

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)



Audit Number: AO-001014

### SITE DETAILS

Site: **Nestlé Waters UK, Buxton Factory**

Address: Waterswallows Road, Waterswallows, Buxton, SK17 7JD, Cheshire, UNITED KINGDOM

Contact Person: Christopher Breislin

AWS Reference Number: AWS-000111

Site Structure: Single Site

### CERTIFICATION DETAILS

Certification status: Certified Platinum

Date of certification decision: 2024-May-14

Validity of certificate: 2027-May-13

### AUDIT DETAILS

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

Audit Type(s): Re-Certification Audit

Audit Start Date: 2024-Mar-05

Lead Auditor: Wicki Nielsen

Audit team participants:

Juan Gorostidi, Observer

Wicki Nielsen, Inspector

Site Participants:

Mark Griffiths, Water Resources Manager,

Hayley Lloyd-House, Head of Corporate Affairs & Sustainability,

Daniel Jones, Compliance Manager,

Camille Dessimond, Project Manager Nestlé,

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### ADDITIONAL INFO

**Summary of Audit Findings:** A total of 15 findings were raised during the certification audit, no major non-conformities, 1 minor non-conformity, 14 observations.

The Client is requested to perform a root cause analysis and define corrective actions for each of the non-conformities and to submit these to WSAS within 30 days of receipt of the audit report by 20/05/2024.

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

The audit team recommends re-certification of Nestlé Waters UK, Buxton Factory at Platinum 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 Minor and this will be evaluated during the Surveillance Audit. The client is requested to upload evidence of implementation prior to the Surveillance Audit.

**Scope of Assessment:** The scope of services covers the recertification audit for assessing conformity of Nestlé Waters' Buxton factory (NWB) against the AWS International Water Stewardship Standard Version 2.

The Nestlé Waters UK bottling site is located just outside the spa town of Buxton, which sits on the edge of Peak District National Park, in the Borough of High Peak, Derbyshire, UK. The regional landscape is characterised mostly by rounded hills, plateaus, valleys, limestone gorges and gritstone escarpments. The area is mostly rural outside relatively small urban centres. Several limestone quarries are located around Buxton.

The Nestlé Waters site bottles two water brands: Buxton Natural Mineral Water and Nestlé Pure Life. The Natural Mineral Water and Spring Water are sourced from two unique sources. St. Ann's (the source of Buxton Natural Mineral Water) is an ancient, artesian thermal spring rising in the centre of Buxton. Lightwood (the source of Nestlé Pure Life Spring Water) is a well-protected catchment to the north west of the town, with water coming from boreholes drilled deep within the folded geology. NWUK have a third source available, known as Rockhead, which is an artesian spring issuing naturally from the limestone of the Wye Valley. Although Rockhead has been connected to the factory it is not currently being used for production. Nestlé owns significant land around its Lightwood and Rockhead sources and have environmental improvement plans in place for both sites and the factory site.

The audit was conducted onsite on 5th to 8th of March 2024. The onsite visit included the assessment of the Nestlé Waters Buxton site and water-related infrastructure, as well as a visit to the St Ann's and Lightwood sources, and surrounding nature conservation and restoration work.

### SCORE

142.00

### FINDINGS

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**NUMBER OF FINDINGS PER LEVEL**

Observation	14
Minor	1

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### FINDING DETAILS

Finding No:	TNR-009502
Checklist Item No:	1.3.3
Status:	Open
Finding level:	Observation
Checklist item:	Site water balance, inflows, losses, storage, and outflows, including indication of annual variance in water usage rates, shall be quantified. Where there is a water-related challenge that would be a threat to good water balance for people or environment, an indication of annual high and low variances shall be quantified.
Findings:	The company provided photographic evidence of the new water meter installed to monitor the foul water discharge. The company could include data from this for more accurate loss and outflow data.
Finding No:	TNR-009508
Checklist Item No:	1.3.5
Status:	In Progress - CA plan approved
Finding level:	Minor
Checklist item:	Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.
Findings:	Plastic containers containing COP cleaning materials were seen standing on the ground, outside a bund, next to a production line. Unidentified empty metal barrels with another company name than Nestle Waters Buxton was seen in the CIP chemical store, as well as empty COP cleaning chemicals seen on the ground outside a storage crate. A container without a lid was seen in the storage crate, which also did not have a lid to prevent the lidless container from falling out or blow away in case of high winds.
Corrective action:	The unidentified empty metal barrels were full of cleaning rags. One Point Lesson Issued to all employees concerning the process of Cleaning of Chemicals. See uploaded file. The One Point Lesson confirms the correct process which states that all empty COP chemicals have been rinsed 3 times to remove chemical residues before moving to the storage crates. It also confirms the correct process of always keeping cleaning chemical containers in bunds.
Evidence of implementation:	One Point Lesson Issued to all employees concerning the process of Cleaning of Chemicals. See uploaded file.  The process of emptying the storage crates has been re-established following the appointment of a new Sodexo Site Services General Manager



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Finding No:	TNR-009556
Checklist Item No:	1.5.3
Status:	Open
Finding level:	Observation
Checklist item:	The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.
Findings:	The conceptual model with the water balance data is dated 2019. The company explained that the document hasn't been updated since then as there is likely not to have been any significant change. It is recommended that a review is carried out of this area to ensure the data is still applicable.
Finding No:	TNR-009558
Checklist Item No:	1.5.5
Status:	Open
Finding level:	Observation
Checklist item:	Important Water-Related Areas shall be identified, and where appropriate, mapped, and their status assessed including any threats to people or the natural environment, using scientific information and through stakeholder engagement.
Findings:	The company has not included information about whether any IWRA's were identified through stakeholder engagement and could consider including details of the sources behind the designations.
Finding No:	TNR-009559
Checklist Item No:	1.5.7
Status:	Open
Finding level:	Observation
Checklist item:	The adequacy of available WASH services within the catchment shall be identified.
Findings:	The company has obtained data and information about WASH within the UK in general however, nothing specifically related to provisions within the catchment. They could look to investigate potential sources of information with this information, specifically on catchment level.
Finding No:	TNR-009562
Checklist Item No:	1.6.2
Status:	Open
Finding level:	Observation
Checklist item:	Initiatives to address shared water challenges shall be identified.
Findings:	As there are three of the eight shared water challenges that have "None identified at present" listed in relation to initiatives, the company could carry out another review of these to see if any new initiatives or projects are now in place to address them.

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Finding No: TNR-009563  
Checklist Item No: 1.6.4  
Status: Open  
Finding level: Observation  
Checklist item: Advanced Indicator  
Potential water-related social impacts from the site shall be identified, resulting in a social impact assessment with a particular focus on water.  
Findings: The company provided information and evidence to address the advanced indicator "Potential water-related social impacts from the site shall be identified, resulting in a social impact assessment with a particular focus on water" at the S1 audit in 2022 however, nothing has been provided this years audit.

Finding No: TNR-009564  
Checklist Item No: 1.8.1  
Status: Open  
Finding level: Observation  
Checklist item: Relevant catchment best practice for water governance shall be identified.  
Findings: The company has identified legal and regulatory requirements as part of best practice for water governance however, these cannot be considered "best practise" as they are required by law. The company could consider updating the Best Practice Summary to exclude these.

Finding No: TNR-009565  
Checklist Item No: 1.8.3  
Status: Open  
Finding level: Observation  
Checklist item: Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.  
Findings: The company has identified legal and regulatory requirements as part of best practice for water quality however, these cannot be considered "best practise" as they are required by law. The company could consider updating the Best Practice Summary to exclude these.

Finding No: TNR-009566  
Checklist Item No: 1.8.4  
Status: Open  
Finding level: Observation  
Checklist item: Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.  
Findings: The company has identified legal and regulatory requirements as part of best practice for site maintenance of Important Water-Related Areas however, these cannot be considered "best practise" as they are required by law. The company could consider updating the Best Practice Summary to exclude these.

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Finding No:	TNR-009617
Checklist Item No:	3.5.3
Status:	Open
Finding level:	Observation
Checklist item:	Advanced Indicator Evidence from a representative range of stakeholders showing consensus that the site is seen as positively contributing to the healthy status of Important Water-Related Areas in the catchment shall be identified.
Findings:	The company provided evidence of consulting and informing stakeholders about progress on the management of IWRA's has been provided. However, this was only in relation to the Japanese Knotweed eradication program, nothing about the other projects in place. Numbers and types of stakeholders consulted were not provided either.
Finding No:	TNR-009622
Checklist Item No:	3.9.5
Status:	Open
Finding level:	Observation
Checklist item:	Actions towards achieving best practice related to targets in terms of WASH shall be implemented.
Findings:	The company has provided information with supporting documentation for actions considered best practise in relation to targets related to WASH. However, none of the information/documentation relate to the best practices identified in the best practice summary provided. There is therefore scope to align best practices identified more with actual actions being carried out.
Finding No:	TNR-009627
Checklist Item No:	4.1.2
Status:	Open
Finding level:	Observation
Checklist item:	Value creation resulting from the water stewardship plan shall be evaluated.
Findings:	The company has not entered data for value creation for all targets at the time of the audit. The company may look at adding this as soon as possible.

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Finding No:	TNR-009628
Checklist Item No:	4.1.3
Status:	Open
Finding level:	Observation
Checklist item:	The shared value benefits in the catchment shall be identified and where applicable, quantified.
Findings:	The company has not entered data for shared value creation for all targets at the time of the audit. The company may look at adding this as soon as possible.
Finding No:	TNR-009815
Checklist Item No:	5.4.1
Status:	Open
Finding level:	Observation
Checklist item:	The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.
Findings:	The company has disclosed efforts to address five out of the eight identified shared water challenges in their 2023 SWP however, actions to address the last three have not been included.

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### Report Details

Report	Value
Report prepared by	Wicki Nielsen
Report approved by	Nathalie Karam
Report approved on (Date)	19/04/2024

### Surveillance

Proposed date for next audit  
2025-Mar-10

### Stakeholder Announcements

Date of publication	Location
06/02/2024	Social media channels
06/02/2024	Stakeholder emails
06/02/2024	Vision Buxton
06/02/2024	Nestlé website
06/02/2024	Nestlé Waters Buxton reception
Comment	Stakeholder recertification notices were put up in the factory reception and H&S induction room, as well as in email to stakeholders, Vision Buxton, social media, newsletter and Nestlé website. <a href="https://www.visionbuxton.co.uk/nestle-waters-buxton-site-seeking-water-stewardship-re-certification/">https://www.visionbuxton.co.uk/nestle-waters-buxton-site-seeking-water-stewardship-re-certification/</a>

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Catchment Information

Catchment Information

No change since 2023:  
Buxton is a spa town situated near the headwaters of the River Wye and is renowned for its thermal waters. Buxton is a historic Spa town, since the Romans developed the first spa, Aquae Arnemetiae, 2000 years ago.

Natural Mineral Water and Spring Water is sourced from two sources. St. Ann's (the source of Buxton Natural Mineral Water) is an ancient, artesian thermal spring rising in the centre of Buxton. Lightwood (the source of Nestlé Pure Life Spring Water) is in a well-protected area to the north west of the town with water coming from boreholes drilled deep within the folded geology. Nestlé Waters Buxton has a third source available, known as Rockhead, which is an artesian spring issuing naturally from the limestone of the Wye Valley. Although Rockhead has been connected to the factory, it is not currently being used for production. NWB owns significant land around both Lightwood and Rockhead and have environmental improvement plans in place for both.

Nestlé Waters have abstraction licenses with the Environment Agency (EA) in place for Lightwood, Rockhead, Portobello and Staden Lane.  
High Peak Borough Council own St Ann's well. NWB also discharge into one compensation source within the catchment, Portobello, in line with their license.

Surface water run-off and excess water from the storage tanks is discharged to the attenuation pond on site ,which passes through an oil-water separator beforehand. Water discharged to the pond will infiltrate the ground, evaporate or discharge via a culvert. All other wastewater discharges, including trade effluent and foul water are sent to the sewer and the wastewater treatment plant.



Catchment.png

Comment Catchment map provided. Note that the catchment boundary is coloured red and not white as on the key.

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### Client Description and Site Details

#### Client/Site Background

No changes since 2023:

Nestlé Waters opened the new bottling factory in 2012 at Waterswallows Lane in Buxton in the United Kingdom and is located on the outskirts of the Peak District National Park. There are 5 bottling lines in the factory.

The company discharges foul water and trade effluent into the sewers after passing through a pH balancing tank and treated at the River Authority's water treatment plan. Surface water run-off and excess water from the storage tanks is discharged to the attenuation pond on site, which passes through an oil-water separator beforehand. Water discharged to the pond will infiltrate the ground, evaporate or discharge via a culvert. NWB continue to develop the nature reserve around the pond and operate a volunteering plan for staff, whereby they can volunteer up to two days a year including, work on environmental projects around the site.

The site operates a mix of boreholes and springs:

- Lightwood Source: BH 4 & BH 6 are the extraction boreholes, BH2 & 3 are for monitoring only. BH1 and BH5 are not used. There are 6 boreholes at Lightwood in total.

- Rockhead: this is a spring source, with a collection chamber.

- St Ann's: there is a natural fracture in the ground where water collects in a pool, which is now the 'collection pool' for the spring.

The site owns land around the Lightwood and Rockhead sources, with environmental management plans in place for both areas. The Portobello compensation source is also mapped. The compensation condition is accurate as described. NWB are alerted to trigger levels in the River Wye by the EA, and compensation flow from Portobello is 1/3rd that of abstraction rate from Lightwood. Discharge is to a small stream which flows into the River Wye. The water is discharged into a stream, next to the Portobello borehole house. The site is responsible for managing the boreholes at Lightwood and Portobello.



Site\_boundaries.png

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### Summary of Shared Water Challenges

#### Summary of Shared Water Challenges

Eight shared water challenges have been identified through conversations and consultations with stakeholders, no new challenges added since 2023 audit.

Since the 2023 surveillance audit, the Water Stewardship Plan has been updated with a QR code link to a feedback survey that includes a question about shared water challenges.

- Water Loss from Peat Moorlands
- Resilience to climate change/ extreme weather events
- Loss of Native Species - migratory fish
- Loss of Native Species - signal crayfish
- Nutrient Load in the River Wye from wastewater and diffuse sources
- Pesticides in Surface Water Catchment
- Summer Water Scarcity in River Derwent Catchment
- Dewatering activities of the extractive industry

### 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 Nestlé Waters (NW) occupies one single water catchment area, with all three water sources located within it.

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



Yes

Comment The site is managed under a single site management system, encompassing the NWB factory.

**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 The site's primary production system, water management, product or service range, and the main market structures are homogeneous.



