CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-001373

WSAS WATER STEWARDSHIP ASSURANCE SERVICES

SITE DETAILS

Site: **Indaiá Brasil Águas Minerais Ltda**

Address: Fazenda Santo Antônio Camboata, s/n BR 093 km 24 Rod BA, 42850-000, Dias d'Avila, Bahia, BRAZIL

Contact Person: Denyse Gomes

AWS Reference Number: AWS-000338

Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Core

Date of certification decision: 2025-Feb-14

Validity of certificate: 2028-Feb-13

AUDIT DETAILS

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

Audit Type(s): Re-Certification Audit

Audit Start Date: 2024-Dec-02

Lead Auditor: Antonio Sanchez

Audit team participants:

Antonio Santos Sánchez, Lead Auditor

Site Participants:

Denyse Sena Gomes, Quality manager

Cassio Leite Ramos, Site Engineer

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ADDITIONAL INFO

Summary of Audit Findings: A total of 11 findings were raised during the certification audit, 0 major non-conformities, 7 minor non-conformities, 4 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 16 February 2025.

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

The audit team recommends re-certification of Indaiá Brasil Águas Minerais at Core level pending approval of the corrective actions plan for the non-conformities.

CLOSURE OF FINDINGS AND CORRECTIVE ACTION PLAN:

The Client has successfully submitted the corrective action plans addressing all findings.
Proof of implementation has been requested for the Minors and this will be evaluated during the Surveillance Audit. The client is requested to upload evidence of implementation prior to the Surveillance Audit.

Scope of Assessment: The scope of services covers the recertification audit for assessing conformity of Indaiá Brasil Águas Minerais Ltda (Minalba Brasil) against the AWS International Water Stewardship Standard Version 2.

The Minalba Brazil DiasAvila Factory (DiasAvila Factory) is a bottling facility, producing bottled water and soft drinks. The facility is in a rural industrial setting, approximately 4 km away from the center of the nearest town, namely Dias D'Avila (Bahia State, Brazil).

The facility is located in the municipality of Dias d'Avila, within the Jacuípe River Hydrographic Basin. The main water source of the site is the São Sebastião aquifer. The site extracts underground water from two wells, and uses it to supply six production lines. The factory is also supplied with potable water from the local water utility. There is a wastewater treatment plant within the site. The treated effluent is then discharged through the Camboatá stream to the River Jacumirim, which is a tributary of the Jacuipe River that discharges to the Atlantic Ocean.

The audit was conducted onsite on 2-4 December 2024.
The onsite site visit included the assessment of water-related facilities, the facilities that provide WASH, some of the six process lines, and interviews with workers and with three relevant stakeholders.

FINDINGS

NUMBER OF FINDINGS PER LEVEL

Observation	4
Minor	7

FINDING DETAILS

Finding No:	TNR-015743
Checklist Item No:	1.2.1
Status:	Open
Finding level:	Observation
Checklist item:	Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall: - Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people; - Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies; - Provide evidence of stakeholder consultation on water-related interests and challenges; - Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups; - Identify the degree of stakeholder engagement based on their level of interest and influence.
Findings:	Out of the total identified stakeholders, feedback was evidenced from only 7 of them, which is approximately 20% of the total consulted.

Finding No:	TNR-015478
Checklist Item No:	1.3.2
Status:	Open
Finding level:	Observation
Checklist item:	Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped
Findings:	The water balance map does not consider the rainwater harvested from the roofs as a potential alternative water source. In addition, according with the evidence "1.1.1 Tratamento de águas residuais do prestador de serviço" that was uploaded for the indicator 1.1.1, the sludge produced from the site's wastewater treatment plant exits the site and is transported to a treatment plant of another company. That constitutes an outflow of water that is neither mapped nor quantified. That document does not indicate the average humidity of the sludge, although it states that the sludge is in a liquid form.

Finding No:	TNR-014501
Checklist Item No:	1.3.5
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Dec-04
Checklist item:	Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.
Findings:	The potentially-harmful chemical products used and stored in the site are not indicated with sufficient detail in the map.
Corrective action:	Create a supplementary document to the map for greater details, using photos and including the distance from the chemical risk area to the sources and the wastewater treatment plant (WWTP).

Finding No:	TNR-015704
Checklist Item No:	1.3.6
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Dec-04
Checklist item:	On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.
Findings:	The site did not provide a description of the status of on-site IWRAs (the APPs – environmental protection area and all the non-built land).
Corrective action:	Review the spreadsheet, including internal IWRA of the site."

Finding No:	TNR-014970
Checklist Item No:	1.5.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Dec-04
Checklist item:	Water governance initiatives shall be identified, including catchment plan(s), water-related public policies, major publicly-led initiatives under way, and relevant goals to help inform site of possible opportunities for water stewardship collective action.
Findings:	Water governance initiatives regarding sanitation in the municipalities of Camaçari and Dias D'Avila (for instance, municipal sanitation plans) were not identified. For example: Plano Municipal de Saneamento Básico e Plano de Gestão Integrada de Resíduos Sólidos (Camaçari, 2015) and Plano Municipal de Saneamento Básico (Dias d'Avila, 2015). In addition, the water management master plan of the Camaçari Petrochemical Complex that is presented in "1.5.1 Plano_Diretor_do_Polo_de_Camaçari" is from 2013 (11 years ago) and is outdated.
Corrective action:	Seek updated studies on government initiatives for basic sanitation infrastructure with the City Hall of Camaçari and Dias D'Ávila. Seek updated studies on the master plan of the Camaçari industrial complex with CETREL.

Finding No:	TNR-014971
Checklist Item No:	1.5.4
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Dec-04
Checklist item:	Water quality, including physical, chemical, and biological status, of the catchment shall be identified, and where possible, quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be identified.
Findings:	The evidences provided offer little information about quality parameters of the surface water bodies of the catchment, particularly the receiving bodies of the site (River Camboatá, Jacumirim, and Santa Helena reservoir). There is no identification of the annual or seasonal high and low variances of the main quality parameters associated with the lack of sanitation coverage in those water bodies.
Corrective action:	Request water quality data from Embasa (Santa Helena Dam) and relevant agencies, results of the Jacumirim, Jacuipe, and Camboatá streams. Seek data related to quality parameters that fluctuate during seasonal periods (rains, droughts, etc.) and lack of basic sanitation coverage.

Finding No:	TNR-015479
Checklist Item No:	1.5.6
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Dec-04
Checklist item:	Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.
Findings:	The vulnerability of the water-related infrastructure to potential droughts was disregarded, even though water scarcity (due to populational growth, climate change) was an identified water challenge.
Corrective action:	Review the spreadsheet "Identification of water-related infrastructure and adequacy of WASH services in the catchment area" to consider water scarcity conditions.

Finding No:	TNR-014972
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:	Reviews of municipal sanitation plans such as the 'Plano Municipal de Saneamento Básico e Plano de Gestão Integrada de Resíduos Sólidos (Camaçari, 2015)' and the 'Plano Municipal de Saneamento Básico (Dias d'Avila, 2015)' have not been taken into account.

Finding No:	TNR-015705
Checklist Item No:	1.6.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Dec-04
Checklist item:	Initiatives to address shared water challenges shall be identified.
Findings:	The identified initiatives are not linked with each of the shared water challenges that they address.
Corrective action:	Review the "Shared Challenges" spreadsheet, linking the initiatives and challenges as presented in the file "PGSA 2023/2024" (Water Stewardship Plan) .

Finding No:	TNR-014993
Checklist Item No:	2.3.2
Status:	Open
Finding level:	Observation
Checklist item:	A water stewardship plan shall be identified, including for each target: - How it will be measured and monitored - Actions to achieve and maintain (or exceed) it - Planned timeframes to achieve it - Financial budgets allocated for actions - Positions of persons responsible for actions and achieving targets - Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.
Findings:	The site's water management plan (EMP) has 10 objectives with 67 associated targets. Due to the high number of objectives and targets, difficulty is evident on the part of the site in setting and tracking targets.

