CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-001355

WSAS WATER STEWARDSHIP ASSURANCE SERVICES

SITE DETAILS

Site: **Diageo: Cameronbridge Distillery**
Address: Windygates, KY8 5RL, Leven, Fife, UNITED KINGDOM
Contact Person: Rebecca Gordon
AWS Reference Number: AWS-000247
Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Core
Date of certification decision: 2025-Apr-09
Validity of certificate: 2028-Apr-08

AUDIT DETAILS

Audited Service(s): AWS Standard v2.0 (2019)
Audit Type(s): Re-Certification Audit
Audit Start Date: 2024-Dec-17
Audit End Date: 2024-Dec-19
Lead Auditor: Ina Ballik

Audit team participants:
Ina Ballik, Lead Auditor
José Manuel González, Observer

Site Participants:
Becky Godon, Environment Lead
Paul Shearer, Environment Manager for Scotch
Paulina Levy, Environment Co-ordinator
Alex Gibbs, Graduate Governance Project Lead
Neil Paton, Process Controller
Mark Mc'Lean, Process Controller
Mark McGhee, Production Business Leader
Tom Smith, Process Manager
Margaux Huismann, Quality Manager
Lesley Kinnear, Quality Control Analyst
Lisa O'Sullivan, Environment Business Leader

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AUDIT TIMES

Dates	Audit from	Duration	Auditor	Description
2024-Dec-18	09:00:00 - 16:00:00	07:00	Ina Ballik	
2024-Dec-19	09:00:00 - 16:00:00	07:00	Ina Ballik	
2024-Dec-17	09:30:00 - 16:30:00	07:00	Ina Ballik	

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ADDITIONAL INFO

Summary of Audit Findings: During the re-certification audit, 18 minor non-conformities and 13 observations were raised.

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 22 March 2025.

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

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

CLOSURE OF FINDINGS AND CORRECTIVE ACTION PLAN:

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

Scope of Assessment: The scope of services covers the recertification audit for assessing conformity of Cameronbridge against the AWS International Water Stewardship Standard Version 2.
The site's premises are located in Scotland, Fife Council area, on the western fringe of the small town of Methil and south of the village of Windygates, just off the A915 arterial road and close to the junction with the A911at Ordnance Survey (OS) Grid Reference NO 345 002. The site occupies approximately 16 hectares, with maximum dimensions of 200m from North to South and 800m from East to West. The site lies in a slight depression with rising ground to all sides, and straddles the River Leven, which flows East to West through the site.

The Diageo Cameronbridge Distillery produces grain whiskey, vodka, and gin along the River Leven in Scotland. It includes a Distillery, White Spirits production facility, Spirit Storage and Bioenergy plant. The gin and vodka manufacturing is performed in a detached White Spirit Plant on the other side of the river. The Bioenergy plant processes the spent wash from the Distillery and is capable of converting it into biomass and biogas for steam export to the distillery. The site operates 24/7 with approximately 160 employees across the full site.

The audit was conducted onsite between the 17th and 19th of December 2024.
Two onsite tours were included as part of the audit, i.e., the 'distillery tour' including the LSO tank (discharge point from site for effluent), water meters, distillery process (grain whisky, gin, vodka), water savings projects and laboratory and the 'bioenergy tour' including water intake (cooling), borehole (process), mains water network, water meters, bioenergy/treatment plant process, reverse osmosis, water savings projects.

FINDINGS

NUMBER OF FINDINGS PER LEVEL

Observation	13
Minor	18

FINDING DETAILS

Finding No:	TNR-016350
Checklist Item No:	1.1.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Dec-17
Checklist item:	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.
Findings:	The majority of the site's water use depends on groundwater from boreholes, however relevant groundwater aquifer(s) or layers, their main features (e.g. deep aquifer under impermeable layer or upper layer / groundwater table), were not mapped/identified to allow the site to gain understanding of important aspects such as how/where the aquifer/water body is recharged, etc.. The site's boundary and physical extent of water-related infrastructure are not comprehensively mapped but are spread out over numerous different technical drawings, illustrations, screenshot maps etc in a multitude of formats incl .pptx, .pdf, .jpg, .and gif, which makes the assessment of compliance with this indicator unnecessarily challenging and raises concern for details being missed out; e.g., it is unclear if and where the cooling water intake and return (lade) is currently mapped, but it is linking into strata via tags FT14093 and FT14094 for the water intake, and tag FT0252 for the water return to River Leven. In summary, the physical scope is not clearly articulated. The aquifer (from which the site draws borehole water) or its extent is not clearly understood.
Corrective action:	To gather the groundwater maps and report detailing the layers, how and where the aquifer is recharged. A large scale project is underway to AcrGIS map all the layers that are spread out over numerous different technical drawings, illustrations, and screenshots. Although the GIS project may not be complete by December 2025, we aim to provide the evidence that we meet all aspects of this requirement in a less challenging manner by the deadline.

Finding No:	TNR-016441
Checklist Item No:	1.2.2
Status:	Open
Finding level:	Observation
Checklist item:	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.
Findings:	It is unclear whether the site's ultimate water source and the final receiving water body for wastewater were considered when assessing the current and potential influence between the site and the stakeholder.
Corrective action:	Further adjustments shall be made to the stakeholder analysis in order to clearly identify how the site's water source and final receiving water body were considered when assessing influence.

Finding No:	TNR-016514
Checklist Item No:	1.3.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Dec-17
Checklist item:	Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped
Findings:	The site water balance is not clear on inflows, losses and outflows even though it has been mapped. The values provided were estimated during the period 2022 to 2023. The overall site water balance i.e. (Water outflow) = (Water inflow) + (Change in storage volume) is not clear.
Corrective action:	As evidence for the audit next year, we will restructure the map to present a clear and simple inflow + change in storage volume = outflow.

Finding No:	TNR-015179
Checklist Item No:	1.3.3
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Dec-17
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's water balance for 01Jul 2023-30Jun2024 was not finally approved at the time of the recertification audit and still considered "work in progress". A consolidated annual quantification of inflows, losses, storage, and outflows was therefore not available. Further, the link between the type of data and the five different data sources i.e., MOD300, 800xA, BEP Valmet, Strada, and EBH Scada is also not established.
Corrective action:	As evidence for the audit next year, we will present inflow, production volume, and outflow quantities over multiple years to visualize annual variance through time.

Finding No:	TNR-016519
Checklist Item No:	1.3.4
Status:	Open
Finding level:	Observation
Checklist item:	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.
Findings:	Clear quantified results of water quality in graphical or tabular or other suitable format should be provided to enable to see variances in water quality.
Corrective action:	The water quality tests shall be compiled within one excel instead of the multiple file locations.

Finding No:	TNR-016521
Checklist Item No:	1.3.6
Status:	Open
Finding level:	Observation
Checklist item:	On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.
Findings:	The River Leven (Markinch to Estuary) was identified as the onsite IWRA; however, the map did not clearly show its relation to the site.
Corrective action:	The mapped evidence provided will be reanalyzed for cohesiveness, and the portfolio will be rewritten to remove errors.

Finding No:	TNR-014945
Checklist Item No:	1.4.1
Status:	Open
Finding level:	Observation
Checklist item:	The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be identified.
Findings:	The embedded water use of primary inputs is not complete. The botanicals for example have been omitted in the review and evaluation process.
Corrective action:	Botanicals shall be added to the primary input spreadsheet.

Finding No:	TNR-016383
Checklist Item No:	1.5.6
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Dec-17
Checklist item:	Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.
Findings:	Existing water-related infrastructure was identified by the site, however its condition and potential exposure to extreme events has not been assessed apart from the Smirnoff Bridge.
Corrective action:	The site condition report will be included as evidence, and an explanation of the incident reporting procedure included - which addresses how the site would respond to extreme events. At a catchment level, Diageo will obtain scope/quote for condition survey of infrastructure, to review to understand benefit of implementation.

Finding No:	TNR-016413
Checklist Item No:	1.5.7
Status:	Open
Finding level:	Observation
Checklist item:	The adequacy of available WASH services within the catchment shall be identified.
Findings:	Although not expected to have issues, the adequacy of available WASH services within the Leven catchment was not sufficiently assessed and further information should be provided.
Corrective action:	The environmental coordinator shall gather more up-to-date and local information regarding WASH services.

Finding No:	TNR-015149
Checklist Item No:	1.6.1
Status:	Open
Finding level:	Observation
Checklist item:	Shared water challenges shall be identified and prioritized from the information gathered.
Findings:	The process behind the prioritisation of the identified SWCs is currently not defined.
Corrective action:	The environmental coordinator shall write out the process behind the prioritization of the identified SWCs.

Finding No:	TNR-015157
Checklist Item No:	1.6.2
Status:	Open
Finding level:	Observation
Checklist item:	Initiatives to address shared water challenges shall be identified.
Findings:	The level of granularity of initiatives to address SWCs is not sufficient, or the link to column F of the WSP is not yet allowing for an identification of concrete initiatives
Corrective action:	The environmental coordinator shall add more granularity to initiatives listed, and clearly link the actions to the SWCs

Finding No:	TNR-016526
Checklist Item No:	1.7.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Dec-17
Checklist item:	Water risks faced by the site shall be identified, and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.
Findings:	It is not clear from the evidence if or how timeframe, potential costs and business impact are considered / factored into the prioritisation (matrix).
Corrective action:	As already provided as evidence in the portfolio, the Water Related Risks were identified, and prioritized, based on likelihood and severity of impact. However, a corrective action will be taken to incorporate more detail on how risks are prioritized and considered, explaining rational, and expanding the timeframe, potential costs, and business impacts each risk may incur.