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### 1 STEP 1: GATHER AND UNDERSTAND

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

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

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



Yes

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### Comment

#### Site boundaries:

Nestlé Waters UK Buxton factory is located on Waterswallows Lane, Buxton, Derbyshire, UK, National Grid Reference 407930,375420 . The company has generated two maps to show boundaries, using Google Maps. One shows the boundaries of the Waterswallows factory perimeter, as well as the boundaries of the land owned around the Lightwood borehole locations and Rockhead spring (in Cowdale), The company also owns a small piece of land named Portobello Road, which can be used as compensation abstraction in times of low flows, as well as a small plot of land within the Staden Lane Industrial Estate, where there is a disused borehole, which is used for monitoring.

#### Water-related infrastructure, including piping network, owned or managed by the site or its parent organization:

Water from St Ann's spring, the two boreholes at Lightwood and the Rockhead spring (water is not currently piped from Rockhead to the factory - the connection exists though) source is piped to the factory via stainless-steel pipes. There is also a tank for municipal water outside the factory, which is connected to the sprinkler system. The company has mapped both on-site infrastructure within the factory perimeter, as well as the location and routing of the piping infrastructure from the sources Lightwood and Rockhead boreholes, as well as St Ann's well.

#### Any water sources providing water to the site that are owned or managed by the site or its parent organization:

Lightwood and Rockhead are owned by NWB, whereas High Peak District Council own St Ann's well, of which NWB manages the maintenance of the piping infrastructure and abstraction. NWB is not responsible for maintaining the infrastructure for the public lions head fountain outside of the underground spring chamber, by the Crescent Hotel in Buxton. Documentation provided in the form of; licenses to abstract documentation for Lightwood, Rockhead, Portobello Road and Staden Lane, and the abstraction agreement for St Ann's.

#### Water service provider and its ultimate water source:

Severn Trent Water (STW) is the only water service provider in the High Peak Borough Council, where NWB is located. The company uses municipal water for industrial and potable consumption, none of this is used in product. The water is sourced from the STW Peak District Supply Zone ZDB01. It is not possible to obtain exact locations of sources from STW however, the company has gathered documentation that explains that 8% come from groundwater, 69% from reservoirs and 23% from rivers. According to NWB, "the Upper Derwent Valley Reservoirs, formed of the Derwent, Howden and Ladybower reservoirs are understood to be the main water sources for the Peak District Supply Zone."

#### Discharge points and waste water service provider and ultimate receiving water body or bodies:

The company discharges foul water and trade effluent into the sewers after passing through a pH balancing tank and treated at the River Authority's water treatment plant that is managed by Severn Trent Water.

Surface water run-off and excess water from the storage tanks is discharged to the attenuation pond on site, which passes through an oil-water separator beforehand. Water discharged to the pond will infiltrate the ground, evaporate or discharge via a culvert.

Waste water from the factory discharges into the sites foul drainage, which is connected to the STW municipal sewage system

Trade effluent from the factory passes through a pH filter before flowing into the foul drainage and then the municipal sewers.

Runoff from outside the factory building pass through oil interceptors, then flows into the surface drainage system that discharges into the attenuation pond, which discharges directly into the River Wye.

Documentation provided that shows points of discharge and location of Buxton Waste Water Treatment Works.

#### - Catchment(s) that the site affect(s) and is reliant upon for water:

The company has identified their catchment area as the Wye Catchment, reference GB104028058460. This was identified using the Environment Agency website and mapped

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using Google Maps. The company also developed a Conceptual Model of the Buxton Area that shows the River Way catchment area, along with cross sections showing the geological features for each source.

The River Wye catchment on 'Buxton\_A0\_030\_Technical-01' is the water body Wye Source to Monks Dale, which is the water body closest to the NWB site.

Whereas in the 'Catchment' it shows the full Rive Wye catchment – to the point where it merges with the River Derwent.

**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** Nestlé Waters utilises the Community Relations Process Tool (CRP) to manage their stakeholder engagement process across all areas, not just AWS linked water issues. The CRP tool is structured around 5 steps: Stakeholder Mapping, Self-Assessment, External Diagnosis, Action Plan and Impact Assessment. Stakeholders (SH) are reviewed on a monthly basis by the management team, and stakeholders are encouraged to feedback annually using the QR code in the Water Stewardship Plan. Some identified stakeholders are not themselves located within the catchment area, for example Derbyshire Wildlife Trust (DWT) however, they manage river banks in the area and carry out conservation and enhancement.

As the numbers of stakeholders differed on the documentation provided, the AWS auditor asked for clarification on this from NWB and had this response, which clarified the query sufficiently:

"The Output of 2023 CRP tool evidences 66 stakeholders mapped which are relevant to the business and local site for all reasons, including water-related stakeholders - this is the complete list versus 56 provided prior to the audit (exported info for specific use).

The 26 stakeholders shown in the PNG image – titled 'Catchment Influence' are the water-related stakeholders identified (excerpt from the CRP Tool)."

**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 26 stakeholders shown in the PNG image – titled 'Catchment Influence' are the water-related stakeholders identified (excerpt from the CRP Tool). The degree of influence has been demonstrated using infographics, along with a colour system showing who has responded and a graph mapping interest of SH on water issues / power of SH at catchment level.

**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.*

  
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Comment The company has a Emergency Preparedness and Response Procedure that includes a Water Stewardship and Water Source Security Emergency Procedure, as well as a Legionella procedure and a Fire Emergency Response procedure. Both appear fit for purpose. This relates to the factory, as well as the sources. In addition to this, the company also has a Security in Water Resources Plan, which includes details of measures in place to avoid incidents, as well as what to do in case one occurs. A comprehensive procedure for how to manage chemical or oil spills has also been provided.

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

Comment The company has identified and mapped inflows, losses, storage and outflows using water maps generated by the Aquassay software and Powerpoint. To compliment these in identifying location of potential losses, are water balance records outlined in Excel. So the water maps shows inflows, storage and outflow and the water balance document lists the potential loss locations: Production waste (rejected) Destroyed stock Returned to surface water Cleaning The waste water flow meter that was missing in order to gather data for the foul water has been fully installed after the 2024 audit and will start to gather data on losses from this going forward.

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. Obs.

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**Comment** The company has developed a Water Balance document that includes data from 2023, including for inflows, losses, and storage.

Four water challenges related to water balance have been identified:

- Water Loss from Peat Moorlands
- Resilience to climate change/ extreme weather events
- Summer Water Scarcity in River Derwent Catchment
- Dewatering activities of the extractive industry

The water balance shows a lower than average water tank balance in July/August.

Monthly rainfall is tracked against historic rainfall, with monthly averages dating back to 2006, in order to support the Water Resources Managers' assessment of sustainable abstraction throughout the year. Groundwater levels in the aquifer at Lightwood varies seasonally in response to aquifer recharge. Therefore, abstraction needs to be managed to maintain flow rates that do not adversely impact on groundwater levels and water quality. The Water Resources Manager regularly reviews data to help in decision making and provide early warning to the production planning team. The site's Lightwood and Rockhead licenses include flow restrictions during times when river levels in the catchment fall below prescribed levels. Abstraction must cease or compensation discharges must be made to the River Wye, via the borehole at Portobello Road.

There are differences between water level monitoring at the boreholes and St Ann's spring where water flows out of the spring fracture continuously flows out of the spring fracture continuously. The site monitors flow states instead, which vary seasonally, and the site will adapt their abstraction levels accordingly.

The water balance summary shows a 1.4% loss from inflow to outflow, which the company is working to address by installing the water meter for the foul water and they have initiated an internal Water Loss Investigation. As a result of this investigation there is an action in the WSP tracker to Install flow meters to provide data where gaps have been identified.

A sample of the water meters were pointed out to the WSAS auditors by the company during the site tour.

**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.*



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**Comment** The company has an on-site lab that carries out daily tests on site of: incoming water, post filtering, line testing (several times a day), and of the finished product. All three sources are also tested by the lab weekly for the required chemical and microbiological factors. The factory effluent is also tested weekly. The company is doing this voluntarily as not required by law, due to the low risk content. The company tests for pH, chemical oxygen demand (COD) and phosphate. A more comprehensive sample testing is carried out annually, and an inorganic, organic and microbiology analysis is carried out by the Nestlé laboratory at Vittel in France. The Water Resources Manager uses Microsoft Power BI, an interactive data visualization software, to manage and analyse all data for quantity and quality to incorporate relevant parameters for Buxton.

It was explained by the company that there is no seasonal variance due to aquifers being classified as stable, and the annual comprehensive analysis is therefore considered sufficient.

Water quality analysis of the mains water is carried out by STW and Legionella testing is carried out by a specialist third party.

The Environment Agency monitors the water quality of the River Wye at Ashwood Park, which is upstream of NWB operations and Ashford Quarry, which is downstream. This monitoring is referenced using Water Framework Directive (WFD) for each related waterbody: GB104028058460 (River Wye from Source to Monk's Dale) GB104028057820 (Wye from Monk's Dale to R Derwent)

Two shared water challenges related to quality have been identified:

- Nutrient Load in the River Wye from wastewater and diffuse sources
- Pesticides in Surface Water Catchment

Since 2022, the Environment Agency status for chemical health in all rivers in England was set to 'Does not require assessment' status. This is mainly due to the high levels of uPBT's, PFAS's, and Phosphorus. Due to this, 0% of England's rivers are currently classified as being in good chemical health.

The company provided copies of Environment Agency river quality testing reports, a document with data on testing results from the river monitoring points and a report on challenges in the environment due to Phosphorus, along with the in-house lab data sheets for incoming mains, mineral and spring water, as well as outgoing effluent. The audit report generated by the Water Resources Manager for the AWS audit shows the location of the EA monitoring locations.

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

 in progress

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001014


**Comment** The company has identified and mapped potential sources of pollution on the factory site, as well as within the catchment area. These have been mapped using Google Maps as well as listed in Excel documents.

Each location was also pointed out during the site tour. A safety perimeter was seen around the Ammonia chiller plant and locked padlocks were seen on the three large hazardous chemical storage units.

During the site tour, some containers containing COP cleaning chemicals, with the corrosive material sticker, were seen standing on the ground, instead of in a bund, next to one of the production lines. Some empty barrels with different delivery details (different company name) to NWB were seen in the CIP chemicals storage area, on a pallet. As they were empty, they were not deemed a potential issue due to the content but due to the unidentified nature. Also, some of the empty COP chemical containers (with the corrosive material sticker) were also seen standing on the ground next to a storage crate, which was also full with empty containers. One of these containers did not have a lid on. Some containers were also seen lying on the ground away from the storage crate, between two of the large locked storage containers used to store hazardous materials. According to the company, the large volume of empty containers was due to some issues with the waste contractor and delayed collections that was out of the hands of NWB.


There were no spillages seen near any of the observations however, due to there being several irregularities in the storage and identification of containers, a finding has been raised for the company to address these issues. Photographic evidence of these issues have been provided as part of this report.

**Finding No: TNR-009508**


**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** The company has identified four on-site IWRA's and mapped them using Google Maps. All four have a general description along with cultural values and a status:  
- St Ann's well (Lions Head) - deteriorating due to manganese scaling.  
- Groundwater source protection zones - good and stable.  
- Natural springs - poor due to known water scarcity in area.  
- Lightwood ponds - improving - due to conservation and enhancement work carried out.

A document listing all identified IWRA's, clearly showing which are on site and which are in the catchment, along with a map of these has been provided.

**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** The company has generated a document that details costs, revenues and a description of the social, cultural, environmental, or economic water-related value generated by the site. Costs have been divided up into nine categories: Factory Operational costs, Water Maintenance costs, Salary within catchment, Salary outside of catchment, Income generated to local suppliers, Water source improvements, Water source maintenance, Catchment and sustainability investment.  
Revenue is only obtained from sales of bottled water and beverages.  
For each category is a separate sheet within the document that outlines specific costs.




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



# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001014

Comment	<p>The company has used the Health &amp; Safety Executive (HSE) Welfare at Work guidance to inform themselves about WASH requirements in the UK.</p> <p>A document showing Legionella testing locations also includes a list of WASH facilities, as well as a spreadsheet listing the locations. The audit report provided to the audit team, section 1.3.8 includes a table that shows numbers of WASH facilities in relation to numbers of staff.</p> <p>The tap water is safe to drink and the company also provides free bottles of water to all staff. Fridges filled with these were seen in the main kitchen canteen as well as in the logistics break room.</p> <p>The company also provides free female hygiene products, which were seen in a sample of ladies toilets.</p> <p>Photographic evidence was taken during site tour.</p>	
<b>1.4</b>	<i>Gather data on the site's indirect water use, including: its primary inputs; the water use embedded in the production of those primary inputs the status of the waters at the origin of the inputs (where they can be identified); and water used in out-sourced water-related services.</i>	
<b>1.4.1</b>	<i>The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be identified.</i>	 Yes
Comment	<p>The company has developed a document that lists all their suppliers that includes details of; name, location, service provided, description of services, if within catchment, material importance, if working within or outside factory, if water is supplied by NWB, annual water use in m3, where and for what the water is used, and origin of the water (e.g Severn Trent mains water, private supply etc).</p> <p>No suppliers of primary inputs are located within the catchment.</p>	
<b>1.4.2</b>	<i>The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.</i>	 Yes
Comment	<p>The document described in 1.4.1 also applies to 1.4.2. Within the description of services it is stated if a supplier is a contractor (outsourcer).</p> <p>Two outsourcers have been identified, both of which work within the factory itself and any water use on their parts will therefore fall within NWB's water balance. Both provide building related services (civils and electrical services) so any water used by these will be for WASH and amounts therefore negligible.</p>	
<b>1.4.3</b>	<i>Advanced Indicator The embedded water use of primary inputs in catchment(s) of origin shall be quantified.</i>	 Yes
Comment	<p>Within the same document used for 1.4.1 and 1.4.2, are the suppliers providing primary inputs identified. Eight have been identified and none of these are based within the catchment. Only one of the eight identified primary input suppliers account for over 5% of the total costs of the associated product.</p> <p>Out of the eight identified suppliers, four have provided data for embedded water use however, the company has provided evidence that shows that all eight have been contacted requesting this information.</p> <p>An observation was raised on this criteria at the S1 audit, stating that the company had not initiated the process of quantifying the embedded water use of primary input suppliers. This observation has been closed as there is evidence that the process has been started from the side of NWB however, the company should follow up with the four suppliers who have not responded, in order to obtain complete data related to this indicator.</p>	
Score	7	



# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001014

<b>1.5</b>	<i>Gather water-related data for the catchment, including water governance, water balance, water quality, Important Water-Related Areas, infrastructure, and WASH</i>	
<b>1.5.1</b>	<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>	Yes
Comment	<p>The company has described governance structures and associated policies and initiatives in the audit report. Within this they have explained that the Environment Agency is the government body with the primary responsibility in relation to water governance in England. The EA has developed a governance structure that conforms with the Water Framework Directive (WFD) and follows a four-layer hierarchy: River basin district (RBD) -&gt; Management catchment (MC) -&gt; Operational catchment (OC) -&gt; Water body (WB).</p> <p>Guidelines for how to use the EA hierarchy can be found on this website: <a href="https://environment.data.gov.uk/catchment-planning/help/usage#the-catchment-data-explorer">https://environment.data.gov.uk/catchment-planning/help/usage#the-catchment-data-explorer</a>.</p> <p>In the case of NWB, the governance structure is as follows:</p> <ul style="list-style-type: none"> <li>- RDB: Humber River Basin District. River basin management plans are updated by the EA every six years, the version published in 2022 can be accessed via this link: <a href="https://www.gov.uk/guidance/humber-river-basin-district-river-management-plan-updated-2022">https://www.gov.uk/guidance/humber-river-basin-district-river-management-plan-updated-2022</a></li> <li>- MC: Derwent Derbyshire Management Catchment. The Derwent Derbyshire Management Catchment Partnership is hosted by the Derbyshire Wildlife Trust. Water abstraction licensing is managed by the EA. A copy of the strategy for the Derwent has been provided.</li> <li>-OC: Derwent Upper - Derbyshire Operational Catchment. According to NWB: "Operational catchments are used to group WFD waterbodies together for the purposes of economic appraisal."</li> <li>-WB: Wye from Source to Monk's Dale water body catchment (WFD: GB104028058460). Link provided to webpage: <a href="https://environment.data.gov.uk/catchment-planning/WaterBody/GB104028058460">https://environment.data.gov.uk/catchment-planning/WaterBody/GB104028058460</a></li> </ul> <p>In addition, the company has listed relevant and sufficient: national/public initiatives, water utility documents, local government documents, as well as public NWB company reports that relate to their water stewardship plan and the targets and actions within this. All of these documents have links to the applicable websites or documents.</p>	
<b>1.5.2</b>	<i>Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.</i>	Yes
Comment	<p>Overall responsibility for ensuring legal compliance at NWB lies with the SHE (Health Safety and Environment) Manager. They are supported by the Compliance Manager and rest of management team. This is further enforced by compliance reviews at Nestlé UK Head Office Management Team.</p> <p>Nestlé UK, including NWB use an in-house system called LROR (Legal Requirements and Other Requirements) to manage legal compliance.</p> <p>The company provided an extract from the Nestlé Management System Manual on determining compliance objectives that sets out responsibilities and the procedure, a document listing all water resource related legal and regulatory requirements, along with an abstraction license summary and copies of all applicable licenses and discharge consent.</p>	
<b>1.5.3</b>	<i>The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.</i>	Obs.

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001014

**Comment** A water balance has been generated for the Wye Catchment, based on data from two groundwater units within the Derbyshire licensing area:  
Derwent Carboniferous Limestone groundwater unit (where the St Ann's spring and Rockhead spring are located) the Derwent Millstone Grit groundwater unit (where Lightwood borehole is located).

NW Buxton have access to catchment level data, either through publicly available sources (such as the Environment Agency Hydrology data explorer), the British Geological Society, the UK Centre For Ecology & Hydrology, and through the use of external consultants.  
Rainfall data is also collected from own monitoring stations. In order to plan abstraction and water resource use, the company also look at licenses from other business within area, these don't show actual uses but use license limit.

The company has prepared the same documentation for this years audit as what was provided for the S1 audit in 2022, and therefore no change in the findings.  
A simplified water catchment balance has been captured in the 'Conceptual Model of the Buxton area', which lists the primary inputs and withdrawals from the catchment. The Inputs have been identified as: rainfall, discharge into catchment, evapotranspiration (ETP) and runoff. The catchment has a positive water budget of +14.63Mm3/year.  
The actual situation is more complex than the simplified calculation, owing to the effect of underground factors, such as; stream sinks, deep drainage and cross-catchment water movement through karstic geology, as well as overground factors, such as; rainfall, temperature (evapo-transpiration), river flow, as well as the volumes withdrawn for commercial use and public water supply.

NW Buxton supplied several documents to support this criteria: Lightwood Sustainability Assessment, Lightwood Climate Resilience Report, Rockhead Spring - Groundwater Resource Assessment, Buxton Resource Evaluation, and the Derbyshire Derwent Abstraction Licensing Strategy. The Lightwood Sustainability assessment contains a water balance summary for the source, outlining the source specific inputs, outputs and the balance of inputs and outputs with abstraction in place. The Rockhead Spring report gives an indication of annual variance in the water balance.

The conceptual model is dated 2019. The company explained that the document hasn't been updated since then as there is likely not to have been any changes however, an observation has been raised for a review to be carried out to ensure the data is still applicable.

**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.*



**Comment** The EA are responsible for keeping record of the water quality status of all water bodies in England. Current and historical data is stored and accessible on the GOV.UK website, which the company provided a link to in the audit report.  
The location of the monitoring stations used within the catchment area is on the map for criteria 1.3.4 in the audit report.




In addition, the company has identified the physical, chemical and ecological statuses of river sources, as well as the chemical status of groundwater within the Wye Catchment:

- Groundwater chemical status is classified as poor.
- River Wye chemical status is good, if excluding uPBT. However, as explained in 1.3.4, all rivers in England are currently classified as poor due to the levels of uPBT in all. If including uPBT, the river has failed.
- River Wye ecological status within the catchment is good or moderate.
- River Wye physical status is Not Designated as an A/HMWB (Artificial & Heavily Modified Water Body, in accordance with the Water Framework Directive classifications.
- Specific data has also been provided for Ammonia, Nitrate, Nitrite, pH, and Phosphate, along with an EA summary document with Wye status information and a
- River Water Quality data sheet showing the different criteria tested.

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)



Audit Number: AO-001014

<b>1.5.5</b>	<i>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.</i>	 Obs.
Comment	<p>In addition to the four on-site IWRA's identified and mapped in 1.3.4, another three have been identified and mapped in the catchment. As well as a general description along with cultural values and a status, threats and opportunities have also been assessed:</p> <ul style="list-style-type: none"><li>- The Wye Valley SSSI/ SAC, good status due to being a protected area. Potential threats: fertiliser application and invasive species. Opportunities: Engage with landowners and other stakeholders and invasive species removal projects.</li><li>- Poole's Cavern, good due to being a significant tourist attraction so are well-managed. No threats identified. Opportunities: Increase awareness of importance of water cycle.</li><li>- Upland peat (such as Combs Moss), Deteriorating due to degradation of peat. Potential threats: Continued degradation and erosion, and loss of biodiversity. Opportunity: Restoration of peatland to store water.</li></ul> <p>A document listing all identified IWRA's, clearly showing which are on site and which are in the catchment, along with a map of these, has been provided.</p>	
<b>1.5.6</b>	<i>Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.</i>	 Yes
Comment	<p>Severn Trent Water are responsible for public water supply management and wastewater treatment and disposal in the catchment. This includes investment in new and maintenance of water and wastewater related infrastructure. The 'Severn Trent Water Resource Management Plan' (WRMP) is a 25 year plan for managing impacts of droughts, environmental obligations and climate change, on the supply and demand balance. The plan for release in 2024 is currently being drafted and a copy of the draft summary has been provided.</p> <p>The Water Act (2003) made it a statutory requirement for water companies, such as Severn Trent Water, to produce and maintain a Drought Plan every five years. This sets out how Severn Trent will manage the resources and supply system during dry and drought years, whilst balancing the interests of customers, the environment and the wider economy. A copy of this has also been provided.</p> <p>Severn Trent are also responsible for delivering a 'Drainage and Waste Water Management Plan' (DWMP), a copy of this has also been supplied.</p> <p>Links to all the relevant documents can also be found in the audit report, on the page for '1.5.6 - Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events'.</p> <p>Buxton WWTP was updated with completion in 2023, in order to to improve treatment capabilities.</p> <p>According to the company, all infrastructure managed by STW is mapped however, there is a cost for accessing this.</p>	
<b>1.5.7</b>	<i>The adequacy of available WASH services within the catchment shall be identified.</i>	 Obs.

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001014

Comment	<p>The majority of households and businesses in the catchment are on public water supply provided by Severn Trent Water.</p> <p>The company has used two publications to inform themselves for this criteria:</p> <ul style="list-style-type: none"><li>- Progress on Sanitation and Drinking Water, UNICEF and World Health Organization, 2015</li><li>- Drinking Water 2022 - Private water supplies in England, Drinking Water Inspectorate (DVI), 2022.</li></ul> <p>According to the UNICEF / WHO report, 2019; 100% of the UK population had access to 'improved' water supply and 99% of the population had access to 'improved' sanitation (improved being the highest ranking in the report).</p> <p>The DVI report includes information about quality, sampling, risk assessment, risk management and enforcement, as well as basic statistics about water provisions and testing of microbiological and chemical parameters.</p> <p>The Drinking Water Inspectorate has guidance documents for managing periods of insufficiency for private water supplies.</p> <p>The majority of households and business in the catchment are connected to mains sewage managed by Severn Trent Water. Buildings that are not connected will utilise septic tanks, cesspits or small sewage treatment plants.</p>	
<b>1.5.8</b>	<p><i>Advanced Indicator</i></p> <p><i>Efforts by the site to support and undertake catchment level water-related data collection shall be identified.</i></p>	 Yes
Comment	<p>The company has developed a process with measures in place to collect catchment level data and making data from their weather station data available to stakeholders. There are monitoring stations at all sources, as well as on at the Waterswallows Lane factory. The responsibility for monitoring weather and water flows has been contracted to a company called Hydro-Logic Ltd. This company has developed a software package called Timeview Telemetry, where all data collected is gathered remotely. NWB is then able to give access to any persons or organisations who contact them with interest in this. In case of high rainfall, an email alert will also be sent to the relevant personnel at NWB, including to the lab, who can carry out extra testing on quality. Thresholds for alarms being set off are &gt;15mm in 24 hours and &gt;10mm in 6 hours.</p> <p>Some examples of data sharing are: collecting external water-related data, such as Hogshaw Brooks Flow and sharing this with the Environment Agency as well as with local residents and organisations, such as for example, a Claire Miller, Buxton Weather and CEMEX. NWB have utilised an external lab to undertake water quality data testing and shared it with The Crescent Hotel.</p> <p>The company has provided example emails of communication requests for access to Timeview and data sets, a data sheet for water quality data shared with the Crescent Hotel, as well as screenshots from Timeview. One screenshot shows how data is collected and the other is a list of people who have access to the NWB data.</p>	
Score	7	
<b>1.5.9</b>	<p><i>Advanced Indicator</i></p> <p><i>The adequacy of WASH provision within the catchments of origin of primary inputs shall be identified.</i></p>	 Yes
Comment	<p>The company has assessed and identified the adequacy of WASH provision within the catchments of origin of primary inputs. Eight have been identified and all but two of these are within the UK so are covered by the same evidence used for 1.5.7. Aside from this, one supplier in France has been identified with the WASH provisions in their catchment being listed as Very Good. And one in Spain, listed as having Good access to WASH in their catchment.</p> <p>The company has provided a table in their audit report that includes details of: Supplier name, area, country, catchment, WASH provision and a link to evidence.</p>	

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001014

Score 4

**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.*



Yes

**Comment** Eight shared water challenges have been identified through conversations and consultations with stakeholders, no new challenges added since 2023 audit. Since the 2023 surveillance audit, the Water Stewardship Plan has been updated with a QR code link to feedback survey that includes a question about shared water challenges.

- Water Loss from Peat Moorlands
- Resilience to climate change/ extreme weather events
- Loss of Native Species - migratory fish
- Loss of Native Species - signal crayfish
- Nutrient Load in the River Wye from wastewater and diffuse sources
- Pesticides in Surface Water Catchment
- Summer Water Scarcity in River Derwent Catchment
- Dewatering activities of the extractive industry

The company has generated a document that includes details about the challenge, including a description, priority and justification to address challenge, as well as a presentation that summarises details of each identified challenge. A copy of the Water Stewardship Plan has also been added to this indicator, to show the QR code provided for feedback. The 2024 plan is still being developed and will be completed post completion of the AWS audit, so a copy of the previous edition has been provided.

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



Obs.

**Comment** Out of the eight shared water challenges identified, five have had relevant initiatives or projects identified. For example, for the challenge of 'water loss from peat moorlands', the Combs Moss peatland restoration project has been identified. Another good example is for the challenge of 'pesticides in surface water catchment', a new collaborative project with other local water users, as well as the EA and Natural England to work with farmers and other partners on "catchment sensitive farming".

**1.6.3** *Advanced Indicator  
Future water issues shall be identified, including anticipated impacts and trends*



Yes

**Comment** Through their own research and discussions with stakeholders, the company has identified and listed four future water issues:

- Increased occurrence of flooding and drought as a result of climate change
- Increased pressure on freshwater resources due to growing population and industry (such as mineral extraction)
- Rise in nitrate concentrations in groundwater (in excess of drinking water standards)
- Emerging contaminants of concern in surface water and groundwater

The company has provided brief summaries for each of these potential issues, including references to sources of information on the page for criteria 1.6.3 in their audit report, with links to their locations, as well as copy reports.

Score 3

**1.6.4** *Advanced Indicator  
Potential water-related social impacts from the site shall be identified, resulting in a social impact assessment with a particular focus on water.*



No

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001014

Comment The company provided information and evidence to address this advanced indicator at the S1 audit in 2022 however, nothing has been provided this year.

**Finding No: TNR-009563**

**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.*



Yes

Comment The company has generated a risk register that includes; a reference code, description of hazard, likelihood, explanation, business impact description and severity, and financial cost to the business. Prioritisation is determined based on the financial costs to the business. Likelihood and impact is assessed using a HR/SHE Nestlé tool for this.

Example: Damage to factory equipment due to sabotage/ vandalism. Likelihood - E (unlikely). Business impact - 3 (significant). Financial cost identified, high priority will be given to this, in case of damage.

**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 As with risks, the company has generated an opportunities register that includes: initiative / project, assessment of opportunity, prioritisation, status, progress, costs, expected value created, investment value.

Example (minus financial information):  
Factory water loss investigation, internal investigation into water losses at factory. High priority, in progress. Expected value created: reduction in abstraction and saving of water within production.

**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 company has developed a Best Practice Summary document, within which best practices for water governance have been identified on factory, national, Europe, and global levels.