Finding No:	TNR-015005
Checklist Item No:	5.2.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Dec-04
Checklist item:	The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.
Findings:	The site did not share the Water Stewardship Plan, claiming that it contains sensitive information that could be compromising, such as some costs. A simplified version of the Water Stewardship Plan, in which sensitive information such as costs is removed, must be disclosed to relevant stakeholders.
Corrective action:	Summarize the PGSA (Water Stewardship Plan) considering information we deem non-restrictive and non-confidential, and select the stakeholders who will receive the PGSA.

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WSAS WATER STEWARDSHIP ASSURANCE SERVICES

Report Details

Report	Value
Report prepared by	Antonio Sanchez
Report approved by	Gregorio Crespo
Report approved on (Date)	15 January 2025

Surveillance

Proposed date for next audit
2025-Dec-04

Comment This is a recertification audit, so the next audit will be the follow-up audit.

Stakeholder Announcements

Date of publication	Location
01/10/2024	https://a4ws.org/certification/stakeholder-announcements/
01/10/2024	https://www.cn1.com.br/noticias/28/125128,minalba-brasil-anuncio-publico-para-partes-interessadas
01/10/2024	https://www.instagram.com/p/DDE7kJuO_qy/?igsh=ZWRqYmh5Y3lvemZx

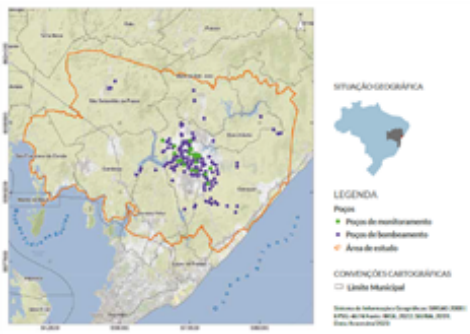
Comment Stakeholder Announcement was made online through the AWS site, and also:
- through radio: Radio Serrana, twice per week from 01/10/2024 to 03/12/2024.
- through the website of a local newspaper, on 01/10/2024: https://www.cn1.com.br/noticias/14/122864,minalba-brasil-anuncio-publico-para-partes-interessadas
- through social media (Instagram), on 01/10/2024 https://www.instagram.com/p/DDE7kJuO_qy/?igsh=ZWRqYmh5Y3lvemZx

Catchment Information

Catchment Information

The Dias d'Avila Factory is located in the Jacuípe River Hydrographic Basin (12,099 km²) located in the State of Bahia, Northeast region of Brazil.
The bottling operations, water sources (wells) and discharge recipient are within the catchment.
The treated effluent from the site is discharged through the Camboatá stream to the River Jacumirim, which ends up in the Santa Helena Reservoir.
The Santa Helena Reservoir was created by damming the waters of the river Jacuípe. This reservoir is very important, as is an important water source for Dias d'Avila, the municipality where the site is located. In addition, this reservoir is linked to another one (Joanes II) that supplies 40% of the water consumption of Salvador, a city with a population of 2 million people and the capital of the State of Bahia. The Jacuipe River discharges to the Atlantic Ocean.
The main water source of the site is the São Sebastião aquifer. The factory is also supplied with potable water from the local water utility, whose main source is also that aquifer.
The groundwater from the São Sebastião aquifer is used for various purposes, mainly by households, agricultural establishments, and the industrial beverage production sector.
There are two main contamination threats to this groundwater source. The first one is the low level of sanitation coverage in the region. The second one is the potential contamination in the petrochemical complex of Camaçari, which is located at around 10 km from the site and is the largest petrochemical complex of Latin America.

1. Reconcavo Norte Rivers.jpg



2. Portion of influence of the São Sebastião aquifer.png

Comment: The maps refer to:
- 1. The group of rivers that form the Reconcavo Norte Water Region. The rivers are short (around 100 km) and discharge into the Atlantic Ocean. One of them is the Jacuípe River.
- 2. A portion of the São Sebastião aquifer. Based on hydrogeological studies, this is the portion on which the site has influence.

Client Description and Site Details

Client/Site Background

Minalba Brazil Dias D'Avila Factory is a bottling facility, producing bottled water and soft drinks under the brand names of Nestlé Pureza Vital, Refri Indaiá, Indaiá, Petrópolis, Night Power Black. The facility is in a rural industrial setting, approximately 4 km away from the center of the nearest town (Dias D'Avila).

The site has six production lines:

3 for PET bottles (two of them are for mineral water; the third one is for soft drinks)

1 for mini cups (200 mL)

1 for cups (5 liters)

1 for big bottles (20 liters)

The main water source of the site is the São Sebastião aquifer. The site extracts its water for the bottling facility from two wells, namely Esmeralda and Rubi. The allowed flow that can be abducted is 82 m³/h for the first and 74 m³/h for the latter. The current flow is below that capacity: around 60 m³/h for Esmeralda and around 50 m³/h for Rubi.

The factory is also supplied with potable water from the local water utility (EMBASA). That water is used for landscape irrigation and facility sanitary water supply.

Sanitary discharge is sent to the factory's wastewater treatment plant. Stormwater discharge is directed for landscape and for garden irrigation.

There is a wastewater treatment plant within the site. The treated effluent is then discharged through the Camboatá stream to the River Jacumirim, at a flow rate of 10-18 m³/h.

Minalba site.png

Summary of Shared Water Challenges

Summary of Shared Water Challenges

1. Waste and high rate of loss of water in the distribution network, illegal exploration, super exploration in the region and clandestine wells.
2. Low rate of waste treatment in the area of influence, launch of domestic and industrial waste directly into rivers and lakes, lack of sanitary adequacy in the rural environment.
3. Vulnerability of water quality due to illegal occupations, potential chemical incidents/accidents that cause groundwater contamination of regional industries, lack of sanitation, irregular disposal of waste.
4. Lack of environmental awareness and education, necessary changes in posture regarding the indiscriminate use of water.
5. Difficulty of access and equal distribution of water.
6. Alteration of the vegetation areas of the sources and margins of rivers/lakes due to irregular occupations and invasions, pressure on property, clearing and burning, landfilling.
7. Water scarcity promoted by population growth, climate change, current non-sustainable management.

0.1	**General Requirements for Single Sites, Multi-Sites and Groups**	
0.1.1	*Eligibility Criteria*	
0.1.2		
0.1.2.1	*Have any water source locations and water-related discharge locations been visited during the audit, if so, which and where? If none were visited please provide justification.*	Yes
Comment	The water source locations of the site were visited during the audit: - Wells Esmeralda and Rubí - supply point of water from the local water utility The discharge location of the treated effluent, after the wastewater treatment plant, was visited during the audit. It was also visited a point in the receiving body (Camboatá stream) located at 30m after the discharge of the treated effluent.	
0.1.1.1	*The site(s) occupy one catchment OR an exception has been granted.*	Yes
Comment	The site occupies one catchment.	
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 under the control of a single management system.	
0.1.1.3	*The scope of the proposed certification shall be homogeneous with respect to primary production system, water management, product or service range, and the main market structures.*	Yes
Comment	The site is homogeneous with respect to: - primary production system (production of soft drinks from groundwater extracted from the site's wells); - water management; - product or service range, and the main market structures (mineral water and soft drinks).	

