes of the AWS Standard.
Corrective action:	We are going to organize a meeting with the Stakeholders with the greatest impact and potential to give them a talk about our WSP and how this plan contributes to AWS results and we will upload the evidence of this talk.
Evidence of implementation:	Evidence of stakeholder communication attached. Water stewardship plan and performance communicated to stakeholders.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000941

Report Details

Report	Value
Report prepared by	Ricardo Salas Colunga
Report approved by	Juan Carlos Ceron
Report approved on (Date)	26-03-2024

Surveillance

Proposed date for next audit
2025-Jan-14

Stakeholder Announcements

Date of publication	Location
12/04/2023	https://www.ecolab.com/corporate-responsibility/environment/water-stewardship
12/11/2023	https://a4ws.org/certification/stakeholder-announcements/
12/11/2023	https://watersas.org/stakeholder-announcements/
Comment	The Lerma stakeholder announcement was posted on Monday, 12/4/2023.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000941

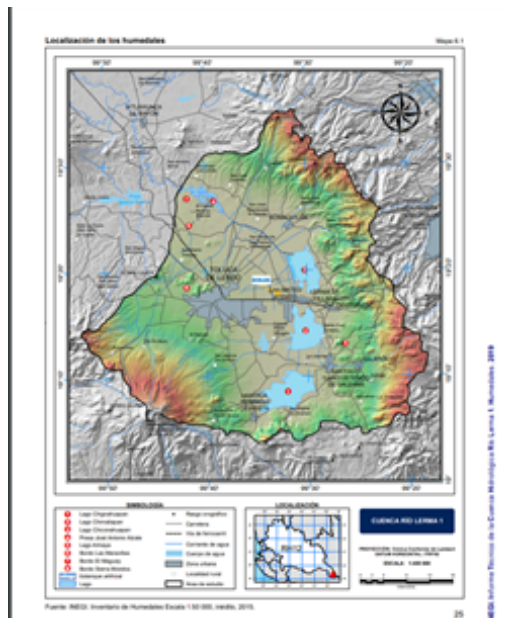
Catchment Information

Catchment Information

The Toluca Valley aquifer is located in the State of Mexico, within the Upper Lerma River basin, located south of the Mexican Altiplano and limited to the north by the Atlacomulco aquifer.

Ixtlahuaca, to the south by the Tenango hill, to the south-west of the Nevado de Toluca Volcano and to the east by the Sierra de las Cruces and Monte Alto respectively, covering a total area of approximately 2,738 km².

In relation to surface hydrography, the studied area is included within Hydrological Region No.12, in the Lerma River basin. The most important surface runoff is the main collector of the Lerma River. A few years ago it originated with the springs that formed the lagoons of Almoloya del Río, Lerma and San Bartolo, all three constituting a lake area in an advanced process of senescence. With the passing of the years and the excessive exploitation of the aquifers, the springs and lagoons have disappeared, but instead, now the Lerma River channel receives important contributions from wastewater from Toluca and neighboring towns, as well as from the industrial corridor. Toluca-Lerma, currently representing one of the most contaminated basins in the country in its Lerma-Atlacomulco section



cuenca 1.1.1.png



Límites del sitio 2.png

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000941



Límites del sitio.png

Client Description and Site Details

Client/Site Background

Ecolab is a leading global sustainability company providing water, cleaning and infection prevention solutions and services to protect people and life's vital resources. For more than 100 years, Ecolab has been driven by a relentless pursuit of science-based innovation, unmatched service, and an enduring commitment to protecting people and life's vital resources.

In the 1980s, Nalco developed Porta-Feed, a returnable and refillable chemical delivery system that eliminated the need to directly handle chemicals and reduced the number of chemical drums sent to landfills.

Ecolab's focus on protecting vital resources met critical cleaning and disinfection needs during a global pandemic. The Ecolab Science Certified™ program creates a new global standard for cleanliness and gives consumers the confidence to return to the places they eat, stay, work and play.

The safety of the workers in the company and Ecolab Lerma has had more than 1,509 continuous incidents in its facilities.



Mapa ECOLAB.png

Summary of Shared Water Challenges

Summary of Shared Water Challenges

Pollution of the Lerma River

Floods

Inequality in distribution




Environmental deterioration of the catchment

Water quality

CERTIFICATION REPORT

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Audit Number: AO-000941

0.1 General Requirements for Single Sites, Multi-Sites and Groups	
0.1.1	Eligibility Criteria
0.1.1.1	<i>The site(s) occupy one catchment OR an exception has been granted.</i> 
Comment	Yes The site is located within the Toluca Valley aquifer, located in the State of Mexico, within the Upper Lerma River basin, located south of the Mexican Altiplano and limited to the North by the Atlacomulco-Ixtlahuaca aquifer, to the South by the hill from Tenango, to the South-West of the Nevado de Toluca Volcano and to the East through the Sierra de las Cruces and Monte Alto respectively, covering a total area of approximately 2,738 km2.
0.1.1.2	<i>The scope of the proposed certification shall be under the control of a single management system.</i> 
Comment	Yes Lerma Supply chain 110 suppliers, 814 products manufacturing, distribution Shipments: 95% Local-Mx and 5% Export, 1,114 customers Serving 5 divisions: Paper, Water, Mining, Energy, Cosmetics
0.1.1.3	<i>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.</i> 
Comment	Yes 1959 Mexican Operation Start Up (IGNSAM) 1960 Saltillo Plant Start Up 1980 Lerma Plant Acquisition Nalco 1999 Suez acquires Nalco and Calgon and integrates both with Aquazur 2000 Calgon integration 2001 Name changed to Ondeo Nalco Company 2003 Ecotec Integration 2011 Ecolab Merge

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)


Audit Number: AO-000941

1 STEP 1: GATHER AND UNDERSTAND

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

1.1.1 *The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including:*

- Site boundaries;
- Water-related infrastructure, including piping network, owned or managed by the site or its parent organization;
- Any water sources providing water to the site that are owned or managed by the site or its parent organization;
- Water service provider (if applicable) and its ultimate water source;
- Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies;
- Catchment(s) that the site affect(s) and is reliant upon for water.

 in progress

Comment The physical scope of the site will be mapped, taking into account the regulatory framework and areas of interest of interested parties, including:- Site limits;
The site features scale-oriented site plans, one of which is a georeferenced image with little editing.
Water-related infrastructure, including the pipeline network, owned or managed by the site or its parent organization; The site presents plans of its hydrosanitary, shower, rainwater, firefighting, drainage and sanitary networks. During the tour, the site's well was visited; It is not included in the water infrastructure plans.
- Water service provider and its final source of water;
The site is supplied with water through a well located within its facilities for which it has legally acquired concessions. The site has an on-site rainwater collection system that is an additional source and reduces its dependence on groundwater. Both sources are definitive for the supply of the site.
- Discharge points and wastewater service provider and final receiving body or bodies of water; The wastewater and wastewater treatment service provider is Reciclagua, which is located close to the site and has its WWTP.
- The basins that affect the site and on which it depends to obtain water,
The site presents a georeferenced oriented map with a graphic scale where the basins on which it depends and those it affects are clearly identified. Basically the upper basin of the Lerma River.