Finding No:	TNR-016414
Checklist Item No:	1.7.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Dec-17
Checklist item:	Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.
Findings:	The site identified several water saving opportunities on site and an opportunity for on-site water quality. However, opportunities to address risks identified in 1.7.1 are missing: Seven water-related risks were identified in indicator 1.7.1 i.e., infrastructure failure, interruption to supply (process/cooling), water scarcity restrictions, on site pollution event (MATTE), on site pollution event (non-MATTE), infrastructure failure, interruption to supply (domestic), flooding, and contamination of supply – chemical (process). Yet the site only identified primarily the water quantity opportunities.
Corrective action:	Cameronbridge will begin investment and construction of new best available techniques that will further lower water pollutant emissions. For the water quality of the river leven, more water quality projects could be considered and discussions will occur between the environemnatl coordinator and the environmental business leader.

Finding No:	TNR-016535
Checklist Item No:	1.8.1
Status:	Open
Finding level:	Observation
Checklist item:	Relevant catchment best practice for water governance shall be identified.
Findings:	The water governance initiatives presented were broad and lacked specific best practices derived from a policy approach. For example, in the Scotch Whisky industry's Sustainability Strategy when it comes to water governance, the strategy only states a general goal: "Continue to use water efficiently – ensuring all producers are within a responsible water use range by 2025." The key question remains: what are the specific measures and actions required to achieve this target that can be regarded as best practices?
Corrective action:	Specific measures and actions that are regarded as best practice shall be listed and cited within the WSP.

Finding No:	TNR-016536
Checklist Item No:	1.8.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Dec-17
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 specific best practices for water efficiencies were not provided. The water balance tool provided in 1.3.2 did not seem effective yet in providing the water balance for the site. A lot of work still needs to be done for it to be considered as best practice unless the site provides more clarity.
Corrective action:	The environmental coordinator shall develop a summary of best practices utilized to optimize water efficiency, and the relevant sector guidance used as references.

Finding No:	TNR-015176
Checklist Item No:	2.1.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Dec-17
Checklist item:	A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments: - That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes - That the site implementation will be aligned to and in support of existing catchment sustainability plans - That the site's stakeholders will be engaged in an open and transparent way - That the site will allocate resources to implement the Standard.
Findings:	A signed site statement or organizational document is missing that includes the following commitments: - That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes - That the site implementation will be aligned to and in support of existing catchment sustainability plans - That the site's stakeholders will be engaged in an open and transparent way - That the site will allocate resources to implement the Standard.
Corrective action:	A letter of commitment is being drafted and will be printed and signed by our Chief Sustainability Officer. This in turn will be posted at the Cameronbridge site.

Finding No:	TNR-014653
Checklist Item No:	2.3.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Dec-17
Checklist item:	A water stewardship plan shall be identified, including for each target: - How it will be measured and monitored - Actions to achieve and maintain (or exceed) it - Planned timeframes to achieve it - Financial budgets allocated for actions - Positions of persons responsible for actions and achieving targets - Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.
Findings:	The WSP is not structured in a way that enables the site to use it effectively: there are substantial gaps in the WSP on one hand, and on the other hand there's a surplus of unnecessary information, which severely limits the usability: - Targets, for example, are currently not integrated, but were provided in a separate document. The WSP therefore does not contain information how each target will be measured and monitored, or how the actions (in column D-F) relate to one or more targets respectively. - - The target dates (column J) refer to the actions, which currently are not linked to the targets. - Financial budgets allocated for actions are missing in the WSP - The links e.g., between shared water challenges (SWCs), identified water risks, and the site's WSP can currently not be clearly drawn without substantial verbal explanations. - The link between targets and the achievement of best practice to help address shared water challenges and the AWS outcomes, where available, cannot be drawn at this point in time with the presented WSP.
Corrective action:	The water stewardship plan will be reformatted to match the desired structure.

Finding No:	TNR-016537
Checklist Item No:	3.3.1
Status:	Open
Finding level:	Observation
Checklist item:	Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.
Findings:	It would be beneficial to present the total water withdrawal by combining municipal and borehole abstraction. This approach would provide a clearer understanding of whether the site is genuinely reducing overall water usage rather than supplementing borehole abstraction with municipal water.
Corrective action:	The Systematic Assessment of Resource Use and Efficiency report will be uploaded as evidence.

Finding No:	TNR-016538
Checklist Item No:	3.4.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Dec-17
Checklist item:	Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.
Findings:	Progress towards meeting the water quality targets set in the Water Stewardship Plan (WSP) has not been sufficiently addressed, despite water quality being identified as a concern in the catchment. The absence of laboratory reports to demonstrate compliance made it challenging to assess the current status and progress toward achieving these targets.
Corrective action:	The environmental coordinator shall ensure the lab data proving compliance is uploaded since the IC reactors are being optimized and more spent wash is being processed, in addition to greater production of RO water, all of which improves water quality.

Finding No:	TNR-016539
Checklist Item No:	3.4.2
Status:	Open
Finding level:	Observation
Checklist item:	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.
Findings:	The facility must provide laboratory reports for the site's effluent as quantifiable evidence of compliance and environmental impact assessment.
Corrective action:	The lab reports and excel analysis of data shall be uploaded.

Finding No:	TNR-016419
Checklist Item No:	3.5.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Dec-17
Checklist item:	Practices set in the water stewardship plan to maintain and/or enhance the site’s Important Water-Related Areas shall be implemented.
Findings:	The Water Stewardship Plan (WSP) includes actions that support the maintenance of Important Water-Related Areas (IWRAs); however, these actions are not clearly linked to the IWRA analysis. Furthermore, the WSP does not outline specific measures demonstrating the direct maintenance or enhancement of the site’s IWRA, such as the River Leven. Additionally, participation in the River Leven Programme was not clearly articulated in terms of how it fulfills the indicator requirement.
Corrective action:	A column listing which IWRA benefits from the action will be added to the WSP.

Finding No:	TNR-016543
Checklist Item No:	3.8.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Dec-17
Checklist item:	Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.
Findings:	The facility did not engage with or notify the owners of any shared water-related infrastructure regarding potential concerns the site may have. There was no evidence of such engagement, nor any record of the key messages being communicated or confirmed as received.
Corrective action:	Email communication that occurs with the shared water-related infrastructure owners (Loch Leven sluice gates operated by Leven Trust) shall be provided going forward.

Finding No:	TNR-016757
Checklist Item No:	3.9.3
Status:	Open
Finding level:	Observation
Checklist item:	Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.
Findings:	Laboratory results demonstrating water quality results at the LSO need to be provided to assess the effectiveness of actions.
Corrective action:	The lab reports and excel analysis of data shall be uploaded.

Finding No:	TNR-016567
Checklist Item No:	4.1.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Dec-17
Checklist item:	Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.
Findings:	The site's Water Stewardship Plan (WSP) includes the five AWS outcomes listed in column Z; however, it does not specify the required targets. As a result, it is unclear how performance against these targets in the site's water stewardship plan was evaluated or how the site's efforts contribute to achieving water stewardship outcomes.
Corrective action:	The WSP will be updated to evaluate performance, and clarify how the targets relate to the actions and subsequently outcomes.

Finding No:	TNR-016429
Checklist Item No:	4.2.1
Status:	Open
Finding level:	Observation
Checklist item:	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.
Findings:	The BEP - H&S - LOC incident reports do not contain the corrective action(s) nor preventative action(s) to immediately remediate the incident, and prevent the same/similar incidents from reoccurring. Corrective action(s) nor preventative action(s) are instead discussed via email exchange with SEPA. This process would benefit from consolidation into a single process documentation.
Corrective action:	The correct evidence will be uploaded.

Finding No:	TNR-016430
Checklist Item No:	4.3.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Dec-17
Checklist item:	Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.
Findings:	While three columns (AE-AG) were added to the WSP to evaluate the effectiveness of stakeholder engagement and propose corrective actions, they remain blank. A summary or written commentary on stakeholder feedback regarding the site's performance was not provided. As a result, there is insufficient information and evidence on how the site assessed stakeholder consultation feedback on its water stewardship performance, including the effectiveness of its engagement process.
Corrective action:	Stronger outreach to stakeholders will occur in 2025 in order to receive more feedback. The survey will be circulated again during summer 2025, and a new one will be sent in late fall 2025. Survey answers will be presented at next Stakeholder meeting and discussed. The goal being to list next steps, improve effectiveness, and increase engagement.

Finding No:	TNR-016577
Checklist Item No:	4.4.1
Status:	Open
Finding level:	Observation
Checklist item:	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.
Findings:	The site's water stewardship plan has been modified and adapted to incorporate relevant information; however, the lessons learned from the evaluations in this step and the resulting changes were not clearly identified.
Corrective action:	The WSP will be updated to clearly identify lessons learned.

Finding No:	TNR-015213
Checklist Item No:	5.1.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Dec-17
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:	The site’s water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations, is currently not disclosed.
Corrective action:	The water-related internal governance will be printed and posted at the gatehouse as a form of disclosure.

Finding No:	TNR-015215
Checklist Item No:	5.2.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Dec-17
Checklist item:	The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.
Findings:	A subset of elements of the WSP has been shared during the last stakeholder meeting on the 05th of Nov 2024 but not how the WSP contributes to AWS Standard outcomes.
Corrective action:	The WSP will be updated to clarify how the targets relate to the actions and subsequently outcomes. Key actions completed and planned were already shared with stakeholders, as evidenced in meeting presentation, but the direct WSP will be shared with stakeholders by email going forward. In addition, Diageo will tie in the AWS Standard Outcomes into following in materials shared with the external stakeholders: 1) Stakeholder engagement presentation. 2) Annual newsletter. * The specific wording of the commitments * A summary table of responsibilities * Clear links between AWS outcomes and projects * Quantified performance against targets, where pertinent. Diageo will also display a poster at each certified site with the specific wording of the commitments.

