

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)



Audit Number: AO-001386

SITE DETAILS

Site: **İnegöl - Bursa, Turkey**

Address: Sulhiye District. Sulhiye Street No:91-A İnegöl/BURSA, 16400, Bursa, TURKEY

Contact Person: Nihan Kibar

AWS Reference Number: AWS-000666

Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Core

Date of certification decision: 2025-May-19

Validity of certificate: 2028-May-18

AUDIT DETAILS

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

Audit Type(s): Initial Audit

Audit Start Date: 2025-Feb-19

Audit End Date: 2025-Feb-21

Lead Auditor: Ozge Gokmen

Audit team participants:

Ozge Gokmen, Lead Auditor

Site Participants:

Nihan Kibar, Water Resources Manager

Banu Akay Cevik, Water Resources Legal Process Executive

İrem Oruc, Water Resources Supervisor

Mehmet Yavuz, Environment and Public Relations Manager

H. Adnan Ceyhan, WR Manager ZEUR Production

Serkan KAHRAMAN, Water Resources Manager

Erman Ince Duygu, SHE Manager

Salih BOYRAZ, Product Supervisor

Selda Agan, Quality Assurance Chief

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ADDITIONAL INFO

Summary of Audit Findings: During the certification audit, 2 minor non-conformities and 2 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 09 May 2025.

Minor non-conformities must be closed out by the time of the next annual audit.
CLOSURE OF FINDINGS AND CORRECTIVE ACTION PLAN:

The Client has successfully resolved 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.
The audit team recommends certification of Nestlé Erikli Inegol Bursa at Core level pending approval of the corrective actions plan for the non-conformities.

Scope of Assessment: The scope of services covers the Initial certification audit for assessing the conformity of Nestle Inegol Water against the AWS International Water Stewardship Standard Version 2.

Erikli natural water sources are located in the Sakarya basins in Bursa province, Turkey. The facility is a Bottled Natural Spring Water production plant, covering an area of 0.03 km². Its bottling capacity is an average of 250 million liters per year. The entire site consists of natural spring water extraction points, with 12 source extraction points for the Erikli brand. The total length of pipes carrying water from these sources to the bottling plant is 57 km. The facility has two bottling lines that fill three different formats: 0.5 liters, 1.5 liters, and 5 liters.
There are two wastewater treatment plants on the factory site—one for domestic wastewater and one for industrial wastewater. The treated water is discharged in two stages into the natural water body of the Sulhiye Stream. The treated wastewater is connected directly to the receiving environment via a combined pipeline (industrial + domestic).

The audit was conducted onsite on 19-21/02/2025.
The onsite site visit included the assessment of water sources, bottled water plant, treatment plant, and discharge point.

FINDINGS

NUMBER OF FINDINGS PER LEVEL	
Observation	2
Minor	2

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FINDING DETAILS

Finding No:	TNR-017611
Checklist Item No:	1.2.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2026-Feb-21
Checklist item:	<p>Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall:</p> <ul style="list-style-type: none">- Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people;- Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies;- Provide evidence of stakeholder consultation on water-related interests and challenges;- Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups;- Identify the degree of stakeholder engagement based on their level of interest and influence.
Findings:	<p>The site has limited stakeholder identification to those with whom collaboration takes place. This does not sufficiently meet the definition of stakeholders in the standard.</p>
Corrective action:	<p>the stakeholder list has been updated and will continue to be updated based on the communications received. Other potential stakeholders will be interviewed and the stakeholders will be evaluated, and possible stakeholders in areas such as industry and agriculture will be added to the list and the list will be revised.</p>
Finding No:	TNR-017355
Checklist Item No:	1.5.4
Status:	Open
Finding level:	Observation
Checklist item:	<p>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.</p>
Findings:	<p>The standard requires also obtaining up-to-date data to understand water quality issues on the catchment and monitor data over the years</p>
Corrective action:	<p>Revised documents will be submitted by providing updated data.</p>

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Finding No:	TNR-017616
Checklist Item No:	1.6.1
Status:	Open
Finding level:	Observation
Checklist item:	Shared water challenges shall be identified and prioritized from the information gathered.
Findings:	The shared water challenges are worded in a generic way that makes it difficult to understand what about water quantity is a challenge in the catchment. The site should also update the shared water challenge identification (a) once they identify further stakeholders and work to understand what challenges they see, and (b) from the update of the analysis of the catchment issues.
Corrective action:	Taking into account the climate projections in the region, indicator requirements will be revised with resources from national sources and will be based on scientific resources. Indicator requirements will be revised.
Finding No:	TNR-017091
Checklist Item No:	5.3.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2026-Feb-21
Checklist item:	A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.
Findings:	The site has disclosed a summary of its water stewardship performance, however, quantified performance against targets has not been disclosed.
Corrective action:	Communication have been contacted with relevant departments. Works have begun to set numerical targets and publish them on the website. Time-bound completion rates of the targets will be added in the Water Stewardship Plan and Progress report as numerically for 2025.

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Report Details

Report	Value
Report prepared by	Ozge Gokmen
Report approved by	Lorenzo Brioschi
Report approved on (Date)	07/04/2025

Surveillance

Proposed date for next audit
2026-Feb-11

Comment It's an initial audit.

