CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-001475

WSAS WATER STEWARDSHIP ASSURANCE SERVICES

SITE DETAILS

Site: **Spadel - Stoumont, Bru - Chevron Plant**
Address: Les Bruyeres, 151, 4987, Stoumont, BELGIUM
Contact Person: Maxime Sohy
AWS Reference Number: AWS-000423
Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Platinum
Date of certification decision: 2025-May-09
Validity of certificate: 2028-May-08

AUDIT DETAILS

Audited Service(s): AWS Std 2025 New Certfication Requirements
Audit Type(s): Re-Certification Audit
Audit Start Date: 2025-Feb-06
Audit End Date: 2025-Feb-06
Lead Auditor: Lorenzo Brioschi

Audit team participants:
Lorenzo Brioschi, Lead Auditor

Site Participants:
Arnaud Collignon, Water Resources Manager
Olivier Crommen, Environment and Water Resources Engineer
Maxime Sohy, Environment and Water Resources Engineer
Philippe Dejardin, Process & Excellence Program Engineer
Kevin Schene, Industrial Manager Bru
Frederic Roth, Safety & Environment Manager Spa & Bru
Christophe Perilleux, Factory Manager
Christelle Monville, C.E. Labo
Angélique Fransolet, GQP Controler

AUDIT TIMES

Dates	Audit from	Duration	Auditor	Description
2025-Feb-06	09:00:00 - 17:30:00	08:30	Lorenzo Brioschi	
2025-Feb-06	09:00:00 - 17:30:00	08:30	Lorenzo Brioschi	
2025-Feb-06	09:00:00 - 17:00:00	08:00	Lorenzo Brioschi	
2025-Feb-06	09:00:00 - 12:00:00	03:00	Lorenzo Brioschi	

WSAS
2 Quality StreetNorth Berwick, EH39 4HW, UNITED KINGDOM

ADDITIONAL INFO

Summary of Audit Findings: During the re-certification audit, 4 minor non-conformities and 8 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 19/04/2025.

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

The audit team recommends re-certification of Spadel Bru Chevron Plant at Platinum level pending approval of the corrective actions plan for the non-conformities.

CLOSURE OF FINDINGS AND CORRECTIVE ACTION PLAN:

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

Scope of Assessment: The scope of services covers the recertification audit for assessing conformity of Spadel Bru Chevron Plant against the AWS International Water Stewardship Standard Version 2.

The Bru-Chevron Plant is located in eastern Belgium, near the Lorcé village within the Stoumont Municipality and into the ‘Parc Naturel des Sources’, a natural reserve. The nearby Pouhon stream is flowing through part of the parc and finishes its course in the Amblève river, which is a right tributary o the river Ourthe, which is itself a tributary of the Meuse river. While the "new" site (where production occurs) is officially located in the Ourthe catchment, both its water supply and water discharge point are located in the Amblève river catchment. It is therefore considered that the site catchment is the Amblève catchment.

Within the Pouhon stream sub-catchment, inside the Parc Naturel des Sources, site is withdrawing its water supply through 8 boreholes. The site effluents (sanitary and industrial) are collected at the site and directed to the site WWTP which is located near the Pouhon river. The on-site rainwater is collected separately and directed to a storm water basin located approximately 100 m North from the site.

The site consists in three different locations: the "new" site (called Bru 2000) were the bottling operations occur, the "old" site where the removal and storage of CO2 occurs, the nearby WWTP and the iron and manganese removal building which is located a couple of hundred meters away from the old-site. The new site includes two bottling lines, one for re-usable glass bottles and one for PET bottles. The site strictly produce mineral water (carbonated and non-carbonated).

The audit was conducted onsite on 3 to 6 February 2025.
The onsite site visit included the assessment of:
- New site: offices, bottling lines, chemical storage, firewater system, WASH facilities and storm basin.
- Iron and manganese removal building and storage tanks
- WWTP
- One source located the nearest to the iron removal building (P'tit Saqwé).

FINDINGS

CERTIFICATION REPORT

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NUMBER OF FINDINGS PER LEVEL

Observation	8
Minor	4

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FINDING DETAILS

Finding No:	TNR-016656
Checklist Item No:	1.3.2
Status:	Open
Finding level:	Observation
Checklist item:	Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped
Findings:	The fire water tank should be added to the diagram for it to be complete.

Finding No:	TNR-016222
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:	- From the cadastral map, the Pouhon stream riparian zone alongside the old site might be part of Spadel Bru-Chevron site (100 to 200 m), which could benefit from status identification. - While the storm basin has no specific public importance per se, It was identified through stakeholder consultation and activities between site and stakeholder that amphibians are living in the storm basin and migrate annually for reproduction. It would be worth to engage stakeholder to assess if the basin could be identified as IWRA for that reason.

Finding No:	TNR-016224
Checklist Item No:	1.4.3
Status:	In Progress - CA plan approved
Finding level:	Observation
Checklist item:	Advanced Indicator The embedded water use of primary inputs in catchment(s) of origin shall be quantified.
Findings:	While site did a Product Footprint Analysis for all his sites, the analysis is based on database of inputs water uses and not actual suppliers data. This does not allow for instance to compare two suppliers of the same primary input to assess their embedded water use.
Corrective action:	In 2025, we will initiate a project to collect actual water consumption data from our main suppliers. As a first step, we will probably focus on a selection of our most significant suppliers based on annual spending. For these suppliers, we will attempt to obtain water consumption data relative to their revenue (= water intensity), using all sources available to us—such as CSRD reporting, Ecovadis assessments, or any other sustainability disclosures. For suppliers where this information is not readily available, we may need to conduct a short survey to gather the required data directly.

Finding No:	TNR-016226
Checklist Item No:	1.5.5
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2026-Feb-04
Checklist item:	Important Water-Related Areas shall be identified, and where appropriate, mapped,and their status assessed including any threats to people or the natural environment, using scientific information and through stakeholder engagement.
Findings:	Currently only the protected area and the quality of the underlying water resources are correctly identified and status assessed. For the rest of the mapped IWRAs, the site analysis fails to determine a clear list of IWRA and the status of these IWRAs has not been assessed, using scientific information and through stakeholder engagement. The link between the identified IWRAs list and the actual biodiversity restoration projects undergoing (and completed) is not easily identifiable (included in the mapping but not clearly identified).
Corrective action:	From our existing list, we will select the most critical IWRAs for the site and our stakeholders. Their status and related issues will be assessed using either scientific data, internal reports, or stakeholder-sourced information. At first, like said beafore, our current IWRA list is too broad, as it includes all areas connected—directly or indirectly—to water in our catchment. We will refine this list to focus on IWRAs where stakeholders are involved, interested, or engaged. For these areas, we will assess their status using the best available sources: scientific data when accessible, stakeholder input, or our own environmental assessments. Please note that our catchment is relatively small, and scientific data is not always available at this scale. For example, for the "Rivière du Pouhon", we regularly conduct biological monitoring ourselves (not required by the legislation), as no external scientific assessment exists.

Finding No:	TNR-016230
Checklist Item No:	1.6.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2026-Feb-04
Checklist item:	Shared water challenges shall be identified and prioritized from the information gathered.
Findings:	Not really challenges from stakeholders. more risks that the site proposed or the risks that the site asked that were related to the catchment. Therefore the answers were related to the risks to the catchment and site applications.
Corrective action:	In 2025, we will repeat the stakeholder consultation with a stronger focus on water-related challenges faced by each stakeholder. This will help us identify which challenges are shared and should be prioritized in our WSP.

Finding No:	TNR-016715
Checklist Item No:	2.3.2
Status:	Open
Finding level:	Observation
Checklist item:	A water stewardship plan shall be identified, including for each target: - How it will be measured and monitored - Actions to achieve and maintain (or exceed) it - Planned timeframes to achieve it - Financial budgets allocated for actions - Positions of persons responsible for actions and achieving targets - Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.
Findings:	The site was able to demonstrate that main WSP targets were set. However, the new version of the WSP still has some empty data that should be completed. Specifically, the "Water Target" tab which should indicate the site specific targets related to the main drivers identified by Spadel group still needs to be populated with the targets set. It will be necessary to clearly link the action in the "WSP" tab with the targets when applicable. The "Category" column in the WSP should be able to cover that, however it is not always clear. The actual use of this new WSP system will be verified during next audit iteration.