1	STEP 1: GATHER AND UNDERSTAND

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

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

Yes

Comment

The site complies with indicator 1.1.1.
- The map of the site includes the site boundaries:
Files "1.1.1 PLANTA DE SITUAÇÃO DIAS DAVILA AWS" and "1.1.1 Planta de situação IWRA e Riscos 2" contain maps that show the limits of the site, the piping lines and the main water/wastewater infrastructure, and the discharge points to the receiving water body.
- The water-related infrastructure, including piping network, owned or managed by the site or its parent organization, and any water sources providing water to the site that are owned or managed by the site or its parent organization is sufficiently indicated in:
File "1.1.1 ETE DIAS DÁVILA - AWS" present a map that details the wastewater treatment plant and effluent piping within the site.
- The site does not have any external water nor waste water service provider. The water source and the ultimate receiving water body are mapped.
- The catchment and the aquifer that the site affects and is reliant upon for water are sufficiently indicated:
"1.1.1 Apresentação área de infuência rev 01" and "1.1.1 AWS ÁREA DE INFUÊNCIA COM IWRA 2024-Formato_A3" show maps of the relevant portion of the aquifer. It was not considered the whole of the aquifer São Sebastião, but only a portion of it defined as "influence area". The area was reduced based on hydrogeological and social criteria. That document contains a map with all the wells of a relevant importance in the influence area.
File "1.1.1 ÁREA DE PROTEÇÃO DE FONTES - MNB DIAS DÁVILA" contains a detailed assessment of hydrogeological and other characteristics of the areas around the two wells that supply the site.
File "1.1.1 Mapa bacia Hidrografica Jacuipe com MNB Dias Davila" presents a map of the catchment (Jacuipe River basin).
File "1.1.1 Mapa RPGA Reconcavo com MNB Dias Davila" presents a map of the river system of the region.
Files "1.1.1 Hidrogeologia_Embasa" and "1.1.1 WATER_EMBASA_relatorio_FINAL_web_REV20231010PCE" presents a comprehensive hydrogeological assessment of the relevant portion of the São Sebastião aquifer.
File "1.1.1 APA Joanes Ipitanga com inclusão da MNB Dias Davila" contains a map that details the environmental areas of the influence area, their degree of protection and other related information.

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.

Obs.

Comment: File "1.2.1 Identificação_das_Partes_Interessadas_-_Rev_01" evidences the first stage that was carried out, which is the listing of potential stakeholders. That list covered indigenous and traditional communities (quilombolas). The identification of such communities was performed by researching the available records from the related governmental agencies. The physical scope (influence area of the catchment and aquifer) was considered for the identification of the stakeholders.
File "1.2.1_e_1.2.2_Mapeamento_Stakeholders_e_Lista_de_Desafios_Dias_DAvila" contains the methodology for selecting the relevant stakeholders. The selection process identified the degree of stakeholder engagement based on their level of interest and influence.
Attached are evidences of contacting the relevant stakeholders through email, and evidences of receiving feedback from some of them, through email.

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.*

Obs.

Comment: The site's ultimate water source and ultimate receiving water body for wastewater were considered when identifying the current and potential degree of influence between site and stakeholder, as presented in the file "1.2.1_e_1.2.2_Mapeamento_Stakeholders_e_Lista_de_Desafios_Dias_DAvila" (uploaded for indicator 1.2.1).
The proposed "stakeholder influence and engagement matrix" in that document considers the degree of influence of the site on the stakeholders.

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

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

Yes

Comment: The indicator is met, as file "1.3.1 DAV-PO-QUA-020_-_Plano_de_Atendimento_à_Emergências_-_PAE_-_Meio_Ambiente_REV03" contains the existing water-related incident response plan. That plan was updated in August/2024.

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

Obs.

Comment: A comprehensive site's water balance map is presented in the file "1.3.2 DAV-FS-QUA-128_Gestão_de_Recursos_Hídricos_-_2024_(Jan_a_Out_2024)".
The map includes inflows, storage, and outflows. The areas where losses occur are identified and they are quantified.
However, the water balance map does not consider the rainwater harvested from the roofs as a potential alternative water source. The sludge produced in the wastewater treatment plant contains water and thus is an outflow of water that is not mapped. An outsourced company carries it on trucks and transports it outside the site, to a landfill.

1.3.3 *Site water balance, inflows, losses, storage, and outflows, including indication of annual variance in water usage rates, shall be quantified. Where there is a water-related challenge that would be a threat to good water balance for people or environment, an indication of annual high and low variances shall be quantified.*

Yes

Comment: The indicator is met through the water balance of the site presented in the file "1.3.2 DAV-FS-QUA-128_Gestão_de_Recursos_Hídricos_-_2024_(Jan_a_Out_2024)" that was uploaded for the indicator 1.3.2. The annual variance in water usage rates, and annual high and low variances, is quantified. The water level of the wells is monitored for each week of the year.

1.3.4 *Water quality of the site's water source(s), provided waters, effluent and receiving water bodies shall be quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be quantified.*

Yes

Comment: The site quantifies the water quality of the site's water sources (wells), the effluent produced in the treatment plant, and the receiving water body.
The water quality of the receiving body (Riacho Camboata) is analyzed twice per year by an external laboratory using samples taken before and after the discharge point. The results of these analysis for 2024 are presented in the file "1.3.4 - Monitoramento Qualidade - Corpo Receptor 2024".
Water quality of the effluent is presented in "1.3.4 Histórico_Qualidade_Lançamento_de_Efluentes_-_2020_a_2024" (one analysis per year from 2020 to 2024) and in "1.3.4 Laudo_CONAMA_430_279010-2024" (July 2024).
The file "1.3.4 Gerenciamento_Monitoramentos_de_Efluentes_2024" presents evidence of continuos monitoring of the quality of the effluent during 2024.
The quantification of the water quality of the two wells is evidenced by the following analytic reports:
"1.3.4 C24_02998",
"1.3.4 ESMERALDA_relatorio_ensaio_2663-2024",
"1.3.4 ESMERALDA_relatorio_ensaio_2668-2024",
"1.3.4 ESMERALDA_relatorio_ensaio_2694-2024",
"1.3.4 LAMIN_2022_-_Fonte_Esmeralda",
"1.3.4 LAMIN_2022_-_Fonte_Rubi",
"1.3.4 RUBI_relatorio_ensaio_2662-2024",
"1.3.4 RUBI_relatorio_ensaio_2667-2024",
and "1.3.4 RUBI_relatorio_ensaio_2669-2024".
File "1.3.4 Gerenciamento_-_Qualidade_da_Água_Captada" evidences continuous monitoring of the water quality of the wells, by providing monthly records of some key quality parameters, from 2020 to the present month.

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

in progress

Comment: File "1.3.5 FG-IND-003-ASPIMP-Aspectos-e-Impactos-Ambientais" identifies potential environmental impacts and classify their severity and probability. The location of each potential impact is identified. Mitigation actions are considered for each potential environmental impact.
File "1.3.5 - Volume de químicos e contenção_" presents a list of the chemicals stored in each area of the site. So does the file "1.3.5 - DAV-TB-QUA-009 - Relação de Produtos Químicos - Limpeza e Sanitização_REV02" with the chemicals used for cleaning and sanitizing.
The map of potential sources of pollution presented in "1.3.5 - Planta_de_situação_IWRA_e_Riscos_2" is not of sufficient detail.

Finding No: TNR-014501

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

in progress

Comment

Hydrogeolocial studies such as "1.1.1 Hidrogeologia_Embasa" and "1.1.1 WATER_EMBASA_relatorio_FINAL_web_REV20231010PCE" (uploaded for indicator 1.1.1 show that the site is located over a recharge zone of the aquifer. Therefore, the on-site IWRAs are: the enviromentally-protected land and all the non-built land of the site.
According to the Brazilian law, all the area located around 30m length of the Camboaté stream is protected land.
The site has made the decision of considering on-site IWRAs not only the environmentally-protected land around the water stream that serves as the receiving body, but also all the non-built land of the site. That implies that the site should treat all non-built land as IWRA, monitor its status, and report its evolution for each audit.
On-site IWRAs have been identified and mapped on file "1.3.6 - Planta de situação IWRA e Riscos_REV 3". A description of their status has not been provided.