Stakeholder Announcements

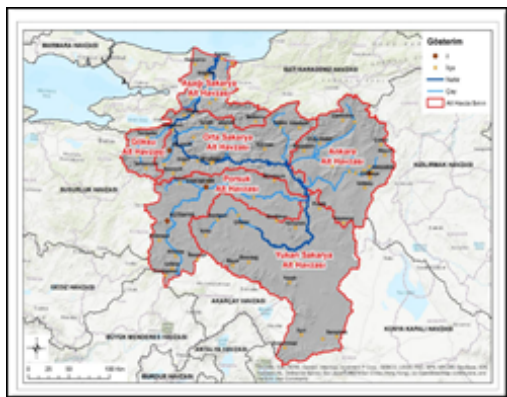
Date of publication	Location
25/12/2024	https://www.erikli.com.tr/sites/g/files/xknfdk2096/files/2024-12/erikli-inegol-fabrikasi-su-yonetimi-paydas-duyurusu.pdf
25/12/2024	https://a4ws.org/wp-content/uploads/2024/12/AWS-000666_NW-Turkey-Inegol_StakeholderAnnouncement_Jul24_V3.0.pdf
25/12/2024	e-mailing with stakeholders

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Catchment Information



sakarya_basin.png

Catchment Information

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The Sakarya Basin is located in the Western Black Sea and Central Anatolia Region of Turkey. The total precipitation area of the Sakarya Basin, which constitutes 1/8 of Türkiye surface area, is 63,303 km². The Sakarya River is the third longest river in Turkey after the Kızılırmak and Fırat rivers and the largest river in northwestern Anatolia. There are many rivers in the Sakarya Basin other than the main branch of the Sakarya River, and these rivers transmit their flows to the Black Sea via the Sakarya River. Main rivers are demonstrated with their sub-basin in the list of the table.

Besides this, the river basin includes many dam lakes and other small / big scales lakes.

The region consists of conglomerate, sandstone, marl, claystone, clayey limestone, and limestone. To the south, conglomerate, sandstone, claystone, and mudstones are more prevalent, while to the north, layers consisting of conglomerate, sandstone, marl, claystone, clayey limestone, and limestone are more commonly found.

A spring can be defined as the location at the land surface where groundwater discharges from the aquifer, creating a visible flow. Different types of spring exist, associated with different mechanism. The following type of springs can be defined such as Depression springs, Contact springs, Fault springs, Joint/ Fracture springs and Karst springs.

Aquifer Description : The water sources of the Inegöl factory are located in the northeastern part of the Uludağ. The rocks composing this massif are showing very poor matrix porosity and permeability. This type of rock is not able to retain water nor able to permit its circulation unless a secondary porosity development take place. Two types of porosity may be considered :The first type comes from the development of fractures and faults network due to the important regional stress. These fractures and fault networks act as a secondary porosity permitting the water to infiltrate and circulate in the massif. The second type is due to the weathering mechanisms affecting the bedrock which permit the development of a secondary porosity network.

The groundwater data for the Sakarya Basin has been compiled from the methodology and findings of the "Project for Developing Turkey's Groundwater Management Capacity," conducted in 2016. A total of 71 groundwater bodies have been identified within the Sakarya Basin.

Previous groundwater budget studies in the project area were carried out separately for plains by the State Hydraulic Works (DSİ) since 1974. However, this study primarily relies on the results of the latest Sakarya River Basin Master Plan (DSİ, 2017). The Master Plan Report also incorporates previous survey studies. According to the report, the basin has been divided into seven main hydrological sub-basins, and a groundwater budget has been established by analyzing groundwater recharge and discharge for each sub-basin.

Groundwater discharges in the region have been calculated based on individual and cooperative irrigation practices, as well as urban and industrial water consumption. The resulting budget distribution is presented in Table 3-4. According to the groundwater budget assessment, the total groundwater recharge is estimated at 2,400 hm³, while the safe groundwater reserve is calculated at 1,900 hm³. Out of this reserve, 1,153 hm³ has been allocated, leaving a remaining groundwater volume of 660 hm³ across the basin.

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Client Description and Site Details

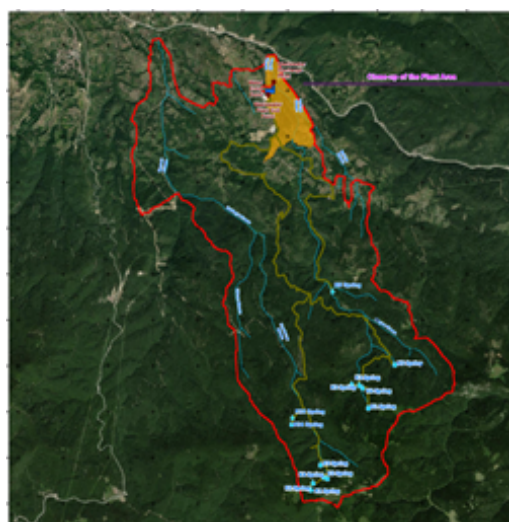
Client/Site Background

Erikli natural water sources are located in the Sakarya basins in Bursa province, Turkey. The facility is a Bottled Natural Spring Water production plant, covering an area of 0.03 km². Its bottling capacity is an average of 250 million liters per year. The entire site consists of natural spring water extraction points, with 12 source extraction points for the Erikli brand. The total length of pipes carrying water from these sources to the bottling plant is 57 km. The facility has two bottling lines that fill three different formats: 0.5 liters, 1.5 liters, and 5 liters.