Finding No:	TNR-018048
Checklist Item No:	3.7.3
Status:	Open
Finding level:	Observation
Checklist item:	Advanced Indicator Actions taken to address water related risks and challenges related to indirect water use outside the catchment shall be documented and evaluated.
Findings:	Spadel Sustainable Procurement specifically request suppliers to measure and reduce use and discharge of water. However, this needs to develop to direct actions or engagement to maintain conformance.

Finding No:	TNR-016290
Checklist Item No:	4.1.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2026-Feb-04
Checklist item:	Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.
Findings:	No target was set for the stakeholder transparency (communication) "Driver".
Corrective action:	The updated WSP now includes specific transparency actions that are part of our annual disclosure routine, such as publishing the "Gestion Durable de l'Eau" report on our website and directly sharing it with relevant stakeholders every year.
Evidence of implementation:	Please find attached a screenshot of our 2025 WSP for the Bru site, filtered on the action category "Transparency".

Finding No:	TNR-016291
Checklist Item No:	4.1.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2026-Feb-04
Checklist item:	Value creation resulting from the water stewardship plan shall be evaluated.
Findings:	While site has a WUR ratio Bru document that contains the ongoing projects and potential savings, this document is new and was not yet implemented for a full year (with actual finished projects and determined savings). Thus, the value creation resulting from these ongoing project was not yet evaluated.
Corrective action:	Once sufficient data is available, we will estimate the water savings achieved through the implemented projects in order to assess their true value.
Evidence of implementation:	I partially agree with your comment. During this audit, we focused primarily on our water savings projects. However, we also assess value creation through our "Added Value" file, which was positively acknowledged under other criteria and reflects a broader range of impacts beyond pure water metrics. Regarding the cost-benefit analysis, we believe that such an exercise would be highly speculative and would bring limited added value internally. Many of our water-related investments—especially those linked to environmental preservation or stakeholder engagement—generate long-term or indirect benefits that cannot be reliably quantified in financial terms. That said, we are able to provide clear investment figures for infrastructure projects related to water efficiency (as listed in our water savings file), and we intend to estimate their benefits once sufficient performance data becomes available, as previously mentioned.

Finding No:	TNR-016292
Checklist Item No:	4.1.4
Status:	Open
Finding level:	Observation
Checklist item:	Advanced Indicator A governance or executive-level review, including discussion of shared water challenges, water risks, and opportunities, and any water-related cost savings or benefits realized, and any relevant incidents shall be identified.
Findings:	Shared water challenges are not reviewed during these management meetings as they are operational oriented management reviews while shared water challenges are more high level. Site should include Shared Water Challenges into the executive-level annual reviews.

Finding No:	TNR-017182
Checklist Item No:	4.3.1
Status:	Open
Finding level:	Observation
Checklist item:	Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.
Findings:	Site did not formally share the 2023 results to their stakeholders in the same way as 2024 results. It would be important to formalise the consultation process in order to not forget sharing.

Finding No:	TNR-016868
Checklist Item No:	5.2.1
Status:	Open
Finding level:	Observation
Checklist item:	The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.
Findings:	Site did not formally share the 2023 results to their stakeholders in the same way as 2024 results. It would be important to formalise the consultation process in order to not forget sharing.

Report Details

Report	Value
Report prepared by	Lorenzo Brioschi
Report approved by	Ozge Gokmen
Report approved on (Date)	17/03/2025

Surveillance

Proposed date for next audit
2026-Mar-04

Stakeholder Announcements

Date of publication	Location
01/12/2024	https://sourceofchange.spadel.com/fr/2024/12/05/bru-public-stakeholder-announcement/
12/12/2024	On local Newspaper Vlan edition of the 11/12/2024 AWS Website

Stakeholder interviews

Name	Organisation/Role/Relationship
Christine Heinesch and Marie Monseur	River Contract Amblève/Coordinator and Project Manager Invasive Species
Didier Gilkinet	Commune de Stoumont/Mayor

Main Outcome of Stakeholder Interviews
Stakeholders interviewed had a general positive feedback on site water management activities. They are positive on the way the site manages water inside the site but also with the willingness of Spadel to work in the catchment. Overall all local stakeholders emphasise the importance of Bru as a local flagships.
It seems however that the communication related to their water stewardship activities is quite limited as both stakeholders had no knowledge of AWS certification and did not seem to remember receiving activity reports related to the site water stewardship activities. Both stakeholders identified some water challenges not identified by site: Stoumont municipality drinking water source vulnerability during droughts, amphibians population that are decreasing in the whole region, invasive species, floodings.

Catchment Information

Catchment Information

The Bru-Chevron Plant is located in eastern Belgium, near the Lorcé village within the Stoumont Municipality and into the 'Parc Naturel des Sources', a natural reserve. The nearby Pouhon stream is flowing through part of the parc and finishes its course in the Amblève river, which is a right tributary of the river Ourthe, which is itself a tributary of the Meuse river. While the "new" site (where production occurs) is officially located in the Ourthe catchment, both its water supply and water discharge point are located in the Amblève river catchment. It is therefore considered that the site catchment is the Amblève catchment.

Within the Pouhon stream sub-catchment, inside the Parc Naturel des Sources, site is withdrawing its water supply through 8 boreholes. The site effluents (sanitary and industrial) are collected at the site and directed to the site WWTP which is located near the Pouhon river. The on-site rainwater is collected separately and directed to a storm water basin located approximately 100 m North from the site.

No external water services providers are used for both water supply and waste water treatment. As such, facility is completely independent from a water utilities point of view.

The underground water body associated with the catchment is designated as RWM100, named "Grès et schiste du massif ardennais" (Lesse, Ourthe, Amblève, Vesdre), covering an area of 3.311 km². In 2010, the annual water withdrawal from this body amounted to 11.7 million m³.

The average annual recharge of water body RWM100, derived from basic percolation and slow hypodermic flows, is estimated at 339 mm over a 20-year period (from 1994 to 2013), with significant fluctuations. The recharge ranged from a minimum of 163 mm in 1996 (a dry year) to a maximum of 475 mm in 2001 (a wet year).

Locally, the aquifer impacted by the catchment is AQ13, the "Cambro-silurian basement of the Ardennes." The Bru-Chevron aquifer is highly heterogeneous and fractured. The alternation of clay and sandstone layers hinders continuity, with phyllite layers, varying from a few centimeters to several meters in thickness, acting as nearly impermeable barriers. Groundwater is stored in open fractures within the sandstone and quartzite layers. Transmissivity values vary significantly, ranging from 10-7 m²/s in the aquiclude areas to 10-4 m²/s in the aquifer zones. The piezometric level is typically located within 10 meters of the surface.

The Bru-Chevron area is also known for CO2-rich mineral groundwater springs (referred to as "pouhon") that emerge due to the upward force of gas bubbles. BRU-CHEVRON operates three boreholes for CO2-rich mineral water (Abbaye, Petit Saqwè, Puits Bois de Bouillon), two CO2-rich mineral springs (Moines, Sart-Badon), one borehole for CO2 extraction (Monastère), and two boreholes for industrial use (Hiersonfontaine and Freuhé).

The water quality of body RWM100 is considered good. BRU-CHEVRON regularly monitors the quality of the groundwater from each borehole, and this water is officially recognized as natural mineral water.

Overall the water extraction index (WEI) of the aquifer is considered as substantially low (< 5%), there are no flooding risks in the sub-catchment area except for the locations near the Pouhon stream where the site WWTP is located. Site however never observed any flooding even during the summer of 2021 were heaving rains provoked flash floods in many areas of Wallonie (including the Liège area). The used aquifers are located in the Parc Naturel des Sources protected area, and there is no agriculture present in the direct recharge area.

Client Description and Site Details

Client/Site Background

While the Bru waters are known since the Roman Empire times, the first industrial exploitation of these waters started in 1903. The Spadel Bru-Chevron production site is located in the Stoumont municipality area, which is located approximately 20 km North-East from the city of Liège. This site extracts and processes natural mineral water, particularly focusing on its unique groundwater with high levels of carbon dioxide.