Finding No: TNR-015704

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 evidences presented were satisfactory, as cover annual water-related costs and revenues from 2021 to 2024 and also provide a description of the social, cultural and environmental water-related value that is generated.
Water-related costs and revenues are presented in the file "1.3.7_custos_e_receitas_anuais_relacionados_a_água". Annual costs and revenues are available for years 2021, 2022 and 2023. The cost of the water-related improvement actions (WASH in the site, IWRAs in the catchment, and others) are detailed for years 2021, 2022, 2023 and 2024. That evidence also presents a description of the social, cultural, and environmental water-related value generated by each of the actions.
Detailed revenues for year 2020 are presented in the file "1.3.7 RAL.2021_48785004674_-_INDAIÁ_DIAS_DÁVILA".
Detailed revenues for year 2021 are presented in the file "1.3.7 RAL.2022_48785004674_-_INDAIÁ_DIAS_DÁVILA".
Detailed revenues for year 2022 are presented in the file "1.3.7 RAL.2023_48785004674_-_INDAIÁ_DIAS_D'AVILA".

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

Yes

Comment

The site provides a sufficient level of access and adequacy of WASH to its workers and also to outsourced workers that occasionally work in the site, such as truck drivers.
File “1.3.8 Wash_Pontos de consumo e Instalações Sanitarias” shows a list with the number and location of each equipment for water consumption. On the second spreadsheet of that Excel file, the site carried out a comparison of the number of WASH equipment and the number of workers, both males and females, to show that the site complies with Brazilian norm NR24.
File “1.3.8 DAV-PO-QUA-001_-_Zoneamento_de_Área_REV02” shows a map with the location of the hand-washing stations within the production areas.
In addition, it was verified during the audit that outsourced workers have access to the site W.C. (although they do not have access to the vestiaries).

1.4 *Gather data on the site’s indirect water use, including: its primary inputs; the water use embedded in the production of those primary inputs the status of the waters at the origin of the inputs (where they can be identified); and water used in out-sourced water-related services.*

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

Yes

Comment

The site has successfully identified and quantified the embedded water use of primary inputs. This assessment is in the file "1.4.1_Identificação_da_água_virtual_em_insumos_e_serviços_2023". The level of water risk within each supplier's catchment is also identified through the Aqueduct and WWF data.
In addition, file "1.4.1 consumo_de_água_indireta" shows the quantification of the reduction in indirect water use originated by the decrease in the use of some primary inputs.
The following emails constitute evidences of contacting suppliers of primary inputs with regards to their water consumption:
"1.4.1 RE_Consulta_-_Consumo_de_Água_-_Mirvi_Brasil__Valgroup"
"1.4.1 RE_Consulta_-_Consumo_de_água_Engepack_2023"
"1.4.1 RES_Consulta_-_Consumo_de_Água_-_Oxford_Packaging"
"1.4.1 RES_Consulta_-_Consumo_de_Água_-_Plastamp"
"1.4.1 RES_Consulta_-_Consumo_de_Água_-_VALFILM"
"1.4.1 RES_Consulta_-_Consumo_de_água_Usina_Olho_D'Água_-_2023"
"1.4.1 RES_Consulta_-_Consumo_de_água_Usina_São_José_Pinheiros_-_2023"

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

Yes

Comment

The indicator was achieved through the identification and quantification of the water use of two outsorced services: electric power and truck washing. Other outsorced services are cleaning, security guards, and meal preparation in the canteen, although those services use water from the site.
The main water use of outsourced services was identified as being the one related with electricity supply. The embedded water use of electricity was identified and quantified in "1.4.1_Identificação_da_água_virtual_em_insumos_e_serviços_2023" (uploaded in 1.4.1).
The water use of the outsourced service of "washing trucks and cars" was identified and quantified in "1.4.2 - Relatorio_Lavagem". The car and truck washing is performed by an outsourced company outside the site, but within the site's catchment. It was found that the total volume of water used in this service is less than 0.03% of the total water consumption of the site.

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

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

in progress

Comment

The "Comite das Bacias do Recôncavo Norte" was identified as the committee responsible for the water governance in the catchment. File "1.5.1 DECRETO_9936-06-CRIA_CBHRN_" provides information about the creation and role of that committee.
File "1.5.1_Governança" details the water governance agencies and norms that are applied in the site's catchment.
Files "1.5.1 Lei_11612_-_Politica_Estadual_de_Recuros_Hidricos_" and "1.5.1 PERH_BA_" refers to the public policy for water resources in the State of Bahia.
File "1.5.1 PORTARIA_DIR_GERAL_DNPM_20091022_391_" identifies the norms that guide the extraction of mineral water in the catchment.
Files "1.5.1 Plano_de_Gerenciamento_de_Recurso_Hidricos_Polo_de_Camaçari_-_Cetrel" and "1.5.1 Plano_Diretor_do_Polo_de_Camaçari", the latter from 2013, detail the water management master plan of the Camaçari Petrochemical Complex, located in the same municipality of the site, and which abducts water from the same aquifer.

Finding No: TNR-014970

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

Yes

Comment The indicator is achieved as the applicable water-related legal and regulatory requirements were succesfully identified. Most of them were already in the documentation uploaded for the indicator 1.5.1.
As a complement, the uploaded files for 1.5.2 show permits for water resource intake (wells).

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

Yes

Comment The catchment's water-balance is presented in a detailed hydrogeolocical assessment that focuses on the aquifer São Sebastião, the sole water source of the site. Annual and seasonal variance is considered in the study, which complies with the requeriments of this indicator.
The assessment is contained in the files "1.1.1 Hidrogeologia_Embasa" and "1.1.1 WATER_EMBASA_relatorio_FINAL_web_REV20231010PCE", which were uploaded for the indicator 1.1.1.
File "1.5.3_acompanhamento_de_mudanças_climáticas" presents an assessment about the impact of climate change on the water resources of the site's catchment (in particular, on the aquifer).

1.5.4 *Water quality, including physical, chemical, and biological status, of the catchment shall be identified, and where possible, quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be identified.*

in progress

Comment This indicator is only partially achieved.
A detailed hydrogeolocical assessment of the aquifer, that includes its physical, chemical, and biological status, is contained in the files "1.1.1 Hidrogeologia_Embasa" and "1.1.1 WATER_EMBASA_relatorio_FINAL_web_REV20231010PCE", which were uploaded for the indicator 1.1.1.
The low level of sanitation coverage is a water-related challenge for the catchment, so file "1.5.4 RAS_Embasa_parasite_2023" provides some information on the sanitation coverage of the municipalities within the catchment.
The water quality of the receiving body (Riacho Camboata) is analyzed twice per year, as shown in the file "1.3.4 - Monitoramento Qualidade - Corpo Receptor 2024". However, it is not presented any graph indicating annual or seasonal high and low variances of its quality parameters.

Finding No: TNR-014971

1.5.5 *Important Water-Related Areas shall be identified, and where appropriate, mapped,and their status assessed including any threats to people or the natural environment, using scientific information and through stakeholder engagement.*

Yes

Comment The Important Water-Related Areas of the site's area of influence in the catchment are correctly identified and mapped.
File "1.5.5 -_Consultas_IWRA_Descrição_e_Status" describes the IWRAs of the catchment and their status.
File "1.1.1 AWS ÁREA DE INFUÊNCIA COM IWRA 2024-Formato_A3", uploaded for indicator 1.1.1, locates the IWRAs within a map of the influence area of the catchment.
File "1.1.1 APA Joanes Ipitanga com inclusão da MNB Dias Davila", which was uploaded for indicator 1.1.1, provides a map showing the IWRAs and the ecological value of the lands of a portion of the catchment (River Joanes, Ipitanga).