Examples:  
Factory level: The Nestlé Policy on Environmental Sustainability.  
National: Department for Environment Food and Rural Affairs (DEFRA) - Our integrated plan for delivering clean and plentiful water  
Europe: Natural Mineral Waters Europe, CO2 Logic - Water Use Ratio 2021 - Final Report  
Global: WWF - Water Risk Filter

The company has also used the best practice summary to list applicable legal and regulatory requirements however, were advised at the audit that legal requirements are not considered "best practice" as they are required by law.

**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.*



Yes



# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)




Audit Number: AO-001014

Comment	<p>The company has developed a Best Practice Summary document, within which best practices for water balance have been identified on regional and global levels.</p> <p>Examples: Regional: Environment Agency - Derbyshire Derwent Abstraction Licensing Strategy Global: World Resources Institute (WRI) - Volumetric Water Benefit Accounting (VWBA): A Method For Implementing and Valuing Water Stewardship Activities</p>	
<b>1.8.3</b>	<i>Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.</i>	Q Obs.
Comment	<p>The company has developed a Best Practice Summary document, within which best practices for water quality have been identified on local, regional, UK and European levels.</p> <p>Examples: Local: Natural England - Site Improvement Plan – Peak District Dales / Wye Valley Diffuse Pollution Plan Regional: Severn Trent Water - Severn Trent's Environmental Protection Scheme UK: UK Government - Catchment Sensitive Farming: advice for farmers and land managers Europe: Ramsar - Ramsar Sites Information Service</p> <p>The company has also used the best practice summary to list applicable legal and regulatory requirements however, were advised at the audit that legal requirements are not considered "best practise" as they are required by law.</p>	
<b>1.8.4</b>	<i>Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.</i>	Q Obs.
Comment	<p>The company has developed a Best Practice Summary document, within which best practices for site maintenance of Important Water-Related Areas have been identified on local, regional, and UK levels.</p> <p>Examples: Local: High Peak Borough Council - Water in Buxton Supplementary planning document Regional: Natural England - European Site Conservation Objectives for Peak District Dales SAC (UK0019859) UK: Environment Agency - The Environment Agency's approach to groundwater protection</p> <p>The company has also used the best practice summary to list applicable legal and regulatory requirements however, were advised at the audit that legal requirements are not considered "best practise" as they are required by law.</p>	
<b>1.8.5</b>	<i>Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.</i>	✓ Yes
Comment	<p>The company has developed a Best Practice Summary document, within which best practices for site provision of equitable and adequate WASH services have been identified on factory and UK levels.</p> <p>Examples: Factory: Nestlé Waters Buxton - Hygiene Manual UK: Health &amp; Safety Executive (HSE) - Welfare at work Guidance for employers on welfare provisions</p>	

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001014


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"> <li>- That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes</li> <li>- That the site implementation will be aligned to and in support of existing catchment sustainability plans</li> <li>- That the site's stakeholders will be engaged in an open and transparent way</li> <li>- That the site will allocate resources to implement the Standard.</li> </ul>	 Yes
Comment	<p>The company has generated and updated public commitment statement that includes all four requirements set out in this indicator. The commitment has been signed by Hannah Philips - Buxton Factory Manager, Mark Griffiths - Water Resources Manager and Grant McKenzie - BEO Nestlé Waters UK.</p> <p>The commitment was seen during the audit site tour and photographic evidence of its location in the company reception has been provided by the company, as well as a copy of the document itself.</p> <p>The company also has a commitment on their website <a href="https://www.buxtonwater.co.uk/sustainability/water-stewardship">https://www.buxtonwater.co.uk/sustainability/water-stewardship</a>. However, this does not directly include the wording from this indicator but instead refers to the AWS certification (so indirectly relates to indicator).</p>	
2.1.2	<i>Advanced Indicator</i> <i>A statement that explicitly covers all requirements set out in Indicator 2.1.1 and is signed by the organization's senior-most executive or governance body and publicly disclosed shall be identified.</i>	 Yes
Comment	As stated in 2.1.1, the commitment has been signed by Grant McKenzie - BEO Nestlé Waters UK.	
Score	1	
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"> <li>- Identification of responsible persons/positions within facility organizational structure</li> <li>- Process for submissions to regulatory agencies.</li> </ul>	 Yes



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## Alliance for Water Stewardship (AWS)



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Comment	<p>The company already had a system in place to maintain compliance obligations prior to obtaining AWS certification. Compliance to environmental requirements is certified through ISO 14001. The NWB Compliance Manager is responsible for managing the compliance process. A copy of the ISO 14001 certificate has been provided.</p> <p>During the site audit it was explained that the Factory Manager is overall responsible for complying with water and wastewater management and associated regulations, with the Water Resources Manager being responsible for maintaining regulatory licenses, and the SHE Manager responsible for ensuring all legal requirements are met.</p> <p>All these members of staff, apart from the Compliance Manager, as not directly involved in the AWS process, are included in the governance organigram provided for indicator 5.1.1: Buxton Water Stewardship Internal Governance.</p> <p>A copy of Section 6.2 – Determining Compliance Objectives, from the Nestlé Management System Manual has been provided. This outlines the procedure for which legal regulations and other requirements effecting NWB are accessed and maintained.</p> <p>The exact process for submissions to regulatory agencies is outlined in the NWB audit report, step 2.2.1. This explains that: "The WRM is responsible for regulatory submissions which include: - Abstraction Returns to Environment Agency - Trade Effluent Consent to Severn Trent (flow returns emailed to STW) Maintenance of compliance obligations are verified externally as part of the ISO 14001 certification audits / certification."</p> <p>Diagram clearly showing the actual process included on the page for indicator 2.2.1 on their audit report was provided and verified during interviews at the site audit.</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
Comment	<p>The first page of the company's Water Stewardship Plan outlines their strategy by clearly defining their Vision, Mission and Goals towards good water stewardship.</p> <p>Vision: To ensure long term sustainability and quality of our water resources and preserve them for future generations. Mission: To identify and address shared water challenges through on and off site actions, engaging and collaborating with stakeholders within our catchment, and continual improvement. Goals:</p> <ul style="list-style-type: none"> <li>- Sustainably manage overall water usage</li> <li>- Monitor water quality related to our activities</li> <li>- Understand and advance good water governance through collective action</li> <li>- Prepare for extreme and emergency events</li> <li>- Develop collective actions with key stakeholders to address shared water challenges,</li> <li>- Fulfil the Nestlé Waters pledge to create a positive water impact locally where we operate by 2025</li> <li>- Share our knowledge and water stewardship performance, and</li> <li>- Manage our land management activities to promote nature and biodiversity</li> </ul> <p>A copy of the WSP has been provided. This is still the one developed in 2022 and updated after the 2023 audit as the 2024 WSP is still in development and won't be completed until the AWS audit process is complete.</p>	

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2.3.2	<p><i>A water stewardship plan shall be identified, including for each target:</i></p> <ul style="list-style-type: none"> <li>- <i>How it will be measured and monitored</i></li> <li>- <i>Actions to achieve and maintain (or exceed) it</i></li> <li>- <i>Planned timeframes to achieve it</i></li> <li>- <i>Financial budgets allocated for actions</i></li> <li>- <i>Positions of persons responsible for actions and achieving targets</i></li> <li>- <i>Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.</i></li> </ul>	 Yes
Comment	<p>The company's external facing Water Stewardship Plan lays out SMART objectives, targets and actions for the year, including progress updates. The internal Water Stewardship Plan Tracker outlines twelve objectives and includes details for:</p> <ul style="list-style-type: none"> <li>Objective,</li> <li>2024 target</li> <li>2024 action</li> <li>2024 budget</li> <li>Action status</li> <li>Start date</li> <li>End date</li> <li>Date last reviewed</li> <li>Responsible person</li> <li>Relevant best practise</li> <li>Progress update</li> <li>Performance</li> <li>Value created</li> <li>Shared value created</li> <li>Communication to stakeholders</li> <li>Location</li> <li>Shared water challenge</li> <li>Key stakeholders</li> <li>and</li> <li>A column for each of the five AWS Outcomes.</li> </ul> <p>The plan is measured and monitored through monthly review meetings by the management team as part of their compliance review.</p>	
2.3.3	<p><i>Advanced Indicator</i></p> <p><i>The site's partnership/water stewardship activities with other sites within the same catchment (which may or may not be under the same organisational ownership) shall be identified and described.</i></p>	 Yes
Comment	<p>Within the audit report provided by NWB, on the page for 2.3.3. the company has outlined an example of a partnership with other sites within the same catchment.</p> <p>The company is involved in the Combs Moss Restoration Project (Water Pledge Project 1), which aims to restore peat landscapes on Combs Moss, which is a site adjacent to the land owned around the Lightwood source. Outcomes of the restoration project are predicted to be retain of water on the peatland, reduce runoff and minimise flooding in Buxton and other downstream communities.</p> <p>Main partners on the project are the Environment Agency, Severn Trent Water, Peak District National Park, Moors for the Future. Other stakeholders in the project are: High Peak Borough Council, local community groups and landowners, Natural England.</p> <p>In addition to this partnership, but not yet document as first meeting was only held at the end of March 2024, at the NWB factory. This is a new initiative on catchment sensitive farming and companies and organisations such as; EA, Natural England, Derbyshire Wildlife Trust (DWT), Severn Trent Water and local planning authorities were listed as taking part in the initial meeting.</p>	
Score	4	

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<b>2.3.4</b>	<i>Advanced Indicator</i> <i>The site's partnership/water stewardship activities with other sites in another catchment(s) (either under same corporate structure or with another corporate site) shall be identified.</i>	 Yes
Comment	<p>Within the audit report provided by NWB, on the page for 2.3.4. the company has outlined an example of a partnership with other sites in another catchment.</p> <p>The company is involved in the River Ecclesbourne Project (Water Pledge Project 2), which aims to restore natural and unimpeded flow in the River Ecclesbourne. Desired outcome of the project is to enable Atlantic Salmon, and other migratory fish species, to return to their natural spawning grounds in over 100 years (the river flow was changed to enable transport by rivers during the Industrial revolution).</p> <p>Main partners on the project are the Environment Agency, Severn Trent Water, Derbyshire Wildlife Trust and the Wild trout Trust. Other stakeholders in the project are: Turnditch and Windley Parish Council, local community groups and landowners, Chatsworth Estate.</p>	
Score	4	
<b>2.3.5</b>	<i>Advanced Indicator</i> <i>Stakeholder consensus shall be sought on the site's water stewardship plan. Consensus should be achieved on at least one target. A list of targets that have consensus and in which stakeholders are involved shall be identified.</i>	 Yes
Comment	The company requests feedback and consensus on their WSP through the surveys access through the QR code on the plan. Examples of responses to the survey have been included on the page for 2.3.5 on the company audit report and the actual responses have also been provided in an excel sheet. Note only five responses on the question.	
Score	7	
<b>2.4</b>	<i>Demonstrate the site's responsiveness and resilience to respond to water risks</i>	
<b>2.4.1</b>	<i>A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.</i>	 Yes
Comment	<p>All planning goes through High Peak Borough Council. The EA also gets involved any planning process that can affect water quantity or quality of aquifers.</p> <p>NWB is an active consultee on planning processes and have contributed with input to the development a planning document published by High Peak Borough Council called "Water in Buxton" that was adopted by the council in 2021.</p> <p>A copy of the document has been provided.</p> <p>A copy has also been provided of High Peak Borough Council's Water Emergency Plan for Buxton.</p> <p>The company has used these two documents to inform themselves on mitigation strategies for the risks identified in 1.7.1. The risk register is also their plan required for this indicator. Examples of risks and mitigation are included on the slide for 2.4.1 on the NWB audit report.</p>	
<b>2.4.2</b>	<i>Advanced Indicator</i> <i>A plan to mitigate or adapt to water risks associated with climate change projections developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.</i>	 Yes

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## Alliance for Water Stewardship (AWS)

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**Comment** NWB had identified potential risks to their operations due to climate change. As a result of identifying that risk, the company commissioned a specialist consultancy firm to carry out a climate resilience study on potential impacts related to recharging of their aquifers. In this case in relation to the Lightwood Groundwater Source. The study used data from the Met Office, the EA and UK Centre for Ecology & Hydrology (UKCEH), as well as information and data from other sources that are referenced within the resulting report. The study concluded a likelihood of wetter winters and drier summers. As a result of the study, the company is now developing a maintenance plan for the Lightwood site. A copy of the plan has been provided.

A Climate Change Plan has been developed following the result from the resilience study, a copy of this has been provided.




Flooding and water scarcity have also been identified as water challenges within the catchment. And climate change is predicted to increase the likelihood of both. To try to combat this, NWB is working with the EA, Severn Trent Water, Peak District National Park Authority and Moors for the Future Partnership in order to restore the Combs Moss peatland, which has been degraded as a result of past industry in nearby towns. The result of the degraded peatland is rapid runoff during rainfall which is believed to have triggered flooding in Buxton. A peat restoration plan was developed by NWB in partnership with the Moors for the Future Partnership to encourage retention/ storage of water within the moss, which will reduce the flooding risk during wet periods and provide a baseflow of water during drier periods. The restoration plan is currently being implemented with the project partners. Copies of documentation related to this project has been provided.