The plant has two production lines, one dedicated to re-usable glass bottles and the other for PET bottles and employs approximately 20 FTE. There are no administrative or support positions on-site as these are shared with the other nearby Spadel site in Spa where the offices are located.

The production facility utilizes a variety of water sources from different boreholes and springs. Specifically, the site operates:

- Three boreholes dedicated to extracting CO2-rich mineral water (Abbaye, Petit Saqwè, and Puits Bois de Bouillon).
- Two CO2-rich mineral water springs (Moines and Sart-Badon).
- One borehole focused on CO2 extraction for industrial use (Monastère).
- Two additional boreholes for industrial purposes (Hiersonfontaine and Freuhé).

The withdrawn waters are first de-carbonated (CO2 is then liquified and stored in a specific storage tank) and then iron and manganese is removed. This is performed in different buildings located near the old production site (not existing anymore). Then mixed mineral waters and the CO2 are then transported through 6 pipelines to the new site for bottling operations.

On the other side the site effluent are brought back to the WWTP which is also located next to the old site location.

Rainwater is not harvested but collected and directed to a storm basin. which overflows into a small stream that collects itself to the nearby E25/A26 highway drainage system. These rain water are therefore discharged in the Ourthe catchment. While there is no oil/grease interceptors in the site rain drains systems, the storm water is analysed periodically to ensure that there is no hydrocarbons identified in them.

Firewater is coming from industrial boreholes and is stored in a firewater tank next to the new site.

Summary of Shared Water Challenges

Summary of Shared Water Challenges

The shared water challenges identified during the 2021 stakeholder survey are the following:
- Hydrocarbon leaks linked to the use of heat engine tools in the forest
- Hydrocarbon leaks in parking lots not connected to oil separators/interceptors
- Hydrocarbon leaks due to fuel tank defects

Comment — Note that a finding was indicated in 1.6.1 for the identification of shared water challenges were misunderstood and only focused to the risks of groundwater resources pollution.

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	- Water source observed: Ptit Saqwé (borehole) - Water discharge: WWTP and effluent discharge into river, Discharge of overflow water direct to the river. Rainwater discharge into storm basin.	
0.1.1.1	*The site(s) occupy one catchment OR an exception has been granted.*	Yes
Comment	The site occupies one catchment.	
0.1.1.2	*The scope of the proposed certification shall be under the control of a single management system.*	Yes
Comment	The scope of the certification is under the control of a single management system.	
0.1.1.3	*The scope of the proposed certification shall be homogeneous with respect to primary production system, water management, product or service range, and the main market structures.*	Yes
Comment	The scope of the certification is homogeneous.	

1	STEP 1: GATHER AND UNDERSTAND

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

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

Yes

Comment

The AWS Scope mapped by the site includes the protected infiltration zone is the Pouhon sub-catchment, an extension to include the piping and the new site location (including storm basin) and the Pouhon river until the confluent with river Amblève. This map does not show all the different site water utilities, but clearly defines the boreholes and the productions site boundaries. The site is using QGIS to precisely map all the relevant site buildings outside the production site boundaries.

The site infrastructures are identified and mapped and include the following:
- the 'new' site where bottling operation occurs (also called Bru 2000);
- the storm basin;
- the old site where the old production building was dismantled. Now remaining buildings are a technical building where CO2 removal and storage is occurs, the "tower building" where the different pipelines are leaving to the new-site, the nearby on the same grounds is the site WWTP and discharge point to the Pouhon stream.
- the "water treatment building" where the water from the mineral water boreholes are received and mixed and the iron and manganese are removed;
- pipelines from the tower building to the production site: 1 for CO2, 2 for Bru mineral waters, 1 for industrial water and one for site effluent brought down from the new site to the WWTP and 1 additional non connected pipe is kept for future purposes.
- Company takes water from 8 boreholes: three boreholes for CO2 rich mineral water (called Abbaye, Petit Saqwè, Puits Bois de Bouillon), two CO2 rich mineral sources (Moines, Sart-Badon), one boreholes for CO2 extraction purpose (Monastère) and two boreholes for industrial use (Hiersonfontaine and Freuhé).

Site does not have additional water suppliers, sanitary water systems are using industrial water. There were no changes in the physical scope and infrastructure since previous audit except for some pipelines that were replaced near the iron and manganese removal building.

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 supplied stakeholders list contains a tab for Bru stakeholders with the analysis of level of interest (based on water challenges and frequency of interactions, geographical scope), influence of site on stakeholder, influence of stakeholder on site. The level of engagement is based on the previous identified points and the desired level of interest. - While the site is autonomous from the point of view of water supply and waste water treatment, the relevant stakeholders in charge of permits, receiving water bodies (both authorities and river contract), management of the forest resources and local administrations were identified and engaged. - Stakeholder "Cercle des Pêcheurs" (local fisherman association) was added lately. - The last consultation of stakeholders was done in 2021 (attached) through a survey. Site has scheduled the next survey for 2025. They will re-do it this year as they identified to do it through a 3-year cycle (postponed for 1 year because of last year local elections). Additional meetings are also held with "important" stakeholders (the type of engagement can be found in the J to N columns), for instance the General Assembly of the Contrat de rivière Amblève, the meetings with the Parc Naturel des Sources (which includes the Stoumont and Spa municipalities). - Note that because of the proximity with other the Spa production site, some stakeholders from the Spa list can be relevant for Bru. - The specific contact details can be found in the "Matrice des Contact_projets" tab.	
1.2.2	*Current and potential degree of influence between site and stakeholder shall be identified, within the catchment and considering the site's ultimate water source and ultimate receiving water body for wastewater.*	Yes
Comment	Yes as per document uploaded in 1.2.1, the desired (or potential in the document) degree of interest (which sites understand as similar to influence, as an interested party isis identified	
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	Supporting documents: - The Emergency procedure attached covers the possible incidents per type and the procedure to follow for each scenario. This includes procedure for soil and water pollution. Note that this plan is being adapted from the Spa site one (see annotations) and is being finalised at the moment. The old emergency response plan was submitted for the records (Plan d'Urgence V3 - dated 25/05/2023). - Sites maps with potential pollution zones.	
1.3.2	*Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped*	Obs.

Comment

- Attached flowchart identifies the water inflows, losses, storage and outflows of the Bru operations. Note that many losses identified at some treatment steps are indicated in pale blue and designated as "returning to nature". This includes for instance losses in the CO2 extraction process, losses for filters backwashing but also bottling operations losses clean water losses that go back to the rainwater drains and then to the storm basin.
- Note that the firewater tank is not indicated in the flowchart but it was identified that it barely consumes water as the required-by-law water pumps test are done in closed loop.

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

Yes

Comment

The attached site water balance exercise was provided for year 2024.
Comments:
- Variances are indicated and depend on the month of the year. Seasonal variances are identifiable especially if warm summer as sales increase.
- The higher the production rate, the better is the Water Use Ration (WUR).
- The higher the proportion of glass water bottles in production, the higher the WUR because of the high water consumption of the bottle washer.
- The water bed of each borehole is monitored and there is a summer and winter level variance identifiable.
- Freu-Hé borehole (industrial water) was having bed level issues as it was clogged and they had to re-drill it.
- Site monitors competition and standard WUR for benchmarking.
- Currently the Water Extraction Index (calculated at sub- catchment level) that is calculated by site annually shows that there is no water-challenge related to the water resources used by the site.

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

Yes

Comment

The document "Standard Analyses et contrôle eau" provides guidance for the analysis and frequency that the production site needs to ensure for both product water (bottled water as per legal requirements) and other waters as per below comments.

For each separate sources:
once per month a sample is taken and sent to Laboratoires Central Henrijean - main chemical parameters (carbonates, calcium, chlorides, magnesium, nitrates, potassium, siliium, sulfates, sodium and sulfates + pH and conductivity). Latest test available 08/01/2025 reviewed during audit.
- Annually a complete analysis is performed (see attached 2023 and 2024 test reports).
- Once per month by internal laboratory: microbiology analysis (coliforms, other colonies, E.Coli, PCA), analysis of CO2 content and conductivity twice per month
- After de-iron and de-manganese - in the buffer tanks samples are taken monthly and analysed for microbiology (same as above). This is a mix of all sources. Once per month they also do at the process stage microbiology. + Iron and manganese is removed.