Finding No:	TNR-015216
Checklist Item No:	5.3.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Dec-17
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 summary of the site's water stewardship performance against targets has not yet been disclosed.
Corrective action:	The environmental coordinator shall strive to quantify performance and present it during the next Stakeholder Engagement Meeting.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-001355

Finding No:	TNR-016431
Checklist Item No:	5.4.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Dec-17
Checklist item:	The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.
Findings:	The efforts made to address identified SWCs over the past certification cycle (3 years) have not been disclosed to the relevant stakeholders. "Potential Resolutions" corresponding to the 2021 shared challenges are outdated at the end of 2024.
Corrective action:	The potential resolutions corresponding to the 2024 shared challenges will be replaced with more current efforts made to address those. The update will be shared at the next Stakeholder Engagement Meeting.

Report Details

Report	Value
Report prepared by	Ina Ballik
Report approved by	Ruth Wandera
Report approved on (Date)	14/02/2025

Surveillance

Proposed date for next audit
2025-Dec-17

Comment: The site enquired about the possibility to switch to the AWS Standard 3.0 at an earlier date and not wait for an entire certification cycle before moving onto the new version.

Stakeholder Announcements

Date of publication	Location
02/12/2024	direct email to stakeholders
07/10/2024	AWS website
01/10/2024	WSAS website

Comment: The site chose email communications to their identified stakeholders to announce their recertification. The email contained an online form that Stakeholders were invited to fill in to provide feedback [https://forms.office.com/pages/responsepage.aspx?id=ayjtiNiIr0-Rj4g9aTMhrvtHr1YXwvlErvstN9fPbAhUNVZES1hITzBGRTNCWEZUWVJaTjVTMFZGSy4u&route=shorturl]

Catchment Information

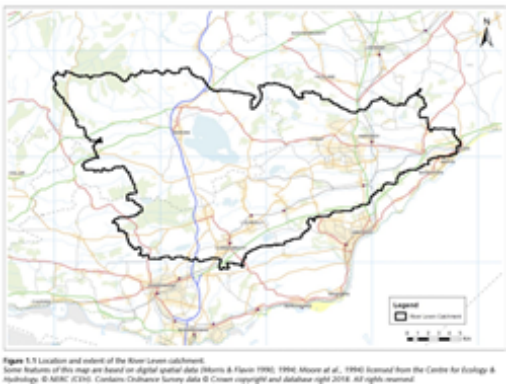
Catchment Information
Catchment Name: River Leven catchment (Fife, Scotland*)
The River Leven catchment runs largely through the Mid-Fife area.
Water Supply & Discharge Catchment
The main stem of the river originates from tributaries around Loch Leven (with Loch Leven itself being situated in the Perth and Kinross Council area) and flows through several towns and communities to the Firth of Forth. The Firth of Forth is the estuary of several Scottish rivers. It meets the North Sea with Fife to its north and Lothian to its south.

Groundwater Aquifers: information pending

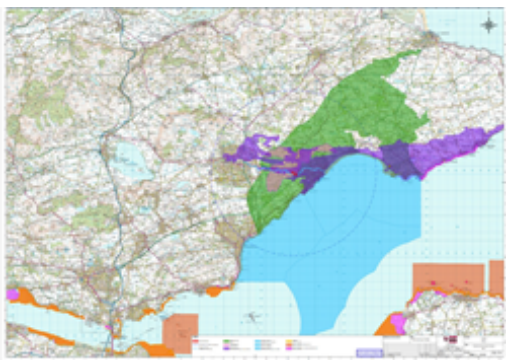
Catchment Water Service Providers
The public entity that provides water (and sewerage) services across Scotland is Scottish Water.

Catchment Features
The River Leven catchment areas is more prone to flooding than at risk of any potential water shortages. Also, spanning both Fife and Perth & Kinross, it is within one of the most deprived areas of Scotland, which leads to chronic concerns about water quality and surface pollution issues. The Scottish Index of Multiple Deprivation (SIMD) indicates that 45% of the population of the catchment live in areas that fall within the three highest categories of deprivation in Scotland.
The catchment has also been under stress by heavy industrial use and faces continued pressures from barriers to fish migration, hydromorphological modification, invasive species, and nutrient input from agricultural land drainage.

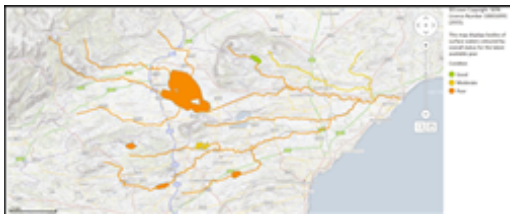
* There are several rivers with the name River Leven in the UK.



River Leven catchment.jpg



CBD_L_0101_0.jpg



Leven catchment.jpg

Client Description and Site Details

Client/Site Background

The site's premises are located on the western fringe of the small town of Methil and south of the village of Windygates, just off the A915 arterial road and close to the junction with the A911at Ordnance Survey (OS) Grid Reference NO 345 002. The site occupies approximately 16 hectares, with maximum dimensions of 200m from North to South and 800m from East to West. The site lies in a slight depression with rising ground to all sides, and straddles the River Leven, which flows East to West through the site.

The Diageo Cameronbridge Distillery produces grain whiskey, vodka, and gin along the River Leven in Scotland. It includes a Distillery, White Spirits production facility, Spirit Storage and Bioenergy plant. The gin and vodka manufacturing is performed in a detached White Spirit Plant on the other side of the river. The Bioenergy plant processes the spent wash from the Distillery and is capable of converting it into biomass and biogas for steam export to the distillery. The site operates 24/7 with approximately 160 employees across the full site.

Intake: Water for the distillery comes from multiple sources, including surface water, groundwater and public supplies (municipality).
Outflow: There are several discharges for the site:
1. The fowl drainage is connected to Levenmouth Waste Water Treatment Works, which is owned by Scottish Water.
2. Via the long sea outfall (LSO) the site discharges their on-site pre-treated effluent (in Wet Handling Plant (WHP) or Aqueous Treatment Plant (ATP)) into the Firth of Forth.
3. Cooling water is directly taken from and discharged back into the River Leven ("closed loop"). Any stormwater/surface water is also released back into River Leven via the ten (10) 'release points' (R1-R10) on site.

There are several discharges including process effluent at the Bioplant and wet handling plant (WHP), which are forwarded to the Firth of Forth. The effluent from the distillery is processed through the WHP or aqueous treatment plant (ATP), and discharged to long sea outfall in Firth of Forth. The Firth of Forth is the estuary of several Scottish rivers including the River Forth. It meets the North Sea with Fife to its north and Lothian to its south. Cooling water is discharged to the River Leven, which flows from Loch Leven into the Firth of Forth at the town of Leven. Wastewater is discharged to new Levenmouth Waste Water Treatment Works, owned by Scottish Water. It was commissioned and started operations in 2021.

Comment	The site is a lower tier Control of Major Accident Hazards (COMAH) establishment > https://notifications.hse.gov.uk/COMAH2015/PublicInformation.aspx?piid=4175. The Scottish Environment Protection Agency (SEPA) enforces COMAH in Scotland (in terms of Environmental protection) alongside HSE (in terms of Health & Safety).

Summary of Shared Water Challenges

Summary of Shared Water Challenges
The site identified ten (10) main shared water challenges (SWCs) with their stakeholders and prioritised them into:
- High priority: cooling water intake/discharge, flooding, fish passage, and climate change resilience (drought/scarcity/flooding)
- medium priority: water volume and quality of the River Leven, non-native species & invasive species, attracting visitors/Quality of life/Health and wellbeing, catchment improvement, and water retention
- low priority: Groundwater availability & quality.

The most recent stakeholder meeting was held on 05 Nov 2024, during which shared water challenges (SWCs) were further discussed e.g., climate change resilience (drought/scarcity/flooding), groundwater availability and general quality, as well as overall catchment improvement incl. non-native species action (e.g., Japanese knotweed confirmed to be of concern in a stakeholder interview).

Comment: According to the RBMP 2015-2027 (see indicators 1.6.1 and 1.6.2) the most widespread pressures on the Scottish water environment are man-made barriers affecting fish migration, modifications to physical condition, rural diffuse pollution, wastewater discharges, and hydroelectricity generation.