**Score** 6

# CERTIFICATION REPORT

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3	<b>STEP 3: IMPLEMENT - Implement the site's stewardship plan and improve impacts</b>	
3.1	<i>Implement plan to participate positively in catchment governance.</i>	
3.1.1	<i>Evidence that the site has supported good catchment governance shall be identified.</i>	 Yes
Comment	<p>The company has listed examples of how they have supported good catchment document, on the page for indicator 3.1.1 of their audit report, and have provided documentation to support these. Examples from the list provided:</p> <ul style="list-style-type: none"> <li>- Supporting High Peak Borough Council in developing planning policy related to protecting water - as stated in 2.4.1, NWB is an active consultee on planning processes and have contributed with input to the development a planning document published by High Peak Borough Council called "Water in Buxton" that was adopted by the council in 2021. A copy of the document has been provided.</li> <li>- Working with the local council as part of the consultation process for planning applications for new construction projects within the source protection zone and catchment for St Ann's spring and Rockhead Spring - example emails related to this have been provided where the Water Resource Manager at NWB has engaged in a planning application to construct a McDonalds within the catchment. NWB are consulted on any planning applications that could impact their water sources. Within the response from NWB, the Water Resources Manager refers to the above-mentioned Water in Buxton planning document.</li> <li>- Undertake land management within our Lightwood and Cowdale land, working with Derbyshire Wildlife Trust to implement a programme of biodiversity improvements - copies of management plans, developed in collaboration with Derbyshire Wildlife Trust have been provided.</li> <li>- Investigations and actions to reduce water losses at the factory - as a result of mapping the site water balance at the factory, and finding a 1.4% loss from inflow to outflow, they have initiated an internal Water Loss Investigation. As a result of this investigation there is an action in the WSP tracker to Install flow meters to provide data where gaps have been identified. A copy of the report from the initial investigation has been provided.</li> <li>- Undertake climate change assessments to understand risks within the area and to our sources - as already noted in 2.4.2, the company commissioned a climate resilience study for the Lightwood source. The study used data from the Met Office, the EA and UK Centre for Ecology &amp; Hydrology (UKCEH), as well as information and data from other sources that are referenced within the resulting report. A copy of the document has been provided.</li> <li>- Implementing a project to reduce the risk of flooding within Buxton through our Combs Moss peat restoration and natural flood management project - already noted in 2.4.2. Supporting documentation provided.</li> </ul>	
3.1.2	<i>Measures identified to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be implemented.</i>	 Yes
Comment	<p>Water rights for abstraction and discharges to surface water are covered under legal and regulatory mechanisms.</p> <p>NWB also works with the High Peak Borough Council and the Crescent Hotel in support of making the Lion's head fountain accessible to the public. This can be located outside of the underground spring chamber, by the Crescent Hotel.</p> <p>The company has provided supporting documentation that outlines usage and maintenance of the St Ann's source.</p>	
3.1.3	<i>Advanced Indicator</i> <i>Evidence of improvements in water governance capacity from a site-selected baseline date shall be identified.</i>	 Yes

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**Comment** The company has outlined improvements and ongoing actions in their provided audit report, along with supporting documents for the ones mentioned below:

- The Water Resources Manager and Sustainability Manager attend quarterly workshops with Zone Europe to share experience and identify opportunities for improvements in water stewardship.
- Promote transparency about our catchments through developing and presenting posters of the water cycle, hydrogeology, water balance and water challenges in the area.
- Attend local community events to discuss our water stewardship activities.
- Disclose relevant water stewardship performance in our Water Stewardship Plan and Performance report.

**Score** 2

**3.1.4** *Advanced Indicator*  
*Evidence from a representative range of stakeholders showing consensus that the site is seen as positively contributing to the good water governance of the catchment shall be identified.*



Yes

**Comment** As well as having a feedback mechanism in the form of the QR code on the published WSP, the company also carried out an annual "local acceptability study". A copy of the results from the 2023 survey has been provided. Of the responses provided, a higher proportion of respondents said that the way the factory manages water resources was positive. The same for managing impact on the environment.

The company also asked for feedback on their Japanese Knotweed eradication program, with positive feedback from this provided. A LinkedIn post by the Nestlé Head of Corporate Affairs & Sustainability also received positive feedback. Evidence for both of these provided.

In addition, stakeholders interviewed during the AWS audit also provided positive feedback on the NWB's management of their water sources and surrounding land, within the catchment.

**Score** 2

**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

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Comment	<p>As already stated in 2.2.1: The company already had a system in place to maintain compliance obligations prior to obtaining AWS certification. Compliance to environmental requirements is certified through ISO 14001. The NWB Compliance Manager is responsible for managing the compliance process. A copy of the ISO 14001 certificate has been provided. There is also a twice annual review of laws and regulations using the LROR platform. During the site audit it was explained that the Factory Manager is overall responsible for complying with water and wastewater management and associated regulations, with the Water Resources Manager being responsible for maintaining regulatory licenses, and the SHE Manager responsible for ensuring all legal requirements are met. Also during the site audit, the auditors were shown the process for submissions on the EA website and the NWB account on there with their licenses.</p> <p>Seen example of internal audit of 14001 June 2023. One major raised on not having a legal register, or maintaining this. This was addressed by adding LROR to the internal audit database and developing a process for maintaining this, by giving the SHE Manager access. The external third party ISO auditor checked the internal finding and acknowledged conformance with the ISO requirements. Did not raise a NC but raised an opportunity for the area to be verified again at the 2024 audit.</p> <p>A copy of Section 6.2 – Determining Compliance Objectives, from the Nestle Management System Manual has been provided. This outlines the procedure for which legal regulations and other requirements effecting NWB are accessed and maintained. Diagram clearly showing the actual process included on the page for indicator 2.2.1 on their audit report was provided and verified during interviews at the site audit.</p> <p>Copies of compliance inspection reports for Lightwood, Rockhead and Portobello road have been provided, alongside an annual volume return for the water abstracted at St. Ann's, submitted to High Peak Borough Council, as well as a copy email to Severn Trent Water with trade effluent volumes.</p>	
3.2.2	<i>Where water rights are part of legal and regulatory requirements, measures identified to respect the water rights of others including Indigenous peoples, shall be implemented.</i>	 Yes
Comment	<p>The company has an abstraction agreement in place with the Local Authority for the St. Ann's spring covering the sharing of water with the Crescent Hotel at times of low flow. A monitoring scheme is in place to cover all the abstracted thermal flows ensuring water rights are respected.</p> <p>Supporting documentation provided in the form of a Method Statement for Data storage, transfer and access, as well as a copy of the abstraction agreement for St Ann's, issued by High Peak Borough Council.</p>	
3.3	<i>Implement plan to achieve site water balance targets.</i>	
3.3.1	<i>Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.</i>	 Yes



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**Comment** The company uses the tracker document to track progress of targets set out in their WSP. Within this, its possible to see that all actions for targets related to water balance, were completed in 2023. All three objectives/targets from 2023 have also been carried across to 2024 as on-going work:

- Responsibly manage overall water usage - Reduce water losses at the factory - Reduce water loses at the factory by 10% for the period Jan to Dec 2023 - completed.
- Water Pledge: create a positive water impact locally by 2025 - Reduce the risk of flooding downstream of Lightwood on Lightwood Road as part of the Combs Moss NFM Project. Deliver at least 200,000 m3 of water benefit to the catchment by 2025 - Start the project construction works by October 2023 - completed.
- Water Pledge: create a positive water impact locally by 2025 - Restore native species to the River Ecclesbourne. Deliver at least 500,000 m3 of water benefit to the catchment by 2025 - Commence the restoration works at Turnditch - completed.

The company also provided progress reports for both the Combs Moss and River Ecclesbourne projects.

**3.3.2** *Where water scarcity is a shared water challenge, annual targets to improve the site's water use efficiency, or if practical and applicable, reduce volumetric total use shall be implemented.*



**Comment** A shared water challenge of "Summer Water Scarcity in River Derwent Catchment" has been identified.

Actions to try to improve water ratio (and help water availability) form part of the site Operational Masterplan for 2024. However, this is not included in the WSP.

An image confirming the inclusion of the action to improve water ratio is included on the page for indicator 3.3.2 on the NWB audit report.

The water ratio is discussed in each factory Monthly Operational Review (MOR) which includes the factory leadership team with managers in all factory departments. The 2024 ratio target for factory: 1.15 Litres to make one Litre.

The 2023 target of 1.13 Litres was not achieved due to lack of customer demand (wet summer). The ratio was not achieved as water was still being extracted, due to having to maintain minimum flow (14cbm / hour) for health and hygiene reasons, water is kept flowing through the pipes. However, due to lack of demand the water abstracted was not bottled but discharged into the river Wye (where it would have gone anyway if not used to be bottled).

The water loss investigation already mentioned is the main action to address challenge of scarcity. The investigation is included within the WSP as an ongoing action to address the objective to "Reduce water losses at the factory".

Documentation has been provided with information and data related to this issue.

In addition to the water use targets that are tracked monthly (see 3.3.1), NWB have developed a dashboard to track multiple indicators related to water levels in their sources and the river levels in the wider catchment. They have live connectivity to three river monitoring stations linked to their licenses (locations: St Mary, North Mushkam and Ashford), which allow them to anticipate when scarcity will be an issue and inform them when to utilise their compensation borehole at Portobello Road.

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







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## Alliance for Water Stewardship (AWS)

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Comment	<p>The company has provided legally binding documentation for two existing collaborative agreements.</p> <p>One is with the Derbyshire Wildlife Trust for the Ecclesbourne Restoration Project, which, according to the agreement has the objective: "to reconnect the River Ecclesbourne to a former side channel that would bypass an existing weir at Postern Mill and to install a bridge to protect the channel from disturbance that may otherwise be caused by agricultural operations. Outcomes of which include: 29 km of the River Ecclesbourne opened up to fish passage, Volumetric flow increased from baseline measurement of zero for fish migration, engagement with landowners, and also community groups to restore riparian habitats.</p> <p>The second is with Peak District National Park for the Combs Moss Restoration Project, which according to the agreement has the objective: "to undertake the restoration of around 350 hectares of Combs Moss, which is a moorland plateau that consists of degraded and modified blanket bog situated between Chapel-en-le-Frith and Buxton in Derbyshire, in the Peak District. The project will be financed by a group of funding partners, including Nestlé Waters. The Nestlé Waters financial contribution will specifically fund the implementation of gully blocks and bunds in the Hogshaw Brook area of Combs Moss, which drains into the Derwent catchment." Outcomes include: Slow the flow of water coming off Combs Moss during significant rain events and make Combs Moss more resilient to drought and climate change.</p> <p>In addition, during the site tour of the water sources, at the visit to St Ann's, the company explained that the flow of water in the Lions Head fountain is slowing, mainly due to mineral build up in the pipes from the pool to the fountain. These are not maintained by NWB however, are in talks with High Peak Borough Council to provide advice and support in maintaining the pipework supplying the fountain. A document outlining the parameters of this agreement has been provided.</p>	
3.3.4	<p><i>Advanced Indicator</i></p> <p><i>The total volume of water voluntarily re-allocated (from site water savings) for social, cultural and environmental needs shall be quantified.</i></p>	 Yes
Comment	<p>The company has developed methodologies for calculating the volumetric water benefit (VWB) of their two water pledge projects (River Ecclesbourne and Combs Moss). Methods for both are based on the World Resources Institute VWBA methodology and have been approved for use by Bluerisk, a third-party organisation who were jointly responsible for preparing the VWBA guidance. The estimated benefits for each project resulting from the factory involvement in the project are:</p> <p>around 500,000 to 600,000m3 per year benefit for aquatic biodiversity improvements along the River Ecclesbourne; and</p> <p>around 100,000 m3 per year related to reducing the risk of flooding at Buxton following implementation of the Combs Moss peatland restoration works.</p> <p>Documentation detailing each project, as well as data gathered for the Ecclesbourne project (Combs Moss is still in the development stages), has been provided.</p> <p>Social and cultural needs have not been addressed.</p>	
Score	6	
3.4	<i>Implement plan to achieve site water quality targets</i>	
3.4.1	<p><i>Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.</i></p>	 Yes

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

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**Comment** The company uses the tracker document to track progress of targets set out in their WSP. Within this, its possible to see that all actions, apart from two, for three 2023 targets related to water quality, were completed in 2023:

- Monitoring water quality related to our activities - Understand the risk to water availability and water quality resulting from Combs Moss restoration work - Prepare a hydrogeological risk assessment prior to commencing restoration - 2 out of 3 actions completed. Copy of risk assessment provided.
- Improve biodiversity within our catchment - Contribute to improving the conservation status and water quality Status of the River Wye - Instigate Japanese Knotweed removal programme for land adjacent to the River Wye within our land ownership. Conduct at least 10 treatments/ inspections in 2023 - all actions completed. Copies of email correspondence related to the status and completion of actions provided.
- Monitoring water quality related to our activities - Not adversely impact the River Wye water quality - Not exceed our discharge limits - launched / delayed. Copy of effluent monitoring data provided.

Six objectives with associated targets and actions have been established for 2024.

**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** In the past, the company discharged their trade effluent directly into the River Wye via the attenuation pond however, this is now discharged into the public sewer network and treated at Buxton WWTP. NWB are not legally required to monitor the quality of effluent discharged, but they measure COD and pH, basically collating effluent data above their regulatory requirements. Adding to this, the company also recently started measuring phosphate, going further above and beyond requirements in order to track their impact in relation to phosphate content in the local water supply. A datasheet with effluent monitoring data has been provided along with data for phosphate monitoring from the beginning of 2024.

On the page for indicator 3.4.2 in the NWB audit report, they have included some graphs showing upper and lower limits for pH and max limit for COD. None of these limits have been breached since last years audit.

In addition to on-site monitoring, as mentioned prior, the company has also recently got involved with a project on catchment sensitive farming that has an objective to reduce water pollution from pesticide use. Other partners on this project are the EA and Natural England. The first meeting with the group involved in this, happened at the end of March after the audit, so there is no documentation for this as of yet. However, this projects was also mentioned by the stakeholder interviewed from Natural England, who informed the AWS assessor that the first meeting was taking place at the Nestlé Waters Buxton factory.

**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

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

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**Comment** Progress on objectives, targets and actions related to IWRA's is clearly maintained in the company's WSP tracker, and supporting documentary and photographic evidence has also been provided. On the tracker sheet for 2023, five IWRA's were identified, all within the catchment. On the sheet for 2024, seven have been identified with four of these related to the catchment and three to the site, two of which had not been launched at the time of the audit. Examples of work implemented to date:


**CATCHMENT**

- Combs Moss restoration project: Prepare a hydrogeological risk assessment prior to commencing restoration - completed in July 2023. Copy of risk assessment report provided.
- Combs Moss restoration project: Complete the project works and begin monitoring - commenced in December 2023, progress meetings launched. Photographic evidence provided in Water Pledge presentation.
- Restore native species to the River Ecclesbourne. Deliver at least 500,000 m3 of water benefit to the catchment by 2025: 2023 construction target completed by September, project works ongoing with completion date of April 2024. Photographic evidence of this also provided in the Water Pledge presentation, along with a brief video of the channel in the river getting re-opened.
- Contribute to improving the conservation status and water quality Status of the River Wye (as stated in 1.5.5, the Wye Valley is a SSSI/ SAC with a threat of invasive species, in particular Japanese Knotweed): action to implement eradication adjacent to the Rockhead source using thermoelectric treatment was completed in August 2023. The target has been carried over into 2024 with an action to carry out another 10 treatments in 2024. Copy correspondence with contractor for this, with photographic evidence provided.

**SITE**

- Support the council with maintenance of their Lion's Head Fountain (IWRA). Restore the flow rate to 0.6m3/hr: develop legal agreement and agree cleaning methodology has been launched and is on track. A copy of the draft agreement with High Peak Borough Council has been provided.


All of the above actions are resulting in an enhancement of the respective IWRA.