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

No

Comment File "1.5.6_e_1.5.7_Infra_estrutura_de_água_e_adequação_de_WASH" provides a list with the water treatment plants and wastewater treatment plants of the municipalities of the catchment, describing their potential exposure to extreme events (only floods were considered).

Finding No: TNR-015479

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

Comment The requirements for this indicator are met, as the file "1.5.6_e_1.5.7_Infra_estrutura_de_água_e_adequação_de_WASH", uploaded for indicator 1.5.6, identifies the level of access to water supply and sanitation coverage for each municipality within the catchment.

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 Seven shared water challenges were identified (DSF 01 to DSF 07).
They are listed and prioritized in the file "1.6.1_e_1.6.2_Desafios_compartilhados". The challenges were identified and prioritized from the review of the information gathered, and also from the feedback obtained from the consultation of stakeholders. Around 15% to 20% of the consulted stakeholders provided feedback, as shown in the documents uploaded for 1.2.1.
During the stakeholders' interview, the main shared water-related challenges informed by them were coincident with some of the ones identified by the site, which are:
1. Waste and high rate of loss of water in the distribution network, illegal exploration, super exploration in the region and clandestine wells.
2. Low rate of waste treatment in the area of influence, launch of domestic and industrial waste directly into rivers and lakes, lack of sanitary adequacy in the rural environment.
3. Vulnerability of water quality due to illegal occupations, potential chemical incidents/accidents that cause groundwater contamination of regional industries, lack of sanitation, irregular disposal of waste.
4. Lack of environmental awareness and education, necessary changes in posture regarding the indiscriminate use of water.
5. Difficulty of access and equal distribution of water.
6. Alteration of the vegetation areas of the sources and margins of rivers/lakes due to irregular occupations and invasions, pressure on property, clearing and burning, landfilling.
7. Water scarcity promoted by population growth, climate change, current non-sustainable management.

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

Comment The file "1.6.1_e_1.6.2_Desafios_compartilhados" contains a list of twenty-one initiatives (INT 01 to INT 21) that were identified to address the seven shared water challenges (DSF 01 to DSF 07).
In addition, for each shared water challenge (DSF) there are some "mitigation actions" identified (15 in total), which are related with the twenty-one initiatives (INT 01 to INT 21).

Finding No: TNR-015705

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 water risks faced by the site are identified and prioritized, including: - likelihood, - severity of impact, - potential costs and business impact. The file that contains that assessment is "1.7.1_e_1.7.2_Riscos_e_Oportunidades". The ten identified water risks are: 1. Well failure due to poor conditions and poor maintenance 2. Decrease in water supply due to excessive abstractions for the population and companies in the area of influence 3. Restrictions on the permitted collection volume during a dry or drought season 4. Existing water contamination within the area of influence 5. Presence of potentially contaminating sources within the site 6. Contamination of water bodies by discharge of untreated wastewater 7. Reputational risk due to the perception that industries use a lot of water, negatively affecting the local community that uses shallow wells 8. Reputational risk due to the perception of negative impact on the natural water environment caused by the reduction of the volume of the water body 9. Limited access to water for employee sanitation and hygiene due to regular supply interruptions at employees' homes due to inefficiency or lack of water supply infrastructure 10. The environmental degradation of water sources could lead to the extinction of natural resources, the increase in banks, the decrease in river humidity and the contamination of waters.	
1.7.2	*Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.*	Yes
Comment	The water-related opportunities are identified and prioritized, including: - a description of the opportunity and how the site may participate, - priorization of each opportunity, - potential savings and business opportunities The file that contains that assessment is "1.7.1_e_1.7.2_Riscos_e_Oportunidades", which is uploaded for indicator 1.7.1.	
1.8	*Understand best practice towards achieving AWS outcomes: Determining sectoral best practices having a local/catchment, regional, or national relevance.*	
1.8.1	*Relevant catchment best practice for water governance shall be identified.*	Yes
Comment	Best practices are listed in the file "1.8_Boas_Práticas". 13 of those best practices are related to Water Governance, from which 11 of them are for the catchment and 2 arfor the site.	
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
Comment	Best practices are listed in the file "1.8_Boas_Práticas". 14 of those best practices are related to Water Balance, from which 3 of them are for the catchment and 11 arefor the site.	
1.8.3	*Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.*	Yes
Comment	Best practices are listed in the file "1.8_Boas_Práticas". 7 of those best practices are related to Water Quality, from which 1 of them is for the catchment and 6 are for the site.	
1.8.4	*Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.*	Yes

Comment	Best practices are listed in the file "1.8_Boas_Práticas". 4 of those best practices are related to the maintenance of IWRAs, from which 1 of them is for the catchment and 3 are for the site.	
1.8.5	*Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.*	Yes
Comment	Best practices are listed in the file "1.8_Boas_Práticas". 5 of those best practices are related to the provision of WASH, from which 3 of them is for the catchment and 2 are for the site.	

2	STEP 2: COMMIT & PLAN - Commit to be a responsible water steward and develop a Water Stewardship Plan	
2.1	*Commit to water stewardship by having the senior-most manager in charge of water at the site, or if necessary, a suitable individual within the organization head office, sign and publicly disclose a commitment to water stewardship, the implementation of the AWS Standard and achieving its five outcomes, and the allocation of required resources.*	
2.1.1	*A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:* *- That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes* *- That the site implementation will be aligned to and in support of existing catchment sustainability plans* *- That the site's stakeholders will be engaged in an open and transparent way* *- That the site will allocate resources to implement the Standard.*	Yes
Comment	The signed organizational document is in page 21 of the Water Performance Report, in the file "2.1.1 - Relatorio_Performance_de_Água_-_MBR-AWS-2023". The indicator is achieved, as this signed document: - was publicly disclosed in the site's website, and also disclosed to several stakeholders; - contains all the commitments required by the indicator.	
2.2	*Develop and document a process to achieve and maintain legal and regulatory compliance.*	
2.2.1	*The system to maintain compliance obligations for water and wastewater management shall be identified, including:* *- Identification of responsible persons/positions within facility organizational structure* *- Process for submissions to regulatory agencies.*	Yes
Comment	The site uses an electronic system to monitor legal compliance obligations. The system is named CAL. It is a tool used to manage legal requirements that allows: - knowledge of new publications and current legislation; - access to the legislation itself; - checklist of compliance with the legislation; - management of the action plan and deadlines of non-conformities; - generation of reports in the form of graphs to visualize compliance. The evidences for the CAL system are presented in the files: "2.2.1 - informação_sobre_sistema_IUSNatura_" "2.2.1 - Verificação_CAL_-_Outubro_2024" The site's team showed the auditor how the CAL system works and explained the process for submissions to regulatory agencies. The responsible persons/positions are the quality manager and quality supervisors, as shown in the matrix of responsabilities in page 3 of the document in file "2.2.1 - PG-IND-004-Atendimento-aos-Requisitos-Legais-SSMA_REV02".	
2.3	*Create a water stewardship strategy and plan including addressing risks (to and from the site), shared catchment water challenges, and opportunities.*	
2.3.1	*A water stewardship strategy shall be identified that defines the overarching mission, vision, and goals of the organization towards good water stewardship in line with this AWS Standard.*	Yes

Comment

The site has a water stewardship strategy, with a well-defined overarching mission, vision, and goals, in line with this AWS Standard. All of the above are defined in the Water Performance Report, file "2.1.1 - Relatorio_Performance_de_Água_-_MBR-AWS-2023", which is uploaded for the indicator 2.1.1.