On site effluent
- daily the flux, twice per month pH (sortie decanter and sortie ruisseau), sludge (suspended matter) and effluent (suspended matter, DCO and phosphor amount).
- In addition, one annual sample sent to external lab for complete effluent analysis as per legal requirements parameters.
- A study for impact of WWTP effluent was conducted (2023) a new one is planned in 2025. This show a limited impact of site effluent to the quality of the Pouhon stream. It is still considered as Good Quality for all chemical indicators).

On rain water:
- conductivity, pH visual inspection of water coming into the storm basin. Different analysis are done no pesticides or essences identified in last test report dated 10/06/2024 reviewed during audit.
- An analysis of the water of the storm water dated 2021 made by the province. It focuses on road-related pollutants (hydrocarbons) and pesticides. No specific pollution of the rainwater observed.

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

Comment

- The three supporting maps called "Activités Risque Pollutions" indicate all the pipelines in the three different sites locations (Bru 2000 new site, new site and iron removal and storage site). In red the storage of chemicals products are emphasised and the bounded areas are also indicated.
- List of chemicals used on site: supporting ListeProduitsBE.xlsx.
- Tour showed all the spill kits and bounded areas for chemicals.

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

On Bru 2000 production site boundaries there are no real IWRA identified, however the old site (and WWTP) are located on the banks of the Pouhon stream. It also has their own storm basin located within the catchment, and several boreholes with protected areas to manage. All these are mapped in different layers within QGIS software.
-The status: borehole quality data and level is assessed continuously (as per production standards) Once every two week they visit and take a sample and check.
Anyway none of these have a shared value as they are mainly important for site operations and therefore not eligible as on-site IWRAs. The aquifer is also used by the local water suppliers then it would mean that it is also an important shared value.

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	Supporting evidence: - "Coût de l'eau" document, cost analysis made in 2023. The year 2024 data will be analysed with the same methodology but analysis was not yet conducted during the audit time and will therefore be verified during next annual itération. - The added-value document evaluates the amount of water-related value by the site: for instance providing work to 20 FTE, protecting the Parc Naturel des Source area, the environmental added-value of the ongoing biodiversity related projects, the Bru water offered during local sport and cultural events.	
1.3.8	*Levels of access and adequacy of WASH at the site shall be identified.*	Yes
Comment	They have identified the amount of WC/sinks and compared it to the legal requirements. Lately site added automatic flow controllers to the sinks and toilets to decrease the amount of water used in sanitary. Supporting documents: WASH count on site and the work code legislation on WASH access at work.	
1.4	*Gather data on the site's indirect water use, including: its primary inputs; the water use embedded in the production of those primary inputs the status of the waters at the origin of the inputs (where they can be identified); and water used in out-sourced water-related services.*	
1.4.1	*The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be identified.*	Yes
Comment	No primary input suppliers are included in the site's catchment as indicated in the attached 2023_SupplierBE.xlsx document. While not mapped, the site identified the top 10 primary input supplier and if they are located in the catchment of site or not.	
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	No service suppliers are included in the site's catchment as indicated in the attached 2023_SupplierBE.xlsx document. While not mapped, the site identified the top 10 service supplier and if they are located in the catchment of site or not.	
1.4.3	*Advanced Indicator* *The embedded water use of primary inputs in catchment(s) of origin shall be quantified.*	in progress
Comment	- Spadel did a water footprint analysis for their different production sites. Data used comes from Glimpact Product Environmental Footprint analysis (attached) which bases its analysis on databases. - The site has a procurement policy which indicates that suppliers need to use responsibly water. ***Finding No: TNR-016224***	
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

Supporting documents:
- Excel document "ContratRiviereAmbleve - Bru-Chevron Spadel pour bilan fin 2024_complétéSpadel": different ongoing actions for 2023-2025 period that Spadel/Bru is doing collectively with the Amblève River Contract (CRA). In addition the CRA is issuing newsletters with ongoing projects.
- Activity report of the Parc Naturel des Sources - (Rapport d'activités 2023 - Parc des Sources) - ongoing projects are the natural reserve 'prairies de Malchamps, prairies du Cerfs et Bronromme.
- PASH_Amblève 2013: Sanitation plan for the Amblève catchment. This is related to a bigger regional plan for the whole Wallonia region. The Lorcé village which is located in the site wider protected area is inside an Autonomous Sanitation area, which means that there are no sewage and that house needs to have their autonomous WW treatment unit.
- Convention 9/10/1993 with the Stoumont community (Confidential, not submitted) - Minutes of last meeting. 16/06/2023 - collaboration between site and the city on different projects.
- "ma_commune_face_aux_inondations_et_coulees_boueuses": flooding and mudflows management plan from the Wallonia region.
- Water Management Plan for Wallonia and the actions annex: higher level management plan for the region, note that the Amblève region is part of the Meuse bigger catchment and is therefore not included separately in the action plan. The plan however identify the river separately in some assessments. Nitrogen and phosphate levels are for instance identified as not problematic for the Amblève river. Overall, the Amblève river is the waterway with the best quality in Wallonia, note that it is identified as not accessible for transportation.

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

Following water-related legal and regulatory requirements identified during audit:
- Permit for boreholes operations (reviewed during audit).
- Permit for WWTP effluent discharge to river (current version attached).
- Contract and letters for providing water and treating waste water for houses located near the old production site (reviewed during audit).

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

- Site is calculating their Water Extraction Index annually in order to monitor that they are using the water resource sustainably. The site has included in their future actions to switch from the Water Extraction Index to another indicator that would better take into consideration the amount of water that actually infiltrates in the ground. Currently the index consider that all the water that was not evapotranspirated is available. Note also that the site identified in their WSP that they do not know how much the village of Stoumont is withdrawing with their own boreholes and an action to engage in order to get that information was set.

- The 2021 study on the impact of climate change on the Spa and Bru water resources (attached 2021_Evaluation des impacts du changement climatique sur les ressources en eau de Spa et Bru_Maxime Sohy_TFE) uses two models to make water balance predictions based on passed data and possible future scenarios. The conclusions are presented in point 3 page 43). However, the models are applied to the Spa catchment which is located nearby.

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
- All boreholes waters are monitored as described in indicator 1.3.4.
- Site identified as Best Practice to have expert doing an analysis of the site effluent impact on the Pouhon Stream every 2 years. Last analysis was performed in 2023 and can be found in the supporting document (P22033 CA_V4 Analyses rejet Bru).
- The Pouhon stream quality sheet can be found in the attached ou27r.pdf, however this one is related to the stream that is connected to the Ourthe river and is located in the nearby river basin (just the other side of the highway). The Amblève III sheet is the one considering the water quality data of the site catchment. The Amblève River at the confluence with the Pouhon stream is considered as good for both ecological and chemical point of view. The exception would be done for Mercury and PBDEs analysed in the biota. These analysis and status are done by the regional authorities.
- The water in the storm basin is analysed once per year for hydrocarbons and pesticides. The last observed test report did not found any detectable traces of these chemicals.

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.*

in progress

Comment
An extended list of IWRA is available and mapped in QGIS in the area. In addition many are protected areas, natural protected zones, or site infrastructure. Example of IWRAs identified are classified as following:
Sources and "Pouhons" (water emergences or artesian sources)
WWTP and storm bassins
Boreholes (Spadel or others)
Protected zones of catchment
Natura 2000 sites
Natural Park of Sources (Parc Naturel des sources)
Natural reserves
Water stream and rivers

Finding No: TNR-016226

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

Yes

Comment
- All infrastructure in protected zone is submitted to the site first (swimming pools, other boreholes).
- The site does not use any other infrastructure. They are monitoring the nearby highway to ensure that if any spillage happens there it will go to their collectors and in their storm basin. This happened in September 2024, site was contacted by the pompiers about a truck incident with spillage. They went there to verify that all the spillage was indeed directed to the highway drains.
- The village of Lorcée is not collected to sewers and is using fosses septiques.