The site does not include information on the dumping points; only one of the plans includes the location of the well, but does not explicitly describe it. The map with geographical coordinates is of poor quality and does not accurately indicate the point to which the coordinates correspond.

Evidence:

cuenca 1.1.1
1.0_Site_boundaries 1.1.1
Duchas 1.1.1
NM-004_ SISTEMA_VS_INCENDIOS_Rev_3,_30_SEP_22 1.1.1
NM-013_AGUA_PLUVIAL_ 1.1.1
Sanitario 1.1.1
Tuberia_de_torre 1.1.1
Water-related_infrastructure 1.1.1
WASH HIDROSANITARIO Lerma

Finding No: TNR-009128

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000941

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.

 in progress

Comment The site presents its list of interested parties, companies, government agencies, universities, NGOs, it does not include vulnerable or indigenous groups.
The site describes the process for identifying interested parties.
The site presents a list of the municipalities that have an indigenous population, however, it does not present evidence of the effort to know their number and condition in the municipality of Lerma.
The site considers the physical scope of the site to identify interested parties.
The site presents as evidence PROFEPA's recognition of the site for its participation in the national environmental audit program.
The site takes into account the participation of interested parties in sustainable water management
The site identifies the degree of commitment of interested parties.

The site does not present sufficient evidence about the identification of indigenous groups in the municipality of Lerma.

Evidence:
Stakeholders_and_Outreach_(Lerma)
Encuesta_de_Servicios_WASH,_Certificación_AWS_Planta_Lerma
Grupos_indigenas_en_la_cuenca_2024 3.1.2

Finding No: TNR-009129

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 site presents as evidence the document "Stakeholders_and_Outreach_(Lerma)", which identifies the current and potential degree of interested parties.
The site assigns an interest and impact value to identified parties to determine the degree of potential interest of interested parties.

Evidence:
Stakeholders_and_Outreach_(Lerma)

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

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000941

Comment	<p>The site presents its "Emergency Plan 2023 October", and a document with the approval of civil protection from the government of the state of Mexico.</p> <p>Being a plant that handles and produces high-risk chemical products, its plan contains all necessary considerations for emergency management, including water emergencies.</p> <p>During the audit an alarm was triggered due to a minor incident, all site personnel including staff, suppliers and auditor were taken to the security meeting point where it was explained why the alarm was triggered, it was indicated that we had to wait until the confirmed that there was no longer any risk to return to our work. The site has gone more than 1500 days without incidents of a level that requires external action.</p> <p>Evidence: Visto bueno Protección Civil Plan_de_Respuesta_a_Emergencias_2023_octubre</p>	
1.3.2	<p><i>Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped</i></p>	 Yes
Comment	<p>The site presents as evidence the document "Site_water_balance_(3) 1.3.2", which schematically presents the site's water balance, inflows, losses, storage and outflows.</p> <p>The site map does not yet contain several improvements to recover water in its processes, its industrial water treatment plant (PTAI) was recently built and is currently in its testing and stabilization phase.</p> <p>Evidence: Site water balance 1.3.2</p>	
1.3.3	<p><i>Site water balance, inflows, losses, storage, and outflows, including indication of annual variance in water usage rates, shall be quantified. Where there is a water-related challenge that would be a threat to good water balance for people or environment, an indication of annual high and low variances shall be quantified.</i></p>	 Yes
Comment	<p>The site presents as proof the document "Water consumption 1.3.3" which contains a lot of information.</p> <p>For indicator 1.3.3, it presents evidence on the water balance of the site, the information is extensive and detailed.</p> <p>The site identifies its water balance as well as its maximum and minimum annual consumption, since there is a challenge related to the availability of water in the catchment. The water balance equation is not presented in a simplified form.</p> <p>It was suggested to the site to make a graph of maximums and minimums to clearly identify how the collection of rainwater has a positive impact on the reduction of water extraction from the aquifer (graph on the "Balance" sheet).</p> <p>Evidence: Consumos_de_agua 1.3.3</p>	
1.3.4	<p><i>Water quality of the site's water source(s), provided waters, effluent and receiving water bodies shall be quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be quantified.</i></p>	 Obs.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000941

Comment The site presents as evidence of the quality of the water in the basin the INEGI report on the hydrological basin "RESULTADOS-MEXICO 1.5.4", which is the national database on water quality in this database were identified results of the wells located in the site's basin, in general no strong contamination was identified, additionally the CONAGUA report on the availability in the aquifer contains basic information on the quality of its water, which indicates that good water quality prior to the year 2000 (D.R 1501).
In relation to water discharges, the site indicates that its wastewater is treated in the "Reciclagua" plant that is located near the site. The results of the analyzes carried out indicate that it complies with the standard for irrigation water.

The quality of surface water was identified as poor
(PHR_2021-2024_RHA_VIII_LSP_cuenca_lerma 1.5.3).

The site does not present the maximum and minimum values of the water quality of the discharges. "reciclagua" in water analyzes cover an annual cycle and could be used to determine its annual variation.

Evidence:

PHR_2021-2024_RHA_VIII_LSP_cuenca_lerma 1.5.3
D.R 1501
RESULTADOS-MÉXICO 1.5.4
reciclagua_2023_2 1.3.4
231024-04A_GC_TRATAMIENTO_SA_DE_CV_(2) 1.3.4

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


Yes

Comment The site is dedicated to the production of chemical products and presents as evidence the summary of its operating document, this document includes all the products used and produced by the site.

The site includes in its plans the location of critical areas within its plant

Evidence:

Resumen_COA_NALCO_2022_(2)1,3,5
NM-003_RUTAS_DE_EVACUACION_Rev_3_30_SEP_22-Modelo_(1)1.3.5

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 During the site walk-through, several areas identified by site staff as having the potential to be identified as IWRA as defined by the AWS standard were identified.
Only one of them meets the characteristics of an IWRA with environmental and cultural values.

The site presents evidence of its environmental and cultural importance.

Staff described some of the occasions where this small site contributed to the environmental education of its visitors.