**3.5.2** *Advanced Indicator*  **Yes**  
*Evidence of completed restoration of non-functioning or severely degraded Important Water-Related Areas including where appropriate cultural values from a site-selected baseline date shall be identified. Restored areas may be outside of the site, but within the catchment.*

**Comment** The company owns the land outlined around the Lightwood source on the site and catchment maps. The land includes a range of different semi-natural habitats that have a long history of management and modifications, but were in times left largely unmanaged. Derbyshire Wildlife Trust were contracted by Nestlé Waters UK in 2017 to assess the current wildlife and nature conservation interest found at the site and to draw up a management plan for the site. The management plan was intended to provide a foundation, rationale and guide for taking forward management activities across the site that result in achieving the overall vision for the site. The plan provides detailed assessment of the site and the management approaches available to try and achieve the site vision. Copy plan provided.

The company provided photographic evidence of the Lightwood site restoration over time, and the AWS assessor also took photos of information boards seen during the catchment tour, along with other photos of the area, including a very large clump of frogspawn seen in one of the ponds.




**Score** 6

**3.5.3** *Advanced Indicator*  **Yes**  
*Evidence from a representative range of stakeholders showing consensus that the site is seen as positively contributing to the healthy status of Important Water-Related Areas in the catchment shall be identified.*

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

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Comment	<p>The company has used the feedback mechanism in the form of the QR code on the published WSP to ask about management of IWRA's. The WSP is sent to stakeholders annually and is also published in a newsletter published by Vision Buxton, "a membership organisation which brings together local businesses, community groups and individuals who are all passionate about making Buxton an even better place to live, work and play" (<a href="http://www.visionbuxton.co.uk">www.visionbuxton.co.uk</a>).</p> <p>As well as asking for feedback on the management of IWRA's in their survey, a LinkedIn post by the Nestlé Head of Corporate Affairs &amp; Sustainability about the Japanese Knotweed eradication project also received positive feedback, indicating consensus.. Evidence for both of these provided.</p> <p>Details about how many stakeholders or interested parties have been consulted or provided feedback in relation to IWRA's has not been provided.</p>	
Score	2	
<b>3.6</b>	<i>Implement plan to provide access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers at all premises under the site's control.</i>	
<b>3.6.1</b>	<i>Evidence of the site's provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers onsite shall be identified and where applicable, quantified.</i>	 Yes
Comment	<p>The answer to this indicator is the same as for 1.3.8 as the WASH facilities and provisions identified for 1.3.8 are the same as for this indicator. The only thing to further underline here is the clear focus on Legionella testing at the factory. Two risk assessment reports have been added for this indicator that evidences the regular considerations and controls for this risk.</p> <p>The company has used the Health &amp; Safety Executive (HSE) Welfare at Work guidance to inform themselves about WASH requirements in the UK.</p> <p>A document showing Legionella testing locations also includes a list of WASH facilities, as well as a spreadsheet listing the locations. The audit report provided to the audit team, section 1.3.8 includes a table that shows numbers of WASH facilities in relation to numbers of staff.</p> <p>The tap water is safe to drink and the company also provides free bottles of water to all staff. Fridges filled with these were seen in the main kitchen canteen as well as in the logistics break room.</p> <p>The company also provides free female hygiene products, which were seen in a sample of ladies toilets.</p> <p>Photographic evidence was taken during site tour.</p>	
<b>3.6.2</b>	<i>Evidence that the site is not impinging on the human right to safe water and sanitation of communities through their operations, and that traditional access rights for indigenous and local communities are being respected, and that remedial actions are in place where this is not the case, and that these are effective.</i>	 Yes
Comment	<p>The company complies with all UK regulations in relation to water abstraction ((Water Resources Act 1991 (as amended by the Water Act 2003), Environment Act 1995, The Water Resources (Abstraction and Impounding) Regulations 2006)), and the legal agreement with HPBC and the Crescent Hotel, for use of the St Ann's thermal source. The factory discharges trade effluent to the sewerage network managed by Severn Trent Water, under a license. The factory complies with the license.</p> <p>Supporting evidence used for 3.1.2 also applies here.</p>	
<b>3.6.3</b>	<i>Advanced Indicator A list of actions taken to support the provision to stakeholders in the catchment of access to safe drinking water, adequate sanitation and hygiene awareness shall be identified.</i>	 Yes

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

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**Comment** Due to the location of this company (in the UK), there isn't much the company can do in addition to what Severn Trent Water is also providing in relation to WASH within the catchment. However, the site provided three examples of how they contribute with provision of WASH within the local community and wider catchment:

Donations to stakeholders:

The factory set up a stall at the Buxton fair and provided water to members of the public to keep hydrated during the event and other events where drinking water may not be accessible. Photo of the stall on the AWS audit report provided by NWB.

Hygiene awareness:

All visitors to the site are reminded of good hygiene in bathrooms and at hygiene stations within the factory.

Signs in bathrooms, signs at hygiene stations, induction video.

Photographic evidence provided by company, as well as taken by AWS assessor during site tour.

Lions Head:

Improvements to the fountain by supporting the High Peak Borough Council with their maintenance of the public fountain.

Copy of draft agreement for this provided for indicator 3.3.3.

**Score** 5

**3.6.4**

*Advanced Indicator:*

*In catchments where WASH has been identified as a shared water challenge, evidence of efforts taken with relevant public-sector agencies to share information and to advocate for change to address access to safe drinking water and sanitation shall be identified.*



Yes

**Comment**

As stated for indicators 1.5.7 and 1.5.9, there are adequate WASH provision in the catchment, which most of the area being connected to the public water supply and drainage networks. WASH is therefore not to be considered a shared water challenge. Despite this, the company has an active programme of water donation in the catchment, in 2023 the site donated over 23,500 bottles of water to 40 organisations.

A tracker document has been provided that shows number of bottles donated in 2023 and there is also a graph and more photos showing examples of the company's stand being at events with free water on the NWB audit report.

The company also works together with High Peak Borough Council on maintaining access to WASH in two locations near St Ann's:

**LIONS HEADS**

In 2023, staff at NWB noticed a reduction in the flow rate of the fountain and contacted HPBC about a potential concern related to availability of water at the public source.

Following an initial communication with the council (a copy of which has been provided), an agreement has been drawn up between the two parties for NWB to provide advice and support for maintaining the pipework supplying the fountain, a copy of which has also been provided.

An emergency response plan has also been drawn up with HPBC, a copy of which has also been provided along with copy email communications related to this.

**CRESCENT HOTEL**

The factory sources water from the St Ann's thermal spring under license from HPBC. The Crescent Hotel abstracts from the nearby St Ann's hotel spring under license from HPBC. The total flow from the thermal spring is greater than the hotel spring and an agreement is in place between NWB and the hotel to allow sharing of water from the thermal spring when the availability of the hotel spring is insufficient for the hotel's needs. The agreement relies on data sharing to understand the relative flows of each of the springs and therefore determine a fair share of water – during a dry period the flow of the thermal spring is also reduced. Data is shared between each party of the agreement.

**Score** 4




**WSAS**

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

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

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<b>3.7</b>	<i>Implement plan to maintain or improve indirect water use within the catchment:</i>	
<b>3.7.1</b>	<i>Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.</i>	 Yes
Comment	<p>There are no targets in the WSP related to indirect water use. There is minimal embedded water in the factory supply chain and therefore the site has justified no further action or need to set an indirect water use target in the Water Stewardship Plan. The other suppliers identified in the catchment do not contribute with primary inputs.</p> <p>As identified in criteria 1.4, the company only has 2 outsourced services located within the catchment. Both services are embedded contractors and therefore any water required for work is supplied by the factory.</p> <p>The company provided the document showing indirect water use of suppliers, and within this columns T, U and V relate to this criteria.</p>	
<b>3.7.2</b>	<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>Following on from 1.7.1, the company further explained their investigations and actions related to embedded water use and engagement with suppliers on this. The company explained their methodology:</p> <p>"The site has prepared an 'Indirect water use of suppliers 2023' spreadsheet, which identifies all of our outsourced services. There are many supplies on the list and the vast majority provide occasional services. We have therefore reviewed the list and identified those services which are materially important to our operations. By this we mean they undertake a lot of work on our behalf either at the factory or the materials provided form a major part of our production process. We have also included a column to filter by within or outside catchment. The site has a total of 2 outsourced services located within the catchment that provide that meet our criteria. Both services are embedded contractors and therefore any water required for work is supplied by the factory."</p> <p>Although it is not applicable to the factory, the company provided two examples of engagement with suppliers regarding this indicator.</p>	
<b>3.7.3</b>	<i>Advanced Indicator Actions taken to address water related risks and challenges related to indirect water use outside the catchment shall be documented and evaluated.</i>	 Obs.
Comment	<p>The company has identified 7 materially important outsourced services located outside the catchment. They have engaged with the companies to understand their water use, to determine whether there are any improvements that can be made to their processes that would have a positive impact on the their water catchments. Response received to date do not indicate a significant water use, however this is reviewed annually.</p> <p>Copies of email correspondence related to information requests and responses have been provided.</p> <p>with these correspondences the site is presenting their efforts to identify the risk however, this advanced indicator requires the site to document and evaluate the actions they took to address water related risks and challenges related to indirect water use outside the catchment which was not yet presented</p>	
Score	6	
<b>3.8</b>	<i>Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have.</i>	



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## Alliance for Water Stewardship (AWS)

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<b>3.8.1</b>	<i>Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.</i>	 Yes
Comment	<p>The company shares water-related infrastructure with the Crescent Hotel and High Peak Borough Council (owners) at the St Ann's source. An image of this has been provided.</p> <p><b>LIONS HEADS</b> In 2023, staff at NWB noticed a reduction in the flow rate of the fountain and contacted HPBC about a potential concern related to availability of water at the public source. NWB also noted that this could be "a reputational risk the factory, despite the fountain being owned, maintained and operated by HPBC" as members of the public who are not aware of ownership frequently assume that infrastructure in the area is owned by Nestlé. Following an initial communication with the council (a copy of which has been provided), a collaboration agreement has been drawn up between the two parties for NWB to provide advice and support for maintaining the pipework supplying the fountain, a copy of which has also been provided. An emergency response plan has also been drawn up with HPBC, a copy of which has also been provided along with copy email communications related to this.</p> <p><b>CRESCENT HOTEL</b> NWB sources water from the St Ann's thermal spring under license from HPBC. The Crescent Hotel abstracts from the nearby St Ann's hotel spring under license from HPBC. The total flow from the thermal spring is greater than the hotel spring and an agreement is in place between NWB, HPBC and The Crescent Hotel to allow sharing of water from the thermal spring when the availability of the hotel spring is insufficient for the hotel's needs. The agreement relies on data sharing to understand the relative flows of each of the springs and therefore determine a fair share of water – during a dry period the flow of the thermal spring is also reduced. Data is shared between each party of the agreement.</p>	
<b>3.9</b>	<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>	
<b>3.9.1</b>	<i>Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.</i>	 Yes
Comment	<p>The company carries out numerous actions that contribute towards water governance best practice. For each target and related action within the WSP tracker, documentation has been provided to support actions stated in relation to best practise. Examples of these (that do not relate to legal or regulatory requirements) include:</p> <ul style="list-style-type: none"> <li>- Effluent testing for COD, pH and phosphate, despite not a legal requirement. Copy of testing data provided.</li> <li>- Water ratio tracking of bottled water volumes. Ratio set for 2024 is 1.13 Litres to make one Litre. Copy of progress presentation and associated data sheet provided.</li> <li>- Partnerships with government bodies and relevant nature-based organisations mentioned prior in this report, such as Derbyshire Wildlife Trust and Peak District National Park Authority to restore and enhance natural areas. In this case, the River Ecclesbourne restoration and biodiversity improvement and the Combs Moss peatland restoration project. Summaries on progress of both these are included in the Water Pledge presentation.</li> <li>- Nestlé Environmental Requirements (NER) monthly production review. Copy of presentation from November 2023 meeting provided.</li> <li>- Contributing to development, and evaluation of planning documentation that relate to water availability in Buxton. Copy of Water in Buxton HPBC document and copy emails from planning officer regarding demolition of building within St Ann's protection zone.</li> </ul>	
<b>3.9.2</b>	<i>Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.</i>	 Yes



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## Alliance for Water Stewardship (AWS)

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**Comment** NWB is regularly reviewing operations in the context of water balance and availability, as well as managing abstraction to reduce the quantities of water losses.  
The company conducts weekly water planning meetings for water resources in order to manage abstractions in response to production plan and water availability.  
The company provided a presentation document showing topics and issues discussed during these planning meetings, along with data evaluated during the monthly management meetings on water availability. The longer-term planning is based on rainfall data and comparison to long term average and based on studies that can help the company better understand the correlation between rainfall, recharge and water availability.  
According to the company, "During dry months, more frequent assessments are made and flow rates are reduced in line with expected availability."  
Monitoring data provided.

The company also commissions water resource assessments every 5 years "to check the assumptions are correct regarding sustainable abstraction from the source and more recently have included assessments of the impacts climate change may have on long term water availability." Copies of the resource studies for Rockwell and Lightwood have been provided, as well as the climate resilience report for Lightwood.

The company is also undertaking a water loss investigation in the factory to identify areas of loss as well as carry out the water ratio monitoring stated in 3.9.1.

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



Yes

**Comment** - Effluent testing for COD, pH and phosphate, despite not a legal requirement. Copy of testing data provided.  
- The company commissioned the study into the possible water quality impacts to our Lightwood source as a result of implementing the Combs Moss project. Copy of report provided.  
- Launched Japanese Knotweed removal programme for land adjacent to the River Wye adjacent to Rockhead source.

In addition, the company also carries out all the testing practices listed for indicator 1.3.4, which had supporting documentation provided.

There are also regular meetings of the technical Natural Source Water Association, of which NWB is a member. They have a Technical Working Group where they discuss Trade Body topics relevant to UK members. Copies of meeting correspondence and meeting minutes from a working group meeting has been provided.

All of this shows that the company has robust mechanisms in place to monitor and gather data on the quality of the water at source, in the factory and post discharge.

**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

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

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Comment The below IWRA's were identified by the company for step 1:

### ON-SITE

- St Ann's well (Lions Head)
- Groundwater source protection zones
- Natural springs
- Lightwood ponds

### CATCHMENT

- The Wye Valley SSSI/ SAC
- Poole's Cavern
- Upland peat (such as Combs Moss)

The company has implemented the following best practice actions for their targets related to maintenance of IWRA's:

- Assessed the ecological condition of the Lightwood and Cowdale (Rockhead) owned land and have had 10 year management plans developed for both areas by the Derbyshire Wildlife Trust. Copies of the management plans have been provided.
- A 2 year programme of Japanese Knotweed eradication is underway at Cowdale (Rockhead). The first year of treatment was undertaken in 2023 using a novel technique (Rootwave) which does not require the use of chemicals or excavation and is therefore better for the environment. The removal of the Japanese Knotweed will improve the biodiversity of the River Wye (identified as a SSSI/ SAC). Communication and photographic evidence provided.
- Implementing agreement with High Peak Borough Council to support maintenance of the pipeline serving the Lions Head fountain. Draft agreement provided.