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

Yes

Comment
- While the access to WASH within in Belgium and within catchment are very high, the villages of Lorcé, Chevron, Bru that are located inside the catchment are in Autonomous Sanitation (see map https://sig.spge.be/carto/apps/webappviewer/index.html?id=788e92576bc341c0890da28761ab53bf).
- Site provided the risk filter from WWF for Bru site which indicates a risk of 1 for Belgium -Access to Basic Safe Drinking Water and Access to Basic Sanitation (see attachment).
- Site provided the JMP sheet for Belgium as per attached.

1.5.8 *Advanced Indicator*
Efforts by the site to support and undertake catchment level water-related data collection shall be identified.

Yes

Comment
Study performed in 2023 about the impact of the WWTP effluent on the Pouhon river. This included the analysis of the Pouhon water before and after the discharge point and showed limited influence of site on stream quality. Update study was scheduled for year 2025.

1.5.9 *Advanced Indicator*
The adequacy of WASH provision within the catchments of origin of primary inputs shall be identified.

Yes

Comment: The identified TOP10 (in €) primary input suppliers are located in EU, and more precisely in Germany, Luxemburg, France and The Netherlands which are know to have a very high adequacy of WASH provision country-wide. The JMP assessments for each country were provided to support this indicator.

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.*

in progress

Comment: - "Gestion Durable de la ressource en eau minérale (Feedback) document identify the shared water challenges.
- Consultation for shared water challenges will be re-done in 2025 (as per 3-year cycle). The attached supporting documents are related to the 2021 survey.

Finding No: TNR-016230

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

Yes

Comment: Identified shared water challenges and initiatives to address them are indicated in the "Gestion durable de l'eau" document attached. While the initiatives are valid, they refer to the shared water challenges identified in 1.6.1 which are only related to the risk of pollution of the groundwater resources. The initiatives identified are the following: implementation of a "source pollution emergency plan" with different local actors (including authorities), including biodegradable oils in the specifications of forest management practices, providing anti-pollution kits to forest management practices, sensibilisation of parking owners to install oils interceptors in drains and the regional plan to census all the heating oil tanks to assess risk of leakage and compliance to regulations.

The lack of diversity and in identification of shared water challenge was documented in the finding raised in point 1.6.1.

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

Yes

Comment: - Future Impact document to be reviewed and 2021_evaluation des impacts des changements climatiques.
This 260 page document identifies possible increase of extreme droughts, and overall more rainfall but also more evapotranspiration because of the increasing temperatures.
In page 67 there is a summary on the results of the study. The different scenarios and models used are based on the nearby Spa catchment, however the impact and trends of climate change are identical because of the proximity of both catchments.
- The document am14r from the regional authorities identifies only 3 industries in the area (which is bigger than the site catchment). Knowing that the catchment includes Naura 2000 zones and the Parc Naturel des Sources there is very little possibility that future trends includes a substantial increase in population or industrial & agricultural activities.

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

Yes

Comment

The water-related impact that could be identified are related to
- The quality of the Pouhon stream where the treated effluent is discharged. The site did a study to confirm the their effluent has a limited impact on the river quality. There are campings downstream from the discharge point, their quality is available here and proof that there is no social impact related to site activities.
- The usage of groundwater that is also providing city water to the city of Lorcé (about 3000 inhabitants). While the municipality boreholes are exploiting surface aquifers (different from Bru ones), there is no sign that the groundwater resources are not exploited sustainably as per water table level and water balance exercise submitted in 1.5.3.
- The protected area of the catchment still allows population to enjoy of the preserved nature of the Natural Parc of the Sources.

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

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

Yes

Comment

- The supporting risk analysis (risk analysis_Bru) includes a matrix with different aspects including likelihood, severity of impact within a given timeframe, potential costs and business impact. Note that while the risk assessment includes physical, regulatory and reputational risks, they are not clearly identified and the site would have a clearer view to add this clarification in their table.
- Water scarcity risk analysis included data from the WWF Water Filter. It however emphasise that the situation at Spa and Bru is not comparable to the whole area risk as the site are the only users of the mineral water aquifers in the catchment.
-

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

Yes

Comment

Opportunities can be found in the WSP - some actions have no dates and therefore are opportunities. A tab with opportunities and best practices regroups both of them.

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

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

Yes

Comment

All best practices are identified in the Best Practices tab of the water stewardship plan. The table also indicates if the specific best practice was yet implemented or not in the different Spadel production sites.
Examples of BP for governance: implementing a Performance Indicator for legal compliance, implementing a CSR strategy for 2025-2030, implementing a Steering Committee (Steerco) for water.

1.8.2 *Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.*

Yes

Comment

All best practices are identified in the Best Practices tab of the water stewardship plan. The table also indicates if the specific best practice was yet implemented or not in the different Spadel production sites.
Examples of BP for water balance: benchmarking WUR with other industrial actors, perform a Product Environmental Footprint to identify water usage on the whole supply chain, implement a Performance Indicator for Water Scarcity Index.

1.8.3	*Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.*	Yes
Comment	All best practices are identified in the Best Practices tab of the water stewardship plan. The table also indicates if the specific best practice was yet implemented or not in the different Spadel production sites. Examples of BP for water quality: TFA analysis in effluent, implement a Source Emergency plan for Bru, effluent quality as good as stream quality prior to site discharge.	
1.8.4	*Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.*	Yes
Comment	All best practices are identified in the Best Practices tab of the water stewardship plan. The table also indicates if the specific best practice was yet implemented or not in the different Spadel production sites. Examples of BP for IWRA maintenance: Life project on riverbanks restoration (EU funded), analysis of stream quality every 3 years.	
1.8.5	*Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.*	Yes
Comment	No best practices were identified for WASH site provision. Site does not consider a priority to identify and implement best practices related to provision of equitable and adequate WASH services as current level of adequacy is considerably high (free bottled water, beverages and coffee for all employees, respect of legislation for WC/sink/shower count for both male and female employees).	

2	STEP 2: COMMIT & PLAN - Commit to be a responsible water steward and develop a Water Stewardship Plan	
2.1	*Commit to water stewardship by having the senior-most manager in charge of water at the site, or if necessary, a suitable individual within the organization head office, sign and publicly disclose a commitment to water stewardship, the implementation of the AWS Standard and achieving its five outcomes, and the allocation of required resources.*	
2.1.1	*A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:* *- That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes* *- That the site implementation will be aligned to and in support of existing catchment sustainability plans* *- That the site's stakeholders will be engaged in an open and transparent way* *- That the site will allocate resources to implement the Standard.*	Yes
Comment	Statement with organigram of water responsibility team is available attached. It is signed by Spadel CEO and available at the following link on Spadel website and is a statement for all certified sites. https://sourceofchange.spadel.com/wp-content/uploads/2024/02/Letter-Marc-du-Bois-130423.pdf	
2.1.2	*Advanced Indicator* *A statement that explicitly covers all requirements set out in Indicator 2.1.1 and is signed by the organization's senior-most executive or governance body and publicly disclosed shall be identified.*	Yes
Comment	Statement in 2.1.1 is signed by Spadel CEO, Mr. Marc du Bois.	
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

- Red-On-Line is used for all the updates of legislation and compliance that would happen and impact the site. It has a log that will indicate any new requirements that need to be reviewed. It can be filtered in Environmental topics and theme (water/air/etc.)
- On Spadel intranet Sharepoint, the necessary permits for each sources/borehole and effluent are available. Permit for pumping trials are also available for new boreholes exploitations.
- Once per year the site needs to submit the Waste Water Declaration (Déclaration des eaux usées)
- No Environmental Declaration is necessary for Bru activities as it was determined that the size and activities of the site does not require a declaration. Site is however requested to be compliant with the permits. The data as per permit (in Step 1) needs to be kept for 5 year in case of a control. The permit also requires to submit any deviations to the SPW-DEE responsible. The amount of water withdrawn for each boreholes needs also to be submitted to the authorities for taxes purposes.
- The responsible person for environmental compliance on site Frédéric Roth - Safety & Environment Manager Spa and Bru. The job description would identify the responsibilities of local legal compliance. At a group level Maxime Sohy/Olivier Crommen (Group Water and Environment Engineer) and Arnaud Collignon (water and environment manager) are also in charge of the water resources and compliance. The corporate Environmental Managers and Engineers specifically work on new permits, sustainable management of the resources for all sites, and more long term projects, while the local team ensure daily tasks and compliance.