Evidence:

IWRA_LERMA1.3.6
Map_On-Site_IWRA1.3.6

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

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000941

Comment The site presents as evidence the document "Datos_Sustentabilidad_LAN". Where it presents the cost of the water source that have been reduced thanks to rainwater harvesting and water recovery in different areas of its productive process. In the document "WATER STEWARDSHIP PLAN ADED VALUE", it presents the costs of the projects implemented and identifies the environmental and cultural values generated.

Evidence:

WATER STEWARDSHIP PLAN ADED
Datos_Sustentabilidad_LAN 1.3.7

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



Comment The site presents the documents "WBCSD_Revised_WASH_Self_Assessment_Tool-final_(1)_1.3.8" and "NM-008,_WASH_AND_DRAINAGE_JOINT,_Rev_2,_30_SEP_2022-Model_1.3.8" in which it presents the assessment of access to all WASH services to workers which is an impartial exercise with ratings ranging from 1.7 to 2. The site also presents the floor plan with the distribution of WASH services in the site facilities.

The site does not present the ratio of workers to WASH services, it does not present in number of women and men to demonstrate that it meets an adequate level of access to WASH.

Evidence:

WBCSD_Revised_WASH_Self_Assessment_Tool-final_(1)_1.3.8.
NM-008,_CONJUNTO_HIDROSANITARIO_Y_DRENAJE,_Rev_2,_30_SEP_2022-Modelo 1.3.8
Encuesta_de_Servicios_WASH,_Certificación_AWS_Planta_Lerma 1.3.8
Encuesta_de_Servicios_WASH_-_2024 1.3.8

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 The site presents its list of main suppliers of primary inputs, none of which are located in the site's catchment, including the volumes purchased and the percentage they represent of their inputs.

Evidence:

Water_in_material_2023 1.4.1

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 The site identifies that it has a subcontracted service in the basin, the site presents one of the communications with the company Lavatel in which it asks for its water consumption for the calculation of its indirect water use. The site does not present an exact calculation but it is clear that its indirect consumption is very low considering the consumption identified in the text.


Evidence:

1.4.2

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000941

1.5	<i>Gather water-related data for the catchment, including water governance, water balance, water quality, Important Water-Related Areas, infrastructure, and WASH</i>	
1.5.1	<i>Water governance initiatives shall be identified, including catchment plan(s), water-related public policies, major publicly-led initiatives under way, and relevant goals to help inform site of possible opportunities for water stewardship collective action.</i>	<div> Yes</div>
Comment	<p>The site identifies government initiatives: "National Environmental Audit Program" promoted by PROFEPA in which it participates that aims to "report the environmental performance of certified companies because they reduce their emissions, waste and pollutant discharges; but also, to be accountable to society regarding the hard work done". The following projects were identified in the state water management plan: Re-engineering project of the water sector in its spheres: federal authority within the state, state and municipal authority. Carrying out studies, executive projects and the construction of drinking water works, contemplated in different federal investment programmes. Centres for immediate attention and attention to hydrometeorological emergencies (CRIAEH). Recovery of the Lerma River sub-basin (Lagoon 1). Regional inter-municipal wastewater treatment plant and collectors for the first lagoon of the Lerma River.</p> <p>The site does not include other initiatives in which it participates.</p> <p>Evidence: PHIEM1_PROGRAMA_HIDRICO_EDOMEX 1.5.6 Constancia_Beneficios_Ambientales_SIDEA_2023 1.2.1</p>	
1.5.2	<i>Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.</i>	<div> in progress</div>
Comment	<p>The site presents its overall compliance programme in document "SHE__PDCA_2022_Lerma-IN-5CG2212ZPT_legal 1.5.2", sheet "8 (2). The site describes the status of legal compliance as currently 96%, and 4% still pending (in process). The site does not include evidence related to customary rights, during the audit the site indicated that it would request an opinion and integrate it into the evidence, however this evidence has not yet been submitted.</p> <p>Evidence: SHE__PDCA_2022_Lerma-IN-5CG2212ZPT_legal 1.5.2</p>	
<div>Finding No: TNR-009150</div>		
1.5.3	<i>The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.</i>	<div> Yes</div>

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000941

Comment The site presents as evidence the document "Water balance 2024", which is a summary of the analysis of several official documents indicating:
Negative surface water balance, no precise data was identified.
Negative groundwater balance of -46,401,765 m3.
These data indicate that there is no volume available for new concessions in the hydrogeological unit called Valle de Toluca aquifer in the State of Mexico.
There is no official information related to the annual variation available.
During the audit it was indicated to the site staff that efforts should be made to comply with the requirements of the indicator beyond the official information.

Evidence:
Balance hídrico 2024
DR 1501
PHIEM1_PROGRAMA_HIDRICO_EDOMEX 1.5.6
Catchment_2024 1.5.3

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 The site presents as evidence the document "RESULTS-MEXICO 1.5.4" and "PHIEM1_PROGRAMA_HIDRICO_EDOMEX 1.5.6".
The first document presents all water quality data collected in Mexico including sampling in the catchment.
The water plan of the state of Mexico identifies that out of 52 stations 44 are rated as poor quality.
The site identifies that there is poor surface water quality in the catchment.
There is no official information on the maximum and minimum variation of surface water quality.
No shared groundwater quality challenge is identified.

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 The site presents as evidence the document "IWRA Lerma catchment" which contains information on the IWRAs in the basin.
The names of some of them are presented:
Nevado de Toluca
Flora and Fauna Protected Area Ciénegas del Lerma
Miguel Hidalgo y Costilla Insurgent National Park - La Marquesa
Lagunas de Zempoala
Cumbres de Ajusco National Park
Sierra Morelos State Park

Evidence:
IWRA cuenca Lerma

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




Comment The site presents as evidence the document "PHIEM1_PROGRAMA HIDRIC EDOMEX 1.5.6".
This document presents the condition of the water infrastructure in the catchment area, as well as the ongoing projects and investments made by the state government.