0.1	General Requirements for Single Sites, Multi-Sites and Groups	
0.1.1	*Eligibility Criteria*	
0.1.2		
0.1.2.1	*Have any water source locations and water-related discharge locations been visited during the audit, if so, which and where? If none were visited please provide justification.*	Yes
Comment	Intake: Water for the distillery comes from multiple sources, including surface water, groundwater and public supplies (municipality). The primary water source is groundwater from the various boreholes on site. Outflow: There are several discharges from the site: - Process effluent: at the Bioplant and wet handling plant (WHP) is forwarded to the Firth of Forth. The effluent from the distillery is processed through the WHP or aqueous treatment plant (ATP), and discharged to long sea outfall in Firth of Forth. The Firth of Forth is the estuary of several Scottish rivers including the River Forth. It meets the North Sea with Fife to its north and Lothian to its south. - Wastewater: discharged to new Levenmouth Waste Water Treatment Works, owned by Scottish Water. It was commissioned and started operations in 2021. - Cooling water: discharged to the River Leven, which flows from Loch Leven into the Firth of Forth at the town of Leven.	
0.1.1.1	*The site(s) occupy one catchment OR an exception has been granted.*	Yes
Comment	The River Leven catchment runs largely through the Mid-Fife area. The main stem of the river originates from tributaries around Loch Leven (with Loch Leven itself being situated in the Perth and Kinross Council area) and flows through several towns and communities before entering the Firth of Forth at Levenmouth.	
0.1.1.2	*The scope of the proposed certification shall be under the control of a single management system.*	Yes
Comment	Site operates under Diageo plc, GRMS Global Risk Management Systems	
0.1.1.3	*The scope of the proposed certification shall be homogeneous with respect to primary production system, water management, product or service range, and the main market structures.*	Yes
Comment	continuous production for whiskey batch production for white spirits	

1	STEP 1: GATHER AND UNDERSTAND	
1.1	*Gather information to define the site's physical scope for water stewardship purposes, including: its operational boundaries; the water sources from which the site draws; the locations to which the site returns its discharges; and the catchment(s) that the site affect(s) and upon which it is reliant.*	
1.1.1	*The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including:* *- Site boundaries;* *- Water-related infrastructure, including piping network, owned or managed by the site or its parent organization;* *- Any water sources providing water to the site that are owned or managed by the site or its parent organization;* *- Water service provider (if applicable) and its ultimate water source;* *- Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies;* *- Catchment(s) that the site affect(s) and is reliant upon for water.*	in progress

Comment

The mapping of the physical site boundary is distributed across various technical drawings and pictograms and is not consolidated in a single map.

- Water-related infrastructure, including piping network, owned or managed by the site or its parent organization:
The drawing < CBD-L-0001 Sht.4 Water.pdf> maps some of the site's critical water-related (and other) infrastructure e.g., their wet handling plant (WHP) & Bioplant (BP), bore water tanks, and the River Leven abstraction point (lade), as well as the surface water, foul, sewer, foam, water main and late and trade effluent infrastructure incl. pipework, and therefore the site's localised physical extent / site's operational boundaries. Please also refer to the 3D model of the site in < 3D model Diageo site.jpg>. There are 10 different discharge points, R1-R10, into River Leven from the site, mapped in < Release points to River Leven.gif>.

- Water sources providing water to the site that are owned or managed by the site or its parent organization:
Water related infrastructure also includes borehole abstraction points; the principal water source for the site. The groundwater is extracted via the several boreholes on and off site: i.e., boreholes 1, 4, 5, and 6 are on-site and boreholes 2 and 3 are off-site. Boreholes 1, and 3-6 extract from the Windygates groundwater body.* Borehole 2 is not to be used for abstraction anymore. The site's boreholes are yet again in a separate map named < Groundwater abstraction.pdf> that was reviewed on site, and their location is mapped in < Borehole location.pdf>.

- Water service provider (if applicable) and its ultimate water source:
There's one main water supply from Scottish water, named 'Water Main' and colour-coded in light blue in drawing < CBD-L-0001 Sht.4 Water.pdf>.

- Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies:
The Long sea outfall (LSO) and ultimate receiving water body receiving the site's comingled process effluents is separately mapped in < Site location incl pipeline.pptx>.

- Catchment(s) that the site affect(s) and is reliant upon for water:
The map < CBD_L_010_0.jpg> shows the wider catchment area incl neighbouring catchments and the areas that can potentially be influenced by the site (colour-coded legend). The contributories to Loch Leven and the surface water from Loch Leven are mapped on < Loch Leven.jpg> that was reviewed on site.

*Scotland’s aquifers have been differentiated and characterised on the basis of relevant criteria, and then subdivided into management units, called groundwater bodies. Windygates groundwater body's overall water quality was rated as poor according to a 2018 report "River Leven Catchment Initiative" [https://www.crew.ac.uk/sites/www.crew.ac.uk/files/publication/CD2018_02_River_Leven_Catchment%20Initiative_Main_Report.pdf] by the Centre of Expertise for Waters (CREW). Groundwater management in Scotland is delivered primarily through the River Basin Management framework.

Finding No: TNR-016350

1.2 *Understand relevant stakeholders, their water related challenges, and the site’s ability to influence beyond its boundaries.*

1.2.1 *Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall:*
- Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people;
- Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies;
- Provide evidence of stakeholder consultation on water-related interests and challenges;
- Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups;
- Identify the degree of stakeholder engagement based on their level of interest and influence.

Yes

Comment

The process used for stakeholder identification that the site deploys is threefold, consisting of formal and informal engagement and the distribution of regular newsletters. A simplified description of the process incl. format, frequency and record keeping requirements can be found in < Stakeholder Engagement Plan-V3.docx>.
Based on this process and the active participation of the site in the "Leven Programme" over the past years, 67 stakeholders have been identified across different categories i.e., regulators, businesses, NGOs and community/vulnerable groups, amenity, as well as land owners and land managers; see < Stakeholder Analysis Spreadsheet.xlsx>. There are no vulnerable groups in the context of the site, or the catchment. A separate communication log is available, see < Stakeholder Engagement Communication Log 2024.docx>.

Diageo is one of the partners of the "Leven Programme" (see Supporting Diagrams of the Leven Programme.docx), through which they're regularly engaging with different stakeholders on topics such as water innovation, heritage, climate action and connectivity, etc. The most recent stakeholder meeting was held on 05 Nov 2024. The meeting participants were Diageo, SEPA (regulator), Fife Countryside (NGO), Forth River Trust (NGO) and Green Action Trust (NGO). Further evidence of the site's continual stakeholder engagement can be found summarised in < Stakeholder Engagement Communication Log 2024.docx>, which lists all exchanges in 2024.

The stakeholders water-related challenges were identified mainly through meetings hosted by the "Leven Programme", and the water-related challenges, per stakeholder and where available*, are documented in < Leven Stakeholder Analysis.xlsx>, column I. The the degree of stakeholder engagement is identified and evaluated in columns D, E, and F of the same excel file.

*in consideration of the ability and/or willingness of stakeholders to participate across the relevant stakeholder groups

1.2.2 *Current and potential degree of influence between site and stakeholder shall be identified, within the catchment and considering the site's ultimate water source and ultimate receiving water body for wastewater.*

Obs.

Comment

The current and potential degree of influence between site and stakeholders within the catchment has been identified and documented in columns G&H of < Leven Stakeholder Analysis.xlsx>.

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

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

Yes

Comment

Being classified as lower tier COMAH establishment, the site must, in accordance with the 2015 regulation, evaluate the potential for hazardous substances to contaminate water supplies, harm marine or terrestrial ecosystems, and cause long-term environmental degradation. The site is obliged to prepare and retain a major accident prevention policy (MAPP). As per the regulation they must also maintain an up-to-date inventory of hazardous substances and regularly assess whether their quantities exceed lower-tier or upper-tier thresholds.

Water-related incident response plans are stored on the site's EQMS under Crisis and Emergency Plans. Section 2.3 of < SECTION 2 - OVERVIEW OF SITE.docx> lists the Major Accident Hazards (MAH) that have been assessed for the site.
Section 3.3 of < SECTION 3 – EMERGENCY RESPONSE ACTIONS.docx> contains the Emergency Response Actions in event of a spillage for different substances e.g., diesel incl. hydraulic oil, fermented wash, ethanol, caustic / corrosive substances, etc. In section 3.4 the site identified two areas where manual intervention is required to reduce loss to the environment in case of spillage; i.e.
1. the tanker parking area where an operator must close two Isolation Valves to stop spirit reaching the river and
2. the Klargester at R8, which leads into the River Leven. A slam shut valve has been installed to isolate the flow of water from Klargester R8 into the River.
Section 3.4 c) describes the arrangements for Emptying Bunds, after a spill incident incl. type of removal from site and additional considerations to be take tailored to the characteristics of the substance spill.

A pH probe has been installed which will also isolate the flow at pH< 4/>9.

Section 3.4 b) contains a map with the location of Spill Kits < Spill kit locations.jpg>
Section 3.6 b) contains a detailed description and photos of tools/measures to be deployed in case Extreme Weather events such Flooding caused by high levels of rainfall, incl. flood barrier deployment. The site follows a colour-coded “Flood warning hierarchy” for these instances. When there are increased river levels / risk of flooding an e-mail notification will be sent to a list of responsible persons on site (to include relevant Business Leaders on site, including Duty Managers, Utilities BL and Environmental BL). These responsible persons will notify the relevant teams on shift when deployment of the flood defences is required.
Section 3.6 e) contains the Procedure to follow in case of Legionnaire’s Disease Outbreak.

All emergency contacts i.e., site, contractors, functions, local emergency contacts, and local governance contacts are detailed in a separate document < SECTION 4 - CONTACTS.docx>.

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

in progress

Comment

5 main data sources are used to create the water map i.e., MOD300, 800xA, BEP Valmet, Strada, and EBH Scada.

The water map is mapped on tab < water map> in the < Site water balance.xlsx>. It was still not approved i.e., in the final sign off stage at the time of the audit, and it was only possible to get a rough visual impression from the Sankey diagram, as when zooming into the inserted picture (.jpg/.gif?) it proved to be illegible. The majority of water IN can be confirmed to come from the site's boreholes, and Scottish Water is making up a smaller contribution to the site's water use. The only recognisable water OUT sources as per the Sankey diagram appear to be comingled effluent to the LSO and product spirit. Storage(s) and loss(es) are currently not featuring on the Sankey diagram.