2.3 *Create a water stewardship strategy and plan including addressing risks (to and from the site), shared catchment water challenges, and opportunities.*

2.3.1 *A water stewardship strategy shall be identified that defines the overarching mission, vision, and goals of the organization towards good water stewardship in line with this AWS Standard.*

Yes

Comment

- The overall mission is to have a sustainable water management of all Spadel resources. It is based on three drivers (goals): No overexploitation of resource (water Water Extraction Index -> Water Scarcity Index), Water savings (decrease water source ratio), water risk management and transparency (water resource risks assessment and action plan to mitigate, transparent communication to stakeholders).
- Note that these new targets were defined lately and will appear in the next CSR (currently the 2024 CSR report was not yet published).

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

Obs.

Comment	- A new version of the WSP was created and presented. This is a more simplified version than the one observed in previous Spadel audits which was focused on site risks. Best practices are identified and the plans still has all the necessary information requested by this indicator. - The Spadel "Drivers" documents presents the main targets at group level for their WSP. Note that these are then translated to site-specific targets that will be indicated in the site WSP in the "Water Targets" tab. - The WSP will indicate the high level targets (WUR, WEI, risk to be addressed), then for specific actions some separate documents are used for the follow-up. This was done to facilitate the WSP document. - The supporting "Water Use Ratio Bru_projets" document will list the ongoing projects related to water savings. Current target set in the WSP requires a WSP of 1,67 for the whole 2025 year. This ratio is monitored monthly (or more frequently) in separate spreadsheets. - The supporting "Risk Analysis_Bru" document will track and monitor the risks identified by the site, and the progress to the 2030 target of controlling 80% of them. - Note that the stakeholder transparency target was not yet set and is therefore not SMART. A finding was raised in indicator 4.1.1 to address the impossibility to track its progress.

2.3.3 *Advanced Indicator*
The site's partnership/water stewardship activities with other sites within the same catchment (which may or may not be under the same organisational ownership) shall be identified and described.

Yes

Comment	- In the "Stakeholders Matrix_Spa_Bru" document the "listing projets" tab is identifying the projects that are conducted with stakeholders. The following collective activities are the most relevant; - Parc Naturel des Sources (PNS): partnership between Spadel, Domaine de Berinzenne and the Spa & Stoumont municipalities to preserve 148 km2 area that includes the two municipalities and the catchments of the two sites. This Natural Parc is supported by the Wallonia region. Many projects are done through the PNS, the most recents/ongoing ones are the Malchamps and Bronromme grasslands status that was changed to natural reserve. This included adaptations of the grasslands to improve biodiversity. - Plan d'Urgence des Sources: based on what was done for Spa catchment, the project aims to create a Source Emergency Plan along with local relevant partners and to sign a convention between all actors. This includes training of firefighters, local police, to specific procedures in case of pollution incidents inside the catchment territory. Currently first contacts with stakeholders were conducted in order to put the basis of this convention.

2.3.4 *Advanced Indicator*
The site's partnership/water stewardship activities with other sites in another catchment(s) (either under same corporate structure or with another corporate site) shall be identified.

Yes

Comment	The supporting "2024_Liste projets biodiversité_Be" document presents the ongoing or completed in Belgium by the Spadel group. All the presented projets are located in the Amblève catchment (except the projet Semois).

2.3.5 *Advanced Indicator*
Stakeholder consensus shall be sought on the site's water stewardship plan. Consensus should be achieved on at least one target. A list of targets that have consensus and in which stakeholders are involved shall be identified.

Yes

Comment	Last stakeholder feedback on targets was done on the stakeholder consultation in 2021. The next stakeholder consultation is planned in 2025 (normally it should have been in 2024 as it is fixed with a 3 year cycle but was postponed because of local elections in 2024). Many projects are still valid though.

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	Biggest identified risk is the pollution of the water resource. Site has in its WSP to make a Plan d'Urgence Source, which includes a convention with local authorities, firefighters, police department in order to be able to answer quickly to possible pollution incidents (outside site boundaries). Site is not dependent on any other water infrastructure than its own (sources are their own, WWTP too, and rainwater system and storm pond too).	
2.4.2	*Advanced Indicator* *A plan to mitigate or adapt to water risks associated with climate change projections developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.*	Yes
Comment	Fiche projet - Hydrologie Regenerative: project to increase the amount of infiltrated water in the Parc Naturel des Sources (both Spa and Bru) to be more resilient for future trends. Note: Restoration of wetlands, creation of habitats, restoration of soil retention, aménagement qui permettent de retenir l'eau en among. (file confidential not submitted) This said the climate change study with the different scenarios presented by the models does not conclude a threat to Spadel Belgian operations in the future. This might not be the case of more superficial aquifers that the local water supplier (Stoumont municipality) is using as these are more vulnerable to seasonal variations.	

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	Evidence of good water governance reviewed during the audit: - Minutes of meetings with Parc Naturel des Sources; - Minutes of meeting with municipality of Stoumont; - Participation to the annual report of Amblève river contract (Contrat Rivière Amblève). - Signed convention with Fagotin not-for-profit NGO - Spadel and Fagotin willl organise trainings on biodiversity and environmental awareness collectively. Fagotin is an NGO that is aiming to solidarity, citinzenship, nature promotion etc.
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	- A couple of houses around the old site is being provided water from the Bru boreholes. They have a letter of convention confirming this and they still provide drinking water quality water - No other indigenous people identified in the area.
3.1.3	*Advanced Indicator* *Evidence of improvements in water governance capacity from a site-selected baseline date shall be identified.* ✓ Yes
Comment	- Maxime Sohy is a shared resource for the Spadel Group only to handle regulatory and water stewardship activities at group level. He started working in 2024 for Spadel. - New "Plan d'Urgence" similar to the one developed in Spa is currently in project. - In the WSP you can see new meetings and activities every year, if you filter per year and per governance you can see improvements that were not present the year before (even when actions are recurring). It was however emphasised the need to formalise the site-selected baseline for following years.
3.1.4	*Advanced Indicator* *Evidence from a representative range of stakeholders showing consensus that the site is seen as positively contributing to the good water governance of the catchment shall be identified.* ✓ Yes
Comment	Stakeholders were engaged in the 2021 survey about governance activities, the following consensus were reached: - Creation of the Parc Naturel des Sources NGO with Spa and Stoumont municipalities - 6 out of 11 stakeholders that answered that question said it was important, 5 of which said it was also effective. - Creation of Plan d'Urgence des Sources. 11 of the 14 stakeholders answered that the Emergency Source Plan was important, 7 of which said it was effective. - Interview with stakeholders showed that the site engaged with them openly and and are scheduling meetings and phone calls to support water governance in the catchment. For instance the River Contract Amblève actively communicated with the site in order to gain access to the Storm Basin during the amphibians migration period, which the site supported actively.
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	- The analysis described in the "Standard Analyse et controle" document describes the water analysis and processes to cover the requirements of the different delivered permits. These are described extensively in indicator 1.3.4. - 'Declaration des eaux usées': once per year the results of the analysis of the WWTP effluent by external laboratory is submitted by mail to the Wallonia Region (DG04). The Declaration for year 2023 was observed during the audit. It is filled and submitted by the site director.	
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	No water rights of others identified in legal and regulatory requirements.	
3.3	*Implement plan to achieve site water balance targets.*	
3.3.1	*Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.*	Yes
Comment	- Water Use Ratio monitoring is available in the supporting Source_Bru document: target for 2024 was 1,64, but site did not reach the target (1.67). - Water Extraction Index: done once per year should be less 10% (target) and site reached 2,3% in 2024.	
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 in the catchment, however site has a water use efficiency (water use ration) target set every year (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	There is a convention of providing water to the houses around the old site (treatment site).	
3.3.4	*Voluntary Advanced Indicator* *The total volume of water voluntarily re-allocated (from site water savings) for social, cultural and environmental needs shall be quantified.*	Yes
Comment	Sponsonring - 29688L Bru Water donated for different social & cultural events (full file observed during audit).	
3.4	*Implement plan to achieve site water quality targets*	
3.4.1	*Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.*	Yes
Comment	In WSP - noting that there is not much quality issues identified on site and in the catchment, the following actions were identified: - The analysis of river and impact of effluent will be re-done this year as it is done in 3 year cycle. Next one is planned for 2025. In Aqua Plan (observed during audit but not submitted for confidentiality reasons): - HEPA filters installed on all boreholes to prevent microbial contamination. - cleaning of buffer tank "300 bas" as part of preventive maintenance. - follow-up of iron and manganese removal after the CO2 removal process improvement. - change of tubing in the WWTP to improve the cleaning process of the WWTP tank during maintenance - maintenance program for the boreholes (some needed a re-drillinge).	