There are two wastewater treatment plants on the factory site—one for domestic wastewater and one for industrial wastewater. The treated water is discharged in two stages into the natural water body of the Sulhiye Stream. The treated wastewater is connected directly to the receiving environment via a combined pipeline (industrial + domestic).



site2.png



site1.png

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Summary of Shared Water Challenges


Summary of Shared Water Challenges

- Water stress linked to climate change and increasing scarcity of resources (streams and rivers, maintenance of ecosystems, etc.)
- Water Quantity


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 Production site and wastewater treatment plants have been visited. Due to the weather conditions, the spring water source could not be visited on-site. However, since the water sources are monitored through a real-time camera system, the water sources were examined via the cameras.

0.1.1.1 *The site(s) occupy one catchment OR an exception has been granted.*  Yes

Comment The site occupies one catchment.

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

Comment The site is under the control of a single management system.

0.1.1.3 *The scope of the proposed certification shall be homogeneous with respect to primary production system, water management, product or service range, and the main market structures.*  Yes

Comment The site bottles natural spring water.

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1 STEP 1: GATHER AND UNDERSTAND

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

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

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



Comment The Erikli production facility is located in the İnegöl district. It is a bottling plant for Natural Spring Water. The site covers an area of 0.03 km². The site's boundaries and water sources are depicted on the map. The site has 12 water sources, with a total pipeline length of 57 km that carries water from these sources to the bottling plant. There are two wastewater treatment plants on the factory site: one is a Domestic WWTP (Wastewater Treatment Plant), and the other is an Industrial WWTP. The treated water is discharged in two stages into the natural water body of the Sulhiye Stream. The treated wastewater is directly connected to the receiving environment via a pipeline (industrial + domestic). Sulhiye Stream originates in Sakarya Basin and flows into Marmara Basin. The AWS watershed boundary covers an area of 33.4 km². The sub-basin of the Marmara basin, where the wastewater is discharged, is also shown on the map. The catchment that the site affects and is reliant upon water is "Goksu sub-basin"

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.

 in progress

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Comment The site has shared various documents related to identifying, engaging, interacting, and following up with different stakeholders. It uses a tool called CPR 2.0 (Community Relations Process), which consists of a spreadsheet with multiple tabs for various analyses, including stakeholder mapping, internal diagnosis, external diagnosis, and action plans. Engagement with stakeholders occurs through different channels such as dialogue and partnerships.

Within this tool, the individuals and institutions engaged with each year are recorded. Their impact on the site and the site's impact on them are assessed under stakeholder categories and subcategories. Mutual expectations are defined and scored.

Typically, when a project is developed, it undergoes a filtering process to identify which stakeholders can be involved. Suitable stakeholders are initially added to the action list, and based on the outcome of the action, they are later transferred to the stakeholder list.

Finding No: TNR-017611

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

Comment The site has identified the level of influence 25 stakeholders. Again the same tool called CPR 2.0 (Community Relations Process) has used. "Influence of site on stakeholder" and "influence of stakeholder on-site" are ranked by using this tool.

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

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

Comment The site has a WATER RESOURCES EMERGENCY AND CONTINGENCY ACTION PLAN document, which has been submitted as evidence. This document defines emergency situations and alarm levels. It also includes the actions to be taken and the responsibilities assigned. Additionally, the Nestle Waters Emergency Plan document addresses water-related incidents and responses such as floods, oil, fuel, and chemical spills. Furthermore, the potential emergency analysis results are reviewed to determine whether they trigger the Business Continuity Plan, and based on the outcome, it is decided whether to implement business continuity steps.

An example response plan was also presented by the site during the on-site audit

Evidence: 1.3.1_SKS.UL.007-15.04.2019-03_Acil_Durum_Eylem_Planı
1.3.1.SHE.471-04.06.2024-05_NW_Acil_Durum_Eylem_Planı (1)
1.3.1. 0199.SHE.PRO.000012_- _SHE_Olaylarının_Analizı_Ve_Raporlaması_Prosedürü_(1)
(1).

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

Comment The site has provided a water balance map. The map shows the total amount of incoming water, the usage area of water, such as social block, cooling tower, etc. Additionally, the total amount of water losses is displayed in the water losses section.

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

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Comment The site monitors the monthly data for produced water volume, Total Water Received, Industrial Water Loss, Industrial Water Received, Bottling Water Loss, Bottling Water Received, Bottling Water Loss per liter, and Total Water Loss in 1 liter. Additionally, the Water Usage Ratio (WUR) is tracked and monitored on a monthly basis. The site has provided these data for the years 2022, 2023, and 2024, demonstrating that it also tracks and evaluates the annual variance

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

Comment The site legally monitors parameters such as TSS (Total Suspended Solids), BOD (Biochemical Oxygen Demand), and pH in the effluent water. Phosphorus, nitrogen, and oil parameters are monitored by NESTLE on their own initiative. While a monthly analysis is typically sufficient, the site takes at least two samples per month and performs the analysis of the relevant parameters in its own laboratory. The analysis results are graphed to continuously track variance and are evaluated in monthly meetings. For example, an increase in the TSS parameter was observed in the effluent water in August. The cause of this increase was investigated and determined to be due to the lack of automatic dosing at the treatment plant. As an action, it was decided to invest in an automatic dosing system. This action has also been defined in the WSP.