Evidence:
PHIEM1_PROGRAMA_HIDRICO_EDOMEX 1.5.6

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000941

1.5.7	<i>The adequacy of available WASH services within the catchment shall be identified.</i>	 Yes
Comment	<p>The site presents as evidence the document "1.5.6 and 1.5.7", the document presents evidence on the WASH services in the basin.</p> <p>It is identified that the drinking water coverage is 99%, drainage 90%, the infrastructure installed for the sanitation of wastewater should be sufficient to treat the total discharges, however, it does not work at 100% in the p153 of the state water plan indicate the problems and projects underway.</p> <p>Evidence: PHIEM1_PROGRAMA_HIDRICO_EDOMEX 1.5.6 1.5.6 y 1.5.7</p>	
1.6	<i>Understand current and future shared water challenges in the catchment, by linking the water challenges identified by stakeholders with the site's water challenges.</i>	
1.6.1	<i>Shared water challenges shall be identified and prioritized from the information gathered.</i>	 Obs.
Comment	<p>The site presents as evidence the document "Copy_of_Matrix_shared_challenges09_lerma_2024 1.6.1".</p> <p>The document identifies 12 initiatives to address the shared challenges according to the focus of the initiatives the site identifies in column f of the document challenges related to:</p> <ul style="list-style-type: none"> Water Scarcity (over exploitation of the acquifer) Water quality Infrastructure (flooding) Ecosystem impacts Productivity. <p>The document has information that seems incorrect such as the "medium impact strategic project" that indicates its partner is "Lavatel" which is the company that washes the company's uniforms and consists of "Construction of a pluvial collector in Nueva Santa María las Rosas in the municipality of Toluca PE-219", that seems out of the possibilities of this small company.</p> <p>The site presents in its evidence some errors.</p> <p>In the document "AWS Presentation Nestlé Toluca", identify the following shared challenges:</p> <ul style="list-style-type: none"> Scarcity, drought Pollution of the Lerma River Floods Inequality in distribution Environmental deterioration of the basin Water quality <p>Evidence: Copy_of_Matriz_desafios_compartidos09_lerma_2024 1.6.1 AWS Presentacion Nestlé Toluca</p>	
1.6.2	<i>Initiatives to address shared water challenges shall be identified.</i>	 Yes

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000941

Comment The site identifies 12 initiatives to address shared remains, some of them are presented: Water self-management project and initiative for the private sector promoted by SEMARNAT, an equivalent project is promoted by PROFEPA and the site participates in it. Initiative to form a compendium of responsible companies that comply with ISO 14001 promoted by the GIAA group, for which no information is presented. Share information for wastewater treatment promoted by the site and the company Mondelez, this company provided advice to the site for the design of its treatment plant. High-impact strategic projects rainwater collection and installation of drinking fountains. This project is promoted by the site and educational institutions.


During the interview carried out with the educational institution, shared challenges were identified in relation to the quality and availability of water in the Catchment.

Evidence:

Copy_of_Matriz_desafios_compartidos09_lerma_2024 1.6.2
AWS Presentacion Nestlé Toluca

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

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

 in progress

Comment The site submits as evidence the document "Risk_Assesment_2024 1.7.1". In which it identifies six risks for the site, includes the likelihood, severity of impact and type of risk. For the identified risk, the site has not identified: a given timeframe, potential costs and business impact.

Evidence:

"Risk_Assesment_2024 1.7.1

Finding No: TNR-009185

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 The site presents the document "PROGRAM_NET_ZERO_Lerma_Site_-_Program_Management_P11_2023_(1)1.7.2" Which contains the corporate objectives at the Latin American level, includes the specific progress of the site, the actions, projects, costs of the implementation of the NET ZERO program on site. During the tour, the progress to achieve the objective was identified, the work culture of the site workers is committed to this objective, they make proposals to reduce consumption or recover water that they identify in their work area, several of these proposals have already been implemented on the site.

Evidence:

Photographs
PROGRAM_NET_ZERO_Lerma_Site__Program_Management_P11_2023_(1)1.7.2

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.*

 Yes

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000941

Comment Relevant catchment best practices for water governance shall be identified. The site includes governance best practices in its WSP:

Participate in mutual aid committee
Collaborate with the community on environmental issues
Promote social empathy regarding resource scarcity in vulnerable areas

Evidence:

Water Stewardship Plan Lerma 2024

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.*

Q
Obs.

Comment The site includes in its WSP best practices for water balance, in the document "Bullets_10-01-2024" includes the following best practices for the site:

Conduct an inventory of water uses at the plant.
Implement REAL-TIME water consumption measurement systems.
POKAYOKES on daily consumptions
0 Losses
Rinsing systems for fabrications.
Efficient use of water

In the WSP are:

Rainwater harvesting
installation of reverse osmosis so that water from the WWTP can be returned to the process.
These two best practices are considered at the catchment level as they reduce the extraction of water from the aquifer and the volume saved is available for other uses. This approach was pointed out by the staff during the audit.

In the water management plan these two actions are not identified as best practices for water balance in the catchment.

Evidence:

Bullets_10-01-2024
Water Stewardship Plan Lerma 2024

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 includes water quality best practices in its WSP:
Collaborate with the community with environmental issues (Give talks to the community about correct water care).
Promote environmental awareness and contribute to the remediation of the Lerma River
Improve Water Quality for the Product Process

Evidence:

Water Stewardship Plan Lerma 2024

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

✓
Yes

Comment The site includes in its WSP best practices related to Important water-related areas:

Promoting social empathy about the scarcity of the resource in vulnerable areas (Increase pollinator gardens at the Lerma plant and provide employees' families with plant selection to replicate in their homes).

Evidence:

Water Stewardship Plan Lerma 2024

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)




Audit Number: AO-000941

1.8.5	<i>Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.</i>	<div><div>✔</div><div>Yes</div></div>
Comment	<p>The site includes WASH best practices in its WSP: Promote social empathy about the scarcity of the resource in vulnerable areas. The action is to train at least 600 people in handwashing. In the WSP the action to train 600 people is not identified as a WASH-focused best practice in the catchment.</p>	

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000941

2	STEP 2: COMMIT & PLAN - Commit to be a responsible water steward and develop a Water Stewardship Plan	
2.1	<i>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.</i>	
2.1.1	<i>A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:</i> <ul style="list-style-type: none"> - That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes - That the site implementation will be aligned to and in support of existing catchment sustainability plans - That the site's stakeholders will be engaged in an open and transparent way - That the site will allocate resources to implement the Standard. 	 in progress
Comment	<p>The site submits as evidence the document "letter_AWS_(1)-1 2.1.1". The reaction of the letter submitted as evidence does not meet all the requirements of the indicator as it does not include:</p> <ul style="list-style-type: none"> - That the implementation of the site will support and conform to the existing sustainability plans of the catchment(s); - That site stakeholders will be involved in an open and transparent manner; and - That the site will allocate resources to implement the Standard. <p>No publication of this letter was identified on Ecolab's website.</p> <p>Evidence: carta_AWS_(1)-1</p>	<p>Finding No: TNR-009192</p>
2.2	<i>Develop and document a process to achieve and maintain legal and regulatory compliance.</i>	
2.2.1	<i>The system to maintain compliance obligations for water and wastewater management shall be identified, including:</i> <ul style="list-style-type: none"> - Identification of responsible persons/positions within facility organizational structure - Process for submissions to regulatory agencies. 	 Yes
Comment	<p>The site presents as evidence the documents "Identification and Evaluation of Legal Requirements, Regulations and others (1) 1.5.2" and "RACI_2024 2.2.1" In both documents the positions of those responsible for legal compliance are indicated, in the first document it is developed in greater breadth and depth.</p> <p>Evidence:</p>	
2.3	<i>Create a water stewardship strategy and plan including addressing risks (to and from the site), shared catchment water challenges, and opportunities.</i>	
2.3.1	<i>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.</i>	 Yes

CERTIFICATION REPORT


Alliance for Water Stewardship (AWS)

Audit Number: AO-000941

Comment The site presents as evidence the document
"WATER_STEWARDSHIP_STRATEGY_LERMA_2024 2.3.1".
Don of it presumes its strategy, mission and vision.
It includes its water saving objectives and targets.