Finding No: TNR-016514

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

in progress

Comment

The site utilizes the 'strata cotopaxi' system as a hub for all the site's automated meter readings, i.e., readings every 10 minutes, for water flow, electricity consumed, and steam metering round site. Strata is the main database systems for the site with all flow meters being linked into strata, except for the County water (mains water). The tab < FY23 WaterBal Data> contains the disaggregated data, forming the basis for the annual consolidation of the site's inflows, losses, storage, and outflows.

The water map that the site has provided is dated Oct 2023 with the remark that it's work in progress and values are estimated in daily averages based on 2022-2023 period. The site's Financial Years are 01Jul-30Jun, so the data cut off point was on 30th June 2023.

Finding No: TNR-015179

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.*

No

Comment

IN:
Borehole: Borehole water is tested for quality parameters separately per borehole in the on-site laboratory as confirmed with the Lab Manager and checking examples in the on-site logbook with the Laboratory Technician.
Mains: Mains water is quality tested by Scottish Water and consumers can check the water quality via their website.
River Leven intake: No quality testing on the water is done since there's no contact with the product and its used for cooling purposes.

OUT:
Effluent: Daily quality parameters are tested for on-site as confirmed with the lab manager and checking examples in the on-site logbook (Klargester WQ Data.pdf). ,The site also has to consolidate their results weekly and report them to SEPA in addition to their biannual reporting to SEPA. Any exceedances of permitted thresholds are noted in the comments section of the weekly reports (in excel format). The annual SEPA report is per calendar year 01 Jan 2023 - 01 Jan 2024. The weekly reports contain the PPC limits on certain parameters and the annual reports contains the average and annual loads for e.g., BOD, Ammoniacal nitrogen, ammonia, nitrogen etc.

Surface water runoff: Klargester testing is conducted by the on-site laboratory and logged in the lab logbook (paper version, not digitised < Klargester WQ Data.pdf>) and reported to the utility department. If there's any exceedances in terms of quality for discharge not being met, the discharge would be shipped off site.

Please refer to the quality parameter testing frequency and responsibilities in < Regulatory Processes.xlsx>

Finding No: TNR-016519

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

Yes

Comment

The site's hazardous substances (substance, quantity, location, and container type) are documented in 2.2 Hazardous Substances in < SECTION 2 - OVERVIEW OF SITE.docx>, with the vast majority being ethanol at varying percentage. A gas oil storage tank (130,000 litres max) at the boiler house area and diesel storage tank (20,000 litres) at the grain intake are listed too, in addition to various caustic or corrosive substances stored across the site.

The hazardous substances are mapped on < CBD-L-0001 Sht.7 Hazardous Substance Map.pdf>

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

Obs.

Comment	The site initially based their analysis of IWRAs on their status as lower tier COMAH establishment, and decided to consider a 10km radius (site's Emergency Planning Zones (EPZ) accordingly. The site identified 49 IWRAs within their 10km search radius < Cameronbridge ERA 10 km Search.xlsx>. Once the site completed the analysis of IWRAs within a 10km radius, they've broadened their search radius beyond the EPZ. The file < Leven IWRA Analysis.xlsx> includes 13 additional IWRAs beyond the 10km radius in the catchment and / or neighbouring catchments. The site states in their portfolio that there are no IWRAs on site despite River Leven flowing through their site East to West, which may be leading to misunderstandings in the future, especially since it is identified as on-site IWRA in < Leven IWRA Analysis.xlsx>. The only on-site IWRA, River Leven, is mapped as described in indicator 1.1.1.	
1.3.7	*Annual water-related costs, revenues, and a description or quantification of the social, cultural, environmental, or economic water-related value generated by the site shall be identified and used to inform the evaluation of the plan in 4.1.2.*	Yes
Comment	The site identified economic, social, and environmental value as described in separate tabs in < Diageo AWS Leven_Shared Value Table.xlsx>. Annual water related costs & revenues are broken down in < Site Water Costs Surveys.xlsx>	
1.3.8	*Levels of access and adequacy of WASH at the site shall be identified.*	Yes
Comment	The site conducts an annual self assessment using the < Self-assessment Tool for Evaluating Access to Water, Sanitation and Hygiene (WASH).xlsx>.The tool has been developed by the World Business Council for Sustainable Development (WBCSD) [https://wash4work.org/tools-resources/the-wash-at-the-workplace-pledge-and-self-assessment-tool-2017-2/] and presents a method of assessing the current status is WASH at the workplace in a given facility. According to their latest self assessment in 2024, the site scores full points and is compliant with the pledge for access to safe water, sanitation and hygiene (WASH) at their facility. See < Cameronbridge Wash Assessment 2024.xlsx>	
1.4	*Gather data on the site's indirect water use, including: its primary inputs; the water use embedded in the production of those primary inputs the status of the waters at the origin of the inputs (where they can be identified); and water used in out-sourced water-related services.*	
1.4.1	*The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be identified.*	Obs.
Comment	The identification and analysis of primary inputs is documented in < 1.4.1.Leven Primary Input_Outsourced Service Identification.xlsx>. None of the site's manufactured products are packaged i.e., bottled on site. All of their products are shipped off site in tank wagons to either maturing sites (whisky) or to be bottled at different bottling sites in the UK.	
1.4.2	*The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.*	Yes
Comment	The site identified three (3) outsourced services, all of which within the Leven Catchment. < 1.4.1.Leven Primary Input_Outsourced Service Identification.xlsx>	
1.5	*Gather water-related data for the catchment, including water governance, water balance, water quality, Important Water-Related Areas, infrastructure, and WASH*	

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

Comment

According to the site, the relevant governance initiatives in the River Leven catchment:
- Water Framework Directive (WFD)
- River Basin Management Plan for Scotland 2015-2027 (RBMP), published by the Scottish Government [https://www.sepa.org.uk/media/163445/the-river-basin-management-plan-for-the-scotland-river-basin-district-2015-2027.pdf]. This RBMP increases its focus on building action-focused partnerships, in particular with land managers, other businesses and voluntary organisations to lead and champion the work as well as working with local communities and businesses to find solutions that maximise social and economic benefits.

Additionally:
- In July 2019, SEPA signed a landmark 'Sustainable Growth Agreement' with 10 partners, and in June 2020, a further five partners signed up to the agreement. This "Leven Programme" brings together government agencies, non-government organisations, private sector and local communities who want to make a positive effort to deliver change to the River Leven and the surrounding areas. It is a series of connected projects along the River Leven in Fife [https://www.theleven.org/]. Diageo is one of the main partners [https://www.theleven.org/partners/].

Key objectives include:
- Water Quality Improvement: Tackling pollution sources, such as agricultural runoff, sewage discharges, and industrial pollution, to enhance water quality throughout the catchment.
- Habitat Restoration: Restoring natural habitats, such as wetlands and riparian zones, to support biodiversity and improve the river's ecological health.
- Sustainable Land Management: Encouraging better land management practices in the catchment area to reduce runoff and improve water quality, including working with local farmers and landowners.
- Community Engagement: Involving local communities, stakeholders, and organizations in environmental education, advocacy, and active participation in conservation efforts.

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

Comment	The RBMP enacts the European Union WFD 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 several 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. See [https://www.sepa.org.uk/media/163445/the-river-basin-management-plan-for-the-scotland-river-basin-district-2015-2027.pdf]. Whisky distillers are largely regulated under the Water Environment (Controlled Activities) (Scotland) Regulations 2011 (CAR) for the abstraction of water from, and the discharge of effluent to, the water environment. Larger grain distilleries can also be covered by the Pollution Prevention & Control Regulations (Scotland) 2012 (PPC). PPC regulates all environmental impacts associated with the processing and manufacturing of Scotch Whisky at large sites. The site is holder of: - a PPC licence [EQMS document number PPC 268628] for the site's discharge conditions, consolidated and dated 16 Nov 2011 and - various Controlled Activities Regulations (CAR) abstraction licences. The original CAR license is dated 2006 [EQMS document number 268627] and there are four variations [EQMS document numbers 268624, 268625, 268626 and 346462] at the time of the recertification audit. According to the PPC license, the site shall monitor their emissions to the water environment daily and provide a weekly summary report, as well as provide a six-monthly summary report each year by the 31 Jan and 31 Jul. Please refer to table 2.1 of the license < PPC Consolidated Licence 2011.pdf>. The PPC defines composite lower limits (CL), composite upper limits (CU), instantaneous lower limits (IL) and instantaneous upper limits (IU) in relation to the site's monitoring parameters for emissions to water, and emissions to water are solely to be made via designated and permitted emission points listed in table 3.3. Any discharge of trade effluent to River Leven is not permitted. The site's "Borehole Deed of servitude" grants rights to legally access the boreholes.	
1.5.3	*The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.*	✓ Yes

