CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-001488

WSAS WATER STEWARDSHIP ASSURANCE SERVICES

SITE DETAILS

Site: **Nestlé Waters Benelux S.A.**
Address: Rue du Bois, 100, 6740, Etalle, BELGIUM
Contact Person: Maxime Gillet
AWS Reference Number: AWS-000675
Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Core
Date of certification decision: 2025-Jul-11
Validity of certificate: 2028-Jul-10

AUDIT DETAILS

Audited Service(s): AWS Standard v2.0 (2019)
Audit Type(s): Initial Audit
Audit Start Date: 2025-Mar-03
Audit End Date: 2025-Mar-05
Lead Auditor: Marion Dardare

Audit team participants:
Marion DARDARE, Lead Auditor
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Site Participants:
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WSAS
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ADDITIONAL INFO

Summary of Audit Findings: During the certification audit, 1 major non-conformity, 9 minor non-conformities, and 16 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 04 June 2025.

The major non-conformities must be closed within 90 days of receipt of the report. In order to meet this timeline evidence is to be submitted to WSAS (within 75 days) by 20 July 2025.

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

The audit team recommends certification of Nestlé Waters Benelux at Core level pending approval of the corrective actions plan for all non-conformities and closure of the major non-conformity.
CLOSURE OF FINDINGS AND CORRECTIVE ACTION PLAN:

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

Scope of Assessment: The scope of services covers the Initial certification audit for assessing conformity of Nestlé Waters Benelux S.A. against the AWS International Water Stewardship Standard Version 2.

Nestlé Waters Benelux, referred to as “the site”, is located in the Municipality of Etalle, in the southern part of Belgium, in the Wallonia region. The main cities nearby are Luxembourg (50 km to the E), Metz, France (100 km to the SSE) Brussels, Belgium (170 km to the NNW).

Nestlé Waters Benelux site encompasses one single factory producing two bottled water brands:
- Nestlé Pure Life (spring water);
- Valvert (natural mineral water), since 1991.

The facility operates two production lines exclusively to bottling water in PET packaging. The site exports its products to Belgium, the Netherlands, Luxembourg and France.

The audit was conducted onsite on 03/03/2025 to 05/03/2025.

The onsite site visit included the assessment of:

1/ The Clean In Place (CIP) area:
- The 4 pipelines entering the factory (identified as GR, HdH, FDV, and HOSS) and associated flow meters (cf. Photo 1 and Photo 2);
- Chemical product storage areas (acid and base) (cf. Photo 3);
- Sampling taps for water testing;
- The pipeline discharging waters from the CIP process to the on-site neutralization station;
- A pollution control kit / spill kit (cf. Photo 4);
- 3 tanks for the CIP process (base, acid, hot water) (cf. Photo 5);
- The pipeline and associated flow meter for the “retour source”, returning unused water to the environment (loop) (cf. Photo 6).

2/ Water storage area:
- 6 storage tanks of 160m3 each, to store water used in production and industrial processes (cf. Photo 7);
- The monitoring screen controlling real-time status of the tank filling.

3/ The boiler room:
- The industrial water softening system;
- The softened water tank;
- The boiler producing hot water for the CIP process, the offices and heating.

4/ The production area:
- Line 1 producing the small formats;
- Line 2 producing the big formats.

5/ The neutralization station (indoor area): (collects water from the CIP process, the laboratory and the disposal of non-compliant manufactured products):
- Chemical product storage areas (acid and base);
- A pollution control kit / spill kit and the associated emergency response sheet;
- The neutralization tank (pH adjustment);
- The sedimentation basin (cf. Photo 8);
- (Outdoor) A manhole and chamber with a valve driving compliant effluents to the buffer pond and another valve that can be opened in case of a quality incident to redirect the effluents to the municipal wastewater treatment plant.

6/ The buffer pond area (ultimately discharging into Gosse Fontaine stream):
- The pond for storage and flow control at the discharge point (but no water treatment);
- Pond isolation valve;
- Downstream sampling point (sampling every m3);
- Flow meter;
- Continuous pH and temperature monitoring screen (cf. Photo 9).