The site has a system in place for monitoring raw water quality analyses. Through this system, the analysis of each parameter, how it will be performed, and by whom is tracked. The system also defines the accepted reference values for the analysis results. When determining the reference values, the values defined by the legal authority are compared with NESTLE's internal standards. The lower value between the two is used as the basis for the compliance evaluation. Variance is continuously monitored. If there is a deviation of more than 3% in a parameter, the analysis frequency is adjusted to weekly or daily (though no such case has occurred yet).

At each stage, such as production or finished products, different analyses are conducted according to various quality plans.

Ensuring that the lab conducts accurate analyses is crucial. Therefore, according to the "Laboratory Quality Plan," the devices are calibrated using standard solutions.

Every Monday, the lab team meets to evaluate and discuss the analysis results.

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

Comment The 1.3.5.SHE.730-28.01.2020-00-Uludağ Factory Logistics Site SHE MAP.xlsx file indicates potential pollution sources (e.g., chemical storage area, waste storage site, forklift maintenance area, etc.). Additionally, a list of chemicals used has been provided along with the MSDS documents.

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

Comment No on-site IWRAs as confirmed by the site visit.

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

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Comment In the 1.3.7_Final_V_210125 Excel file, water-related expenditure items and their costs are specified. Variable and fixed energy costs have also been included under water-related items, as the facility's operations involve water processing, making energy consumption directly related to water. For the same reason, expenses for PET bottle raw materials, labor costs, and similar items have been considered as water-related costs and included in the list.

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



Yes

Comment The site has provided the documents called "Wash_Self_Assessment Tool" and by using this tool, the site evaluated itself regularly. Additionally, the site is regularly checked during hygiene inspections conducted by the Ministry of Health to ensure that the number of washbasins is adequate for the number of people. Furthermore, the adequacy of the existing wet areas has been compared with the requirements of the Occupational Health and Safety Regulation, and it is found to be compliant. Additionally, the facility has created the layout of all sections and marked the type and number of wet areas in each section.

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

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



Yes

Comment The site has defined an AWS catchment boundary of 33,4 km². There are no suppliers within this defined boundary. Therefore, there is no embedded water usage within the AWS watershed boundary.

Evidence:

1.4.1.Supplier_List_for_Embedded_Water_Consumption.xlsx: The suppliers' name, their addresses and their annual water consumption are listed.

1.4.1.Tedarikçi_AWS_Havza_Durumları.pptx: The maps in the presentation show the AWS catchment boundaries and the locations of the suppliers on the map.

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



Yes

Comment The site has identified its outsourced services. These services include only kitchen, waste, and cleaning services. The water used for these services is sourced from the site's water supply, and therefore, it is not considered as embedded water. The site has measured these services water uses separately.

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 The site identified various water governance initiatives. The site engages with various regulatory initiatives throughout the water use permit acquisition process. The entire permitting procedure, including the involved legal initiatives and the collaborative efforts undertaken, has been documented.

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



Yes

Comment The site has identified applicable water-related legal and regulatory requirements and the responsible person for following up the regulatory changes. The site has a list of water-related legislation and their requirements.

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1.5.3	<i>The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.</i>	 Yes
Comment	The site has some detailed studies about the catchment and the catchment's water capacity. These information are confidential and effect the rivalry directly. On the other hand, the site has provided some data such as rainfall and snow capacity per year, aquifer recharge per year and precipitation rate per month. Also, the site has given the storage change of water on the catchment.	
1.5.4	<i>Water quality, including physical, chemical, and biological status, of the catchment shall be identified, and where possible, quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be identified.</i>	 Obs.
Comment	The site has provided some documents about the catchment water quality. According to the Sakarya Basin Report of the Basin Protection Action Plan Preparation Project, significant parameters indicating organic pollution in the Sakarya Basin, namely COD and BOD, predominantly fall into Class IV (very polluted water) in the Porsuk Stream, Karasu Stream, Çarksuyu, and Kalburt Göksu Stream along with its feeding streams, while the Sakarya River and its other branches are predominantly at Class II (slightly polluted water) or Class III (polluted water) levels.	
1.5.5	<i>Important Water-Related Areas shall be identified, and where appropriate, mapped, and their status assessed including any threats to people or the natural environment, using scientific information and through stakeholder engagement.</i>	 Yes
Comment	The site has not identified any IWRA on the catchment. The site attempted to identify important water-related areas (IWRA) through a stakeholder survey conducted as part of the IWRA determination process. According to the survey results, no areas were identified as significant by the stakeholders.	
1.5.6	<i>Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.</i>	 Yes
Comment	The site has provided documents about existing water-related infrastructure. (8. Susurluk_Basin_Groundwater_Summary_Report, A113257_Water_Resource_Study_-_Kestel) Also, the site has identified potential exposure to extreme events via these documents: 1. 4. Susurluk_River_Basin_Management_Plan 2. 5. Susurluk_Basin_Drought_Management_Plan_2023 2. Susurluk_Basin_Flood_Management_Plan_Strategic_Evaluation_(Draft)_2024	
1.5.7	<i>The adequacy of available WASH services within the catchment shall be identified.</i>	 Yes
Comment	The site, unable to find a written and public document on the subject, sent a letter to the Bursa Water and Sewerage Administration (BUSKİ) to inquire about WASH access. The response from BUSKİ stated that 100% access is available in all areas within the zoning and village settlement boundaries, and that water is provided.	
1.6	<i>Understand current and future shared water challenges in the catchment, by linking the water challenges identified by stakeholders with the site's water challenges.</i>	
1.6.1	<i>Shared water challenges shall be identified and prioritized from the information gathered.</i>	 Obs.