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



No

Comment The company has provided three examples for actions related to WASH however, none of these relate to the best three practice actions listed for indicator 1.8.5. One of these is understandable, as it relates to members of the local community contacting NWB about help with install or repair water fountains, so are not regular practices but instead ad hoc requests. NWB have responded positively to both enquiries and have provided copies of the email correspondence.

The second example relates to education at schools around hygiene, which there was no evidence provided for however, evidence of staff from NWB attending a career fair as well as hosting school kids on site at the factory for talks around hygiene, including practical exercises and a site tour.

The third relates to the donation of bottles of water to support local events. A charity donations tracker document has been provided for this.

**Finding No: TNR-009622**

**3.9.6** *Advanced Indicator  
Achievement of identified best practice related to targets in terms of good water governance shall be quantified.*



Yes

Comment




- Water ratio tracking of bottled water volumes. Ratio set for 2024 is 1.13 Litres to make one Litre. Copy of water ratio data sheet along with Novembers Monthly Production Review provided.
- Monthly monitoring of trade effluent not required by law. Data sheets for pH, DOP and phosphate provided.
- Assessment of river flow of Ecclesbourne VWBA prior to and after the previous flow from pre-industrial times were restored. Flow data dating back to 1971 provided as part of comparison document with flow post restoration.
- Wildlife monitoring surveys have been carried out. At Lightwood it was in the ponds, where amphibian and reptile counts were made in the spring of 2023. At Cowdale (Rockwood), a breeding bird survey was carried out in Q3 of 2022.

Score 8

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<b>3.9.7</b>	<b>Advanced Indicator</b> <i>Achievement of identified best practice related to targets in terms of sustainable water balance shall be quantified.</i>	 Yes
Comment	<ul style="list-style-type: none"><li>- Water ratio tracking of bottled water volumes. Ratio set for 2024 is 1.13 Litres to make one Litre. Copy of progress presentation and associated data sheet provided. Graph of 2023 ratios against target also included on 3.9.7 page on audit report. 2023 ratio of 1.15 Litres not achieved due to low demand combined with ongoing flow of sources for hygiene reasons.</li><li>- Water loss investigation carried out at factory, production line 11. Progress report with data findings provided for this.</li><li>- The company provided a presentation document showing topics and issues discussed during these water resource planning meetings, along with data evaluated during the monthly management meetings on water availability. The longer-term planning is based on rainfall data and comparison to long term average and based on studies that can help the company better understand the correlation between rainfall, recharge and water availability.</li><li>- Monitoring methodology and proposed water storage data from the Combs Moss restoration project, in the form of Volumetric Water Benefit Accounting.</li></ul>	
Score	8	
<b>3.9.8</b>	<b>Advanced Indicator</b> <i>Achievement of identified best practices related to targets in terms of water quality shall be quantified</i>	 Yes
Comment	<ul style="list-style-type: none"><li>- Monthly monitoring of trade effluent not required by law. Data sheets for pH, DOP and phosphate provided. A graph also provided showing trends.</li><li>- The River Ecclesbourne project aims to improve the ecological water quality of the by improving access migratory fish species. The VWBA monitoring data sheet has been provided and a graph on the NWB audit report page for 3.9.8 shows the flow criteria are predicted from a volumetric benefit of 1,000,000m3.</li><li>- No quantitative data provided from management of Lightwood however, there is data on the types of aquatic life found at Lightwood, in the document 'Light Wood Ecological Evaluation and Recommendations for future management' and the pond surveys carried out by the DWT includes numbers of species founds in the ponds.</li><li>- No quantitative data available from Knotweed eradication programme as of yet, only one round of thermo-electric treatment carried out so far.</li></ul> <p>The company has provided correspondence and photographic evidence from the Japanese Knotweed clearings near the Rockhead source however, no numerical data has been provided on the progress there so far of a 2 year programme.</p>	
Score	8	
<b>3.9.9</b>	<b>Advanced Indicator</b> <i>Achievement of identified best practices related to targets in terms of the site's maintenance of Important Water-Related Areas have been implemented.</i>	 Yes

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**Comment** River Wye SSSI / SAC:  
 - In 2023, the company has started a 2 year programme of Japanese Knotweed eradication. According to NWB, the work is 50% completed, another 10 sessions scheduled for 2024. Progress correspondence and photos provided.  
 - NWB are constantly assessing their effluent water quality to internally set targets to ensure the water quality of the River Wye is not impacted by their activities. Including additional monitoring for phosphate to evaluate our impact and develop a plan to mitigate the risk if applicable. Copy of effluent and phosphate data provided.

St Ann's spring Source Protection Zone (SPZ):  
 - The company was an active stakeholder in the development of the HPBC Water in Buxton Supplementary Planning document that was adopted in December 2021. The document is now used to enforce best practice when reviewing planning, implementing below ground construction activities and drainage. Company of the Water in Buxton document provided.  
 - The company routinely reviews planning applications within the SPZ, supporting the consultation process and providing support to the council where appropriate. Example correspondence provided for this.

Lions Head fountain:  
 - The site is in the process of implementing support for a maintenance plan for High Peak Borough Council allowing them to restore the flow rate 0.625 l/s within Q2 of 2024. Copy of draft agreement provided, no data yet.

**Score** 8


**3.9.10** *Advanced Indicator*  Yes  
*Achievement of identified best practice related to targets in terms of WASH shall be quantified.*

**Comment** There are only two targets related to WASH due to the high level of provisions by Severn Trent Water and UK HSE requirements. However, in accordance with Nestlé Product Donation guidelines, the company donated 23,552 bottles of water to the local community in 2023 against a target of 30,000. The same target has been set for 2024. A copy of the charity donations tracker has been provided.

The other target related to WASH is the soon to be implemented agreement with HPBC supporting the maintenance of the piping for the Lions Head. So far no Best Practice has been identified for this target and there is no data yet as the work hasn't commenced yet.

The company hasn't designated any best practice(s) against the new target of maintaining the infrastructure at the Lions Head so could look at adding something for this.

**Score** 4

**3.9.11** *Advanced Indicator*  Yes  
*A list of efforts to spread best practices shall be identified.*

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

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**Comment** The company has provided a list of examples of actions around spreading best practice undertaken by the factory in 2023, the list below is also on their provided audit report:

- Attendance at the Buxton Flood Risk Community event (14th March 2023) to present our Combs Moss peat restoration and NFM project. Copy of email with details provided.
- Presented at the Zenith conference in 22nd March 2023 on our water stewardship activities to raise awareness of the shared water challenges and methods that can be used to address them. Slides from presentation provided.
- A stall at the Buxton Spring Fair on 1st May 2023 to discuss our water stewardship, our water stewardship plan and the activities we are undertaking in the catchment. Details of stall content and information provided.
- Guest lecture on the water cycle, sustainable water use, and training on water quality sampling for the University of Derby. Email from university post visit provided.
- A number of visits to local schools to talk about the water cycle and the importance of preserving our water.
- Sharing the work we are doing in the catchment around water stewardship, and good water stewardship practice, at the Buxton Crescent Heritage Trust - Business Breakfast event on 12th July 2023.
- Meeting with the Rivers Trust to discuss the River Ecclesbourne project and present the VWBA methodology and the accounting method used for our project on 1st August 2023. Copy email from Rivers Trust provided.
- Led a walking tour of our Lightwood land in partnership with Derbyshire Wildlife Trust on 12th Sept 2023. The walking tour was for the local public and provided an opportunity to discuss sustainable water use, showcase the biodiversity improvements at lightwood and talk about the benefits of the Combs Moss project. Copy of email correspondence with details provided.
- Contributed to the preparation of and attendance of our European AWS Workshop in November 2023 to provide training and share best practice, examples and experience of water stewardship. Copy of email correspondence with details provided.
- Contribution to the NSW Socio-economic report. Copy of report also submitted as evidence.

**Score** 3

**3.9.12** *Advanced Indicator*  
*A list of collective action efforts, including the organizations involved, positions of responsible persons of other entities involved, and a description of the role played by the site shall be identified.*



Yes

**Comment** The company provided the following information on their audit report for this indicator, this has been verified by the auditor and supporting documentation provided:

"Refer to Step 2.3.3 and 2.3.4 for the water projects we are working on collaboratively to achieve AWS outcomes.

For the Ecclesbourne Project NWUK act as a funder and attend monthly project meetings and quarterly board meetings. The Water Resources Manager has played an active role in supporting the planning application for the works, including guidance on the approach to address planning conditions, helping to develop the method to quantify the water benefits (VWBA), identifying opportunity for eDNA testing and other monitoring. The Sustainability Manager has provided support in developing communication material for the project during key project milestones.

Nestlé Waters are primarily a funder of this for the Combs Moss project. However, the Water Resources manager has played an active role in shaping the project scope and developing the method for calculating the volumetric benefit accounting. The cross functional team attends the bi-weekly project meeting and has attended several on site meeting throughout the development of the project and throughout the implementation of the project, engaging with the stakeholders and strengthening relationships. The Sustainability Manager has arranged volunteering of factory staff to install essential monitoring equipment that will help quantify the benefits of the project and provide the data to support research and feasibility studies for other similar projects.

**Score** 14

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### 3.9.13

#### Advanced Indicator



Yes

*Evidence of the quantified improvement that has resulted from the collective action relative to a site-selected baseline date shall be identified and evidence from an appropriate range of stakeholders linked to the collective action (including both those implementing the action and those affected by the action) that the site is materially and positively contributing to the achievement of the collective action shall be identified.*

#### Comment

Details regarding this have been copied from the audit report generated by NWB, due to the clear explanations of the collective actions, baseline data and supporting evidence involving suitable stakeholders:

"Refer to Step 2.3.3 and 2.3.4 for the water projects we are working on collaboratively to achieve AWS outcomes.

For the River Ecclesbourne project we have quantified the volumetric benefit to Atlantic Salmon (migratory fish species) based on an industry approved method and validated by a third-party expert panel. It was not possible for migratory fish to migrate upstream of the project however since the weir has been by-passed this is now possible. This outcome will be supplemented by eDNA sampling and analysis, and electrofishing, from a baseline date prior to the works. Baseline sampling was undertaken in May and September 2023 with repeat sampling scheduled for May and September 2025 (experts have advised to delay repeat monitoring for a period of more than 1 year after the works are completed). In addition photographs have been undertaken before during and after the project works to help quantify the improvements brought about by the restoration works as well as making use of fixed point photography and an application called WildMaps to allow the public to see the progress and learn more about the benefits of the project.

For Combs Moss the baseline is effectively zero as there are currently no natural flood management measures in place due to the degraded state of the peat. Baseline groundwater level monitoring has been undertaken by volunteers using the monitoring standpipes installed. Whilst the data won't be used to calculate the project benefit it will provide useful data for research projects and assess the effectiveness of different intervention types. A methodology has been developed to log the volume of the dams created in the peat and measure the frequency these dams fill to determine the benefit related to flooding.

For the River Ecclesbourne project, it is already possible to see from flow data that more water is coming through the stream, which should according to the consultants on the project result in migratory fish being able to return.

Project collaborators (shown on slide 3 of Water Pledge slides): EA, Chatsworth House, Wild Trout Trust, Derbyshire Wildlife Trust (copy agreement provided) and Severn Trent Water.

Project Collaborators on Combs Moss: Peak District National Park (copy agreement provided), Moors for the Future.

VWBA calculations have been generated for Ecclesbourne with data provided back from 1971. For Combs Moss, the VWBA methodology and proposed water storage figures have been developed for different types of interventions (gully blocking or bunding).

#### Score

8

# CERTIFICATION REPORT

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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> <span style="float: right;">✔ Yes</span>
Comment	<p>The company uses a tracker developed using Excel to monitor and evaluate performance against targets and actions. The plan is measured and monitored through monthly review meetings by the management team as part of their compliance review. Out of the 21 actions set for 7 targets in 2023, 19 were completed. The two outstanding had been launched but not completed so have been carried over to 2024.</p> <p>As stated in 2.3.2: The company's external facing Water Stewardship Plan lays out SMART objectives, targets and actions for the year, including progress updates. The internal Water Stewardship Plan Tracker outlines twelve objectives and includes details for: Objective, 2024 target 2024 action 2024 budget Action status Start date End date Date last reviewed Responsible person Relevant best practise Progress update Performance Value created Shared value created Communication to stakeholders Location Shared water challenge Key stakeholders and A column for each of the five AWS Outcomes.</p> <p>The company has summarised an evaluation of targets and actions in 2023 on the page for 4.1.1 on their audit report, which matches the current statuses shown on the tracker.</p>
4.1.2	<i>Value creation resulting from the water stewardship plan shall be evaluated.</i> <span style="float: right;">🔍 Obs.</span>
Comment	<p>The company evaluates value creation through the WSP tracker. Column O of the document has been developed to meet indicator 4.1.2. A summary of the 2023 evaluation has been provided on the page for 4.1.2 on the NWB audit report. A specific example has also been provided for the in-house water loss investigation at line 11 and the results from this, with a supporting document. The tracker comment related to value creation being: "Reduction in waste water. Or, use less water and hence strain on the aquifers, additional volume stored in the Lightwood aquifer."</p>
4.1.3	<i>The shared value benefits in the catchment shall be identified and where applicable, quantified.</i> <span style="float: right;">🔍 Obs.</span>



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**Comment** The company evaluates shared value creation through the WSP tracker. Column P of the document has been developed to meet indicator 4.1.3. A summary of the 2023 evaluation has been provided on the page for 4.1.3 on the NWB audit report.

### 4.1.4 Advanced Indicator

*A governance or executive-level review, including discussion of shared water challenges, water risks, and opportunities, and any water-related cost savings or benefits realized, and any relevant incidents shall be identified.*



Yes

**Comment** NWB carries out two annual senior leadership team (SLT) reviews that address several water-related topics, including:

- Water use vs targets and discussion around opportunities for improvements.
- Compliance with the relevant licenses and internal standards.
- Water Stewardship and Regeneration (i.e. implementation of NWB projects).
- Community engagement and shared value created.
- Shared water challenges has been added to the agenda for the 2023 review, which will take place in April 2024.

The company provided a document "Buxton Factory Management Review July 2023 - Review of January to May 2023" however, there is only one page related to AWS matters on the report and it does not go into any details about risks, opportunities, cost savings or benefits. There is a section of the report related to the environment with performance and effectiveness data for waste and energy however, nothing on water. The slides include details of the topics discussed but there are no further details about "shared water challenges, water risks, and opportunities, and any water-related cost savings or benefits realized". The company did explain that shared water challenges are included from 2024 going forward. The report states there have been no incidents since the previous AWS audit. There are no details of which staff attending the review meeting (for relevance).