7/ On-site wastewater treatment facility (gathering effluents from the workers' social premises, ultimately discharging into Gantaufet pond):
- Oil separator (underground);
- Wastewater treatment system by sludge aeration (underground).

8/ The workers' social premises:
- The canteen area: 1 faucet/sink;
- Men's dressing room: showers and sinks;
- Men's and women's toilets: WC, sinks, hand soap, hand sanitizer, handwashing instructions.

The visit of water-related infrastructures in the catchment included:

9/ The Buzenol wastewater treatment plant (quick look from the street);
10/ A water tower on Maigriges street (quick identification passing by car);
11/ Gros Ruisseau stream (IWRA).

12/ Fond de Volette water well (supplying for Nestlé Pure Life brand) (cf. Photo 10):
- The fenced area of the close protection zone;
- The water well;
- The water sampling point;
- The flowmeter.

13/ Gros Ruisseau GR5 water well (supplying for Valvert brand):
- The fenced area of the close protection zone (cf. Photo 11);
- The water well;
- The water sampling point
- The flowmeter;
- The binder for recording daily visits.

FINDINGS

NUMBER OF FINDINGS PER LEVEL

Observation	16
Minor	9
Major	1

FINDING DETAILS

Finding No:	TNR-017316
Checklist Item No:	1.1.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2026-Mar-05
Checklist item:	The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including: - Site boundaries; - Water-related infrastructure, including piping network, owned or managed by the site or its parent organization; - Any water sources providing water to the site that are owned or managed by the site or its parent organization; - Water service provider (if applicable) and its ultimate water source; - Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies; - Catchment(s) that the site affect(s) and is reliant upon for water.
Findings:	The site's physical scope considers two separate catchments, for which the level of detail and collected data would differ. Catchment 1: The “ruisseau de Laclaireau” containing the water sources is fully encompassed within the AWS physical scope, the definition of this catchment is compliant, and this catchment is relevant for water balance. However, for catchment 2, a portion of the “Semois I” (sub-catchment) with the most relevant areas is contained within the AWS physical scope but the following areas not included, with the relevance for AWS outcomes: - Water quality: Including a section of the catchment both upstream and downstream of the WWTP in the physical scope will enable the site to monitor water quality and detect any potential impact of WWTP operations on the Semois River. - Water governance: The site identified the Municipality of Etalle as one of its main AWS stakeholders. The municipality includes several villages located within the “Semois I” sub-catchment (SC08R) but not included in the AWS physical scope: Sainte-Marie, Fratin, Vance. - Stakeholder verified information: The Sainte-Marie-Etalle wastewater treatment plant defined their zone of influence in a presentation document provided by the site. Following villages included within the Semois I sub-catchment are idenfified: Etalle, Sainte-Marie, Fratin, Sivry. Some of these villages are not included in the sub-catchment.
Corrective action:	Update the site's physical scope map to include : - the villages of Sainte-Marie, Fratin, Vance and Sivry - a section of the catchment “Semois I” both upstream and downstream of the WWTP of Sainte-Marie (zone of influence)

Finding No:	TNR-017317
Checklist Item No:	1.2.1
Status:	Closed
Finding level:	Major
Due date:	2025-Aug-03
Checklist item:	Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall: - Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people; - Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies; - Provide evidence of stakeholder consultation on water-related interests and challenges; - Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups; - Identify the degree of stakeholder engagement based on their level of interest and influence.
Findings:	Some stakeholders relevant for water stewardship are listed as stakeholders but are not considered "AWS stakeholder", thus are not involved in the AWS process or communications (example: 2 farmers organizations linked to the Agrivair program, AIVE (Intermunicipal Agency for Water Valorization)). Questionnaires sent to 4 stakeholders in 2024 helped identify their water-related concerns, such as: - Increasing water demand (construction of a hospital) - Emerging water stress, - Leaks in the municipal drinking water distribution pipes, - Presence of limestone and sand in municipal water intended for drinking water supply, - Concerns about the site's industrial discharges into the natural environment). However, none of these concerns expressed by the stakeholder's feedback was reported in the CRP tool as water-related challenges of stakeholders.
Corrective action:	Update the CRP : - for each stakeholder, check whether it is AWS relevant - from interview assessment, review action plan and WSP accordingly Note : Water related challenges of stakeholders are already reported in slide 9 powerpoint (Water quantity (in red) and Water Quantity (in yellow)).
Evidence of implementation:	See the two uploaded files. List of AWS SH reviewed and water related concerns addressed as opportunities, added in WSP and in CRP action plan.