2.3.2

A water stewardship plan shall be identified, including for each target:
- How it will be measured and monitored
- Actions to achieve and maintain (or exceed) it
- Planned timeframes to achieve it
- Financial budgets allocated for actions
- Positions of persons responsible for actions and achieving targets
- Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.

Obs.

Comment

The site's water stewardship plan (WSP) has 10 goals with 67 associated targets. Each target has at least one action associated (total 74 actions).
Due to the high number of targets and associated actions, during the audit it was checked a sample of them, and it was evidenced their compliance with the indicator 2.3.2.
This WSP succeddes to achieve the indicator, as it includes, for each target:
- how it will be measured and monitored,
- actions to achieve/maintain targets,
- planned timeframes;
- financial budgets allocated for actions;
-positions of persons responsible for actions and achieving targets;
- link between each target and the achievement of best practice and the AWS outcomes.
The WSP also considers "lessons learned" and leaves space for commentaries to further improve and upgrade each action.
The water stewardship plan is presented in the file "2.3.2_PGSA".

2.4

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

2.4.1

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

Yes

Comment

10 Water Risks were identified (see file "1.7.1_e_1.7.2_Riscos_e_Oportunidades", uploaded for indicator 1.7.1)
A plan to mitigate it is presented in the file "2.4.1 - Plano de mitigaçao e adaptaçao".
For each of the 10 identified risks and the 7 shared challenges:
- relevant stakeholders are considered;
- dates for consultation during 2024 (or attempted consultation) with relevant stakeholders are included;
- mitigation and adaptation actions are planned.
The plan was developed in co-ordination with relevant public-sector and infrastructure agencies, as some of them were consulted and some feedback was received.

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

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

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

Comment: The actions for good catchment governance set in the site's stewardship plan were implemented.
During the audit, the site showed the meeting minutes of the Managing Council of the Areas of Environmental Protection of the rivers Joanes and Ipitanga.

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

Comment: The water rights of others were respected, as the site complied with all water-related legal requirements.
The document presented in "3.1.2 - Publicação_DOU_PL_870119_87_(5)" specifies the maximum flow of water that the site can abduct from the aquifer. Meanwhile, the spreadsheet "1.3.2 DAV-FS-QUA-128_Gestão_de_Recursos_Hídricos_-_2024_(Jan_a_Out_2024)", uploaded for 1.3.2, shows the flow that was effectively abducted. It is observed that the abducted flow was below the maximum that is allowed. The flow data that are presented in the spreadsheet is reliable, as the data is from telemetric flow meters that are audited by the ANM - Brazilian Mining Agency, as stablished in the norm 374 from 1st October 2009 (MME).

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

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

Comment: It was verified during the audit tha the CAL system was fully operative.
During the audit, the site's team made a demonstration of the CAL system, which is the online platform that is used to verify and comply with legal and regulatory requirements.
File "3.2.1 - Verificação_CAL_-_Outubro_2024" shows a verification report taken from the CAL platform.

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

Comment: The site is operating legally, in compliance with all legal and regulatory requirements, as evidenced by the documents "3.1.2 - Publicação_DOU_PL_870119_87_(5)", uploaded for 3.1.2, and "1.3.2 DAV-FS-QUA-128_Gestão_de_Recursos_Hídricos_-_2024_(Jan_a_Out_2024)", uploaded for 1.3.2.

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

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

Comment: The status of progress of the actions associated with each target is indicated in the column Q of the Water Stewardship Plan (WSP). Depending on which type of action, the status can be measured as "ongoing", "ongoing, with a % of conclusion" or "concluded".
In the WSP ("2.3.2_PGSA" uploaded for 2.3.2) there is also a description of the methodology to measure the progress of each target (column F).

3.3.2	*Where water scarcity is a shared water challenge, annual targets to improve the site's water use efficiency, or if practical and applicable, reduce volumetric total use shall be implemented.*	Yes
Comment	Water scarcity was identified as a shared water challenge (Water Challenge #7). Annual targets to improve the site's water efficiency are implemented: * The target and monitoring of the Key Performance Indicator (KPI) for water use is in "1.3.2 DAV-FS-QUA-128_Gestão_de_Recursos_Hídricos_-_2024_(Jan_a_Out_2024)" – spreadsheet "Indicador 2024", (uploaded in 1.3.2). * The target and monitoring of the Key Performance Indicator (KPI) for water use is also described in "3.3.2_Comitê_de_Água_-_2024".	
3.3.3	*Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.*	Yes
Comment	According to the Brazilian legal framework (in particular, the Plano Nacional de Recursos Hídricos/Brazilian Plan of Water Sources), the site is not responsible for the re-allocation of water to social, cultural or environmental needs.	
3.4	*Implement plan to achieve site water quality targets*	
3.4.1	*Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.*	Yes
Comment	The status of progress towards meeting the water quality targets 4.4., 4.6, and 4.10 is identified in column Q (status of progress: 50%).	
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	Where water quality is as a shared water challenge (Water Challenges #2 and #3). Continual improvement to achieve best practice for the site's effluent is identified and quantified. The record of analysis of the effluent and the receiving body does not allow to track continual improvement of the quality parameters, although it allows verifying that the regulatory quality standards are met (files "1.3.4 - Monitoramento Qualidade - Corpo Receptor 2024" and "1.3.4 Histórico_Qualidade_Lançamento_de_Efluentes_-_2020_a_2024"). Continual improvement to achieve best practice for the site's effluent is verified through the following evidence: * Evidence of buying a new set of laboratorial equipment (oxymeter, pHmeter, filter) to increase the frequency and the number of parameters to be analyzed, in "3.4.2 - Novos equipamentos laboratório". That action of purchasing new laboratorial equipment is in accordance with the water quality's Best Practice 57. * Evidence of installing a containment basin for chemical products to preserve the effluent that arrives to the treatment plant from chemical spills. File "3.4.2 - Bacia de contençao". That action is in accordance with the water quality's Best Practices 35 and 36.	
3.5	*Implement plan to maintain or improve the site's and/or catchment's Important Water-Related Areas.*	
3.5.1	*Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.*	Yes

Comment	It was evidenced the implementation of the practices set in the WSP to preserve and enhance the site's IWRAs, such as: * contracting guards to help with the monitoring of the site's IWRAs (evidenced during the audit) * the instalation of das guidance signs indicating APP (Areas of Permanent Protection) around the water stream that serves as receiving body. File "3.5.1 - Placas_APP". * acquisition of tree seedlings to reforest the site's IWRAs and also to donate to reforesting projects within the catchment. File "3.5.1 - Doaçao de mudas para AIRAs".	
3.6	*Implement plan to provide access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers at all premises under the site's control.*	
3.6.1	*Evidence of the site's provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers onsite shall be identified and where applicable, quantified.*	Yes
Comment	The quality of the treated water that is supplied to the workers is satisfactory, as evidenced by the file "1.3.4 Gerenciamento_-_Qualidade_da_Água_Captada" (uploaded for 1.3.4). The water quality of the storage tank #6, which supplies water to the workers, is periodically analysed. Microbiological analysis are also conducted periodically in drinking fountains and in the canteen's water points. In the file " 1.3.8 Wash_Pontos de consumo e Instalações Sanitarias" it is showed that the ratio of WASH equipment for each worker complies with the Brazilian Norm NR24. That file was uploaded for indicator 1.3.8. In addition, during the audit it was observed a good condition of both W.C. and vestiaries, and that access to W.C. is granted to outsourced employees.	
3.6.2	*Evidence that the site is not impinging on the human right to safe water and sanitation of communities through their operations, and that traditional access rights for indigenous and local communities are being respected, and that remedial actions are in place where this is not the case, and that these are effective.*	Yes
Comment	The site is operating legally, in compliance with all legal and regulatory requirements, as evidenced by the documents "3.1.2 - Publicação_DOU_PL_870119_87_(5)", uploaded for 3.1.2, and "1.3.2 DAV-FS-QUA-128_Gestão_de_Recursos_Hídricos_-_2024_(Jan_a_Out_2024)", uploaded for 1.3.2. In addition, the document "1.2.1 Identificação_das_Partes_Interessadas_-_Rev_01", uploaded for indicator 1.2.1, spreadsheets "Indígenas" and "Quilombolas", shows that there are no traditional or indigenous communities in the catchment.	
3.7	*Implement plan to maintain or improve indirect water use within the catchment:*	
3.7.1	*Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.*	Yes
Comment	The indicator was achieved, as demonstrated by the following evidences of quantification of the achievement of the Targets on indirect water use: Target 6.1 - Reduce the amount of sugar in REFRI recipes - completed. Files "3.7.1 - LAFOR COLA BRIX 4.0 ATUALIZADO", "3.7.1 - Xarope Limão 4.0", "3.7.1 - Xarope Guaraná 4.0" and "3.7.1 - Xarope Laranja 4.0". Target 6.2 - Reduce the weight of preforms of REFRI Cola, grape and orange and natural water cap - completed. File "". Target 6.3 - Reduce 2 bar of high pressure - completed Target 6.4 - Valve operation (100% closing when process stopped and % opening according to process needs) - completed 6.5 - Target 2025 – in progress.	