The company also provided a one pager with justification and benefits for the River Ecclesbourne restoration project with total cost, estimated benefits and opportunities. However, no mention of risks (if any). The same for Combs Moss restoration project.

The company could consider consolidating the information related to this indicator into one document for clearer overview of information for requirements.

**Score** 3

### 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** All environmental and water related incidents and violations are recorded using the company SHE-PM tool. An summary over the past 3 years is presented in Table 4.2.1 on the NWB audit report, there have been no incidents recorded since the factory opened in 2013. The SHE manager and water resources manager review the data annually and prepare a written report. The annual management review includes reporting of the year's emergency incidents. No water-related emergency incidents occurred as confirmed by the 'Water and environmental incidents' document.

### 4.3 Evaluate stakeholders' consultation feedback regarding the site's water stewardship performance, including the effectiveness of the site's engagement process.


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<b>4.3.1</b>	<i>Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.</i>	 Yes
Comment	<p>The company carried out a variety of types of stakeholder consultation:</p> <p>Every September the company completes a Local Acceptability Survey in Buxton. This takes place over 3 days on Buxton high street, where professional surveyors approach members of the public to ask them a set of questions. Individuals must be residents, and the survey includes questions on water issues, such as: how the company manages water resources and how the factory manages its impact on the environment. See indicator 3.1.4 for details of this.</p> <p>WSP and performance report is emailed to the stakeholders on the list once a year, this was last done in September 2023. Stakeholders can provide feedback using the QR code on the SWP.</p> <p>Members of Vision Buxton (<a href="http://www.visionbuxton.co.uk">www.visionbuxton.co.uk</a>) is also sent this information on the website. Copy of email from Vision Buxton provided.</p> <p>The company also attends events throughout the year and depending on the event, they will bring the WSP for people to look through. Examples of events attended on the page for 4.3.1 on the audit report.</p> <p>Documents showing examples of feedback through acceptability survey and QR code feedback function from WSP.</p>	
<b>4.3.2</b>	<i>Advanced Indicator</i> <i>The site's efforts to address shared water challenges shall be evaluated by stakeholders. This shall include stakeholder reviewing of the site's efforts across all five outcome areas, and their suggestions for continual improvement.</i>	 No
Comment	<p>NWB is very proactive in consulting its stakeholders on how the factory performs, and also in highlighting general water issues.</p> <p>The company includes details of the shared water challenges within the annual WSP shared with stakeholders via email and through the Vision Buxton website.</p> <p>Confirm that all the challenges identified earlier in the report are included in the WSP:</p> <ul style="list-style-type: none"><li>- Water Loss from Peat Moorlands</li><li>- Resilience to climate change/ extreme weather events</li><li>- Loss of Native Species - migratory fish</li><li>- Loss of Native Species - signal crayfish</li><li>- Nutrient Load in the River Wye from wastewater and diffuse sources</li><li>- Pesticides in Surface Water Catchment</li><li>- Summer Water Scarcity in River Derwent Catchment</li><li>- Dewatering activities of the extractive industry</li></ul> <p>The company provided a screenshot from their WSP feedback survey results, which ranks the importance of the identified challenges. There is also a summary of feedback received in 2023 on the page for 4.3.2 in the NWB audit report, with a note that it is limited to draw specific conclusions due to low number of respondents. However, the company has deduced from the feedback provided that "Most respondents agreed or strongly agreed with the shared water challenges identified are the important water related issues within the Derwent catchment"</p> <p>However, no further details provided in relation to stakeholder evaluation of efforts to address the challenges.</p> <p>The 5 AWS outcomes are continuously referenced throughout the WSP however, no evidence provided for 'stakeholder reviewing of the site's efforts across all five outcome areas, and their suggestions for continual improvement.'</p>	
<b>4.4</b>	<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>	

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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 company has added the new feedback process using the QR code as a response to the minor raised on this indicator in 2023 (The site should refocus their consultation efforts to focus on feedback on their water stewardship plan and how they perform against it, rather than seek general feedback on their environmental and water performance).</p> <p>The company have reviewed the feedback received from their 2023 Water Stewardship Plan as part of the development of the 2024 WSP.</p> <p>In addition, the WSP is reviewed monthly and updated in response to feedback from relevant stakeholders, where applicable. This includes discussions with project partners for the Water Pledge projects, such as the Environment Agency, Derbyshire Wildlife Trust, Wild Trout Trust and Moors for the Future Partnership.</p>	

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5	STEP 5: COMMUNICATE & DISCLOSE - Communicate about water stewardship and disclose the site's stewardship efforts	
5.1	Disclose water-related internal governance of the site's management, including the positions of those accountable for legal compliance with water-related local laws and regulations.	
5.1.1	The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.	Yes
Comment	<p>Prior to the onsite audit, the company had provided their audit report, which had a page for 5.1.1 that included an organigram showing water-related internal governance from global to local level. However, that organigram (dated 28/02/2024) did not include details of the SHE Manager who is responsible for compliance with water-related laws and regulations at Buxton. Therefore, post audit, the company provided an updated organigram (dated 08/03/2024) that includes the SHE Manager.</p> <p>The location where this page is normally displayed in the company reception had been replaced with the notification of the AWS audit however, after the site audit was completed on the 8th of March the Water Resources Manager ensured this was returned to its relevant location. A photograph has been provided of this as evidence, along with a copy of the updated internal governance document.</p>	
5.2	Communicate the water stewardship plan with relevant stakeholders.	
5.2.1	The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.	Yes
Comment	<p>The WSP was sent to stakeholders on the 18th of September 2023, with stakeholders on bcc so the email addressed were not visible however, a spreadsheet with the stakeholders email has been provided separately.</p> <p>The publication of the plan was also included in the October newsletter for Vision Buxton, sent on the 3rd of October. Copy of this also provided.</p> <p>The plan published includes details about how the water stewardship plan contributes to AWS Standard outcomes.</p>	
5.3	Disclose annual site water stewardship summary, including: the relevant information about the site's annual water stewardship performance and results against the site's targets.	
5.3.1	A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.	Yes
Comment	<p>A summary of the site's water stewardship performance, including quantified performance against targets is disclosed annually, as stated in 5.2.1:</p> <p>The WSP was sent to stakeholders on the 18th of September 2023, with stakeholders on bcc so the email addressed were not visible however, a spreadsheet with the stakeholders email has been provided separately.</p> <p>The publication of the plan was also included in the October newsletter for Vision Buxton, sent on the 3rd of October. Copy of this also provided.</p> <p>The 2024 document with 2023 data and performance information will be ready in April, post completion of the AWS audit and recertification.</p>	
5.3.2	Advanced Indicator The site's efforts to implement the AWS Standard shall be disclosed in the organization's annual report.	Yes

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**Comment** As Buxton Water is part of the global Nestlé Group, they don't generate their own annual report. They are instead included in the global 'Creating Shared Value and Sustainability Report' that is published annually and a copy of the 2023 report has been provided. The company explained that as this is a global report that includes information about water stewardship, including AWS certification, they are not able to include a lot of content specifically for Buxton. The data provided is instead for all companies within the Nestlé Waters group. The company instead compiles a summary report that is submitted to Nestlé Global each year, for potential inclusion in the global report. Details about the Ecclesbourne River restoration project has been included, as a case study for Nestlé Waters in action.

**Score** 1

### 5.3.3 *Advanced Indicator*

*Benefits to the site and stakeholders from implementation of the AWS Standard shall be quantified in the organization's annual report.*



Yes

**Comment** As stated in 5.3.2, NWB does not publish their own annual report as this is done for the global group instead. Due to the limitation on site specific information in the 2023 CSV report, quantified benefit data is based on global data, for example:  
"4.4 million m³ volumetric water benefits delivered by Nestlé Waters' local water stewardship projects."

Instead, the company has included 2022 achievements (bearing in mind this is from the 2023 report and the 2024 report is still in development at time of audit), which does include some benefits such as:

- Improvement of water ratio from 1.23 in 2021 to 1.17 in 2022.
- Staff volunteered 64 hours to install 100 dip wells monitoring groundwater levels, helping to collect baseline data.
- More than 10 ecological surveys completed between April and October.
- 35,276 bottles of water donated to 48 local charities and organizations in the catchment/local community.
- 150 native trees planted to expand woodland at Lightwood and Cowdale (Rockhead) sites.

Due to not having their own annual report as one is generated by the Nestlé Group, the company has quantified benefits for some of their actions on their WSP published in 2023. However, this has only been carried out for some of the achievements listed in the report and not all.

**Score** 1

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

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



Obs.

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- Comment
- Recap of the identified shared water challenges:
- Water Loss from Peat Moorlands
  - Resilience to climate change/ extreme weather events
  - Loss of Native Species - migratory fish
  - Loss of Native Species - signal crayfish
  - Nutrient Load in the River Wye from wastewater and diffuse sources
  - Pesticides in Surface Water Catchment
  - Summer Water Scarcity in River Derwent Catchment
  - Dewatering activities of the extractive industry

The company has included examples of two of the projects in place to address shared water challenges; the River Ecclesbourne restoration project and the Combs Moss peatland restoration project. These two projects relate to the challenges #Water Loss from Peat Moorlands, Resilience to climate change/ extreme weather events, Loss of Native Species - migratory fish, Loss of Native Species - signal crayfish and Summer Water Scarcity in River Derwent Catchment'. Other actions have also been stated in the 2022 achievements section of the report.

However, no efforts have been mentioned to address the challenges of 'Nutrient Load in the River Wye from wastewater and diffuse sources, Pesticides in Surface Water Catchment and Dewatering activities of the extractive industry.'

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



Yes

Comment

The company works with a number of public-sector agencies in delivering water stewardship projects, such as the Combs Moss and Ecclesbourne restoration project. The Combs Moss project is a Natural Flood Management project which is supporting the Environment Agency (EA), who have overarching responsibility, however at a local level this responsibility is delegated to local authority (Derbyshire County Council) and municipal water and sewerage providers (Severn Trent Water).

NWB also supported the EA at a public event on the 14th of March 2023, at the Pavilion Gardens in Buxton, to discuss local flooding and ways to help. Once complete, the project will support public sector agencies in mitigating flooding in Buxton town centre.

The River Ecclesbourne project will support the improvement in ecological status of the river, which is the responsibility of the EA, delegated to the Derbyshire Wildlife Trust through the River Basin Management Plan.

The company has also started the collaborative partnership with the EA, Natural England, Derbyshire Wildlife Trust, Severn Trent Water, High Peak Borough Council & Staffordshire Moorlands District Council, and other identified relevant stakeholders for the Catchment Sensitive Farming, the first partnership meeting for this was held at the end of March 2024, after the AWS audit. There is therefore no documentary evidence from this meeting however, an email from Natural England for the planning of the meeting has been provided, with a proposed agenda.

The company also provided photographic evidence of other examples of stakeholder engagement, such as:

- Big Business Breakfast hosted by the Buxton Crescent Heritage Trust
- Buxton Spring Fair
- Zenith conference
- Instagram posts on work carried out by Buxton Water, some with responses.
- Internal and external volunteer days and school visits.

NWB has also listed actions to engage stakeholders on the page for 5.4.2 in their audit report.

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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>	<div><div>✔</div><div>Yes</div></div>
Comment	The company has a "Process for reporting and responding to incidents", a copy of this has been provided, alongside with a screenshot of the SHE management portal where 0 water related incidents have been registered since the audit in 2023.	
5.5.2	<i>Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.</i>	<div><div>✔</div><div>Yes</div></div>
Comment	No corrective actions taken as no incidents.	
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>	<div><div>✔</div><div>Yes</div></div>
Comment	No requirement to disclose data or information regarding water related incidents or violations as none have occurred.	



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Ammonia safety perimeter.JPEG



Water meter 1.JPEG

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Mains water entry point 2.JPEG



COP containers - one without lid and two on the ground.JPEG

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Trade effluent drain cover.JPEG



Source water pipes going into production.JPEG

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Foul sewer drain cover.JPEG



Emergency water tank.JPEG



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Lightwood overview.JPEG



Logistics toilet wash and sanitiser.JPEG

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Metail containers with different company name.JPEG



Lightwood information board.JPEG



Logistics break room.JPEG

**WSAS**

2 Quality StreetNorth Berwick, EH39 4HW, UNITED KINGDOM

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Attenuation pond 1.JPGEG



Mains water entry point 1.JPGEG



Stakeholder recertification notice H and S induction room.JPGEG



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Locked Divosan Mezzo storage.JPGG



Lightwood borehole 6.JPGG

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St Anns pool rupture.JPEG



Entry to St Anns.JPEG

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Locked Pascal storage.JPEG



Hey girls 1.JPEG

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St Anns piping.JPG



Wash and sanitation station by production entrance.JPG



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Water meter 2.JPG



UV filter for municipal water.JPG

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Stakeholder recertification notice reception.JPEG



Lightwood borehole 4.JPEG

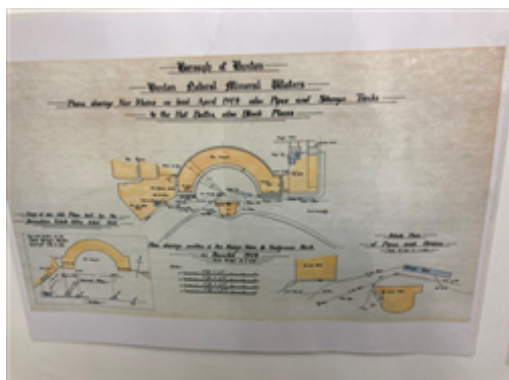
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Liquid carbon dioxide.JPEG



St Anns historical documents 1.JPEG



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Lightwood pigmy weed warning sign.JPEG



St Anns historical documents 2.JPEG

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COP containers on ground next to production line.JPEG



Source water containers.JPEG

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Particle filter for municipal water.JPG



Lightwood frog spawn.JPG

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Locked Total storage.JPG



Attenuation pond 2.JPG



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Various empty containers on the ground.JPGEG



Hey girls 3.JPGEG

# CERTIFICATION REPORT

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Ammonia chiller plant and container on bund.JPG



Hey girls 2.JPG

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Storm drain at production entrance.JPEG



Lightwood steps built by DWT volunteers.JPEG



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Water meter at lightwood.JPG



Oil and coolant waste store.JPG

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Surface water drain cover.JPEG



Municipal water tank.JPEG

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Storage tank inflow pipes.JPG



Foul pump.JPG

✔

Yes

### Previous Findings

*All non-conformities raised in the previous audit have been satisfactorily closed.*

✔

Yes