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Comment	<p>The site has shared a questionnaire with all stakeholders defined in the CRP TOOL through a service procurement. Through this questionnaire, they have inquired about potential water-related challenges. They have assessed the level of concern of stakeholders under the following headings and, based on these results, identified the shared water challenge:</p> <ul style="list-style-type: none"> Level of concern regarding the pressure on water resources Level of concern regarding water availability Level of concern regarding the amount of water used by other stakeholders Level of concern regarding water quality Level of concern regarding WASH <p>When the results were evaluated, the parameter that showed the highest level of concern was focused on water availability. The shared water challenges are:</p> <ul style="list-style-type: none"> - Water stress linked to climate change and increasing scarcity of resources (streams and rivers, maintenance of ecosystems, etc.) - Water Quantity 	
1.6.2	<i>Initiatives to address shared water challenges shall be identified.</i>	 Yes
Comment	Actions to tackle the shared water challenges have been outlined in the consolidated document.	
1.7	<i>Understand the site's water risks and opportunities: Assess and prioritize the water risks and opportunities affecting the site based upon the status of the site, existing risk management plans and/or the issues and future risk trends identified in 1.6.</i>	
1.7.1	<i>Water risks faced by the site shall be identified, and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.</i>	 Yes
Comment	<p>Water risks have been identified and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact. The risks have been classified as regulatory, reputational, financial, environmental, health, and safety. Shared water challenges, risks and opportunities, and WSP are on the same Excel document. The risks has identified based on the shared water challenges.</p> <p>Risks: Insufficient quality of drinking water for the downstream part of the village due to precipitation impacting reservoir / social/reputational risk 'Excessive and uncontrolled water use due to lack of monitoring and measurement of water use / Physical/Regulatory/Reputational</p>	
1.7.2	<i>Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.</i>	 Yes
Comment	Shared water challenges, risks and opportunities, and WSP are on the same Excel document. Within the same document, potential savings have been analyzed and ranked based on priority, their possible impact has been evaluated, and the financial value of the savings achieved within the specified timeframe has been assessed.	
1.8	<i>Understand best practice towards achieving AWS outcomes: Determining sectoral best practices having a local/catchment, regional, or national relevance.</i>	
1.8.1	<i>Relevant catchment best practice for water governance shall be identified.</i>	 Yes

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Comment	<p>1) The site has prioritized the implementation of the AWS standard and recognized the establishment of a water management organizational structure as a best practice to ensure adherence to and execution of the standard's requirements.</p> <p>2) The site utilizes the CRP Tool 3.0 to actively listen to regional concerns through regular meetings with stakeholders who share the catchment and water resources. Survey studies help identify solutions to environmental, stakeholder, and catchment-related water challenges within this scope.</p>	
1.8.2	<i>Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.</i>	 Yes
Comment	The data, which is manually monitored and calculated monthly using meters in the production areas, will be digitally tracked remotely under the developed Aquassay project. This will also increase the monitoring frequency.	
1.8.3	<i>Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.</i>	 Yes
Comment	<p>Erikli İnegöl Factory Wastewater Treatment Plant discharges its wastewater into the receiving environment in accordance with Table 20.9 of the Water Pollution Control Regulation. In addition to regulatory requirements, the phosphorus parameter, which is not legally mandatory for measurement, is monitored in line with Nestlé standards, considering the quality of the receiving environment and the catchment water.</p> <p>While the regulatory requirement limits the analysis frequency to once per month, Nestlé standards ensure internal monitoring every two weeks to control water quality.</p>	
1.8.4	<i>Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.</i>	 Yes
Comment	The site has not identified any IWRA within the catchment boundaries. (Look at 1.5.5.)	
1.8.5	<i>Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.</i>	 Yes
Comment	<p>The site has used a document called "Wash_Self_Assessment Tool" and by using this tool, the site evaluated the adequacy and efficiency of its wash services. The fact that this monitoring is done regularly through a tool filled out by employees is an important best practice.</p> <p>Hygienic Design: For spring waters that emerge naturally, the standard spring water intake design is considered. The intake is constructed in such a way that the water is safely suspended from its exit point, ensuring it is ready for treatment while preventing any contamination and external influences. In intake designs, the continuity of flow at every point where water comes into contact is crucial. The basic hygienic design principles are followed to prevent the formation of "dead zones" that could lead to quality issues. The designs are patented.</p>	