3.4.2	*Where water quality is a shared water challenge, continual improvement to achieve best practice for the site's effluent shall be identified and where applicable, quantified.*	Yes
Comment	Water quality is not considered a shared water challenge in the catchment. The receiving river is in an excellent quality and the effluent influence was analysed and does not impact too much the stream quality.	
3.5	*Implement plan to maintain or improve the site's and/or catchment's Important Water-Related Areas.*	
3.5.1	*Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.*	Yes
Comment	- CSR Biodiversity 2025: strategy to 2030 about IWRA and other biodiversity activities --> planning of future activities on a 5 years period. - The 2024_Liste Projets Biodiversité document lists and briefly explains the ongoing projects. - Curent IWRA enhancement projects in the WSP: Pré au Cerf natural reserve implementation (80% completed), Malchamp grasslands natural reserve implementation (50% completed), implementation of regenerative hydrology projects (new, 5% as at early stage of project planification), Neubois forest management plan (start in 2025), biodiversity impact of site activities study (10%, currently call for project).	
3.5.2	*Advanced Indicator* *Evidence of completed restoration of non-functioning or severely degraded Important Water-Related Areas including where appropriate cultural values from a site-selected baseline date shall be identified. Restored areas may be outside of the site, but within the catchment.*	Yes
Comment	- Life Vallées Ardennaise project (2020-2028) - As part of this wider EU-funder project, the LIFE Ardenne Liégoise focus on bog restoration and included the Spa-Malchamp restoration project. The following link includes a summary of the achievements for the whole Ardenne Liégoise part of the project: https://biodiversite.wallonie.be/fr/life-ardenne-liegeoise-2012-2020.html?IDC=3590. A video describing the project results is available at the following link: https://www.youtube.com/watch?v=-O-3XKco_Cs A newsletter on the Life Ardenne Liégoise project achievement is provided by the Domaine de Berinzenne, the latest letter is dated October 2024 (supporting document). - Status Report of the Tetra Lyre project dated 2023 (project started in 2018) reviewed during audit. - River Contract Amblève provides an annual batrachians count report during annual campaigns around site. This however shows that the trend is negative (as for the whole Wallonia).	
3.5.3	*Advanced Indicator* *Evidence from a representative range of stakeholders showing consensus that the site is seen as positively contributing to the healthy status of Important Water-Related Areas in the catchment shall be identified.*	Yes
Comment	Last stakeholder feedback done in 2021, the next one is planned in 2025. The following IWRA projects were presented to be assessed by stakeholders (approval rate was adapted to the number of stakeholders that answered): - 4000 Ha Protection Zone implementation: 90% of approval. - Forest Management practices on Bru owned land: 80% of approval. - Implementation of Pré-Humide natural reserve on old productions site area - 83% of approval. - Clean-up project: 80% of approval. - Supporting CRA in amphibians count: 80%.	
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	Currently about 20 FTE on Bru site. The supporting site WASH count serves as evidence of adequate provision.	
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	No issues with WASH and sanitation of local communities. was identified.	
3.6.3	*Advanced Indicator* *A list of actions taken to support the provision to stakeholders in the catchment of access to safe drinking water, adequate sanitation and hygiene awareness shall be identified.*	Yes
Comment	- Catchment has a high level of access to safe drinking water and sanitation. - Approx. 29000 L of bottled water was provided for different activities. - In the Spa nearby catchment the site is taking care of local fountains to ensure that potable water is coming out from them.	
3.6.4	*Voluntary Advanced Indicator:* *In catchments where WASH has been identified as a shared water challenge, evidence of efforts taken with relevant public-sector agencies to share information and to advocate for change to address access to safe drinking water and sanitation shall be identified.*	N/A
3.7	*Implement plan to maintain or improve indirect water use within the catchment:*	
3.7.1	*Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.*	Yes
Comment	No primary suppliers within site catchment identified.	
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	No suppliers and services providers within site catchment.	
3.7.3	*Advanced Indicator* *Actions taken to address water related risks and challenges related to indirect water use outside the catchment shall be documented and evaluated.*	Obs.
Comment	Spadel Sustainable Procurement specifically request suppliers to measure and reduce use and discharge of water. However, this needs to develop to direct actions or engagement to maintain conformance.	
3.8	*Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have.*	
3.8.1	*Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.*	Yes

Comment	No shared water infrastructure identified on site, supply water infrastructure is all in charge of site, no connection to city water. The WWTP and related tubing are also property of the site. Same goes for storm water basin and drains.	
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	Actions towards best practices related to water governance: - Having a Source Urgency Plan for each site: ongoing project, this was finalised for Spa site and a similar plan needs to be done for the Bru, it includes the authorities and local firefighters and police. - Use a standard for "essai de pompage"' for new boreholes for all sites.	
3.9.2	*Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.*	Yes
Comment	Actions towards best practices related to water balance: - Site is implementing the calculation of the Water Scarcity Index (in addition to the Water Extraction Index) to better assess the water availability in the catchment. - Benchmarking of WUR with other industries in the same sector.	
3.9.3	*Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.*	Yes
Comment	Actions towards best practices related to water quality: - Make all boreholes sanitisables. - Make an analysis/study on impact of effluent on receiving water body (last in 2023- planned to be re-done before end of 2025) - Analysis of TFAs on raw waters.	
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	IWRA: - Making a CSR 2030 plan with biodiversity projects they want to work with. - Seeking stakeholder feedback on biodiversity projects. - Hydrology regenerative projects to be implemented for further 2025-2030 period.	
3.9.5	*Actions towards achieving best practice related to targets in terms of WASH shall be implemented.*	Yes
Comment	No real WASH best practices identified/necessary in the catchment.	
3.9.6	*Voluntary Advanced Indicator : Achievement of identified best practice related to targets in terms of good water governance shall be quantified.*	N/A
3.9.7	*Voluntary Advanced Indicator: Achievement of identified best practice related to targets in terms of sustainable water balance shall be quantified.*	N/A
3.9.8	*Voluntary Advanced Indicator: Achievement of identified best practices related to targets in terms of water quality shall be quantified*	N/A

3.9.9	*Voluntary Advanced Indicator:* *Achievement of identified best practices related to targets in terms of the site's maintenance of Important Water-Related Areas have been implemented.*	N/A
3.9.10	*Voluntary Advanced Indicator:* *Achievement of identified best practice related to targets in terms of WASH shall be quantified.*	N/A
3.9.11	*Voluntary Advanced Indicator* *: A list of efforts to spread best practices shall be identified.*	N/A
Comment	Any type of internal best practices sharing? Check with Arnaud? All the best practices are shared between sites.	
3.9.12	*Voluntary Advanced Indicator* *A list of collective action efforts, including the organizations involved, positions of responsible persons of other entities involved, and a description of the role played by the site shall be identified.*	Yes
Comment	- Source Emergency Plan: establishing a collective collaboration between the authorities, local emergency services (firefighters, police and forest rangers) to act quickly and efficiently in case of pollution in the area. The Site is in charge of training the different stakeholders, elaborating and managing the plan, the municipality of Stoumont is participating as the different emergency services answers to them. - Parc Naturel des Sources: involved stakeholders : municipalities of Stoumont and Spa, domaine de Bérinzenne and Spadel. The **Parc Naturel des Sources** focuses on protecting natural landscapes, biodiversity, and cultural heritage. It promotes sustainable agriculture, forestry, and land use. The park also organizes educational programs, offers ecotourism opportunities like hiking and cycling, and works with local communities to foster environmentally responsible regional development. Its goal is to balance conservation with sustainable growth for both nature and people. Through the Domaine de Bérinzenne they manage EU-funder LIFE projects in the region, and awareness activities.	
3.9.13	*Voluntary Advanced Indicator:* *Evidence of the quantified improvement that has resulted from the collective action relative to a site-selected baseline date shall be identified and evidence from an appropriate range of stakeholders linked to the collective action (including both those implementing the action and those affected by the action) that the site is materially and positively contributing to the achievement of the collective action shall be identified.*	N/A