3.7.2	*Evidence of engagement with suppliers and service providers, as well as, when applicable, actions they have taken in the catchment as a result of the site's engagement related to indirect water use, shall be identified.*	Yes
Comment	The site engaged with suppliers and service providers, as evidenced by the email exchanges uploaded for indicated 1.4.1. The actions taken in the catchment as a result of the site's engagement related to indirect water use are identified and quantified in the file "3.7.1 - consumo de água indireta", which was uploaded for indicator 3.7.1.	
3.8	*Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have.*	
3.8.1	*Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.*	Yes
Comment	The site does not have any shared water-related infrastructure. All the water cycle occurs within the site: collection of raw water in the wells, treatment, use, treatment of wastewater, and discharge. All the equipment used for collection, treatment, pumping, and distribution is property of the site.	
3.9	*Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.*	
3.9.1	*Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.*	Yes
Comment	The planned actions related to best practices for water governance were implemented, as evidenced in the following sample of actions. In the site: * Semana do Meio Ambiente. File "3.9.1 - _#COMUNICAÇÃO - Semana do Meio Ambiente - Qual legado você quer deixar para o MUNDO_" and "3.9.1 - FW_ APOIO SEMANA MEIO AMBIENTE APA JOANES-IPITANGA". * Diálogo da Qualidade. "3.9.1 - Diálogo da Qualidade - Semana do Meio Ambiente", "3.9.1 - DQ" and "3.9.1 - DQ2". In the catchment: * Participation in the meeting of the Committee of River Basins. File "3.9.1 - Reunião - Comitê das Bacias Hidrográficas - 11.09.24". * Participation in the Council of the Environmentally-Protected Areas of the River Joanes and Ipitanga. File "3.9.1 - Portaria_de_Reconducao__nº_30.279_DE_30_DE_JANEIRO_DE_2024___APA_Joanes_Ipitanga___2023.2025". * Summary of other actions, in file "3.9.1 Evidência das ações".	
3.9.2	*Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.*	Yes
Comment	The planned actions related to best practices for water balance were implemented, as evidenced in the following sample of actions. In the site: * Actions described in the document "3.3.2 – Comitê interno de água", uploaded for 3.3.2. * Installation of a water tank for reused water. Files "3.9.2 - instalação de caixa de Água G20_" and "3.9.2 - Projeto de Reuso de Água - G20L". In the catchment: * Dia Mundial da Água 2024. Action for the education in fighting against the waste of water in the school Anfrisia Santiago. File "3.9.1 - FW_ APOIO SEMANA MEIO AMBIENTE APA JOANES-IPITANGA" uploaded for 3.9.1. * Granting access to CETREL to take measures of the water level of the aquifer. Files "3.9.2 - LIBERAÇÃO_DE_VEÍCULO".	

3.9.3	*Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.*	Yes
Comment	The planned actions related to best practices for water quality were implemented, as evidenced in the following sample of actions. In the site: * installing a containment basin for chemical products to preserve the effluent that arrives to the treatment plant from chemical spills. File “3.4.2 - Bacia de contençao” (uploaded for 3.4.2). * retrofit of the floor of the industrial site, to prevent the infiltration of chemical products in case of chemical spills. File “3.9.3 - reforma piso”. In the catchment: * granting access to CETREL to take measures of water quality parameters of the aquifer. Files "3.9.2 - LIBERAÇÃO_DE_VEÍCULO", uploaded for the indicator 3.9.2. * installation of septic tanks in communities wiithout sanitation coverage, to prevent contamination of superficial and underground water sources. File "3.9.3 - Relatório_Técnico_de_instalação_FSE_Minalba_com_anexos".	
3.9.4	*Actions towards achieving best practice, related to targets in terms of the site’s maintenance of Important Water-Related Areas shall be implemented.*	Yes
Comment	The planned actions related to best practices for the maintenance of IWRAs were implemented, as evidenced in the following sample of actions. In the site: * planting of trees of native species by the site's workers. File ""3.9.4 - DIA DA ÁRVORE 2024”. In the catchment: * cleaning of the receiving water body Riacho Camboatá (action 10.8.1 of the WSP). File "3.9.4 - limpeza corpo receptor Riacho Camboata". * educational actions related to protecting IWRAs developed in the school Professora Altair da Costa Lima. File "3.9.4 - DIA DA ÁRVORE 2024". * Donation of trash bins to SEMAM, to be installed in nearby communities. File "3.9.4 - Evidências - PGSA".	
3.9.5	*Actions towards achieving best practice related to targets in terms of WASH shall be implemented.*	Yes
Comment	The planned actions related to best practices for WASH were implemented, as evidenced in the following sample of actions. In the site: * WASH educational event for the site's workers. Files "3.9.5 - Eventos_-_Qualidade_-_5_de_maio_-_Dia_Mundial_de_Lavagem_de_Mãos" and "3.9.5 - Lista_de_Presença_-_DSQ_Higiene_das_mãos". * retrofit of W.C. and vestiaries. File “3.9.1 Evidência das ações” (uploaded for 3.9.1). In the catchment: * installation of septic tanks in communities wiithout sanitation coverage. File "3.9.3 - Relatório_Técnico_de_instalação_FSE_Minalba_com_anexos" (uploaded for 3.9.3). * register of people from neighbouring communities that do not have access to sanitation and water supply. File "3.9.5 - Lista de Moradores - Dia D'Ávila".	