Finding No:	TNR-017319
Checklist Item No:	1.2.1
Status:	Open
Finding level:	Observation
Checklist item:	Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall: - Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people; - Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies; - Provide evidence of stakeholder consultation on water-related interests and challenges; - Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups; - Identify the degree of stakeholder engagement based on their level of interest and influence.
Findings:	- The questionnaires are reported in English and use untranslated acronyms such as WASH. None of the stakeholder interrogated answered on the WASH subjects for example. The site may want to evaluate the performance and clarity of their CRP questionnaires to collect more comprehensive feedback. - An interview of one stakeholder allowed the audit team to identify potential missed opportunities to reinforce communication and effort exchange. Natagora (environmental NGO) was interviewed by the auditors during the audit. This stakeholder (SH) is particularly engaged in the conservation of wetlands, aquatic ecosystems, and improving water quality through various environmental projects and advocacy. The SH ranking on the criterion "Interest of SH in water-related topics" in the Site's CRP tool is 1.5 of 2.0. The Site may reconsider or justify this ranking according to the SH engagement towards IWRAs.

Finding No:	TNR-017738
Checklist Item No:	1.2.2
Status:	Open
Finding level:	Observation
Checklist item:	Current and potential degree of influence between site and stakeholder shall be identified, within the catchment and considering the site's ultimate water source and ultimate receiving water body for wastewater.
Findings:	The site has collected feedback from their stakeholders since 2020 and could look at the trends of influence and engagement.

Finding No:	TNR-017322
Checklist Item No:	1.3.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2026-Mar-05
Checklist item:	Existing water-related incident response plans shall be identified.
Findings:	Although quick emergency response sheets are associated with the identified water-related potential incidents, no full plan was identified except for quality deviation on water source. No emergency response plan was identified for fire. If workers onsite perform drills and training related to water-related incident plans, evidence was not provided.
Corrective action:	Drawing up the emergency response plan.

Finding No:	TNR-017323
Checklist Item No:	1.3.1
Status:	Open
Finding level:	Observation
Checklist item:	Existing water-related incident response plans shall be identified.
Findings:	A municipal pipeline and fire hydrants are located on the site. No evidence of an emergency response plan in collaboration with the fire department has been identified (ensuring access for firefighters to the fire hydrants on the site, etc.)

Finding No:	TNR-017326
Checklist Item No:	1.5.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2026-Mar-05
Checklist item:	Water governance initiatives shall be identified, including catchment plan(s), water-related public policies, major publicly-led initiatives under way, and relevant goals to help inform site of possible opportunities for water stewardship collective action.
Findings:	During the visit of the catchment, the auditor picked up signs mentioning the “Contrat de Rivière Semois-Chiers”. This water governance initiative leads missions towards improving water quality, restoring important water-related areas, managing flood risks, promoting sustainable land use practices, engaging local stakeholders in water management decisions. Many of the site’s identified stakeholders are engaged in this committee: 22 municipalities (counting Etalle), the SPW, environmental NGOs, educational institutions (e.g. ULg/FUL Arlon), local users, farmers, citizens, cross-border partners. This initiative was not identified by the site. The stakeholder interviews allowed the audit team to identify a yearly water governance initiative called “Journées Wallonnes de l’eau” (Walloon Water Days). The next event will occur between March 14th and 30th 2025 and will involve 300 free activities organized by the River Contracts and their partners. In the Étalle region, located within the Semois-Chiers hydrographic sub-basin (in which the site’s physical scope is included), several activities are planned including walks, conferences, exhibitions or workshops that contribute to raising public awareness on water governance and resource conservation. This water governance initiative was not identified by the site.
Corrective action:	Update the list ofwater governance initiatives by being more concrete and exhaustive.