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 following general targets are monitored For Water Balance: - WUR - Water Use Ratio Bru 2024 documents the monthly follow-up of the WUR target. Target was 1.64 and 2024 finished with 1.67. This highly depends on the amount of glass production they have. - WEI - Once per year the Water Extraction Index is calculated with the annual data gathered. This is then compared to the < 10% target fixed (half of the 20% target set by the European Environmental Agency for sustainable use of WEI). For 2024 the WEI for Bru was 2.3% For Water Governance and Quality: - Amount of controlled risk from risk matrix - 80% of controlled risk for 2030 - currently 56% of controlled for 2024, which means that the site is over-performing as per their current target. - Stakeholders transparency/communication - no target while it is set-up as a main target. - Have the 5 sites certified to Platinum (or keep it). IWRA: - One biodiversity project per country per year: currently two in Belgium, Malchamp and Bronromme natural reserve implementation. Currently this target will be replaced by a percentage of profit re-invested each year in biodiversity projects. All the projects not specifically related to a general target are also recorded in the WSP and indicate for which AWS outcome they are linked to and the percentage of completion. The related AWS outcome is indicated for each action in the WSP. ***Finding No: TNR-016290***	
4.1.2	*Value creation resulting from the water stewardship plan shall be evaluated.*	in progress
Comment	While the site prepared a document to evaluate the value creation from their WSP (mainly through water savings projects), this was not yet implemented. ***Finding No: TNR-016291***	
4.1.3	*The shared value benefits in the catchment shall be identified and where applicable, quantified.*	Yes
Comment	Supporting document "2024_Added_Value_BruChevron V1" describes the shared value benefits identified by site. It describes the added value for environment (with short description of the different biodiversity projects, the catchment protection zone), for the society and economics (through the Parc Naturel des Sources and its importance for tourism/nature of the area, and donation of 30000L of Bru water and sponsorship of social and cultural activities in the catchment; 20 FTE and local taxes paid annually for the withdrawal of mineral water).	
4.1.4	*Advanced Indicator* *A governance or executive-level review, including discussion of shared water challenges, water risks, and opportunities, and any water-related cost savings or benefits realized, and any relevant incidents shall be identified.*	Obs.
Comment	A site management review is done biannually, each sites will review and communicate the identified local risks and opportunities, incidents, costs savings and benefits.	
4.2	*Evaluate the impacts of water-related emergency incidents (including extreme events), if any occurred, and determine the effectiveness of corrective and preventative measures.*	

4.2.1	*A written annual review and (where appropriate) root-cause analysis of the year's emergency incident(s) shall be prepared and the site's response to the incident(s) shall be evaluated and proposed preventative and corrective actions and mitigations against future incidents shall be identified.*	Yes
Comment	Supporting documents: - Incident response plan (Draft). - "250204 Spa_Bru Registre Inc_Acc_Plaintes_Actions_ameliorations": annual incidents and complaints records with root-causes and CA and actions follow-up. During annual management reviews, water resources needs are taken into account and includes the risks to the source and CAPEX analysis of necessary investments related to it.	
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.*	Obs.
Comment	The attached "Spadel_Gestion eau_Bru_2025_Public_V2" document is used to present site water stewardship activities and performance to stakeholders. The general targets and AWS outcome are indicated. This document is available online but was also sent to the following stakeholders Parc Naturel des Sources, Commune de Stoumont, Fagotin, Contrat Rivière Ambleve (CRA) and SPW-DNF and site specifically requested feedback.	
4.3.2	*Voluntary Advanced Indicator : The site's efforts to address shared water challenges shall be evaluated by stakeholders. This shall include stakeholder reviewing of the site's efforts across all five outcome areas, and their suggestions for continual improvement.*	N/A
4.4	*Evaluate and update the site's water stewardship plan, incorporating the information obtained from the evaluation process in the context of continual improvement.*	
4.4.1	*The site's water stewardship plan shall be modified and adapted to incorporate any relevant information and lessons learned from the evaluations in this step and these changes shall be identified.*	Yes
Comment	The new WSP has an "update" tab with records of important updates to the plan. Note that a complete new WSP system was created to better fit with the standard requirements. This was launched at the beginning of this year, and is being used right now for the new targets. The previous version of the plan was also available for review.	

5	STEP 5: COMMUNICATE & DISCLOSE - Communicate about water stewardship and disclose the site's stewardship efforts	
5.1	*Disclose water-related internal governance of the site's management, including the positions of those accountable for legal compliance with water-related local laws and regulations.*	
5.1.1	*The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.*	Yes
Comment	Statement shared on Spadel website (https://sourceofchange.spadel.com/wp-content/uploads/2024/02/Letter-Marc-du-Bois-130423.pdf) includes the organigram with the position of the persons accountable for water compliance. In a general way, the local environmental manager is in charge of submitting and ensuring compliance, while the site manager has the final responsibility of everything being done.	
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.*	Obs.
Comment	The WSP plan was communicated within the attached "Spadel_Gestion eau_Bru_2025_Public_V2"' document.	
5.3	*Disclose annual site water stewardship summary, including: the relevant information about the site's annual water stewardship performance and results against the site's targets.*	
5.3.1	*A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.*	Yes
Comment	The Gestion Durable de l'Eau document is available on SourceofChange website in the CSR sustainability section. This document presents the main targets and the annual performance against target.	
5.3.2	*Advanced Indicator* *The site's efforts to implement the AWS Standard shall be disclosed in the organization's annual report.*	Yes
Comment	The 2024 CSRD report was not yet issued, but in the 2023 report, the AWS efforts were already disclosed.	
5.3.3	*Voluntary Advanced Indicator* *; Benefits to the site and stakeholders from implementation of the AWS Standard shall be quantified in the organization's annual report.*	N/A
5.4	*Disclose efforts to collectively address shared water challenges, including: associated efforts to address the challenges;engagement with stakeholders; and co-ordination with public-sector agencies.*	
5.4.1	*The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.*	Yes
Comment	The "Gestion durable de l'eau" document informs about site's shared water challenges identified and the project related to them. The challenges are all related to catchment pollution as identified in finding indicator 1.6.1.	

5.4.2	*Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.*	Yes
Comment	Meetings minutes observed/ held. The stakeholder matrix is indicating what kind of communication/meeting is done with each stakeholders. Evidences are the following: - Meeting minutes from 16/06/2023 - with the municipality of Stoumont. - Meeting with Parc Naturel des Sources (includes Stoumont, Spa, domaine de Beringenne, CRA, FWA, Le Fagotin) in it): 07/03/2024 - 2 General Assembly per year to discuss about the management the Parc Naturel des Sources. - Meeting - General Assembly with Contrat Rivière Amblève: last one done in 2023, but interview confirmed that site will join again in 2025.	
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	- Supporting document 250204 Spa_Bru Registre Inc_Acc_Plaintes_Actions_ameliorations records all the complaints and incidents of the year. Note that contained and controlled incidents are also recorded in this document, which means that most of them are not communicated to the authorities since they have no external impact. - Legal permit for effluent indicates that the site needs to communicate any compliance violations. - Communication with authorities about past incidents were reviewed during audits showed site transparency in their incident management.	
5.5.2	*Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.*	Yes
Comment	The incidence record list reviewed in 5.5.1 includes any corrective actions taken following the incident.	
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	No violations identified since previous audit. It is however indicated in the site procedures that in case of violation authorities will be immediately informed.	

Previous Findings

	All non-conformities raised in the previous audit have been satisfactorily closed.	N/A