

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)



Audit Number: AO-001277

### SITE DETAILS

Site: **Diageo Spey Catchment Group**  
Address: Dufftown Distillery, Dufftown, AB55 4BR, Keith, UNITED KINGDOM  
Contact Person: Paul Shearer  
AWS Group Reference Number: AWS-G-000027  
Site Structure: Group Site

### CERTIFICATION DETAILS

Certification status: Certified Core  
Date of certification decision: 2025-Mar-27  
Validity of certificate: 2028-Mar-26

### AUDIT DETAILS

Audited Service(s): AWS Standard v2.0 (2019)  
Audit Type(s): Re-Certification Audit  
Audit Start Date: 2024-Sep-23  
Lead Auditor: Mia Antoni-Naidoo  
Audit team participants:  
Lisa Seufert  
  
Site Participants:  
Rebecca Gordon, Environmental Lead  
Paul Shearer, Environmental Manager  
Duncan Pirie, Environmental Co-Ordinator  
Alex Gribbs, Graduate Governance Project Lead



Audit Number: AO-001277

ADDITIONAL INFO

Summary of Audit Findings: A total of 23 findings were raised during the certification audit, 0 major non-conformities, 12 minor non-conformities, 11 observations.

The Client is requested to perform a root cause analysis and define corrective actions for each of the non-conformities and to submit these to WSAS within 30 days of receipt of the audit report by 11 December 2024.

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

The audit team recommends re-certification of Diageo Spey Group at Core level pending approval of the corrective actions plan.

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

Scope of Assessment: The scope of services covers the recertification audit for assessing conformity of Diageo Spey Group against the AWS International Water Stewardship Standard Version 2.

The audit was conducted onsite on 23-26 September 2024. Diageo Spey Group consists of 11 distilleries that produce whiskey, all located within the Spey Catchment. Each facility includes a distillery, storage tanks for raw materials and final product, dams, cool systems, ablutions, and offices. The audit included an on-site site visit that assessed the water-related facilities and activities at Cragganmore, Knockando, and Benrinnes distilleries.

The following distilleries form part of the Diageo Spey Group:

- Dalwhinnie Distillery AWS-000216
- Cardhu Distillery AWS-000217
- Knockando Distillery, AWS-000218
- Dailuaine Distillery, AWS-000219
- Cragganmore Distillery AWS-000220
- Dufftown Distillery AWS-000221
- Mortlach Distillery AWS-000222
- Glendullan Distillery, AWS-000223
- Benrinnes Distillery AWS-000224
- Glen Spey Distillery AWS-000225
- Auchroisk Distillery AWS-000226

FINDINGS

NUMBER OF FINDINGS PER LEVEL

Observation	11
Minor	12



# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001277

### FINDING DETAILS

Finding No:	TNR-012558
Checklist Item No:	0.3.2.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Sep-23
Checklist item:	<p>The ICS shall include:</p> <ul style="list-style-type: none"><li>a) a documented set of procedures covering group processes;</li><li>b) a detailed description of how production units are structured;</li><li>c) appropriate procedures for maintenance of records;</li><li>d) records from internal audits of production units; and</li><li>e) a description of the responsibilities of staff of production units and ICS.</li></ul>
Findings:	<p>Although the group processes and what is managed at group or site level is understood at group and site levels, there is no documented set of procedures covering group processes, structures, or internal audits. Although some elements of water management are covered by internal audits against Diageo water management standard and the Global Risk Management System audits, records were insufficient to show how internal audits of production units cover the requirements of the AWS Standard which are relevant to the activities at the distilleries.</p>
Corrective action:	<p>Diageo will provide a documented summary of processes for managing and maintaining AWS Certification for the Spey Group at the start of the Spey Group portfolio of evidence. This will be written after liaising with José Manuel González (AWS), to find an effective way forward given:-</p> <ul style="list-style-type: none"><li>1) The uniqueness of this group, i.e. all sites in the group are owned and run by Diageo under the leadership of a single Operations Director.</li><li>2) The updated certification requirements will be in place before the next audit.</li></ul>



# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001277

Finding No:	TNR-013382
Checklist Item No:	0.3.2.3
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Sep-23
Checklist item:	The ICS shall identify the applicable AWS Standard and define procedures and sanctions for dealing with non-conformities resulting from internal audits.
Findings:	There is no formal procedure for dealing with non-conformities arising from internal AWS reviews other than the process for correcting operational issues which are discussed in daily and weekly Tier management meetings. The site will need to formalise their process into a procedure and ensure records are kept.
Corrective action:	Diageo will provide a documented summary of processes for managing and maintaining AWS Certification for the Spey Group at the start of the Spey Group portfolio of evidence. This will be written after liaising with José Manuel González (AWS), to find an effective way forward given:- 1) The uniqueness of this group, i.e. all sites in the group are owned and run by Diageo under the leadership of a single Operations Director. 2) The updated certification requirements will be in place before the next audit.
Finding No:	TNR-013383
Checklist Item No:	0.3.4.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Sep-23
Checklist item:	All Group members shall have an adequate understanding of the AWS Standard and access to the specified requirements determined by the group (Standard and certification requirements).
Findings:	The Diageo distillery staff group members had very little knowledge of the AWS Standard and its requirements for implementation. This will need to be improved upon to achieve conformity.
Corrective action:	Diageo will include a high level review of AWS requirements in the Site Environmental Review process from F25.  Diageo will update the operations teams at group sites more regularly - via internal social media application and/or toolbox talks and/or newsletters and/or posters.



# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001277

Finding No:	TNR-013386
Checklist Item No:	0.3.4.3
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Sep-23
Checklist item:	The AWS Group Manager shall keep the following information up to date: a) Copies of contracts between the group and individual group members; b) group member list; c) maps of sites and property areas; d) internal audit reports; e) non-conformities (both minor and major), sanctions and follow-up action arising from both internal audits and external audits; and f) complaints and appeals (to group management, the CAB, or AWS directly).
Findings:	Records were insufficient to show how internal audits of production units cover the requirements of the AWS Standard which are relevant to the activities at the distilleries. Non-conformities and their follow up were not recorded. The Group Management has to conduct internal audits on the distilleries (Group Members) and manage non-conformities in accordance with the developed internal procedures.
Corrective action:	Diageo will provide a documented summary of processes for managing and maintaining AWS Certification for the Spey Group at the start of the Spey Group portfolio of evidence. This will be written after liaising with José Manuel González (AWS), to find an effective way forward given:- 1) The uniqueness of this group, i.e. all sites in the group are owned and run by Diageo under the leadership of a single Operations Director. 2) The updated certification requirements will be in place before the next audit.
Finding No:	TNR-013388
Checklist Item No:	0.3.4.4
Status:	In Progress - CA plan approved
Finding level:	Observation
Checklist item:	The internal audits shall be conducted with sufficient scope and detail to provide group management with a robust appraisal of whether or not each group member continues to maintain conformity with the AWS Standard and certification requirements
Findings:	The finding for this has already been raised previously.
Corrective action:	Diageo will provide a documented summary of processes for managing and maintaining AWS Certification for the Spey Group at the start of the Spey Group portfolio of evidence. This will be written after liaising with José Manuel González (AWS), to find an effective way forward given:- 1) The uniqueness of this group, i.e. all sites in the group are owned and run by Diageo under the leadership of a single Operations Director. 2) The updated certification requirements will be in place before the next audit.



# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001277

Finding No:	TNR-013418
Checklist Item No:	0.3.4.10
Status:	In Progress - CA plan approved
Finding level:	Observation
Checklist item:	All group members shall be recorded on a list. The list of group members shall be updated annually or more often if necessary and shall include at least the following information for each member: a) name of the member or code assigned to the member; b) location c) the nature (product types) and volume of production (units); d) volume of water use (inputs and outputs) specify units; e) Group membership status (including any non-conformities and corrective action plans); f) date(s) of most recent internal audit; g) date(s) of most recent external audit; and h) any other group-specific information as may be needed.
Findings:	The information pertaining to Group membership as per Certification Requirement 5.5.10 could be improved upon, not all the information was easily available on request.
Corrective action:	Diageo will provide a documented summary of processes for managing and maintaining AWS Certification for the Spey Group at the start of the Spey Group portfolio of evidence. This will be written after liaising with José Manuel González (AWS), to find an effective way forward given:- 1) The uniqueness of this group, i.e. all sites in the group are owned and run by Diageo under the leadership of a single Operations Director. 2) The updated certification requirements will be in place before the next audit.
Finding No:	TNR-012561
Checklist Item No:	1.3.1
Status:	In Progress - CA plan approved
Finding level:	Observation
Checklist item:	Existing water-related incident response plans shall be identified.
Findings:	The site could improve their incident response plans which are currently generic and not specifically related to water.
Corrective action:	We presented the site crisis management plans on day one of the audit – during which it was discussed that it wasn't specific enough. We followed up with our wider governance team and identified more specific sections that we had not shared on the day one of the audit. These were shared with the auditor on day 3 of the audit and we don't feel this has been considered. We also offered to get a copy of the Business Continuity Plan, which we did not have access to, but this was declined.



# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001277

Finding No:	TNR-012292
Checklist Item No:	1.3.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Sep-23
Checklist item:	Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped
Findings:	The Water Balance maps only reflect the inflow, storage and the internal flow of water through the distillery but do not reflect clearly the outflow of water. The water balance map will need to be revisited once the water balances have been produced.
Corrective action:	Diageo are currently reviewing our water balances for all sites to align with CSRD reporting requirements, with a view to produce balances that conform to all necessary regulatory, certification and internal standard requirements.
Finding No:	TNR-012293
Checklist Item No:	1.3.3
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Sep-23
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 site do not have a water balance calculations using actual data, only theoretical water models for water use were presented. Water balances for each distillery using actual data of water inflow, storage, losses and outflow are required for conformity.
Corrective action:	Diageo are currently reviewing our water balances for all sites to align with CSRD reporting requirements, with a view to produce balances that conform to all necessary regulatory, certification and internal standard requirements.



# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001277

Finding No:	TNR-013513
Checklist Item No:	1.5.6
Status:	In Progress - CA plan approved
Finding level:	Observation
Checklist item:	Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.
Findings:	Diageo could improve their understanding of their vulnerability to infrastructure break down by assessing the current condition of the infrastructure and documenting the potential exposure to extreme events.
Corrective action:	Diageo will obtain scope/quote for condition survey of infrastructure, to review to understand benefit of implementation.
Finding No:	TNR-013514
Checklist Item No:	1.7.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Sep-23
Checklist item:	Water risks faced by the site shall be identified, and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.
Findings:	The potential costs and business impact of each risk have not been identified.
Corrective action:	Diageo will review the Spey Water Related Risks file and add further detail related to potential costs and business impact.
Finding No:	TNR-012710
Checklist Item No:	1.7.2
Status:	In Progress - CA plan approved
Finding level:	Observation
Checklist item:	Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.
Findings:	Diageo could expand and improve their understanding of potential opportunities by identifying water-related actions in the catchment.
Corrective action:	Diageo will update Water Stewardship Plan to include and more easily highlight catchment opportunities and actions.



# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001277

Finding No: TNR-013536  
Checklist Item No: 1.8.2  
Status: In Progress - CA plan approved  
Finding level: Minor  
Due date: 2025-Sep-23  
Checklist item: Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.  
Findings: The site has not sufficiently identified possible best practice projects for water balance (either through water efficiency or less total water use) to meet the requirement of the indicator. The site is required to revisit the identification process through engagement of stakeholders in the catchment, conducting research, and benchmarking against other industries both in the area and other distillery sites around the world. This pertains to both site and catchment activities.  
Corrective action: Diageo will conduct research to identify further sector/catchment best practice for water balance and include within the evidence portfolio.

Finding No: TNR-013538  
Checklist Item No: 1.8.4  
Status: In Progress - CA plan approved  
Finding level: Minor  
Due date: 2025-Sep-23  
Checklist item: Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.  
Findings: The site has not sufficiently identified possible best practice projects for the maintenance of Important Water-Related Areas to meet the requirement of the indicator. The site is required to revisit the identification process through engagement of stakeholders in the catchment, conducting research, and benchmarking against other industries both in the area and other distillery sites around the world. This pertains to both site and catchment activities.  
Corrective action: Diageo will conduct research to identify further catchment best practice for site maintenance of Important Water Related Areas and include within the evidence portfolio.



# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001277

Finding No:	TNR-012713
Checklist Item No:	2.1.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Sep-23
Checklist item:	<p>A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:</p> <ul style="list-style-type: none"><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>
Findings:	<p>The site has a water stewardship strategy (2022) which refers to the commitment of getting site certified to the AWS. This is available on the Diageo Website. The statement of strategy is not signed. There is no reference to the commitment statements required by the Standard.</p>
Corrective action:	<p>Diageo will add the specific wording of the commitments in materials shared with the external stakeholders going forward, e.g.</p> <ol style="list-style-type: none"><li>1) Stakeholder engagement presentation.</li><li>2) Annual newsletter.</li></ol> <p>Diageo will display a poster at each certified site with the specific wording of the commitments.</p>
Finding No:	TNR-013559
Checklist Item No:	2.3.2
Status:	In Progress - CA plan approved
Finding level:	Observation
Checklist item:	<p>A water stewardship plan shall be identified, including for each target:</p> <ul style="list-style-type: none"><li>- How it will be measured and monitored</li><li>- Actions to achieve and maintain (or exceed) it</li><li>- Planned timeframes to achieve it</li><li>- Financial budgets allocated for actions</li><li>- Positions of persons responsible for actions and achieving targets</li><li>- Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.</li></ul>
Findings:	<p>The site could improve on their water stewardship plan by adding targets which the actions are working towards achieving. The plan is long and can also be improved by separation by time increments or other factors.</p>
Corrective action:	<p>Diageo will update Water Stewardship Plan to include numerical targets, where pertinent.</p> <p>Diageo will update Water Stewardship Plan into Diageo financial years.</p>



# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001277

Finding No:	TNR-012715
Checklist Item No:	2.4.1
Status:	In Progress - CA plan approved
Finding level:	Observation
Checklist item:	A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.
Findings:	The site could improved their response to water risk mitigation by reviewing their risks identified in 1.7 and cross referencing against their own internal emergency response plan or risk mitigation plans.
Corrective action:	Diageo will add detail to their portfolio to cross reference internal processes, e.g. 1) Incidents - crisis management plans 2) Recovery - business continuity plans 3) Future - risk mitigation plans
Finding No:	TNR-013560
Checklist Item No:	3.7.2
Status:	In Progress - CA plan approved
Finding level:	Observation
Checklist item:	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.
Findings:	Diageo can improve their engagement with suppliers and service providers with the intention to influence their water management and good water stewardship practices to more fully meet the requirement of the Standard.
Corrective action:	Diageo utilises a Partnering with Suppliers code with supplies and contractors which includes minimum environmental and water expectations.  Diageo has added Water and Nature requirements to their Third Party Risk Management processes, launching in November 2024.  For the Spey Group, the biggest supplier is Diageo owned maltings providing malted barley - engagement between the maltings and distilleries is significant and these maltings have taken significant action on water.



# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001277

Finding No: TNR-013561  
Checklist Item No: 3.9.2  
Status: In Progress - CA plan approved  
Finding level: Observation  
Checklist item: Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.  
Findings: Diageo has two listed Best Practice for water balance activities which have already been implemented, the site could improve this by including more, shorter term targets and water balance related projects to the WS Plan.  
Corrective action: Diageo will update Water Stewardship Plan to include numerical targets, where pertinent.

Diageo will update Water Stewardship Plan into Diageo financial years.

Finding No: TNR-013562  
Checklist Item No: 4.1.2  
Status: In Progress - CA plan approved  
Finding level: Observation  
Checklist item: Value creation resulting from the water stewardship plan shall be evaluated.  
Findings: Diageo could improve their understanding of the value creation arising from implementation projects in the WS Plan by performing a cost benefit analysis  
Corrective action: This has been assessed qualitatively in column W of the Water Stewardship Plan

Finding No: TNR-012744  
Checklist Item No: 5.1.1  
Status: In Progress - CA plan approved  
Finding level: Minor  
Due date: 2025-Sep-23  
Checklist item: The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.  
Findings: Diageo has a table of responsibilities for water-related internal governance but this has not been disclosed. The site is required to disclose the positions of those accountable for compliance to water related laws.  
Corrective action: Diageo will add a summary table of responsibilities in materials shared with the external stakeholders going forward, e.g.  
1) Stakeholder engagement presentation.  
2) Annual newsletter.



# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001277

Finding No:	TNR-012747
Checklist Item No:	5.2.1
Status:	In Progress - CA plan approved
Finding level:	Observation
Checklist item:	The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.
Findings:	Diageo could improve the disclosure of the WS Plan by linking the projects and activities to the 5 AWS outcomes.
Corrective action:	Diageo will add links to AWS outcomes to projects and activities disclosed in materials shared with the external stakeholders going forward, e.g. 1) Stakeholder engagement presentation. 2) Annual newsletter.
Finding No:	TNR-012748
Checklist Item No:	5.3.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Sep-23
Checklist item:	A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.
Findings:	The site has disclosed a summary of the site's water stewardship performance, however this does not include quantified performance against targets.
Corrective action:	Diageo will included quantified performance against targets, where pertinent, in materials shared with the external stakeholders going forward, e.g. 1) Stakeholder engagement presentation. 2) Annual newsletter.



# CERTIFICATION REPORT

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### Report Details

Report	Value
Report prepared by	Mia Antoni-Naidoo
Report approved by	Ozge Gokmen
Report approved on (Date)	08/11/2025

### Surveillance

**Proposed date for next audit**  
2025-Sep-23

### Stakeholder Announcements

Date of publication	Location
06/08/2024	AWS and WSAS Websites Via email to stakeholders

### Catchment Information

**Catchment Information**  
All 11 distilleries which are the members of the Diageo Spey Group are located in the Spey Catchment. The Spey Catchment, covering an expansive area of over 3,000 km<sup>2</sup>, is home to the River Spey – Scotland’s third largest river. This network of rivers and tributaries, spanning over 36,500 km. The River Spey catchment rises in the Monadhliath Mountains and enters the Moray Firth at Spey Bay. It is the second longest river in Scotland, with a catchment area of over 3,000km<sup>2</sup>. The River Spey is designated as a Special Area of Conservation (SAC) for atlantic salmon, freshwater pearl mussel, lamprey and otter, and the lower Spey is a Special Area of Conservation for coastal shingle and floodplain woodland features. Over 60% of the catchment falls within the Cairngorms National Park. The upper catchment land use is predominantly hill farming, forestry and sporting estates, while the lower catchment has a greater level of livestock and arable farming. There are a number of small villages and towns throughout the catchment, with the greatest population density occurring in the Aviemore area.  
Two hydro electricity schemes operate in the upper catchment, on the Tromie / Truim tributaries and at Spey Dam.  
Further information on the condition of water bodies in the River Spey catchment can be found on SEPA’s interactive map at [www.sepa.org.uk/water/river\\_basin\\_planning.aspx](http://www.sepa.org.uk/water/river_basin_planning.aspx)



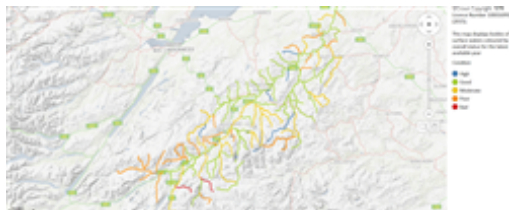


# CERTIFICATION REPORT

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Audit Number: AO-001277

Spey.png



Spey Catchment.png



# CERTIFICATION REPORT

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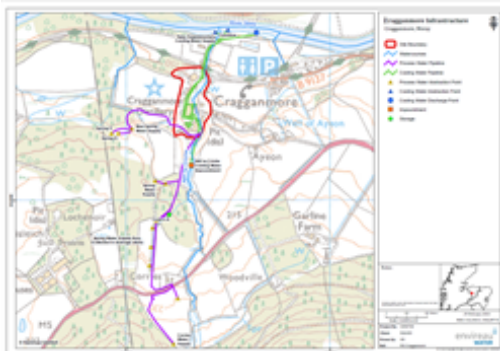
### Client Description and Site Details

#### Client/Site Background

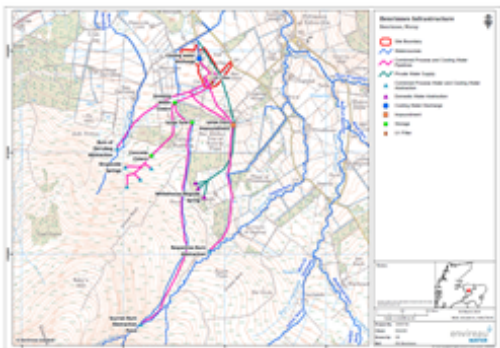
The Diageo Spey Catchment group consists of eleven distilleries producing scotch whiskey in the along the River Spey in Scotland. The Spey Catchment Group includes the following Sites: Auchroisk Distillery, Benrinnes Distillery, Cardhu Distillery, Cragganmore Distillery, Dailuaine Distillery, Dalwhinnie Distillery, Dufftown Distillery, Glendullan Distillery, Glen Spey Distillery, Knockando Distillery, and Mortlach Distillery. Water for the distilleries comes from multiple sources, including springs, surface water, groundwater and public supplies (municipalities). Each distillery has discharge points (cooling water only), however, effluent is collected at each site and is then trucked (or sometimes piped) to the Glendullan distillery where it is treated and then released back to the Spey River. Sewage is handled via septic tanks and soak aways maintained at each distillery.

Address details for all 11 sites are:-

- Auchroisk Distillery, Mulben, Keith, AB55 6XS
- Benrinnes Distillery, Aberlour, AB38 9NN
- Cardhu Distillery, Knockando, Aberlour, AB38 7RY
- Cragganmore Distillery, Ballindalloch, AB37 9AB
- Dailuaine Distillery, Carron, Aberlour, AB38 7RE
- Dalwhinnie Distillery, Dalwhinnie, PH19 1AA
- Dufftown Distillery, Dufftown, Keith, AB55 4BR
- Glendullan Distillery, Dufftown, Keith, AB55 4DJ
- Glen Spey Distillery, High Street, Rothes, Aberlour, AB38 7AT
- Knockando Distillery, Knockando, Aberlour, AB38 7RP
- Mortlach Distillery, Fife Street, Dufftown, Keith, AB55 4AQ



Cragganmore.png



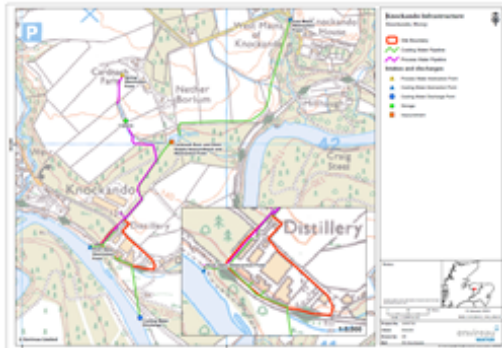
Benrinnes.png



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Audit Number: AO-001277



Knockando.png

### Summary of Shared Water Challenges

#### Summary of Shared Water Challenges

Cooling Water Discharge Temperatures (Dufftown)  
Preserve designated sites (freshwater pearl mussels)  
Water volume and quality (Dullan)  
Water volume and quality (Fiddich)  
Water volume and quality (Spey)  
Water volume and quality (Rothes)  
Private water supplies (Dailuaine)  
Private water supplies (Cragganmore)  
Private water supplies (Benrinnes)  
Private water supplies (Auchroisk)  
Flooding  
Fish passage (Dufftown)  
Fish passage (Rothes)  
Water retention  
Attracting visitors  
Land spreading  
Supply of groundwater  
Fish passage (Green Burn)  
Water volume and quality (Glenrinnnes)  
Water Scarcity  
Climate Change Resilience  
Invasive Species  
Competing for the same water resources