Finding No:	TNR-017915
Checklist Item No:	1.5.3
Status:	Open
Finding level:	Observation
Checklist item:	The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.
Findings:	Surface water was not considered in the balance (streams, rivers, ponds, etc.). The site has commissioned a new study to assess and quantify the water balance of the catchment, expected in 2025, and the scope of work for the study includes surface waters.

Finding No:	TNR-017330
Checklist Item No:	1.5.5
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2026-Mar-05
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:	The site was unable to explain how it determined the status ratings of the IWRAs. The auditor noted a rating of 3/5 for the “Etang de Gantaufet” while the stakeholder “Le Gardon Stabulois” (local fishing association using the pond) considers the quality of the pond as excellent. Stakeholders feedback or input was not used to help identify the IWRAs and rate their status.
Corrective action:	Request analytical results to owners (when available) and re-assess status of IWRA with owners and available public data.

Finding No:	TNR-017331
Checklist Item No:	1.5.6
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2026-Mar-05
Checklist item:	Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.
Findings:	The conditions of the identified water-related infrastructures in the catchment is not provided. The stakeholders were not actively consulted to obtain information on existing or planned water-related infrastructure.
Corrective action:	Ask stakeholders to provide us with information on condition of the existing infrastructures. Ask stakeholders to provide us with information on planned water-related infrastructures (if any).

Finding No:	TNR-017333
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:	Although: - The catchment water balance performed by the site shows current positive balance; - The Aqueduct Water Risk Atlas shows low-medium risk regarding water depletion; some stakeholders express their concern regarding emerging water stress. Whether this potential risk is perceived or proven, it would deserve to be investigated in more detail to align the data with the feedbacks.

Finding No:	TNR-017916
Checklist Item No:	1.6.2
Status:	Open
Finding level:	Observation
Checklist item:	Initiatives to address shared water challenges shall be identified.
Findings:	The stakeholder interview with the Etalle municipality (Mairie d'Etalle) allowed the audit team to identify a few other initiatives that have not yet been considered by the site: - an initiative undertaken by the municipality to help address the SW1 (nitrates issues): the town hall finances mechanical weeding in the municipality of Etalle. - an initiative undertaken by the municipality to help address the SW3 (improve WASH services in the catchment): the stakeholder provided information on the planification of new wastewater treatment plants in Chantemelle and Viller-sur-Semois.

Finding No:	TNR-017743
Checklist Item No:	1.7.1
Status:	Open
Finding level:	Observation
Checklist item:	Water risks faced by the site shall be identified, and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.
Findings:	The timeframes in which each risk is likely to occur have not been identified. Potential costs are characterized qualitatively "Low to Extremely high". This qualitative approach is not precise and could be refined in a more quantitative aspect.

Finding No:	TNR-017336
Checklist Item No:	1.7.2
Status:	Open
Finding level:	Observation
Checklist item:	Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.
Findings:	Some comments extracted from the stakeholder feedbacks (CRP questionnaires) could be converted into opportunities. For example, presence of leaks in the drinking water supply pipes for the community, requirement for rainwater reuse in new constructions, presence of limestone and sand in the municipal drinking water, etc.