4	STEP 4: EVALUATE - Evaluate the site's performance.	
4.1	*Evaluate the site's performance in light of its actions and targets from its water stewardship plan and demonstrate its contribution to achieving water stewardship outcomes.*	
4.1.1	*Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.*	Yes
Comment	File "4.1 Desempenho do site" (uploaded in 4.1) evaluates in detail the performance against the targets that are set in the site's Water Stewardship Plan (WSP). Moreover, file "4.1 Desempenho do site" tracks the performance of the actions proposed in the WSP, including their status of accomplishment and the lessons learned and comments for the critical analysis of each action. In addition, the WSP evaluates the status of the targets associated to the water stewardship outcomes (status in column Q, file "2.3.2 – PGSA" uploaded for indicator 2.3.2.	
4.1.2	*Value creation resulting from the water stewardship plan shall be evaluated.*	Yes
Comment	The environmental/economic/social value created by each action is evaluated in the WSP. The WSP is in the file "2.3.2 – PGSA", uploaded for 2.3.2. Column X of the WSP indicates if the created value is environmental, economic, or social.	
4.1.3	*The shared value benefits in the catchment shall be identified and where applicable, quantified.*	Yes
Comment	The shared value benefits created by each action is evaluated in the WSP. The WSP is in the file "2.3.2 – PGSA", uploaded for 2.3.2. Column W of the WSP describes the shared benefits that are created with the stakeholders of the catchment.	
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	The indicator is met as, even if the site hasn't had a water-related incident during the past 22 years, the process to write an annual review and a root-cause analysis is set in place in case it does occur. If there is any incident, it has to be reported to the public agencies INEMA, IBAMA, SEMAM. The process is set in the PAE - Emergency Plan uploaded for indicador 1.3.1. The site performs a simulation of a water-related incident (chemical spills) where the brigades are trained to follow the procedures in accordance with the PAE master plan. As there were no incidents, no reports were written during the past 22 years.	
4.3	*Evaluate stakeholders' consultation feedback regarding the site's water stewardship performance, including the effectiveness of the site's engagement process.*	
4.3.1	*Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.*	Yes

Comment	There was sufficient consultation efforts, although the level of feedback was relatively low. The emails that evidence that evidence consultation efforts with stakeholders are uploaded for the indicator 1.2.1. Some of them evidence consultation on the site's Water Stewardship Performance. The file "1.2.1_e_1.2.2_Mapeamento_Stakeholders_e_Lista_de_Desafios_Dias_DAvila" (uploaded for 1.2.1) indicated the stakeholders that provided feedback. There was feedback from 7 of them, which is around 20% of the total consulted.

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

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

Comment	This indicator is achieved, as the Water Stewardship Plan (WSP) uploaded for 2.3.2 contains, in its last column, space to introduce lessons learned, critical analysis, and comments for each of the actions developed. The document ""4.1 Desempenho do site" (uploaded in 4.1)" also considers lessons learned and critical analysis in its last two columns. In addition, it can be observed that the last version of the WSP (2022-2023) considers a set of lessons learned and critical analysis that were used to upgrade the last version of the WSP (2023-2024). File "4.4.1 - Plano_de_Gestão_Sustentável_da_água_REV05_(2022-2023)".

5	STEP 5: COMMUNICATE & DISCLOSE - Communicate about water stewardship and disclose the site's stewardship efforts	
5.1	*Disclose water-related internal governance of the site's management, including the positions of those accountable for legal compliance with water-related local laws and regulations.*	
5.1.1	*The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.*	Yes
Comment	The indicator is achieved, as the water-related internal governance is diclosed on page 15 of the Water Stewardship Performance Report (WSPR). Specifically, it is disclosed the position of the people in charge: director of operations, quality manager, mines engineer. The current WSPR and the one from the last year are disclosed online in: https://minalbabrasil.com.br/nosso-proposito-2/	
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.*	in progress
Comment	The site did not share the Water Stewardship Plan, claiming that it contains sensitive information that could be compromising, such as some costs. ***Finding No: TNR-015005***	
5.3	*Disclose annual site water stewardship summary, including: the relevant information about the site's annual water stewardship performance and results against the site's targets.*	
5.3.1	*A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.*	Yes
Comment	The current Water Stewardship Performance Report (WSPR) and the one from the last year are disclosed online in: https://minalbabrasil.com.br/nosso-proposito-2/. The WSPR quantifies performance against targets. File "5.3.1 - Relatorio-MBR-AWS-2023-assinado-2".	
5.4	*Disclose efforts to collectively address shared water challenges, including: associated efforts to address the challenges;engagement with stakeholders; and co-ordination with public-sector agencies.*	
5.4.1	*The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.*	Yes
Comment	The site's shared water-related challenges and efforts made to address them are indicated in the Water Stewardship Performance Report (WSPR). In 2023, three shared water-related challenges were listed (page 13 of the WSPR): quantity, quality, and education. File "5.3.1 - Relatorio-MBR-AWS-2023-assinado-2" uploaded for 5.3.1. In 2024, seven shared water-related challenges were listed, which will be disclosed in the next version of the WSPR.	
5.4.2	*Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.*	Yes

Comment	The Water Stewardship Performance Report (WSPR), uploaded for indicator 5.3.1, identify and disclose the efforts to engage stakeholders. Moreover, the efforts made by the site to engage stakeholders were identified through the evidences uploaded for indicators 1.2.1 and 3.9.1, and also in the interviews carried out with the stakeholders. Feedback from public-sector agencies on the ESPR are presented in "5.4.2 - Feedbacks_-_Respostas_via_link_sobre_desempenho" and "5.4.2 -RE__Comunicação_e_Feedback_-_Relatório_de_Performance_de_Água_2023".	
5.5	*Communicate transparency in water-related compliance: make any site water-related compliance violations available upon request as well as any corrective actions the site has taken to prevent future occurrences.*	
5.5.1	*Any site water-related compliance violations and associated corrections shall be disclosed.*	Yes
Comment	The site did not have water-related violations in the last 22 years. However, there is a process set in place to disclose compliance violations and their associated corrections, which complies with indicator 5.5.1. Such process is described in the Emergency Action Plan - PAE, file "5.5.1 - DAV-PO-QUA-020_-_Plano_de_Atendimento_à_Emergências_-_PAE_-_Meio_Ambiente_RE V03". File “5.5.1 - DAV-PO-QUA-021_-_Comunicação_Interna_e_Externa_REV02” contains the guidelines for disclosing any violations and associated corrections, as well as the responsabilities. In the case of a contamination of the aquifer, the regulatory agency ANM would stop the operations and then would publicily disclose the water-related violation.	
5.5.2	*Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.*	Yes
Comment	The site did not have water-related violations in the last 22 years. This indicator is achieved as, in accordance with the Water Stewardship Performance Report (WSPR), any corrective action would be disclosed in the WSPR, which is disclosed online in https://minalbabrasil.com.br/nosso-proposito-2/	
5.5.3	*Any site water-related violation that may pose significant risk and threat to human or ecosystem health shall be immediately communicated to relevant public agencies and disclosed.*	Yes
Comment	The site did not have water-related violations in the last 22 years. The indicator is achieved as the process to inmediately communicate and disclose any water-related violations set and described in the Emergency Action Plan - PAE, file "5.5.1 - DAV-PO-QUA-020_-_Plano_de_Atendimento_à_Emergências_-_PAE_-_Meio_Ambiente_RE V03", uploaded for 5.5.1. Any site water-related violation that may pose significant risk and threat to human or ecosystem health must be inmediately communicated to the Brazilian enviromental control agencies, which are responsible to disclose the situation to the local population and the whole of society.	

Photographic Evidence from Audit

Yes

Awareness - save water - in the site's W.C.

Awareness - save water - in the site's W.C..JPG

Receiving water body - Riacho Camboata - after the discharge of the effluent.JPG

Sign in the IWRA - Environmentally Protected Area.JPG

Flow metering of the treated effluent before its discharge

Metering of the treated effluent.JPG

IWRA in the site around the water stream

IWRA in the site around the water stream.JPG

IWRA in the site around the water stream 2

IWRA in the site around the water stream 2.JPG

Awareness and education in the site's W.C. 2

Awareness and education in the site's W.C. 2.JPG

Previous Findings		
	All non-conformities raised in the previous audit have been satisfactorily closed.	Yes
Comment	The previous audit (surveillance) was conducted in September 12, 2023. One minor non-conformities were raised: * Indicator 1.3.7. Actions for economic water-related value were provided but current description or quantification of the annual value related to water have not been provided. Cause: Cost and value were identified and quantified for each action in PGSA, but not shared as total annual value. Corrective Action: Prepare a spreadsheet considering 1.3.7 criteria to share the total annual value evolution. The corrective action was conducted and this non-conformity has been satisfactorily closed.	