Evidence:
WATER_STEWARDSHIP_STRATEGY_LERMA_2024 2.3.1

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 presents its Sustainable Water Management Plan. the site meets the general requirements:
The way in which it will be measured and supervised, measures to maintain or improve it, expected deadlines, its assigned budget, the positions of those responsible and the achievement of the objectives and takes into account its relationship with each of the objectives for the achievement of the objectives. best practices to help address your shared challenges and AWS results.

The plan has several inconsistencies:
The site linked best practices to the plan, not all best practices are clearly stated in the plan, for example none of them are clearly associated with WASH-related objectives.
Some shared challenges are expressed in a generic way "water balance", "Water quality".
Another shared challenge is "increasing green areas in the community" this shared challenge was not identified during the audit.
For some objectives and actions, they do not have an associated metric; since they do not have an objective value, they do not allow the identification of progress towards meeting the objective. For example, "Giving talks to the community about correct water care" does not indicate a number of talks or a number of actions. people.
The action "Collecting food through Ecolab volunteering and delivering it (drinking water)" does not have an objective value.

Evidence:
Water Stewardship Plan Lerma 2024

Finding No: TNR-009195

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 presents as evidence its "Emergency_Response_Plan_2023_October (1) 1.3.1", and "Seen_good_civil_protection".
It considers all identified water risks and is validated by civil protection of the state government.

Evidence:
Plan_de_Respuesta_a_Emergencias_2023_octubre (1) 1.3.1
Visto_bueno_protección_civil

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000941

3 STEP 3: IMPLEMENT - Implement the site's stewardship plan and improve impacts
<p>3.1 <i>Implement plan to participate positively in catchment governance.</i></p>
<p>3.1.1 <i>Evidence that the site has supported good catchment governance shall be identified.</i></p> <p style="text-align: right;">  Yes </p>
<p>Comment The site presents several documents with evidence of their participation in water governance in the catchment.</p> <p>The site presents three documents of World Water Day celebrations, only one of which presents evidence on water governance in the catchment.</p> <p>The site presents as evidence its certificate granted by PROFEPA to the site for its participation in its environmental audit program.</p> <p>During the audit, the site presented evidence of collaboration with NGOs and municipalities, however, the documents presented are not included in the evidence.</p> <p>Interviews conducted with interested parties in collaboration projects with companies and educational institutions</p> <p>Participation in the GIREL group, made up of companies located in the basin whose objectives are to improve the environmental performance of its members.</p> <p>Evidence: Constancia_Beneficios_Ambientales_SIDEA_2023 3.1.1 DIA_DEL_AGUA,_2021 3.1.1 Día_Mundial_del_Agua_2023 3.1.1 DIA_MUNDIAL_DEL_AGUA 3.1.1 Convenio GIREL (Ultima actualización) Evidencia grupo GIREL invitaciones</p>
<p>3.1.2 <i>Measures identified to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be implemented.</i></p> <p style="text-align: right;">  Obs. </p> <p>Comment The site presents as evidence "GSC_Environmental_Policy 3.1.2", which indicates that "This policy defines Ecolab's requirements to limit the effect of our operations on the environment related to emissions to air, stormwater and water effluents. wastewater, water extraction, waste management, perimeter noise and odor, and spill protection and emergency response." The policy is applicable to all employees and supervised contractors. External contractors must comply with these requirements when performing work in Ecolab GSC's own facilities and warehouses. In the event this policy conflicts with regional/local regulations, codes or standards, the more stringent requirements will apply.</p> <p>Site staff indicated that this policy involves respect for the water rights of others.</p>
<p>3.2 <i>Implement system to comply with water-related legal and regulatory requirements and respect water rights.</i></p>
<p>3.2.1 <i>A process to verify full legal and regulatory compliance shall be implemented.</i></p> <p style="text-align: right;">  Yes </p>

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000941

Comment The site presents the document "MNRL_NALCO_Lerma_V112_29_Dec_2023 3.2.1", which contains the procedures to ensure legal compliance.
It contains the list of regulations, change control, evidence of compliance and frequency.
The site presents complementary evidence in the documents
"SHE_PDCA_2022_Lerma-IN-5CG2212ZPT_legal 1.5.2" on Sheet 8 (2).
Includes as evidence licenses, concession titles, permits.
Evidence:

MNRL_NALCO_Lerma_V112_29_Dic_2023 3.2.1
SHE_PDCA_2022_Lerma-IN-5CG2212ZPT_legal 1.5.2
Licencia_Ambiental_Unica_LLENADO_(1) 3.2.1
Licencia_DAR_2023_(2) 3.2.1
Licencia_de_funcionamiento-2023_(2) 3.2.1
Titulo_de_Concesión_Pozo_Mayo_2018_(1) 3.2.1

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 The site indicates that it consulted with its legal advisors who indicated that it is not identified is this type of rights are applicable to the site.
The site presents all existing regulations in the document
"MNRL_NALCO_Lerma_V112_29_Dec_2023 3.2.1" in the Nalco Lerma V112 matrix environmental regulations tab. None of these make any reference to the site potentially affecting other people's water rights.

Evidence:
MNRL_NALCO_Lerma_V112_29_Dec_2023 3.2.1

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

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



Yes

Comment The site presents as a basis the 2023 water management plan, the plan was not analyzed in its entirety, it contains objectives from 2018 to 2023, only the objectives for 2023 were considered.

"A recovery head will collect all the steam condensates from the latex area, and later condensates will be returned to the steam boiler."

The document "WATER_STEWARDSHIP_STRATEGY_LERMA_2024 3.3.2" presents evidence of compliance with this objectives p11.

During the tour of the site facilities, the presence of the infrastructure generated by these objectives was verified.

Evidence:
WATER_STEWARDSHIP_STRATEGY_LERMA_2024 3.3.2
Water Stewardship Plan Lerma 2023

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 The site presents its targets for improving the site's water use efficiency in the document "WATER_STEWARDSHIP_STRATEGY_LERMA_2024 3.3.2", on page 23, with a 7% water reduction target for Mexico.