Comment	According to the latest State of Scotland's Water Environment: Summary Report 2022 [https://www.sepa.org.uk/media/es5ht2zk/2022-classification-summary-report_final.pdf], the overall condition of Scottish water bodies and water resources have seen a net improvement. However, SEPA started publishing their first Water Scarcity Reports during summer 2024, highlighting regions at potential risk of water scarcity [https://beta.sepa.scot/news/2024/sepa-publish-first-water-scarcity-report-of-summer-2024/]. The public can also refer to their dedicated website > https://www.sepa.org.uk/environment/water/water-scarcity/ Abstractors are advised to check for regular water scarcity reports so they are aware of the water situation in their area. Cameronbridge has not been affected by any stop notices yet. The site's strata Cotopaxi system that can generate plotted graphs for different time scales between hourly and a couple of years for analytical purposes. According to SEPA's Summary Report of Autumn 2024 [https://www.sepa.org.uk/media/4bff5kbb/2024-autumn-water-situation-report.pdf], rainfall was below the long-term autumn average across most of Scotland. Based on Met Office rainfall data it was the 5th driest autumn in 100 years, and the Firth of Tay region saw around half of average rainfall for autumn which follows on from a drier summer. Five, where the site is located is situated between the Firth of Tay and the Firth of Forth. Cameronbridge was not affected by this. No water scarcity is forecasted that would affect the Cameronbridge. Forecasts are for 180 days typically. The site provided also the < Loch Leven Water Balance.pdf> page 8 shows seasonal fluctuations in the catchment. [https://nrfa.ceh.ac.uk/data/station/spatial/17002]	
1.5.4	*Water quality, including physical, chemical, and biological status, of the catchment shall be identified, and where possible, quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be identified.*	Yes

Comment

For an assessment of water quality at catchment level the site relies on SEPA's sources, provided in their SEPA's Water Classification Hub [https://informatics.sepa.org.uk/WaterClassificationHub/]. Different categories can be selected interactively e.g., groundwater quality, surface water quality, or protected areas; e.g., the condition is rated poor or bad upon selecting surface water>river basin district Scotland>local authority Fife>Catchment River Leven (Fife). See screenshot < Surface water quality River Leven_Fife.jpg>.

According to the RBMP 2015-2017 (see indicators 1.5.1 and 1.5.2) the dominant pressures on water quality in Scotland are rural diffuse pollution, wastewater discharges, acidification, urban diffuse pollution, and inputs from land contamination. See < Pressures on water quality.jpg>. Agriculture run off, urban diffuse pollution, and fish passage are applicable for Cameronbridge. Fish passage has been a localised issue that has gained more interest by several stakeholders (SWCs).

According to an 2018 synthesis report by CREW – Scotland's Centre of Expertise for Waters < CD2018_02_River_Leven_Catchment Initiative_Main_Report.pdf> the River Leven catchment contains:
- 6 Water Framework Directive (WDF) baseline standing waters of which 3 have met or exceeded their WFD ecological status target for 2021
- 17 WFD water bodies of which seven have met their WFD ecological status targets for 2021 and 10 require further improvement;
- 9 groundwater bodies of which 3 have met their WFD target for 2021 and 6require improvement.

According to the State of Scotland's Water Environment: Summary Report 2022 [https://www.sepa.org.uk/media/es5ht2zk/2022-classification-summary-report_final.pdf], the overall condition of Scottish water bodies and water resources have seen a net improvement, whilst a net deterioration has been witnessed in terms of water quality, which might be explained by SEPA focussing monitoring efforts on those parts of the water environment considered to be most at risk.

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

Yes

Comment

The site provided a map of the catchment's IWRAs, < CBD_L_0101_0.pdf>, which distinguishes different groundwater and surface water designations and SSSI (colour-coded), based on the determination of with SEPA or Nature Scot.
The site documented its identified IWAS and their status in two separate files as initially, they based their analysis on a 10km radius in accordance with their COMAH status. After this initial exercise, they expaned their analysis beyond the 10km radius and added further IWRAs in the catchment, as explained in indicator 1.3.6. Please refer to < Cameronbridge ERA 10 km Search.xlsx> and < Leven IWRA Analysis.xlsx>.

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

in progress

Comment

The site identified the River Leven release points, the long sea outfall (LSO) for site comingled effluent, the cooling water lade which abstracts water from River Leven, and boreholes 1, 4, 5, and 6 (on-site) and boreholes 2 and 3 (off-site) as water-related infrastructure. Borehole 2 is for observation purposes. Please refer to < Borehole location.pdf>. As per the most recent variation to the CAR license, borehole 2 is not to be used for abstraction anymore, with a limit of 10m3/day.
There are currently no confirmed plans or budgets planned for new infrastructure.

Finding No: TNR-016383

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

No

Comment | According to the Scottish House Condition Survey 2019 only 2% (around 40,000 homes) are estimated to be below the Tolerable Standard. [https://digitalpublications.parliament.scot/ResearchBriefings/Report/2021/10/13/43a5d8fb-e099-401f-aff6-38f34be2b8ed]

Finding No: TNR-016413

1.6 *Understand current and future shared water challenges in the catchment, by linking the water challenges identified by stakeholders with the site's water challenges.*

1.6.1 *Shared water challenges shall be identified and prioritized from the information gathered.* Obs.

Comment | The site identified the shared water challenges from their formal and informal stakeholder engagements, as described in indicator 1.2.1. The top ten (10) SWCs are documented and prioritised in < Leven Shared Challenges.xlsx>.
The most recent stakeholder meeting was held on 05 Nov 2024, during which shared water challenges (SWCs) were further discussed and identified e.g., climate change resilience (drought/scarcity/flooding), groundwater availability and general quality, Fish passage (Leven), as well as overall catchment improvement incl. non-native species action (e.g., Japanese knotweed confirmed to be of concern in a stakeholder interview). The SWCs shared with each respective stakeholder are listed in column I of < Leven Stakeholder Analysis.xlsx>. Also see < Stakeholder Engagement Notes.docx>.

Serious environmental challenges have arisen within the river catchment, with multiple pressures and environmental impacts stemming from the historical use of the river, including barriers to fish migration, water quality issues and physical river modifications. [https://www.theleven.org/media/1037/leven_programme_intro_leaflet.pdf]
According to the RBMP 2015-2027 (see indicators 1.6.1 and 1.6.2) the most widespread pressures on the Scottish water environment are man-made barriers affecting fish migration, modifications to physical condition, rural diffuse pollution, wastewater discharges, and hydroelectricity generation. See < Water pressures RBMP 2015-2027.jpg>. According to the RBMP two of the biggest challenges are in tackling diffuse pollution and modifications to the physical condition of water bodies, connected with various land uses. However, the current RBMB aims to increase its focus and effort on reducing rural diffuse pollution and improving the physical condition of water bodies. Emerging risks such as the spread of invasive non-native plants and animals and necessity to adapt to climate change are also key elements of the plan.

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

Comment | The SWCs initiatives are contained in the site's WSP in column F, see indicator 2.3.2.

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

1.7.1 *Water risks faced by the site shall be identified, and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.* No

Comment

The site identified 19 water risks faced by the site and prioritised them using a 3x3 Impact x Likelihood matrix (manageable/major/critical x remote/possible/likely) < Leven Water Related Risks-24.docx>.

According to this assessment, the following seven (7) risks are considered in the site's action plan:
- Infrastructure failure,
- interruption to supply (process/cooling),
- Water Scarcity restrictions,
- On site pollution event (Major Accident to the environment = MATTE),
- Infrastructure failure,
- Interruption to supply (domestic),
- Flooding,
- On site pollution event (non-MATTE), and
- Contamination of supply – chemical (process).

Finding No: TNR-016526

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

in progress

Comment

The site identified the following "water saving" projects: Water Saving Projects:
• Installation of new flow meters at lade intake
• Sediment management & removal of invasive species
  - Tree removal in the River Leven
  - Increased awareness of invasive species and non-native species along River Leven
• Upgrading Taps and Cubicles
• Reverse Osmosis Plant
• CIP Optimisation
• Water roadmap for water savings

In terms of water quality improvements there's
• Installation of new Autosampler at the LSO

Finding No: TNR-016414

1.8 *Understand best practice towards achieving AWS outcomes: Determining sectoral best practices having a local/catchment, regional, or national relevance.*

1.8.1 *Relevant catchment best practice for water governance shall be identified.*

Obs.

Comment

The site identified and relies on guidance from:
Scotch Whisky Association (SWA) [https://www.scotch-whisky.org.uk/newsroom/scotch-whisky-commits-to-reach-net-zero-by-2040-with-launch-of-new-sustainability-strategy/], Malt Distillers Association of Scotland (MDAS), the Scottish Distillers Association (SDA), as well as SEPA's Scotch Whisky Sector Plan [https://consultation.sepa.org.uk/communications/sector-approach-to-regulation-consultations-on-sco/supporting_documents/SEPA_Whisky%20Sector%20Plan_Final.pdf] for best practice benchmarking in their sector.
The SWA's Water Stewardship Framework, launched in 2023 focusses on improving efficiency and make reductions in its water use across the production process.
SEPA promotes the minimisation of water use and good water quality to ensure sustainable water supply, considering the key environmental impacts at the various stages of the supply chain, from water abstraction for irrigation of grains to water usage for colling purposes as well as the water embedded in the final product to final process discharges. The site, as are whisky distillers in general, is regulated under the Water Environment (Controlled Activities) (Scotland) Regulations 2011 (CAR) for the abstraction of water from, and the discharge of effluent to, the water environment.

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

Please refer to indicator 1.8.1.
Diageo shared their Water Balance Tool with SWA Members 10 years ago (Aug 2014) as mentioned in the < Bulletin Issue 10.pdf> by the Scotch Whisky industry, and as demonstrated via accessing live data on site via scapa, they are extracting well below their CAR license limits in 2023 and 2024.
Beyond the Whisky sector the site is looking at best practice / implementing a range of technologies to help them improving the effluent quality and further optimising the aqueous treatment plant at Bioenergy on site. Therefore, the site considers some benchmarking with the Food and Milk industry EU Directive and Large combustion plant (LCP) EU Directive to be aligned with regulators before 2030.