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0.1 General Requirements for Single Sites, Multi-Sites and Groups	
0.1.1	<i>Eligibility Criteria</i>
0.1.1.1	<i>The site(s) occupy one catchment OR an exception has been granted.</i>
Comment	All the distilleries are located in one catchment
0.1.1.2	<i>The scope of the proposed certification shall be under the control of a single management system.</i>
0.1.1.3	<i>The scope of the proposed certification shall be homogeneous with respect to primary production system, water management, product or service range, and the main market structures.</i>

✔  
Yes

✔  
Yes







✔  
Yes



# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001277

0.3	Requirements for Groups	
0.3.1	Group Management Requirements	
0.3.1.1	<i>The management of the group shall be clearly defined.</i>	 Yes
Comment	The AWS certification are managed by the Environment Team in Scotch, with the addition of two other people but primarily is Becky Gordon, Paul Shearer and Duncan Pirie meeting once a month on the AWS issues. There exists a table of responsibilities within Diageo outlines this structure and details the management of the group.	
0.3.1.2	<i>The group shall identify the person with overall management responsibility for the group.</i>	 Yes
Comment	Paul Shearer is the overall manager with responsibility, in the Table of responsibility document which details team functions and responsibilities, but no overall management responsibility has been designated.	
0.3.1.3	<i>The group shall nominate an 'AWS Group Representative' who assumes overall responsibility for the group's implementation of and compliance with the AWS Standard and AWS certification requirements and serves as the primary contact for AWS communications.</i>	 Yes
Comment	Becky Gordon is the AWS Group Representative responsible but this has not been documented in anyway. It is understood by all staff at Diageo that Becky Gordon is the AWS Representative.	
0.3.1.4	<i>The Group Management shall have clearly defined responsibilities.</i>	 Yes
Comment	The responsibilities are clearly understood within the Diageo environment team, this has been documented in a table of responsibilities.	
0.3.2	Group Internal Control System	
0.3.2.1	<i>The group shall operate an Internal Control System (ICS) which meets the requirements of the AWS Standard and AWS certification requirements.</i>	 Yes
Comment	The ICS for AWS operation is driven by the portfolio of information which has been prepared for the AWS implementation. All 11 sites are within "Scotch" under lean manufacturing, Six Sigma, at site level a daily morning meeting in the morning, this is an operational meeting but includes HSE and water use, this is followed up by Tier 2 meeting which is all the distilleries and then is followed by Tier 3 meeting which is management driven. Water issues are discussed and managed at the time. Tier 4 meetings (Scotch level) happen weekly and are online, 4 reps online for East, West, Cambly, etc. The site uses excel spreadsheet/Power BI (Tier 3/Tier 4 Board) to log the results from the meetings against metrics, there is a water efficiency metric and a water to alcohol metric, these are watched weekly. The Sites all have an escalation matrix document where water issues and pollution incidents are recorded including request for assistance.	
0.3.2.2	<i>The ICS shall include:</i> a) a documented set of procedures covering group processes; b) a detailed description of how production units are structured; c) appropriate procedures for maintenance of records; d) records from internal audits of production units; and e) a description of the responsibilities of staff of production units and ICS.	 in progress




# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001277

**Comment** No documented set of procedures processes for the sites were presented during audit. The sites are all ISO 9001 certification. No internal audit for AWS but there are internal audits for the Diageo water management standard. The site uses Enabelon as a tool for these internal audits. Diageo has a Global Risk Management system. Diageo has a Risk Function that conducts the audits through the Governance team. The site was not able to produce the evidence of these audits as they are conducted by the Governance Team, The Environmental Team is notified if actions are required by this team in relation to non-conformities raised in the Diageo Internal Audits. Environmental audits are currently conducted annually but this will likely change to every other year. Diageo has a Records and Information Standards which has a retention and destruction policy.


**Finding No: TNR-012558**

**0.3.2.3** *The ICS shall identify the applicable AWS Standard and define procedures and sanctions for dealing with non- conformities resulting from internal audits.*  in progress


**Comment** AWS team has only a review process, there are no internal audit, and no non-conformities are raised. Corrections are made informally and without formal record taking. The ICS uses the AWS Portfolio as the basis for reviewing compliance to this annually, and its completed before the time of the audit.

**Finding No: TNR-013382**


**0.3.3** *Group Membership Agreement*

**0.3.3.1** *Each group member shall indicate their entry into an agreement with group management to coordinate AWS certification as a group (known as the 'Group Membership Agreement').*  N/A


**Comment** There are no formal agreements between the distilleries and the ICS group (Environment Team) but each distillery is within the same legal entity and no formal agreement is required.

**0.3.3.2** *Group management shall make sure that each group member understands the implications of entering into the Group Membership Agreement.*  N/A

**Comment** All senior site managers were convened and the requirements of the Standard explained to them. Are there is no agreement required within the distilleries no further actions were taken with the sites. The AWS implementation is currently "owned by the Environment Team".

**0.3.3.3** *The Group Membership Agreement shall contain at least the following:*  
a) a commitment by the group member to fulfil the requirements of the AWS Standard and applicable AWS Certification Requirements;  
b) a commitment by the group member to provide the group management with required information in a timely manner;  
c) acceptance by the group member of internal and external audits;  
d) an obligation for the group member to report non-conformities; and  
e) the rights of group management to terminate the membership of any member if continued participation by that member threatens the credibility of the group.  N/A

**0.3.4** *Group Member Requirements*

**0.3.4.1** *All Group members shall have an adequate understanding of the AWS Standard and access to the specified requirements determined by the group (Standard and certification requirements).*  in progress



# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001277

**Comment** The Environment Team provided evidence of a presentation shared with senior management of the distilleries in 2020 and again in 2021 but no interaction on the sites on understanding of the AWS Standard since was available during audit. The Diageo distillery staff group members had very little knowledge of the AWS Standard and its requirements for implementation.

**Finding No: TNR-013383**


**0.3.4.2** *Records covering the relationship between the group management and group members shall be maintained and kept up to date.*



N/A

**Comment** No administrative records particular to AWS are kept, only operational issues are recorded via email. Enablon is the most formal way of interacting via water related issues, but not relating directly to AWS implementation.

**0.3.4.3** *The AWS Group Manager shall keep the following information up to date:*  
*a) Copies of contracts between the group and individual group members;*  
*b) group member list;*  
*c) maps of sites and property areas;*  
*d) internal audit reports;*  
*e) non-conformities (both minor and major), sanctions and follow-up action arising from both internal audits and external audits; and*  
*f) complaints and appeals (to group management, the CAB, or AWS directly).*

 in progress

**Comment** Contracts are not required for this group as all fall under the same company and management system. The Group Manager has maps and a member list. The Group Manager has not conducted internal audits as they would be auditing their own work, however, these are required and an independent auditor will need to be appointed to review the Group Members implementation of the AWS Standard on an annual basis. No non-conformities have been raised.

**Finding No: TNR-013386**

**0.3.4.4** *The internal audits shall be conducted with sufficient scope and detail to provide group management with a robust appraisal of whether or not each group member continues to maintain conformity with the AWS Standard and certification requirements*

 Yes

**Comment** The finding for this has already been raised previously.

**0.3.4.5** *Each member of the group shall be internally audited on at least once per year.*

 Yes

**Comment** The Group Manager reviews the AWS Portfolio of evidence on an annual basis, however this is insufficient to meet the requirement. This has been raised as an NC on a separate indicator.

**0.3.4.6** *New or proposed group members shall always be subject to an internal audit before they may be added to the list of group members.*

 N/A

**Comment** No sites have been added or removed

**0.3.4.7** *The AWS Group Representative shall perform an annual review of the status of all members of the group and shall take a decision as to continuing membership of each member. This decision shall be based on internal audits and other information.*

 N/A

**Comment** No changes have been made

**0.3.4.8** *Safeguards shall be in place to ensure that internal auditors are not unduly influenced in their findings by group management or group members.*

 N/A



# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001277

Comment The sites are managed centrally by the Environmental Management Team. As the site has not identified internal auditors for the AWS Standard implementation this will be reviewed in subsequent audits.

**0.3.4.9** *Group members shall have the right to appeal internal audit findings of non-conformity.*

  
N/A

Comment No internal audits nor findings raised to date.