Evidence:
WATER_STEWARDSHIP_STRATEGY_LERMA_2024 3.3.2

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000941

3.3.3	<i>Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.</i>	 Yes
Comment	<p>The site indicated during the audit that there are no legally binding documents for the reallocation of water to cultural needs.</p> <p>The site presents as evidence the document "MNRL_NALCO_Lerma_V112_29_Dic_2023 3.2.1"</p> <p>The document includes all laws at the federal and state level, they do not identify binding documents related to the reallocation of water.</p> <p>Evidence: MNRL_NALCO_Lerma_V112_29_Dic_2023 3.2.1</p>	
3.4	<i>Implement plan to achieve site water quality targets</i>	
3.4.1	<i>Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.</i>	 Yes
Comment	<p>The 2023 plan contains a goal "Create collection station for eggshells and marketing posters to be able to gather eggshells needed for h2o Lerma's project to use eggshells to clean the Lerma River."</p> <p>The site identifies 100% progress, the objective does not have a defined metric, so the positive impact of meeting the objective cannot be measured.</p> <p>During the audit, evidence of compliance with this objective was requested. The site presented an acknowledgment from the NGO with which it collaborated on this objective.</p> <p>Evidence: Carta de agradecimiento. Water Stewardship Plan Lerma 2023</p>	
3.4.2	<i>Where water quality is a shared water challenge, continual improvement to achieve best practice for the site's effluent shall be identified and where applicable, quantified.</i>	 Yes
Comment	<p>The water quality is a shared challenge and the site presents the quantification of the improvements in relation to the effluent from the site including the installation of the WWTP during 2023, which is currently very close to becoming operational.</p> <p>The document "WATER_STEWARDSHIP_STRATEGY_LERMA_2024 3.3.2", presents on page 28, the benefits of its operation.</p> <p>Evidence: WATER_STEWARDSHIP_STRATEGY_LERMA_2024 3.3.2</p>	
3.5	<i>Implement plan to maintain or improve the site's and/or catchment's Important Water-Related Areas.</i>	
3.5.1	<i>Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.</i>	 Yes

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000941

Comment The 2023 sustainable water management plan contains no targets related to IWRA, the only target included in it that meets the meaning of the standard, which is reforestation in 2019. The site presents a report from the NGO PRONATURA on the environmental benefits of the reforestation carried out in 2019 and which will provide benefits for at least 10 years according to the data in the report.
The site indicated during the audit that it carried out reforestation, but did not include the evidence in the intact platform.
The 2024 plan includes an objective related to IWRA at the site and watershed "Increase pollinator gardens at the Lerma plant and provide employees' families with plant selection to replicate at home". This started in April 2023 and the IWRA has already been identified at the site.
The site identifies 30% progress.

Evidence:
Pronatura_NBS_BenefitSummary_Ecolab_8.26.2022_ERT_v2 3.3.3
Water Stewardship Plan Lerma 2024
Water Stewardship Plan Lerma 2023
IWRA_LERMA1.3.6

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 The site presents as evidence the document "WBCSD_Revised_WASH_Self_Assessment_Tool-final_(1)_ 3.6.1" in this document access to WASH services is evaluated, through the following indicators
General
Workplace Water Supply
Workplace Sanitation
Workplace Hygiene
Value/Supply Chain WASH
Community WASH
The site generated a graph with the values obtained, which reflect the good conditions of access to WASH
During the tour of the site facilities, the good condition of the sanitary facilities and access to water was verified.

Evidence:
WBCSD_Revised_WASH_Self_Assessment_Tool-final_(1)_ 3.6.1
Photographs

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 The site indicates that it has full legal compliance with both its water sources and discharges, and has not had any fines or notifications of violations of other people's human right to water.





The site presents all existing federal and state regulations in the document MNRL_NALCO_Lerma_V112_29_Dec_2023 3.2.1 "in the environmental regulations tab. In none of them does it refer to the site potentially affecting the water rights of other people.

Evidence:
MNRL_NALCO_Lerma_V112_29_Dic_2023 3.2.1

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000941

3.7	<i>Implement plan to maintain or improve indirect water use within the catchment:</i>	
3.7.1	<i>Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.</i>	 No
Comment	<p>The site in its sustainable water management plan does not include any objectives related to indirect water use.</p> <p>evidence: Water Stewardship Plan Lerma 2023 Water Stewardship Plan Lerma 2024</p> <p style="text-align: right;">Finding No: TNR-009536</p>	
3.7.2	<i>Evidence of engagement with suppliers and service providers, as well as, when applicable, actions they have taken in the catchment as a result of the site's engagement related to indirect water use, shall be identified.</i>	 Yes
Comment	<p>The site presents evidence of communication with its laundry service provider; the communication identifies that the water used by the service provider does not represent significant consumption in relation to the site's water consumption. Site consumption = 10759 m3 Clothes washing service consumption = 0.576 m3/week = 30 m3/year It is equivalent to 0.28% of the site's consumption.</p> <p>Evidence Lavatel_Response 3.7.2 Consumos_de_agua 1.3.3</p>	
3.8	<i>Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have.</i>	
3.8.1	<i>Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.</i>	 Yes
Comment	<p>The state-owned company "Reciclagua" performs analyses of the site's discharges to verify that they comply with the regulations in document "Resultados_Reciclagua__2020 3.4.2", all discharges from the site are treated in this company's WWTP and submits data on discharges that comply with the applicable Mexican standard. The site does not identify any concerns regarding the "Reciclagua" infrastructure, as wastewater analysis and treatment reports are submitted on a regular basis throughout the year.</p> <p>Evidence: Resultados_Reciclagua__2020 3.4.2 231024-04A_GC_TRATAMIENTO_SA_DE_CV_(2) 3.6.2 Contrato_RECICLAGUA 3.7.2</p>	
3.9	<i>Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.</i>	
3.9.1	<i>Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.</i>	 Yes

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000941

Comment The site presents in its 2023 sustainable water management plan the objective "Create a coalition of good water stewards" whose expected result is the implementation of the NET ZERO programme, the site presents evidence of its implementation.
The objectives of the 2024 plan are in the process of implementation.
The most advanced objective is "Increase pollinator gardens at the Lerma plant and provide employees' families with a selection of plants for them to replicate in their homes". With 30% progress, the site presents evidence of progress.

Evidence:
Water Stewardship Plan Lerma 2023
Water Stewardship Plan Lerma 2024
IWRA_LERMA1.3.6
WATER_STEWARDSHIP_STRATEGY_LERMA_2024 3.3.2

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



Comment The site presents in its 2023 sustainable water management plan the objective "A recovery head will collect all the steam condensates from the latex area, and later condensates will be returned to the steam boiler." whose expected result is a saving of 1600 m3 per year, this infrastructure is already in operation, the annual savings due to the operation of this infrastructure have not yet been quantified.
During the tour of the facilities, the presence and operation of this infrastructure was verified.
The objectives of the 2024 plan are in the process of implementation according to the indicated progress, the projects and inputs are in the process of being quoted.