Finding No: TNR-016536

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

Yes

Comment

Please refer to indicator 1.8.1.
The site attends Environmental fora, where best practices e.g, vaporising cooling water rather than reintroducing it to the water bodies were recently shared, which contributes positively to the water temperature of the receiving water body, especially during the warmer summer months where the water temperature is already high at the intake. Many operators struggle to obtain sufficient cooling for their processes and the risk of having temperatures above the permissible threshold upon cooling water return to the water body can be omitted via the evaporation technique.

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

Yes

Comment

Diageo's active membership in the River Leven Programme is considered widespread best practice in the AWS community. The programme focusses on IWRA restorations, water quality improvements across the catchment, or enhanced water data collection in collaboration with the University. Moreover, please refer to indicator 1.8.1.

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

Yes

Comment

The site using a reputable tool developed by the World Business Council for Sustainable Development (WBCSD) [https://wash4work.org/tools-resources/the-wash-at-the-workplace-pledge-and-self-assessment-tool-2017-2/] to self-assess their compliance with Access to Safe Water, Sanitation and Hygiene (WASH) at the Workplace is an opportunity for companies to contribute concretely to the implementation of SDG 6, while at the same time ensuring that they provide international best practice on WASH.

2	**STEP 2: COMMIT & PLAN - Commit to be a responsible water steward and develop a Water Stewardship Plan**	
2.1	*Commit to water stewardship by having the senior-most manager in charge of water at the site, or if necessary, a suitable individual within the organization head office, sign and publicly disclose a commitment to water stewardship, the implementation of the AWS Standard and achieving its five outcomes, and the allocation of required resources.*	
2.1.1	*A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:* *- That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes* *- That the site implementation will be aligned to and in support of existing catchment sustainability plans* *- That the site's stakeholders will be engaged in an open and transparent way* *- That the site will allocate resources to implement the Standard.*	in progress
Comment	An AWS newsletter is shared annually and Diageo's 2030 ambition contains a water stewardship strategy. The most recent example of such newsletters is < Fall 2024 AWS Newsletter.pdf>. The site also shared DIAGEO's Water Stewardship Strategy < preserve-water-for-life-our-water-stewardship-strategy-june-2022.pdf>. A signed and publicly disclosed site statement however was not available at the time of the recertification audit. Please refer to the minor finding in the following. ***Finding No: TNR-015176***	
2.2	*Develop and document a process to achieve and maintain legal and regulatory compliance.*	
2.2.1	*The system to maintain compliance obligations for water and wastewater management shall be identified, including:* *- Identification of responsible persons/positions within facility organizational structure* *- Process for submissions to regulatory agencies.*	Yes
Comment	The site uses Enhesa as a provider and their screening questionnaires, and the 'enablon' software package for governance is rolled out for reporting. At the time of the recertification audit, compliance obligations are still extracted from the existing licenses, i.e., the PPC and CAR licenses. See < Regulatory Processes.xlsx>. It's the responsibility of the Environmental Co-Ordinator and the Scotch Manufacturing Director to compile and submit the biannual and PPC and CAR annual reports to SEPA. SEPA and SWA are also actively engaging with the operators in Scotland.	
2.3	*Create a water stewardship strategy and plan including addressing risks (to and from the site), shared catchment water challenges, and opportunities.*	
2.3.1	*A water stewardship strategy shall be identified that defines the overarching mission, vision, and goals of the organization towards good water stewardship in line with this AWS Standard.*	Yes
Comment	Please see 2.1.1.	

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

in progress

Comment: The site's Water Stewardship Plan (WSP) is updated annually and was last updated during H2 2024. However, there are still substantial gaps in the WSP on one hand, and on the other hand there's a surplus of unnecessary information, which severely limits its usability for the site.
Targets, for example, are currently not integrated, but were provided in a separate document < 2.3.2.diageo-society-2030-spirit-of-progress-targets.pdf>. The WSP therefore does not contain information how each target will be measured and monitored, or how the actions (in column D-F) relate to one or more targets respectively. The target dates (column J) refer to the actions, which currently are not linked to the targets. Financial budgets allocated for actions are missing in the WSP.

Finding No: TNR-014653

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

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

Yes

Comment: Plans to mitigate or adapt to identified water risks are developed via the River Leven Program and agreed upon in a multi-stakeholder consultation. The site is a key member of the programme.
In addition, the site receives the regular SEPA updates for water scarcity over the summer and autumn months (e.g., < 20241010 water scarcity report.pdf>) and according to the alert level the site issues a newsletter to all Scottish sites (e.g., FY24NL048 - Water Scarcity Newsletter F25 (002).docx) with a set of expectations and recommendations for a course of actions. Similarly, for flooding alerts the site relies on automated alerts via a level gauge at the river (via strata) and a flood campaign alert newsletter (e.g., FY24NL018 - National Flooding Campaign Newsletter.docx) with preventative actions.
The site is also collaborating with SEPA on local issues such as invasive species and flood walls maintenance.

3	STEP 3: IMPLEMENT - Implement the site's stewardship plan and improve impacts	
3.1	*Implement plan to participate positively in catchment governance.*	
3.1.1	*Evidence that the site has supported good catchment governance shall be identified.*	Yes
Comment	DIAGEO is one of the founding members of the River Leven program and have been asked to become a board member but the appointment has not happened yet. SEPA is chairing the meetings. DIAGEO is supporting and chairing the River Park Programme and funding provided over four years. [the leven/projects/the river-park/] and in the steering committee. They're also collaborating in the University of Stirling on the installation of flow meters. Confirmed by a stakeholder interview.	
3.1.2	*Measures identified to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be implemented.*	Yes
Comment	The River Leven has fishing rights, which the site respects as 'water rights of others' and fishermen had been observed on site on a few occasions. Contributing to improved fish passability, the site installed a fish passage and a screen at the lade . Moreover, by complying with SEPA's abstraction rights as set out in the CAR license they're ensuring that they're not depriving other abstractors downstream. The strata data for 2024 up to the 20 Dec 2024 < Strata_2024-12-19T10_30_18.876Z.pdg> shows similar extraction rates to the previous year.	
3.2	*Implement system to comply with water-related legal and regulatory requirements and respect water rights.*	
3.2.1	*A process to verify full legal and regulatory compliance shall be implemented.*	Yes
Comment	In accordance to SEPA Compliance Assessment Scheme https://www2.sepa.org.uk/compliance/ the site has been given an excellent rating for compliance with their CAR license in 2019 and a good rating for compliance with their PPC license in 2019. No new assessment has been conducted since. The CAR license compliance has been excellent between 2015-2019. [https://www2.sepa.org.uk/compliance/] The site's continual monitoring of borehole water abstraction and effluent testing. PPC is reported biannually and CAR annually. The strata data shows that the site was in full compliance with their CAR license between 01Jan23 and 01Jan24. The official report for SEPA will be concluded and shared on the 31Jan25.	
3.2.2	*Where water rights are part of legal and regulatory requirements, measures identified to respect the water rights of others including Indigenous peoples, shall be implemented.*	Yes
Comment	The site's deed of servitude for the boreholes grants them legal access rights to the boreholes and in terms of respecting the water rights of others please refer to the audit notes on 3.1.2 and 3.2.1.	
3.3	*Implement plan to achieve site water balance targets.*	
3.3.1	*Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.*	Obs.

Comment

The borehole abstraction is the bulk of water used and according to strata there has been a steady decrease from 2021 with a notable decline from 2022 to 2023. The bioenergy plant was commissioned in 2022 and the RO came online around that time, which explains the step change reduction.

For Scotch there's an internal target to reduce water use and the progress is tracked in monthly meetings.

Diageo's ESG targets are available on https://www.diageo.com/en/esg/spirit-of-progress-targets

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

Yes

Comment

Water scarcity is not a shared water challenge. Despite of it, the site is year on year seeking to improve its water efficiency as per DIAGEO's strategy and in accordance with best practice guidelines outlined in indicator 1.8.2. Across the company, a 30% improvement on water efficiency is sought (see diageo-spirit-of-progress-targets.pdf)
The site had reduced its water consumption steadily since 2021 with a significant reduction in 2022 when their RO came online. Please see indicator 3.3.1.

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

Yes

Comment

Not applicable. The site would be in a position to reallocate water but there is no binding agreement to force them to do so at the moment.

3.4 *Implement plan to achieve site water quality targets*

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

No

Comment

The PPC compliance is the target. No further targets have been identified as of yet to improve quality above PPC limits.
The site uses the Strata Cotopaxi system to monitor various water parameters in line, and consolidates monitoring data for regular reports to SEPA.

Finding No: TNR-016538

3.4.2 *Where water quality is a shared water challenge, continual improvement to achieve best practice for the site's effluent shall be identified and where applicable, quantified.*

Obs.

Comment

Whilst poor and moderate water quality has been identified by SEPA as a catchment wide issue, the site's effluent discharge does not affect or have an impact on the surface water bodies in the catchment as it discharges directly into the estuary via the LSO.
An auto-sample for the site's effluent had been installed in Q2 2023 to improve accuracy. The lab have been providing weekly water quality data to the site, which was confirmed in the on-site lab's logbook.

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

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

in progress

Comment

Please see the finding raised.

Finding No: TNR-016419

3.6 *Implement plan to provide access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers at all premises under the site's control.*

3.6.1 *Evidence of the site's provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers onsite shall be identified and where applicable, quantified.* Yes

Comment The site conducts an annual self assessment using the < Self-assessment Tool for Evaluating
Access to Water, Sanitation and Hygiene (WASH).xlsx>.The tool has been developed by the World Business Council for Sustainable Development (WBCSD) Please see indicator 1.3.8. The site uses the tool for the past couple of years, and they have achieved a year on year improvement in their score.
This, in combination with the fact that they reduced their work force on site, means that there's a surplus of WASH facilities on site now.