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2	STEP 2: COMMIT & PLAN - Commit to be a responsible water steward and develop a Water Stewardship Plan	
2.1	<i>Commit to water stewardship by having the senior-most manager in charge of water at the site, or if necessary, a suitable individual within the organization head office, sign and publicly disclose a commitment to water stewardship, the implementation of the AWS Standard and achieving its five outcomes, and the allocation of required resources.</i>	
2.1.1	<i>A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:</i> <ul style="list-style-type: none"> - That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes - That the site implementation will be aligned to and in support of existing catchment sustainability plans - That the site's stakeholders will be engaged in an open and transparent way - That the site will allocate resources to implement the Standard. 	 Yes
Comment	The site manager's signed "Water Commitment" is publicly available on the website. This commitment supports progress within the AWS water management program, ensures the site's practices align with existing watershed sustainability plans, promotes stakeholder involvement throughout the process, and guarantees the allocation of necessary resources for implementing the standard.	
2.2	<i>Develop and document a process to achieve and maintain legal and regulatory compliance.</i>	
2.2.1	<i>The system to maintain compliance obligations for water and wastewater management shall be identified, including:</i> <ul style="list-style-type: none"> - Identification of responsible persons/positions within facility organizational structure - Process for submissions to regulatory agencies. 	 Yes
Comment	The site has thoroughly outlined and presented the water source permitting processes step by step. Responsibilities and duties related to these processes are clearly defined in job descriptions. Additionally, an organizational chart for the wastewater treatment plant specifies the roles and responsibilities of personnel involved in wastewater management.	
2.3	<i>Create a water stewardship strategy and plan including addressing risks (to and from the site), shared catchment water challenges, and opportunities.</i>	
2.3.1	<i>A water stewardship strategy shall be identified that defines the overarching mission, vision, and goals of the organization towards good water stewardship in line with this AWS Standard.</i>	 Yes
Comment	The site's water leadership strategy, encompassing its vision and mission, is accessible to the public on the website under the title "Water Management Plan and 2024 Progress Report."	
2.3.2	<i>A water stewardship plan shall be identified, including for each target:</i> <ul style="list-style-type: none"> - 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. 	 Yes

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Comment

The site has a comprehensive WS Plan that includes targets and actions, all of which are measured. Each target has specific timeframes, a budget allocated, and a responsible person assigned to ensure the goal is achieved.

The site has aligned the target with shared water challenges (the process of identifying shared water challenges should be reviewed) and the AWS outcomes, as well as the achievement of Best Practices.

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

The risks and corresponding actions have been outlined in the WSP. These actions are directly connected to key stakeholders, identified in the "O column," and have been planned in collaboration with the relevant stakeholders. As an example, for the purpose of "Exploration new water resources to ensure water access to the Mezit village", the site has planned some activities in coordination with BUSKÍ and Mezit Mukhtar.

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3	STEP 3: IMPLEMENT - Implement the site's stewardship plan and improve impacts	
3.1	<i>Implement plan to participate positively in catchment governance.</i>	
3.1.1	<i>Evidence that the site has supported good catchment governance shall be identified.</i>	 Yes
Comment	With the protocol signed with BUSKİ, the site is collaborating with BUSKİ to provide drinking water to Mezit village.	
3.1.2	<i>Measures identified to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be implemented.</i>	 Yes
Comment	The site upholds human rights by adhering to all water-related laws and regulations. Additionally, it follows the "Nestlé Human Rights Policy." Ensuring the local community's access to drinking water is a key priority in water resource allocation. Therefore, during the water resource leasing process, the site considers this criterion as a primary factor. Even if a water source has been leased to the site, it voluntarily relinquishes the resource for public use in cases where the local community experiences difficulties in accessing water. Stakeholders have shared several real-life examples demonstrating this commitment.	
3.2	<i>Implement system to comply with water-related legal and regulatory requirements and respect water rights.</i>	
3.2.1	<i>A process to verify full legal and regulatory compliance shall be implemented.</i>	 Yes
Comment	The process for verifying full legal and regulatory compliance was confirmed under indicator 2.2.1. The site tracks its compliance status using the Monitoring and Measurement Annual Tracking Table, which includes sections on responsibility, frequency, and compliance evaluation. Additionally, the site actively monitors current regulations through the LEXPERA - Yeni Nesil Hukuk Sistemi platform. This platform allows the facility to stay informed about regulatory changes by providing access to the latest legal updates. By using this system, the facility ensures adherence to the most recent legal requirements and integrates necessary updates into its water management and operational practices.	
3.2.2	<i>Where water rights are part of legal and regulatory requirements, measures identified to respect the water rights of others including Indigenous peoples, shall be implemented.</i>	 Yes
Comment	Water rights are part of the site's legal and regulatory requirements. The priority in water resource allocation is to ensure the local community's access to drinking water. Therefore, when applying for water resource leasing, the facility prioritizes this criterion in its selection process. Even if a water source has been leased to the facility, in cases where the local community faces difficulties in accessing water, the facility relinquishes the resource for public use. Various real-life examples of this practice have been shared by stakeholders.	
3.3	<i>Implement plan to achieve site water balance targets.</i>	
3.3.1	<i>Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.</i>	 Yes
Comment	The status of progress toward targets set in WSP has been identified P column on WSP. "Reach the Water Use Ratio target: 1,15 L/L in 2028" is the defined target. The main goal is optimizing water consumption.	