Evidence:
Water Stewardship Plan Lerma 2023
Water Stewardship Plan Lerma 2024
IWRA_LERMA1.3.6
WATER_STEWARDSHIP_STRATEGY_LERMA_2024 3.3.2

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



Comment The site presents in its 2023 sustainable water management plan the objective "Create collection station for eggshells and marketing posters to be able to gather eggshells needed for h2o Lerma's project to use eggshells to clean the Lerma River. The site presented during the audit an acknowledgment from the NGO that heads the project..
The 2023 sustainable management plan does not indicate a value for this objective, only "Number of eggshells collected" was indicated, a target value was not determined., which is why it is not possible to evaluate the impact of meeting the objective 100%.
The 2024 plan includes objectives that are in development
The objective "Pretreatment of rainwater" was developed in 2023 and has a progress of 95%, the site presents evidence of compliance.

Evidence:
CARTA AGRADECIMIENTO
Water Stewardship Plan Lerma 2023
Water Stewardship Plan Lerma 2024
WATER_STEWARDSHIP_STRATEGY_LERMA_2024 3.3.2

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.*



Audit Number: AO-000941

Comment The site in its sustainable water management plan 2023 does not present objectives related to IWRA. The site presents as evidence the document "Pronatura_NBS_BenefitSummary_Ecolab_8.26.2022_ERT_ERT_v2 3.3.3" which presents the benefits of reforestation carried out in 2019. The objectives of the 2024 plan are in the process of implementation according to the progress indicated the objective "Increase pollinator gardens in the Lerma plant and provide the families of employees with the selection of plants so that they can replicate it in their homes". With 30% progress. The site shows evidence of progress.

Evidence:

- Water Stewardship Plan Lerma 2023
Water Stewardship Plan Lerma 2024
IWRA_LERMA1.3.6
Pronatura_NBS_BenefitSummary_Ecolab_8.26.2022_ERT_v2 3.3.3

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

Q Obs.

Comment The site in its 2023 sustainable water management plan does not present WASH related targets. The 2024 sustainable water management plan does not explicitly identify WASH related targets. The plan includes the actions Delivery of provisions in vulnerable areas (bottled water) Train at least 600 people on handwashing issues Donate rainwater collection containers for people with difficult access to water. All these actions correspond to access to water, hygiene and sanitation in the catchment and on site (WASH). These actions are scheduled for April, May and December.




Evidence:

- Water Stewardship Plan Lerma 2023
Water Stewardship Plan Lerma 2024

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)




Audit Number: AO-000941

4 STEP 4: EVALUATE - Evaluate the site's performance.	
4.1	<i>Evaluate the site's performance in light of its actions and targets from its water stewardship plan and demonstrate its contribution to achieving water stewardship outcomes.</i>
4.1.1	<i>Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.</i> <div>  Yes </div>
Comment	<p>The site evaluates its objectives of the 2023 sustainable management plan in the document "WATER STEWARSHIP PLAN ADED VALUE", including monetary value, social and environmental benefits, reduction of reputational risks.</p> <p>The 2023 sustainable water management plan indicates that all objectives for 2023 were 100% met.</p> <p>This plan indicates that objectives started in 2020 and 2021 have not yet been 100% met, their date to be completed is undetermined.</p> <p>Evidence: WATER STEWARSHIP PLAN ADED VALUE Water Stewardship Plan Lerma 2023</p>
4.1.2	<i>Value creation resulting from the water stewardship plan shall be evaluated.</i> <div>  Yes </div>
Comment	<p>The site has benefits generated from its water management plans, highlighting the evidence related to the reforestation carried out in 2019 and that the NGO Pronatura estimates the current and future benefits of reforestation.</p> <p>The document "WATER STEWARSHIP PLAN ADED VALUE" presents an evaluation of the value from the 2023 plan.</p> <p>Evidence: WATER STEWARSHIP PLAN ADED VALUE Pronatura_NBS_BenefitSummary_Ecolab_8.26.2022_ERT_v2 3.3.3</p>
4.1.3	<i>The shared value benefits in the catchment shall be identified and where applicable, quantified.</i> <div>  Yes </div>
Comment	<p>The site has benefits generated by the site, evidence of current and future benefits generated is presented.</p> <p>The Pronatura report presents the benefits generated by the reforestation carried out in 2019 and estimates current and future benefits.</p> <p>The document "WATER_STEWARDSHIP_STRATEGY_LERMA_2024 3.3.2" contains the estimated costs and benefits for projects started in 2023.</p> <p>The document "WATER STEWARSHIP PLAN ADED VALUE" presents the benefits generated by the implementation of the 2023 plan.</p> <p>evidence: WATER STEWARSHIP PLAN ADED VALUE PROGRAM_NET_ZERO__Lerma_Site_-_Program_Management_P11_2023_(1)1.7.2 Pronatura_NBS_BenefitSummary_Ecolab_8.26.2022_ERT_v2 3.3.3</p>
4.2	<i>Evaluate the impacts of water-related emergency incidents (including extreme events), if any occurred, and determine the effectiveness of corrective and preventative measures.</i>

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000941

4.2.1	<i>A written annual review and (where appropriate) root-cause analysis of the year's emergency incident(s) shall be prepared and the site's response to the incident(s) shall be evaluated and proposed preventative and corrective actions and mitigations against future incidents shall be identified.</i>	 Yes
Comment	<p>The site indicates that this type of incident has not occurred; currently the site has more than 1,500 days without any incident to report to the water and civil protection authorities. Your risk management plan contains the procedures to apply in the event of an incident.</p> <p>Evidence: Plan_de_Respuesta_a_Emergencias_2023_octubre</p>	
4.3	<i>Evaluate stakeholders' consultation feedback regarding the site's water stewardship performance, including the effectiveness of the site's engagement process.</i>	
4.3.1	<i>Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.</i>	 Yes
Comment	<p>The site presents evidence in the document "Stakeholders_and_Outreach_(Lerma) 4.3.1". This has information on interested parties, communication, their assessment, shared challenges, associated initiatives. No evidence is identified relating to the consultation on the site's sustainable water management performance. The site also presents the document "ECOLAB_Sust-Lerma_EN 4.3.1" the document presents the efforts and achievements achieved by the site, but includes no evidence related to the site's efforts to consult with interested parties on the site's performance. None of the documents presented as evidence are related to the requirements of the standard.</p> <p>The site received a letter of gratitude from the NGO "H2O Lerma con charm", which is evidence of the environmental performance of the site.</p> <p>The site has also received recognition from PROFEPA for its participation in the National Environmental Audit program</p> <p>Evidence: ECOLAB_Sust-Lerma_EN 4.3.1 Stakeholders_and_Outreach_(Lerma) 4.3.1</p>	
4.4	<i>Evaluate and update the site's water stewardship plan, incorporating the information obtained from the evaluation process in the context of continual improvement.</i>	
4.4.1	<i>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.</i>	 Yes
Comment	<p>The sustainable management plan was significantly modified because the 2023 plan contains objectives from 2018 to 2023; several of the objectives do not have a defined start or end date. Some objectives do not have defined actions or measures that allow them to be evaluated. Several do not have a budget assigned. All these aspects were modified in the 2024 sustainable water management plan.</p>	