Finding No:	TNR-017337
Checklist Item No:	1.8.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2026-Mar-05
Checklist item:	Relevant catchment best practice for water governance shall be identified.
Findings:	There are some gaps with the identification of best practices on water governance: - Some listed best practice for water governance are very generic and their translation at the catchment scale is unclear. For example, “establishing or participating in Public-Private Partnership” does not provide insight into what this actually entails at the local scale. - best practice for water governance points to the Nestle Environmental Requirements (NER). How it is relevant for catchment governance or what practices in the document are relevant, is not clear. In addition, some points of improvement can be noted: - Some best practice for water governance was or has already been implemented but are not reported. For example: poster of the water balance of the catchment displayed in the municipality and shared in the local newspaper. - Some comments extracted from the stakeholder feedback (CRP questionnaires) could be converted to catchment best practice for water governance (for example: the comment: “dommage que le site ne participe pas aux clubs organisés par la CCIB” / “It is a pity the site does not participate in the clubs organized by the CCIB”). - A stakeholder interview allowed the audit team to identify an annual event on water governance called “Journées Wallonnes de l’Eau” (Walloon Water Days), The next event will occur between March 14 and March 30, 2025. This event is organized by the Semois-Chiers Rover Contract and provides activities for the general public in order to raise awareness on the watercourse preservation.
Corrective action:	Update the list of best practices by being more concrete and exhaustive.

Finding No:	TNR-017338
Checklist Item No:	1.8.2
Status:	Open
Finding level:	Observation
Checklist item:	Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.
Findings:	- The document listing all identified best practices (BP summary) does not provide the extraction of relevant best practices but simply points to the general reports (for example: Volumetric Water Benefit). The site could make it clearer what from these documents is best practice relevant for the site/catchment. - Some best practices identified in the document “synthese des best practices” are not reported in the best practice summary document (for example, worker training to help reducing water waste is not reported in the BP summary).

Finding No:	TNR-017339
Checklist Item No:	1.8.3
Status:	Open
Finding level:	Observation
Checklist item:	Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.
Findings:	Some best practices identified in the document “synthese des best practices” are not reported in the best practice summary document. For example, the best practice “help the farmers to select crops that require less phytosanitary products” is not textually reported in the core document Best Practice summary. This measure is likely embedded into “Agrivair” with no further details. Thus, the effectiveness of this document for planification is being questioned. Generally, the site did not “unbox” the best practices identified in various heavy documents to summarize them in their core document “Best Practice summary”. “The audit team noted during the audit that the site had performed a sampling program for the quantification of PFAS in groundwater. Unless this campaign was mandatory, it was not identified as best practice for water quality.

Finding No:	TNR-017340
Checklist Item No:	1.8.4
Status:	Open
Finding level:	Observation
Checklist item:	Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.
Findings:	The site did not “unbox” the best practices identified in various heavy documents to summarize them in their core document “Best Practice summary”. Thus, the effectiveness of this document for planning is being questioned.

Finding No:	TNR-017342
Checklist Item No:	2.1.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2026-Mar-05
Checklist item:	A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments: - That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes - That the site implementation will be aligned to and in support of existing catchment sustainability plans - That the site’s stakeholders will be engaged in an open and transparent way - That the site will allocate resources to implement the Standard.
Findings:	The commitment letter does not include a commitment that the site implementation will be aligned to and in support of existing catchment sustainability plans, or a similar wording convening the same message.
Corrective action:	Update the commitment letter by adding the relevant paragraph from the standard :"la mise en application sur le site sera alignée sur les plans de durabilité existants dans le bassin versant et les soutiendra".

Finding No:	TNR-017343
Checklist Item No:	2.2.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2026-Mar-05
Checklist item:	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.
Findings:	Although the team in charge of submissions to regulatory agencies identified all regulatory agencies receiving their submissions, was able to describe orally their process for submissions and provided evidence of implementation, the process is not documented to ensure consistent implementation in case personnel change.
Corrective action:	Document the process for submitting data to regulatory agencies (table).

Finding No:	TNR-017344
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 projects associated with the restoration of degraded IWRAs in the catchment has been put on hold. Two project sheets have been prepared by the external consultant Antea (no date provided however). These provide information on the project description and context, implementation steps, objectives, stakeholders to involve, completion timeline, cost estimate, etc. This represents a first step in the project initiation, which does not appear in the WSP. The site must demonstrate that it maintains a proactive approach in order to keep this project within its WSP. Otherwise, another action covering the IWRA outcome will need to be identified.