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3.3.2	<i>Where water scarcity is a shared water challenge, annual targets to improve the site's water use efficiency, or if practical and applicable, reduce volumetric total use shall be implemented.</i>	 Yes
Comment	Water scarcity isn't a shared water challenge. Again The site has a target to reduce the Water Usage Ratio (WUR) value to 1.15 L/L by 2028. For achieving this target, the site is conducting a water balance digitalization project called Aquassay.	
3.3.3	<i>Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.</i>	 Yes
Comment	The site does not have a legally binding document for reallocation of water to social, cultural and environmental needs.	
3.4	<i>Implement plan to achieve site water quality targets</i>	
3.4.1	<i>Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.</i>	 Yes
Comment	Water quality has not been identified as a shared water challenge by the site. On the other hand, some targets about water quality have been set on WSP. To improve increasing of water quality in the catchment, dosage pumps in the WWTP are planned to be exchanged. The aim is controlling excessive chemical dosage.	
3.4.2	<i>Where water quality is a shared water challenge, continual improvement to achieve best practice for the site's effluent shall be identified and where applicable, quantified.</i>	 Yes
Comment	The facility legally monitors parameters such as TSS (Total Suspended Solids), BOD (Biochemical Oxygen Demand), and pH in the effluent water. Phosphorus, nitrogen, and oil parameters are monitored by NESTLE on their own initiative. While a monthly analysis is typically sufficient, the facility takes at least two samples per month and performs the analysis of the relevant parameters in its own laboratory	
3.5	<i>Implement plan to maintain or improve the site's and/or catchment's Important Water-Related Areas.</i>	
3.5.1	<i>Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.</i>	 Yes
Comment	No IWRA is defined by the site.	
3.6	<i>Implement plan to provide access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers at all premises under the site's control.</i>	
3.6.1	<i>Evidence of the site's provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers onsite shall be identified and where applicable, quantified.</i>	 Yes
Comment	The site has listed all WASH facilities within its premises. In accordance with occupational health and safety regulations, it has verified that the number of these facilities is adequate. Additionally, the site has provided the document called "Wash_Self_Assessment Tool" and regularly evaluates itself using this tool.	
3.6.2	<i>Evidence that the site is not impinging on the human right to safe water and sanitation of communities through their operations, and that traditional access rights for indigenous and local communities are being respected, and that remedial actions are in place where this is not the case, and that these are effective.</i>	 Yes

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Comment	The site has the Nestlé Human Rights Policy document. When selecting or using leased water sources, the facility prioritizes monitoring and ensuring continued public access to drinking water. If an issue arises regarding the local community's access to clean water in the area supplied by the source, the facility, if necessary, relinquishes its leased water source to ensure public access. This practice has been verified through stakeholder consultations	
3.7	<i>Implement plan to maintain or improve indirect water use within the catchment:</i>	
3.7.1	<i>Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.</i>	 Yes
Comment	The site has determined that there are no identified suppliers located within the AWS catchment area, and as a result, there are no significant indirect water uses associated with its operations. Consequently, the facility has not set a specific target for indirect water use in the Water Stewardship Plan (WSP).	
3.7.2	<i>Evidence of engagement with suppliers and service providers, as well as, when applicable, actions they have taken in the catchment as a result of the site's engagement related to indirect water use, shall be identified.</i>	 Yes
Comment	The site does not have any material or service providers located within the defined AWS catchment (see 1.4.1, 1.4.2.), and therefore, there is no indirect water use within the catchment. However, the site has reached out to its four major suppliers to gather information regarding their water usage, water reduction policies, and overall water management strategies by e-mail.	
3.8	<i>Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have.</i>	
3.8.1	<i>Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.</i>	 Yes
Comment	The Water Management Plan and 2024 Progress Report prepared by the site and have been shared with stakeholders by e-mail. In this context, risks and opportunities have been identified, and shared water challenges in the catchment have been evaluated.	
3.9	<i>Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.</i>	
3.9.1	<i>Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.</i>	 Yes
Comment	In line with the adopted Water Management approach, a new structure and Water Management organization have been established. The site utilizes the CRP Tool 3.0 to actively listen to regional concerns through regular meetings with stakeholders who share the catchment and water resources. Survey studies help identify solutions to environmental, stakeholder, and catchment-related water challenges within this scope.	
3.9.2	<i>Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.</i>	 Yes
Comment	The data, which is manually monitored and calculated monthly using meters in the production areas, will be digitally tracked remotely under the developed Aquassay project. This will also increase the monitoring frequency. The project is ongoing.	
3.9.3	<i>Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.</i>	 Yes

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Comment Erikli İnegöl Factory Wastewater Treatment Plant discharges its wastewater into the receiving environment in accordance with Table 20.9 of the Water Pollution Control Regulation. The chemical concentration dosed using manual dosing pumps in the facility cannot be monitored. Due to chemical leaks, occasional increases in pollution parameters in the discharge water can lead to exceedances in some parameters. This issue stems from the unmonitored chemical dosing.

To improve the traceability and optimization of the chemical concentrations dosed during wastewater treatment, the manual pumps will be replaced with automatic dosing pumps.

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 Through regular meetings with stakeholders who share the catchment and water resources using the CRP Tool 3.0, regional concerns are actively listened to. In this context, survey studies prioritize Important Water-Related Protected Areas. We develop and adopt policies that embrace WASH standards as an equal and fair right for all people around the world. To guide our policies in this area, we value and prioritize all of our employees as well as the operational areas where we are stakeholders.

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



Yes

Comment Mezit DW Resources Rehabilitation
Drinking water provided for human intended consumption for neighbouring village. Although the water quality and quantity is sufficient in the upstream part of village, the downstream part has no sustainable water quality.

Current water source that is feeding the villages drinking water tank is being affected by precipitation immediately. Whenever it rains, the turbidity in water rapidly increases and population cannot use the water until it clears up (insufficient quality of drinking water).

Community benefit value (+ reputational) and provides further communication opportunities with important stakeholder Municipality of Bursa which is the main local water management authority as well as neighboring Mezit Village nearby Inegol Factory.