**0.3.4.10** *All group members shall be recorded on a list. The list of group members shall be updated annually or more often if necessary and shall include at least the following information for each member:*  
*a) name of the member or code assigned to the member;*  
*b) location*  
*c) the nature (product types) and volume of production (units);*  
*d) volume of water use (inputs and outputs) specify units;*  
*e) Group membership status (including any non-conformities and corrective action plans);*  
*f) date(s) of most recent internal audit;*  
*g) date(s) of most recent external audit; and*  
*h) any other group-specific information as may be needed.*

  
Obs.

Comment The AWS portfolio maintained by the Group Manager contains most of the of the information but not all. Volume of water use is kept on Enablon.



# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001277

### 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** All the sites of the Group have been mapped, see evidence attached. Each map contains the location of water sources and discharge locations, including infrastructure and piping paths. Cragganmore: The site has abstraction licences for the springs, do not own the land, SEPA licences with limits. The licenses are dated but have no expiry, variations to the license are issued. Wayleave is a legal document with the land owners to run piping over the land and have access to the spring. SEPA water use data is submitted annual but limits are daily. SEPA conduct inspections based on analysis of the date provided and and breach of daily abstraction limits. The site has provided the map with the water extraction points on the Spey River and the discharge points. Only water which is discharged is cooling water and this goes back into the Spey. All effluent is tankered off site and sent to WWTW. Glendullen plant has WWTW and processes all effluent and discharges back into the Fiddich River. Fiddich runs to the Spey River. Benrinnes: Springs with cisterns are the process water supply, Cooling water is discharged into a water ditch which connects to the Burn of Aberlour and then into the Spey River. Effluent is piped Daluiane and then tankered to Glendullan. Knockando has spring water sources and discharges into the Spey. Scottish Water is used for drinking water only. Other factories purchase drinking water in for use. All three sites use septic tanks and process water for flushing. Soakaways are used and the water ultimately returns to the land. Knockando uses municipal water for WASH. The Catchment for all 11 sites is the Spey catchment.

**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



# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001277

Comment	<p>Initial stakeholders were all from Spey Catchment Initiatives, extended the list through interactions and meetings with existing stakeholders. The site has presented a stakeholder analysis document which list all stakeholders and the interactions and also recorded the shared water challenges.</p> <p>An annual stakeholder event is held in-person, Diageo invite as many as possible to a group session, there is a record of this, the stakeholder engagement deck. This session is growing with each year in attendance, now with people also dialing in. Internal stakeholders from other departments also attend.</p> <p>Diageo Newsletter is also annual event, a review of the past year and the plans for the forthcoming year.</p> <p>Diageo staff attend Spey Catchment Initiative meetings. Following this a survey was issued in 2024. but only 2 people responded.</p> <p>Originally the first interaction with stakeholders was a zoom call with main original stakeholders and every year, these are -reconfirmed and asked for further shared challenges. Also shared their projects on Rothes Burn Flowing monitoring project and climate resilience projects.</p> <p>Stakeholder Feedback forms review, these reflect that every the previously identified shared water challenges are reconfirmed and also new are identified through discussion</p>	
1.2.2	<i>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.</i>	 Yes
Comment	See stakeholder analysis document.	
1.3	<i>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.</i>	
1.3.1	<i>Existing water-related incident response plans shall be identified.</i>	 Obs.
Comment	Diageo has presented generic emergency response plans to incidents on site, most specifically dealing with spills. The site also has confidential business continuity plans which were not available for review. The site has conducted three water scarcity studies which reviews the necessary steps to be taken to avoid this. Documents viewed by the auditor include: Site Name / Site Non-Core Documentation / 02 - Health & Safety / Crisis and Emergency Plan / Crisis and Emergency Plan.	
1.3.2	<i>Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped</i>	 in progress
Comment	The Water Balance maps only reflect the inflow, storage and the internal flow of water through the distillery but do not reflect clearly the outflow of water. The water balance map will need to be revisited once the water balances have been produced.	
		<b>Finding No: TNR-012292</b>
1.3.3	<i>Site water balance, inflows, losses, storage, and outflows, including indication of annual variance in water usage rates, shall be quantified. Where there is a water-related challenge that would be a threat to good water balance for people or environment, an indication of annual high and low variances shall be quantified.</i>	 in progress



# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001277

**Comment** The information provided reflected that that water balance for the distilleries have been modelled based on high, mid and low usage, what was not available during the audit was the actual water withdrawal, storage, use and discharge data in the water balance for each site for the last 2 years. The site has done a model of the water balance but is not using actual annual data in the balance .  
The site has the data for annual volumetric use but it is not been used in the water balance modeling which are only done every 3 years as an indication of how much water should be used.  
The sites review these consumptive water use on a bi-annual reconciliation basis, using the volumetric consumption use.

Knockando Distillery has been closed since for 6 years and re-opened in March 2024 and does not have a model or balance.

**Finding No: TNR-012293**

**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 monitors the incoming process water once a year, by a UKAS accredited laboratory. This is voluntary analysis as this is also tested by the regulator once a year.

The WWTW at Glendullan plant test the water voluntarily once a week and is checked by SEPA doing spot checks. The permit for the discharge site is valid. All the effluent from all the distilleries is tankered or piped to this treatment plant where it is treated and released into the Spey.

Drinking water is analysed for chemical parameters once a year and once a quarter for microbiological parameters.  
Data on water quality of the Spey River (receiving body) can be downloaded from the River Basin Management Plan website. <https://www.sepa.org.uk/> or <https://informatics.sepa.org.uk/WaterClassificationHub/>

The site did not provide copies of the water testing results, however, the auditor reviewed a sample of all types of monitoring during the audit.

Water quality in the Spey Catchment is overall very good and this is not a shared water challenge.

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

**Comment** Pollution maps have been provided for all sites and include fuels and waste product from production.

The sites do not used chemicals in the facility other than small amounts of domestic products

**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** Site has provided the IWRAs for the catchment and the site, the spreadsheet can be filters for onsite. The status of some of the IWRAs is available and provided and some is not available. Too small etc





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



# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001277

Comment	Yes updated for 2024. Cultural and environmental value has been presented	
<b>1.3.8</b>	<i>Levels of access and adequacy of WASH at the site shall be identified.</i>	 Yes
Comment	<p>The site has used the WBCSD tool for all sites and then repeated it for every year that the tool was updated. The site has recently created a uniform way of answering the questions for all sites. There are showers on site but not required by law.</p> <p>The WASH facilities at all the sites were good.</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	Diageo has provided the water use data for the primary inputs, the data has been provided as a ratio of water used per quantity of primary input provided to Diageo. Diageo has comments on the water quality and the level of risk for each supplier.	
<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	Diageo has provided the water use data for the outsourced services, the data has been provided as a ratio of water used per quantity of primary input provided to Diageo.	
<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



# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001277

Comment	Diageo have identified a long list of catchment plans and water-related initiatives for both the catchment and area as a whole, these have been attached as evidence. Included is SEPA (Scottish Environmental Protection Agency) documentation for the River Basin Management systems, SEPA drives the improvement of degraded areas. The Spey Catchment initiative is voluntary group - collective action in the catchment, biggest roll is funding to exist as a body but not necessarily project driven, this is planned for the future. The Spey Catchment Management Plan is produced by the Spey Catchment Initiative (SCI), a multi-stakeholder partnership whose goal is to take forward key actions from the Catchment Management Plan. The SCI is run by a steering group made up of partner organisations, of which Diageo has been one since 2014, and co-ordinates a wider group of stakeholders including landowners, recreational users, communities, and industry. Further information on the SCI can be found at the link below together with completed and ongoing projects.	
	The attached documents outline the River Basin Management Plan for Scotland (RBMP) covering the period 2021-2027 and published by the Scottish Government. The RBMP enacts the European Union Water Framework Directive and is the principal legislative / public policy driver for catchment level improvements to Scotland's waterbodies. Under the RBMP Scotland's waterbodies have been assessed by the Scottish Environment Protection Agency (SEPA) and assigned a status based on a number of factors (e.g., water quality, flows and levels, barriers to fish passage) with the aim of implementing improvements where a waterbody achieves less than 'good' status for any particular feature. The RBMP approach encourages action-focused partnerships involving land managers, businesses, public bodies and third sector organisations. Diageo participates in two such partnerships, one of which is within the Spey catchment working to improve the status of the Rothes Burn (water supply for Glen Spey Distillery).	
1.5.2	<i>Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.</i>	Yes
Comment	The site is working with Enablon for many years, however the Legal compliance module is only recently been added to Diageo. The site is working with a third party supplier to populate the legal compliance module of Enablon, this is currently be rolling out within Scotch sites with 3 pilots sites running. Abstraction, Cooling Water Discharge and Effluent Discharge Licences were presented by the site for reviewed by the auditor.	
1.5.3	<i>The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.</i>	Yes
Comment	The site has the Spey Abstractions Report from 2008 and then also 2021. This report contains the catchment balance. The catchment is not a water stressed catchment and this data is not even required to be used in the planning of the annual water demand use for the distilleries.	
1.5.4	<i>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.</i>	Yes
Comment	The SEPA data is available and the water quality is excellent and is not an issue for the site. The data is available from the SEPA website.  <a href="https://informatics.sepa.org.uk/WaterClassificationHub/">https://informatics.sepa.org.uk/WaterClassificationHub/</a>	
1.5.5	<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>	Yes



# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001277

Comment	The SEPA information databases it the source of IWRA, there are so many IWRAS in the area that ones which have been deemed to have a less than good status as these will need the attention. The water classification hub was used to provide the status. The data are available was sufficient, there was no need to additionally engage SEPA.	
1.5.6	<i>Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.</i>	Q Obs.
Comment	All infrastructure which the sites are reliant on are either on their land or under their control. all infrastructure has been listed by Diageo in the portfolio document, see attached. The site has not listed the condition of these nor their potential for exposure to extreme events.	
1.5.7	<i>The adequacy of available WASH services within the catchment shall be identified.</i>	✓ Yes
Comment	Diageo provided information from the Scottish Housing conditions and standards.  <a href="https://digitalpublications.parliament.scot/ResearchBriefings/Report/2021/10/13/43a5d8fb-e099-401f-aff6-38f34be2b8ed">https://digitalpublications.parliament.scot/ResearchBriefings/Report/2021/10/13/43a5d8fb-e099-401f-aff6-38f34be2b8ed</a>  The Tolerable Standard is a basic standard set out in legislation that applies to homes in all tenures. Councils have powers to enforce this standard. Only a small proportion of Scotland's homes, around 2%, are estimated to be below the Tolerable Standard. The tolerable Standard includes access to piped drinking water and sanitation.  <a href="https://digitalpublications.parliament.scot/ResearchBriefings/Report/2021/10/13/43a5d8fb-e099-401f-aff6-38f34be2b8ed#aba0b576-3d83-11e8-81d5-000d3a23af40.dita">https://digitalpublications.parliament.scot/ResearchBriefings/Report/2021/10/13/43a5d8fb-e099-401f-aff6-38f34be2b8ed#aba0b576-3d83-11e8-81d5-000d3a23af40.dita</a>	
1.6	<i>Understand current and future shared water challenges in the catchment, by linking the water challenges identified by stakeholders with the site's water challenges.</i>	
1.6.1	<i>Shared water challenges shall be identified and prioritized from the information gathered.</i>	✓ Yes
Comment	The shared water challenges were taken from the challenges gathered from meetings and interactions with stakeholders. These have been cross-referenced with the sites own challenges of the distilleries.  The site has prioritised the challenges accordingly the scale of impact, and number of stakeholders it affected. See attached. Diageo updates the listed shared water challenges after each year's engagement with stakeholders.	
1.6.2	<i>Initiatives to address shared water challenges shall be identified.</i>	✓ Yes
Comment	The site has identified initiatives to address the shared water challenges in column B Potential resolutions of the previous document.	
1.7	<i>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.</i>	
1.7.1	<i>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.</i>	✎ in progress




# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001277


**Comment** The site reviewed the operational risks for the distilling process and identified all water-related issued which could impact the operations of the site. The site has rated all of their risks, with likelihood and and severity of impact. This is reflected in the assessment of production stoppage.  
No potential cost have been calculated

**Finding No: TNR-013514**


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

**Comment** The site has provided opportunities for improvement of the sites through engineering upgrades.  
Water maps document is a snip from the file. Ownership with the water reduction opportunities is the Sustainability Team. Each items has a water saving associated with the intervention,. The site has not considered opportunities beyons its own boundaries.

**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** Diageo has identified various governance initiatives throughout the catchment, including the The Spey Catchment Management Plan is produced by the Spey Catchment Initiative (SCI), the Scotch Whisky Association Environment Strategy, and the Sector environmental performance and future goals are also governed by the Scotch Whisky Sector Plan agreed with the Scottish Environment Protection Agency (SEPA). These all represent multistakeholder best practice for water governance.  
<https://www.speycatchment.org/>  
<https://speycatchment.org/our-work/>  
Spey Catchment Management Plan (2017-2022)  
Spey Catchment Management Plan Review  
Spey Catchment Management Plan (2023-2030)  
SWA Environment Strategy 2016  
SWA Environment Strategy 2018 progress  
SWA Environment Strategy 2020 progress  
SWA Sustainability webpage current  
SWA Water Stewardship Framework 2023  
Scotch Whisky Sector Plan (SEPA)

**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.*  in progress

**Comment** The site has listed their process water theoretical model as possible best practice. The site's identification of best practice has been limited through their misunderstanding of the water balance as a concept.

**Finding No: TNR-013536**

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




# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001277


**Comment** Water quality is not an driving issue in the Spey catchment as the water quality is good in the region. Diageo has identified several government driven initiatives to maintain the good water quality status of water in the area. These include the development of fish passages and improving IWRAs which are under their control are the primary areas for best practice.

River Basin Management Plan for Scotland 2021-2027  
 Appendices to the River Basin Management Plan for Scotland 2015-2027)  
 Scotland's Water Environment 2019: Summary and Progress Report  
 Water Framework Directive  
 The above documents outline the River Basin Management Plan for Scotland (RBMP) covering the period 2021-2027 and published by the Scottish Government. The RBMP enacts the European Union Water Framework Directive and is the principal legislative / public policy driver for catchment level improvements to Scotland's waterbodies. Under the RBMP Scotland's waterbodies have been assessed by the Scottish Environment Protection Agency (SEPA) and assigned a status based on a number of factors (e.g., water quality, flows and levels, barriers to fish passage) with the aim of implementing improvements where a waterbody achieves less than 'good' status for any particular feature. The RBMP approach encourages action-focused partnerships involving land managers, businesses, public bodies and third sector organisations. Diageo participates in two such partnerships, one of which is within the Spey catchment working to improve the status of the Rothes Burn (water supply for Glen Spey Distillery).

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

**Comment** The Site has identified only the Scottish Water basin Management plan as the only best practice offering for the maintenance of Important Water-Related Areas.

**Finding No: TNR-013538**

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

**Comment** Diageo has identified two options for best practice for WASH - World Business Council for Sustainable Development (WBCSD) - WASH pledge and the Wash 4 Work - mission. WASH is not an issue in Scotland as 98% of the population has access to clean water and sanitation. <https://www.wbcd.org/> and <https://wash4work.org/missional/>



# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001277



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	<p>A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:</p> <ul style="list-style-type: none"> <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>
Comment	<p>The site has a water stewardship strategy (2022) which refers to the commitment of getting site certified to the AWS. This is available on the Diageo Website. The statement of strategy is not signed. There is no reference to the commitments statements above.</p> <p style="text-align: right;"><b>Finding No: TNR-012713</b></p>
2.2	Develop and document a process to achieve and maintain legal and regulatory compliance.
2.2.1	<p>The system to maintain compliance obligations for water and wastewater management shall be identified, including:</p> <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>
Comment	<p>The site is working with Enablon for many years, however the Legal compliance module is only recently been added to Diageo. The site is working with a third party supplier to populate the legal compliance module of Enablon, this is currently be rolling out within Scotch sites with 3 pilots sites running. Routine submission are only to SEPA is annual abstraction data, this is done via email and the process is on the SEPA website. Including guidance for submission. The site has provided the attached evidence to demonstrate how they ensure legal compliance. The document uploaded identifies the persons responsible for the compliance obligations.</p>
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	<p>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.</p>
Comment	<p>Diageo has a water stewardship strategy document which covers the sites' intentions and commitment to water stewardship. Although not necessarily described as a mission and vision the information provided covers the intention of the indicator requirement.</p>



# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001277






<b>2.3.2</b>	<i>A water stewardship plan shall be identified, including for each target:</i> <ul style="list-style-type: none"><li>- How it will be measured and monitored</li><li>- Actions to achieve and maintain (or exceed) it</li><li>- Planned timeframes to achieve it</li><li>- Financial budgets allocated for actions</li><li>- Positions of persons responsible for actions and achieving targets</li><li>- Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.</li></ul>	 Obs.
Comment	The water stewardship plan of Diageo contains actions however it lacks any targets. The actions listed have a way to be measured and monitored, have timelines and budgets and people allocated as responsible. There are clear links to best practice and the AWS outcomes.	
<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>	 Obs.
Comment	<p>Each site would have a crisis and emergency plans (presented to the auditor) but these have not been linked to the risks identified under indicator 1.7. Diageo has provided a list of public sector agency plans for larger water risks which include:</p> <p>SEPA's National Scarcity Plan SEPA's Flood Risk Management Strategy Spey Catchment Management Plan (2017-2022) Spey Catchment Management Plan Review Spey Catchment Management Plan (2023-2030)</p> <p>The site has a risk management plan, through having done water vulnerability studies. The Environmental Team reviews this fortnightly. There is a flood preparation study, a consultant has been contracted to look at this option, this tends to be a risk management option undertaken by other departments in Diageo.</p>	



# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001277






<b>3</b>	<b>STEP 3: IMPLEMENT - Implement the site's stewardship plan and improve impacts</b>	
<b>3.1</b>	<i>Implement plan to participate positively in catchment governance.</i>	
<b>3.1.1</b>	<i>Evidence that the site has supported good catchment governance shall be identified.</i>	 Yes
Comment	Diageo has and intends to continue to maintain active participation in the Spey Catchment Initiative as part of the Water Stewardship Plan and can be evidenced. The site participate in activities arranged by the Scottish Water Association, participates in SEPA Rothesburn Stakeholders group and maintains good relationship with all water regulators. Diageo recently built the Dufftown fish pass which went above and beyond legal requirement and is an example of support good catchment governance.	
<b>3.1.2</b>	<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	WASH in Scotland is well established and not an issue, current work and stakeholder analysis has not identified any required actions on this aspect.	
<b>3.2</b>	<i>Implement system to comply with water-related legal and regulatory requirements and respect water rights.</i>	
<b>3.2.1</b>	<i>A process to verify full legal and regulatory compliance shall be implemented.</i>	 Yes
Comment	<p>Diageo is rolling out a Legal compliance IT module for Enablon, using a service provider Enhesa, to be a EHA legal register for all sites to manage regulations, permits and policies.</p> <p>SEPA, the environmental regulator, do spot checks and inspections of all the distilleries. Results of the SEPA Compliance Assessment Scheme can be found here: <a href="https://www2.sepa.org.uk/compliance/">https://www2.sepa.org.uk/compliance/</a></p> <p>The most recent results uploaded are for assessment year 2019. Note: not every licence is assessed every year. More recent inspection reports can be found at this location.</p> <p>The most recent Abstraction Licence returns were submitted in January 2024 for calendar year 2023. The auditor viewed copies of these during the audit. Internally, exceedances would be raised on the T1 document, should they occur and daily abstractions are reported on a and excel sheet.</p> <p>Internally, Effluent Licence compliance is monitored with a quarterly KPI. Exceedances would be raised on the T1, should they occur. There is also a weekly Bioplant Compliance meeting which is a roundup of current performance. This is administered on a sheet like this.</p> <p>Internally, Cooling Water Licence compliance is monitored using Compliance Checks (examples available on site). The site takes their own samples for effluent, to be released to the Spey, to get ahead of samples which are taken by SEPA.</p>	
<b>3.2.2</b>	<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	There are no identified issues in this respect, but Diageo may add to the action plan a review of their historic water rights to ensure improved visibility, understanding and appropriateness. Diageo has sole rights wayleave contracts to access their water sources.	
<b>3.3</b>	<i>Implement plan to achieve site water balance targets.</i>	
<b>3.3.1</b>	<i>Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.</i>	 Yes



# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001277

Comment	The site has several water balance targets in the water stewardship plan and the status of progress towards meeting the targets is found in column J.	
<b>3.3.2</b>	<i>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.</i>	 Yes
Comment	Water scarcity is identified as a shared challenge, especially in drought periods and with future climate change impacts. Rainfall and snowfall are predicted to reduce over the next 50 years, indicating that water scarcity. Each site has water efficiency targets with expectation to improve year on year in line with Diageo's 2030 ambition (specific evidence available at site). We've identified actions to address climate change impacts and resilience, also to actively participate in the SEPA-led CAR license review which will address drought periods. There is an ongoing shared challenge regarding Cooling Water use and discharges in Dufftown - this is not specifically related to volumetric totals. The site has overall operational targets which do not currently appear in the WS Plan.	
<b>3.3.3</b>	<i>Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.</i>	 Yes
Comment	An opportunity has been identified to provide compensation flow on the Allt an t-Sluic at Dalwhinnie. Currently much, or all, of the flow is abstracted for use in the third-party hydro scheme, including cooling water returned by the distillery to the third-party abstraction point. There is no legally binding, or other, requirement to do this but an opportunity exists to return the distillery cooling water (or equivalent volume) to the river as a social and environmental improvement. Realisation of any such opportunity would be dependent on agreement of the third party.  Benrinnes and Cragganmore distilleries have privately owned houses which are provided water by the site. This is drafted into the sale agreement however the legally binding document were not available.	
<b>3.4</b>	<i>Implement plan to achieve site water quality targets</i>	
<b>3.4.1</b>	<i>Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.</i>	 Yes
Comment	The site has actions in the plan regarding the temperature of the cooling water which is discharged back into the Spey, these have a status of progress towards meeting targets in column J	
<b>3.4.2</b>	<i>Where water quality is a shared water challenge, continual improvement to achieve best practice for the site's effluent shall be identified and where applicable, quantified.</i>	 Yes
Comment	Water quality is not a shared water challenge . The site has a WWTW at Glendullan, which has an exceptionally well run biopant, there are projects here which a looking to improve the efficiency of the plant and produce the same results.	
<b>3.5</b>	<i>Implement plan to maintain or improve the site's and/or catchment's Important Water-Related Areas.</i>	
<b>3.5.1</b>	<i>Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.</i>	 Yes



# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001277



Comment	The site has several improvement projects for IWRAs on the sites of the distilleries. Diageo is a funding contributor to the Spey Catchment Initiative to help it exist as an entity. In 2021, Diageo completed a three year, £550,000 project to upgrade the weir and provide best practice fish passage via a step pool design. The Spey Fishery Board provided advice into the design of the fish pass and throughout building works which were undertaken to minimise impact on fish stocks and river. Increased salmonid spawning activity has already been noted in the River Dullan resulting from the project. They fund SSSI to remove invasive species from waterways.		
3.6	<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>		
3.6.1	<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	There are activities to improve the wash facilities in all the distilleries. This is achieved through annual WASH assessments. See also Water Stewardship Plan actions for facility upgrades.  F24 Site WASH Assessments – with updated understanding of tool and consistent approach have been uploaded as evidence. Suitable WASH services are available to all throughout the catchment.		
3.6.2	<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	This is not an issue in Scotland where WASH is available to over 98% of the population		
3.7	<i>Implement plan to maintain or improve indirect water use within the catchment:</i>		
3.7.1	<i>Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.</i>		Yes
Comment	The site has 3 indirect water use targets on the WS Plan based on technology and engineering improvements. Malting water efficiencies has an improvement of 30%. The second is a reverse osmosis which has not yet enough data to be quantified. Two have been implemented and one is at a pre-authorisation stage.		
3.7.2	<i>Evidence of engagement with suppliers and service providers, as well as, when applicable, actions they have taken in the catchment as a result of the site's engagement related to indirect water use, shall be identified.</i>		Obs.
Comment	Diageo has engaged with suppliers, some of which are based outside the catchment and requested their data for water use, quality and risk understanding. Where the site has operational influence e.g the malting production the actions taken towards good water stewardship are evident.  The site has not provided evidence to support that they have engage with Mcphersons, to influence their water use.		
3.8	<i>Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have.</i>		
3.8.1	<i>Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.</i>		Yes



# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001277

Comment	As the site has very little shared infrastructure, they maintain operational control of the water related infrastructure for both incoming and outgoing water. Diageo therefore has little requirement to interact with owners of other infrastructure. The site was able to show an email with other members of the Spey Catchment Initiative on the issue of returning cooling water to a section of the Spey which has low water levels.	
	The site has a communications log from Stakeholder engagement which lists the interaction with others on infrastructure as it happens.	
<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	The site produces an annual newsletter for talking about AWS activities which is shared with stakeholders. The best practice for governance best practice is taken from the WS Plan, by filtering in the best practice column, those which fall under governance and those which have been completed.	
	The site has a listed of the Best practice projects and then categorised according to the AWS Outcomes.	
<b>3.9.2</b>	<i>Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.</i>	 Obs.
Comment	Diageo has ongoing focus on water efficiency improvements, including: - High gravity mashing. CIP (cleaning in place) optimisation.	
<b>3.9.3</b>	<i>Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.</i>	 Yes
Comment	Diageo has built and maintains an effluent treatment plant at Glendullan distillery. This plant treats the effluent of all the distilleries in the group and releases consistent and legally compliant water back into the Spey River.	
	Diageo has implemented three other projects which impact water quality: Explore possibilities for involvement in initiatives for peatland restoration / water retention, Install temperature monitoring at Dufftown / Mortlach / Glendullan and implemented at Biodiversity Action Plan - Auchroisk Distillery. Guardians of Our Rivers A member of the Environment Team joined the Guardians of our Rivers volunteer group, a new Buglife Scotland project. Carrying out training and then completing monitoring and surveying on the Rothes Burn in Speyside. This invertebrate monitoring programme provides an early warning system that will highlight water quality issues.	
<b>3.9.4</b>	<i>Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.</i>	 Yes



Audit Number: AO-001277

Comment      The site has undertaken invasive removal projects, river health projects, and green bank reinforcement projects.  
For example: Group Action on Invasive Species  
The Scotch Environment Team assisted the Scottish Invasive Species Initiative and gave nature a helping hand in tackling the invasive species of Japanese Knotweed along the banks of River Spey at the Upper Brae Beat. An estimated 8,100 Japanese Knotweed stems were treated with herbicide on a team volunteering day.  
Guardians of Our Rivers  
A member of the Environment Team joined the Guardians of our Rivers volunteer group, a new Buglife Scotland project. Carrying out training and then completing monitoring and surveying on the Rothes Burn in Speyside. This invertebrate monitoring programme provides an early warning system that will highlight water quality issues.

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

Comment      Diageo have upgraded WASH facilities across the distilleries and evidence of these projects has been provided. for example: Completed upgrade of staff water-related welfare facilities at Dailuaine Distillery.  
Upgrade the welfare facilities. This included replacing kitchen units and increasing cupboard storage. Additional appliances such as a dishwasher and new dining table and chairs. Water saving taps and cistern in kitchen and toilets. Cragganmore: Upgrade to the current welfare facilities that are available to operators, contractors & drivers onsite.



# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001277

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	The site has chosen to evaluate the performance against the actions taken by describing the impact which have been felt by implementation the action. The site has not evaluated performance against timeliness or budget. Columns T, U and V in the WS Plan attached.
4.1.2	<i>Value creation resulting from the water stewardship plan shall be evaluated.</i> <span style="float: right;">🔍 Obs.</span>
Comment	The WS Plan has a column for this W which has a descriptive/qualitative nature, there is no cost benefit analysis.
4.1.3	<i>The shared value benefits in the catchment shall be identified and where applicable, quantified.</i> <span style="float: right;">✔ Yes</span>
Comment	Within the WS Plan, the site has included in column X a qualitative description of benefit is to the larger catchment of having taken the actions towards go water stewardship.
4.2	<i>Evaluate the impacts of water-related emergency incidents (including extreme events), if any occurred, and determine the effectiveness of corrective and preventative measures.</i>
4.2.1	<i>A written annual review and (where appropriate) root-cause analysis of the year's emergency incident(s) shall be prepared and the site's response to the incident(s) shall be evaluated and proposed preventative and corrective actions and mitigations against future incidents shall be identified.</i> <span style="float: right;">✔ Yes</span>
Comment	<p>The site has a list of all emergency incident which have taken place which had an impact to the environment since 2021. See portfolio - the auditor reviewed the Dufftown incident.</p> <p>Diageo has their own classification system for incidents and an elevation system to take the more serious incident up the level of responsibility, for each incident a report is written which includes root cause analysis and preventative measures taken.</p> <p>The site has not provide a written annual review of all incidents.</p>
4.3	<i>Evaluate stakeholders' consultation feedback regarding the site's water stewardship performance, including the effectiveness of the site's engagement process.</i>
4.3.1	<i>Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.</i> <span style="float: right;">✔ Yes</span>
Comment	It was originally only done through Spey Catchment Initiative but now Diageo has a Stakeholder engagement plan which is held annually. This interaction with stakeholders has been recorded in the WS Plan in columns Y, Z and AA. Each stakeholder has been logged and their response and feedback in the WS Plan. The information on performance which is shared with stakeholders highlights the projects which have been implemented and also those which have been proposed.
4.4	<i>Evaluate and update the site's water stewardship plan, incorporating the information obtained from the evaluation process in the context of continual improvement.</i>



# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001277

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>	<div><div></div><div>Yes</div></div>
Comment	The site originally reviewed the WS Plan quarterly and now more recently this has been changed to bi-annually. Each review episode has been saved as new sheet in the WS plan. Each time the review is performed the actions in the plan are updated and adapted where necessary.	



# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001277

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. <span style="float: right;">in progress</span>
Comment	Diageo has a table of responsibilities for water-related internal governance but has not been disclosed.
<b>Finding No: TNR-012744</b>	
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. <span style="float: right;">Obs.</span>
Comment	The site does not share the plan in its entirety but shares the projects which have been completed and those which are forthcoming. Evidence attached as presentation slide deck.
	There is an annual newsletter which is sent to internal and external stakeholders the content of which is about the actions from the WS Plans.
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. <span style="float: right;">in progress</span>
Comment	The site does not share the performance as such but shares the water stewardship projects which have been completed and those which are forthcoming. There is an annual newsletter which is sent to internal and external stakeholders the content of which is about the actions from the WS Plans. The actual performance against targets is not disclosed.
<b>Finding No: TNR-012748</b>	
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. <span style="float: right;">Yes</span>
Comment	At the annual stakeholder day SWC are revisited and discussed and requests for new ones are made. Attached is a log of all stakeholder communications and what was discussed with the stakeholder, many of the SWC are discussed during these interactions.
	The SWC are disclosed at Spey Catchment Initiative meetings which are quarterly, and the efforts to address them. There are other examples of disclosure attached.
	Diageo has further provided a list additional disclosure of the water projects and solutions in the portfolio.
5.4.2	Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified. <span style="float: right;">Yes</span>



# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001277

Comment Diageo's Stakeholder engagement plan and communication log with stakeholders has been provided as evidence of compliance to this indicator.

**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 Any compliance violation (condition of the permits) is reported to SEPA. See attached and example SEPA report which includes the corrective actions. Evidence of disclosure of compliance violations can also be found in the attached communications log.

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



Yes

Comment Diageo has a corrective action process which they follow, as an example attached is the SEPA report which includes the corrective actions.

**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 Since 1-Jan-2020, six events have been communicated to SEPA and some have also been communicated to local farmer.

### Photographic Evidence from Audit



Yes

Comment IT was agreed with Diageo that no photographs would be taken on site.

### Previous Findings

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



N/A

Comment Only observations were raised at previous audits.