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000941

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	During the audit, the Ecolab Lerma page was visited where information on the governance of the site related to water is found. Evidence: https://es-mx.ecolab.com/stories/ecolab-lerma-mx-plant-certified-as-water-stewardship-leader Ecolab Water Stewardship Position_pdf Ecolab Global Safety Health and Environment Position_pdf
5.2	Communicate the water stewardship plan with relevant stakeholders.
5.2.1	The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders. No
Comment	The site does not present evidence related to this indicator Finding No: TNR-009214
5.3	Disclose annual site water stewardship summary, including: the relevant information about the site's annual water stewardship performance and results against the site's targets.
5.3.1	A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum. Yes
Comment	The site presents as evidence the document "ECOLAB_Sust-Lerma_EN 4.3.1" this document contains the positive impacts of the site, its objectives in the short and medium term, as well as the progress towards achieving the objectives. The publication is from 2023. The site presents evidence of disclosure of the document. Evidence: ECOLAB_Sust-Lerma_EN 4.3.1 imagen
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

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000941

Comment	<p>The site presents as evidence its web page where it shares the shared challenges and the actions implemented to face these challenges.</p> <p>The site presents as evidence the document "ECOLAB_Sust-Lerma_EN 4.3.1" this document contains the positive impacts of the site, its objectives in the short and medium term, as well as the progress towards achieving the objectives. The publication is from 2023. The site presents evidence of disclosure of the document.</p> <p>Evidence: ECOLAB_Sust-Lerma_EN 4.3.1 imagen https://es-mx.ecolab.com/stories/ecolab-lerma-mx-plant-certified-as-water-stewardship-leader</p>	
5.4.2	<i>Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.</i>	 Yes
Comment	<p>The site belongs to the GIREL group that integrates companies located in the Toluca industrial corridor. The site presents the minutes of the meeting held in January 2024, where topics on environmental management in the Lerma River basin are discussed.</p> <p>Evidence: Evidencia grupo GIREL Convenio GIREL (Ultima actualización) Invitaciones</p>	
5.5	<i>Communicate transparency in water-related compliance: make any site water-related compliance violations available upon request as well as any corrective actions the site has taken to prevent future occurrences.</i>	
5.5.1	<i>Any site water-related compliance violations and associated corrections shall be disclosed.</i>	 Yes
Comment	<p>The site indicates that it has not incurred any breach of the legal regulations applicable to the site. The site has its legal compliance procedure that reviews and monitors compliance with applicable laws.</p>	
5.5.2	<i>Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.</i>	 Yes
Comment	<p>The site indicates that it has not incurred any breach of the legal regulations applicable to the site. The site has its legal compliance procedure that reviews and monitors compliance with applicable laws.</p>	
5.5.3	<i>Any site water-related violation that may pose significant risk and threat to human or ecosystem health shall be immediately communicated to relevant public agencies and disclosed.</i>	 Yes
Comment	<p>The site indicates that it has not incurred any breach of the legal regulations applicable to the site. The site has its legal compliance procedure that reviews and monitors compliance with applicable laws.</p>	

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000941

Photographic Evidence from Audit



área de residuos.jpg



tanques de almacenamiento agua pluvial.jpg

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000941



sistema recuperación de agua.jpg



comedor.jpg

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000941



área de lavamanos.jpg



cubículo descarga sosa cáustica.jpg

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000941



cubículo para descarga productos químicos.jpg



área de solventes utilizados en lavado de equipo.jpg

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000941



Ducha y lava ojos área de laboratorio.jpg



zona elefante.jpg

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Alliance for Water Stewardship (AWS)

Audit Number: AO-000941



tanque de productos químicos.jpg



sistema recuperación de agua (2).jpg

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Alliance for Water Stewardship (AWS)

Audit Number: AO-000941



flujometro sonico.jpg



ductos y tanque de almacenamiento.jpg

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Alliance for Water Stewardship (AWS)

Audit Number: AO-000941



tanque agua de recuperación.jpg



zona agua dura.jpg

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000941



tanque de agua recuperada.jpg



área de calderas.jpg

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000941



tanque agua dura.jpg



área de descarga insumos.jpg



separación basura comedor.jpg

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000941



área miportante relacionada con el agua del sitio.jpeg



deposito de desechos área de laboratorios.jpg

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000941



sanitario.jpg



equipo de emergencia.jpg



flujometro sonico 2.jpg

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

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000941



tanques con agua de producción.jpg



pozo.jpg



cubiculo para descarga productos químicos.jpg

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000941



área de calderas.jpg



tanque agua dura.jpg

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000941



tanque agua de recuperación.jpg



equipo de emergencia.jpg

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000941



sanitario.jpg



área de solventes utilizados en lavado de equipo.jpg

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000941



pozo.jpg



área de descarga insumos.jpg



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CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000941

separación basura comedor.jpg



área miportante relacionada con el agua del sitio.jpeg



tanques de almacenamiento agua pluvial.jpg

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000941



sistema recuperación de agua.jpg



comedor.jpg



flujometro sonico.jpg

✓
Yes

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000941

Comment Photographs of different areas of the site are presented



tanques con agua de producción.jpg



área de residuos.jpg

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000941



Ducha y lava ojos área de laboratorio.jpg



área de lavamanos.jpg

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000941



ductos y tanque de almacenamiento.jpg



tanque de productos químicos.jpg

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000941



zona elefante.jpg



zona agua dura.jpg

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000941



sistema recuperación de agua (2).jpg



tanque de agua recuperada.jpg

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000941



deposito de desechos área de laboratorios.jpg



cubículo descaga sosa caástica.jpg

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000941

Previous Findings		
	<i>All non-conformities raised in the previous audit have been satisfactorily closed.</i>	<div><div></div><div>Yes</div></div>
Comment	Before starting the audit, the number of non-conformities and open observations was reviewed. It was identified that there were no open findings	