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4 STEP 4: EVALUATE - Evaluate the site's performance.	
4.1	<i>Evaluate the site's performance in light of its actions and targets from its water stewardship plan and demonstrate its contribution to achieving water stewardship outcomes.</i>
4.1.1	<i>Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.</i> ✔ Yes
Comment	The site holds team meetings every Monday to review and share necessary updates. Additionally, performance tracking is conducted during monthly routine meetings with the zone team. Furthermore, for each project defined in the WSP, milestones are recorded in the WSP.
4.1.2	<i>Value creation resulting from the water stewardship plan shall be evaluated.</i> ✔ Yes
Comment	The site has evaluated value creation result and identified it Y column on WSP. The following value to the site has been evaluated: <ul style="list-style-type: none"> - Hygienic healthy potable water will be able to supply to the community and watershed. - To be covered from the outdoor impacts by rebuilding the current catchment building. -Volume of water saved - Reducing of Excessive Water Usage in the region -Encouraging best agricultural practices - Increasing awareness on the efficient use of water - Measuring basin-based water balance -Protection of water bodies - Increasing of water quality in the watershed
4.1.3	<i>The shared value benefits in the catchment shall be identified and where applicable, quantified.</i> ✔ Yes
Comment	Shared value benefit from the implementation of water stewardship to date was described Z column on WSP. Collaborative water resource management Reducing the impact of water withdrawals Collaborative water resource management Increasing of water quality in the watershed
4.2	<i>Evaluate the impacts of water-related emergency incidents (including extreme events), if any occurred, and determine the effectiveness of corrective and preventative measures.</i>
4.2.1	<i>A written annual review and (where appropriate) root-cause analysis of the year's emergency incident(s) shall be prepared and the site's response to the incident(s) shall be evaluated and proposed preventative and corrective actions and mitigations against future incidents shall be identified.</i> ✔ Yes
Comment	No incidents occurred during the auditing period. The site utilizes a digital tool called AKORT, which tracks unsafe conditions, near-miss incidents, and other events on a department-by-department basis.
4.3	<i>Evaluate stakeholders' consultation feedback regarding the site's water stewardship performance, including the effectiveness of the site's engagement process.</i>
4.3.1	<i>Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.</i> ✔ Yes

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Comment	The site has prepared a Water Management Plan and a 2024 progress report. Stakeholders were first informed through one-on-one calls, online meetings, or face-to-face discussions, after which the relevant documents were shared with them via email. The email evidence has been reviewed.
4.4	<i>Evaluate and update the site's water stewardship plan, incorporating the information obtained from the evaluation process in the context of continual improvement.</i>
4.4.1	<i>The site's water stewardship plan shall be modified and adapted to incorporate any relevant information and lessons learned from the evaluations in this step and these changes shall be identified.</i>
Comment	As this is the first year of implementing the standard, the site has not yet made any revisions to the WSP. However, the WSP includes a column titled "Lessons Learned," which is actively monitored, and updates will be made as needed.



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5 STEP 5: COMMUNICATE & DISCLOSE - Communicate about water stewardship and disclose the site's stewardship efforts	
5.1	Disclose water-related internal governance of the site's management, including the positions of those accountable for legal compliance with water-related local laws and regulations.
5.1.1	The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed. ✓ Yes
Comment	A "Water Management Organization" has been established for the active monitoring and implementation of AWS. This organizational chart is published on the website, shared with stakeholders via email, and also displayed on boards at entry screens in the field.
5.2	Communicate the water stewardship plan with relevant stakeholders.
5.2.1	The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders. ✓ Yes
Comment	The "Water Management Plan and 2024 Progress Report" has been shared both on the website and via email with stakeholders as a WSP summary. The shared report summarizes risks and opportunities while also addressing water challenges. AWS requirements have been covered. As a summary of the WSP, the 2024 water commitment projects have been listed, with the purpose, AWS outcome, target, and status outlined for each project.
5.3	Disclose annual site water stewardship summary, including: the relevant information about the site's annual water stewardship performance and results against the site's targets.
5.3.1	A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum. → in progress
Comment	The "Water Management Plan and 2024 Progress Report" has been shared both on the website and via email with stakeholders as a WSP summary. It has been observed that the defined targets are not provided in a measurable way. The targets are expressed too generally and are not trackable. The site has disclosed a summary of its water stewardship performance, however, quantified performance against targets has not been disclosed. Finding No: TNR-017091
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 "Water Management Plan and 2024 Progress Report" has been shared both on the website and via email with stakeholders. The shared report summarizes risks and opportunities while also addressing shared-water challenges.
5.4.2	Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified. ✓ Yes
Comment	With the protocol signed with BUSKI, the site is collaborating with BUSKI to provide drinking water to Mezit village.

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5.5 *Communicate transparency in water-related compliance: make any site water-related compliance violations available upon request as well as any corrective actions the site has taken to prevent future occurrences.*

5.5.1 *Any site water-related compliance violations and associated corrections shall be disclosed.*


Yes

Comment The site has not had any water-related compliance violations in the past year.

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


Yes

Comment There were no incidents that would require this.

5.5.3 *Any site water-related violation that may pose significant risk and threat to human or ecosystem health shall be immediately communicated to relevant public agencies and disclosed.*


Yes

Comment There were no incidents that would require this.

Photographic Evidence from Audit


Yes

Previous Findings

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


N/A

Comment It's an initial audit.