3.6.2 *Evidence that the site is not impinging on the human right to safe water and sanitation of communities through their operations, and that traditional access rights for indigenous and local communities are being respected, and that remedial actions are in place where this is not the case, and that these are effective.* Yes

Comment N/A. There is no evidence of presence of indigenous peoples.
The stakeholder interviews confirmed that the site is held in high regard in the community and there are no concerns of impingement on human rights or alike that would require any mitigation.

3.7 *Implement plan to maintain or improve indirect water use within the catchment:*

3.7.1 *Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.* Obs.

Comment here are no indirect water use targets set in the Water Stewardship Plan at the moment. Please refer to indicator 1.4.1. and observation raised there.

3.7.2 *Evidence of engagement with suppliers and service providers, as well as, when applicable, actions they have taken in the catchment as a result of the site's engagement related to indirect water use, shall be identified.* Yes

Comment The actions completed in 2024 are listed on slide 8 of the < Formal Engagement Deck 2024 -CMB.pptx>; i.e., those include e.g., catchment actions such as raising awareness of invasive species and non-native species along River Leven, and tree removal in the River Leven, as well as activities on site such as water package FY24/borehole maintenance and repainting Colour-coded drains.

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

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

Comment The Leven Trust operates the sluice gates at Loch Leven, which are the only shared infrastructure at the moment. Please see < Loch Leven Initial Control Rules.pdf>, which stipulates the Loch Leven control rules and lists Diageo as one of the downstream water users in table 1.1. with allocated water quantities.

Finding No: TNR-016543

3.9	*Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.*	
3.9.1	*Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.*	Yes
Comment	WSP actions in progress or planned are summarised on slides 9 & 10 of < Formal Engagement Deck 2024-CMB.pptx>. Those include e.g., continued attendance in Leven Programme board meetings as well as active participation in their working groups and the Water scarcity project, Providing funding for River Leven park delivery phase (4-year roll-out period), the participation in the SWA Water and Effluent group, Reviewing the water balance at site, Water saving project and flood risk assessment FY25 etc. See indicator 3.1.1 also.	
3.9.2	*Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.*	Yes
Comment	The site invested/invests considerable resources to link all relevant water meters into the Sankey diagram for their water balance (tab FY23 WaterBal Data in < CMB Water Balance Oct-23.xlsx>); however, this work is still in progress (WIP), and the site's most recent annual water balance could not be presented at the time of the audit. See non-conformity raised in indicator 1.3.3. Further, the site set an overall water efficiency as a dynamic target over the year, in accordance with production levels. See example in indicator 3.3.1 and refer to indicator 1.8.2 for best practice on water balance.	
3.9.3	*Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.*	Obs.
Comment	Please refer to indicator 1.8.1, demonstrating the active collaboration of the site with local stakeholders via the River Leven Programme, which amongst other topics focusses on improving water quality. As mentioned in indicator 1.7.2, the site has also installed a new autosampler at the LSO, through which the site discharges directly into the estuary.	
3.9.4	*Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.*	Yes
Comment	The site is providing funding for for River Leven Park Programme [https://www.theleven.org/projects/the-river-park/], which is implemented over a 4-year period. Other than that, no other evidence of actions towards achieving best practice, related to targets in terms of the site's maintenance of IWRAs, were presented or are put forth in the current WSP.	
3.9.5	*Actions towards achieving best practice related to targets in terms of WASH shall be implemented.*	Yes
Comment	The site has been demonstrating best practice by using a reputable tool developed by the World Business Council for Sustainable Development (WBCSD) [https://wash4work.org/tools-resources/the-wash-at-the-workplace-pledge-and-self-assessment-tool-2017-2/] to self-assess their compliance with Access to Safe Water, Sanitation and Hygiene (WASH) at the Workplace for the past four years. According to the first self-evaluation in 2021, the site didn't comply with the pledge, but they progressively and gradually improve their WASH service provisions year on year. Please see attached 2022, 2023 and 2024 self-assessments. Please also see indicator 1.8.5.	

4	STEP 4: EVALUATE - Evaluate the site's performance.	
4.1	*Evaluate the site's performance in light of its actions and targets from its water stewardship plan and demonstrate its contribution to achieving water stewardship outcomes.*	
4.1.1	*Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.*	in progress
Comment	The site's Water Stewardship Plan (WSP) includes the five AWS outcomes listed in column Z; however, it does not specify the required targets. As a result, it is unclear how performance against these targets in the site's water stewardship plan was evaluated or how the site's efforts contribute to achieving water stewardship outcomes. ***Finding No: TNR-016567***	
4.1.2	*Value creation resulting from the water stewardship plan shall be evaluated.*	Yes
Comment	The site provided a cost/benefit evaluation in column AC.	
4.1.3	*The shared value benefits in the catchment shall be identified and where applicable, quantified.*	Yes
Comment	The shared value benefits in the catchment are documented in column AD of the site's WSP. Please also consider the finding raised against indicator 2.3.2.	
4.2	*Evaluate the impacts of water-related emergency incidents (including extreme events), if any occurred, and determine the effectiveness of corrective and preventative measures.*	
4.2.1	*A written annual review and (where appropriate) root-cause analysis of the year's emergency incident(s) shall be prepared and the site's response to the incident(s) shall be evaluated and proposed preventative and corrective actions and mitigations against future incidents shall be identified.*	Obs.
Comment	This section has been redacted for confidentiality reasons.	
4.3	*Evaluate stakeholders' consultation feedback regarding the site's water stewardship performance, including the effectiveness of the site's engagement process.*	
4.3.1	*Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.*	in progress
Comment	Since there had been a lack of response to the last years newsletter and survey, the site decided to change their engagement, ahold a stakeholder engagement meeting this year on the 05th of Nov 2024. Please see indicator 1.2.1. A slide deck < Formal Engagement Deck 2024-CMB.pptx> was shared during this audit, touching upon various water-related topics and AWS performance of the site. ***Finding No: TNR-016430***	
4.4	*Evaluate and update the site's water stewardship plan, incorporating the information obtained from the evaluation process in the context of continual improvement.*	
4.4.1	*The site's water stewardship plan shall be modified and adapted to incorporate any relevant information and lessons learned from the evaluations in this step and these changes shall be identified.*	Obs.

Comment	The latest version of the WSP is version 8 FY25 and the version before was last updated in July (version 7 FY25 H2), meaning the site updates it at least twice a year. It is actually a living document, being updated as and when relevant changes occur. Column Y contains Successful Actions/ Best Management Practices. All versions of the WSP are contained within the same excel file, that means any changes can be identified by comparing the most recent version with historic versions on other tabs. Please also consider the finding raised against indicator 2.3.2.

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.* — in progress

Comment: The team function, responsibilities and interactions are tabulated in the portfolio but the site's water-related internal governance is currently not disclosed. Please refer to the finding raised.

Finding No: TNR-015213

5.2 *Communicate the water stewardship plan with relevant stakeholders.*

5.2.1 *The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.* — in progress

Comment: Summarised elements of the WSP have been shared during the last stakeholder meeting on the 05th of Nov 2024 but the how the water stewardship plan contributes to AWS Standard outcomes has not been made. Please refer to the finding raised.

Finding No: TNR-015215

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.* — in progress

Comment: Please refer to the finding raised.

Finding No: TNR-015216

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.* — in progress

Comment: The slide deck < Formal Engagement Deck 2024-CMBpptx> that was shared with the stakeholders during the meeting on 05th Nov 2024 addresses shared water-related challenges indirectly i.e., Slide 8 is summarises completed actions by the site and slide 12 summarises Shared Challenges in 2021, but given that the recertification audit took place in Dec of 2024, the "Potential Resolutions" corresponding to the 2021 shared challenges are outdated and should by now be replaced with the real efforts made to address those over the past certification cycle. Please see the finding.

Finding No: TNR-016431

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

Comment: The document Stakeholder Engagement Communication Log 2024 outlines the site's efforts to engage stakeholders and collaborate with public-sector agencies, including GAT, Forth River Trust, the University of Stirling, SEPA, NHS Fife, the Leven Programme, FCCT, Archaeology Scotland, and HES.

5.5	*Communicate transparency in water-related compliance: make any site water-related compliance violations available upon request as well as any corrective actions the site has taken to prevent future occurrences.*	
5.5.1	*Any site water-related compliance violations and associated corrections shall be disclosed.*	Yes
Comment	There were no significant water-related violations to be disclosed. Site water-related compliance violations and associated corrections would be disclosed to the public authority.	
5.5.2	*Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.*	Yes
Comment	There were no significant water-related violations as stated in indicator 5.5.1. Please refer to an observation raised to improve the incident reporting and mitigation process in indicator 4.2.1. Necessary corrective actions taken by the site to prevent future occurrences were disclosed to the public authority.	
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	There were no significant water-relationsas that required immediate communication as stated in indictor 5.5.1. Please see an example notification for one of the low impact incidents sent to SEPA in October 2024 < Cameronbridge Environmental Incident - 19_10_24.msg>	

Photographic Evidence from Audit

Yes

Comment: The photos have been redacted for confidentiality reasons

Previous Findings

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

Comment: The last audit prior the WSAS recertification audit had been performed by SCS in January of 2024. Apart from the audit finding for indicator 2.3.2, all other audit findings raised by SCS were closed as explained in the respective indicators.
In a few cases new observations were raised.