Finding No:	TNR-017744
Checklist Item No:	3.9.1
Status:	Open
Finding level:	Observation
Checklist item:	Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.
Findings:	Some best practice for water governance was or has already been implemented but are not reported. For example: poster of the water balance of the catchment displayed in the municipality and shared in the local newspaper. The last implementation of a best practice on water governance dates back to 2023 (open house day). The site has not demonstrated the implementation of any best practice on water governance since then, despite the many identified opportunities.

Finding No:	TNR-017917
Checklist Item No:	4.1.2
Status:	Open
Finding level:	Observation
Checklist item:	Value creation resulting from the water stewardship plan shall be evaluated.
Findings:	The site evaluated the value created from a qualitative perspective. However, there are also quantifiable benefits which can be evaluated.

Finding No:	TNR-017351
Checklist Item No:	4.1.3
Status:	Open
Finding level:	Observation
Checklist item:	The shared value benefits in the catchment shall be identified and where applicable, quantified.
Findings:	Value creation resulting from some actions may have the opportunity to be described with more details. For example, the value created for water quality by the rehabilitation of the wastewater treatment plant (STEP de Buzenol) is defined as follows: “improved quality of WWTP discharges into the environment, thus preserving the water quality of the catchment”. If the preserved water volumes or operational benefits are quantifiable, they should be reported.

Finding No:	TNR-017746
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:	The return receipt from the email to the stakeholder SPW indicated that the message could not be delivered. The site has not provided evidence that it attempted to resend or transmit its communication through another means. Based on the identified elements, it therefore appears that this stakeholder has not received the information regarding the WSP. The site sent the commitment letter to 16 stakeholders (receipts were provided as evidence). However, a total of 17 stakeholders were primarily identified in 1.2.1. Therefore, one stakeholder was forgotten. In reference of the findings in 1.2.1, potentially new identified stakeholders shall receive communication of the site's water stewardship plan.

Finding No:	TNR-017354
Checklist Item No:	5.3.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2026-Mar-05
Checklist item:	A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.
Findings:	Current performance against some targets were not disclosed. For example, the site aims to reach and/or maintain nitrate concentration below 10 mg/L in surface water and groundwater by 2023. A monitoring program was implemented and data already available but not disclosed. Similarly, current performance on the water use ratio (WUR, which target is set at 1.2 L/L by 2028) is not disclosed, although available.
Corrective action:	- Include quantified performance against targets for all indicators into summary of the site's water stewardship performance. - Share annual performances with AWS stakeholders by email.

Report Details

Report	Value
Report prepared by	Marion Dardare
Report approved by	Carla Oberdiek
Report approved on (Date)	24th.April.2025

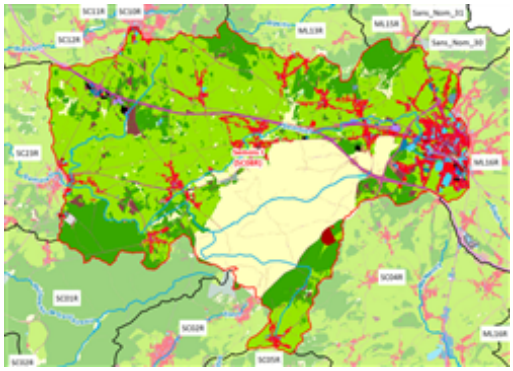
Surveillance

Proposed date for next audit
2026-Mar-03

Stakeholder Announcements

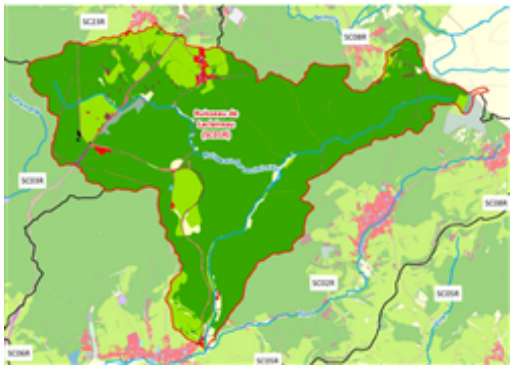
Date of publication	Location
01/12/2024	https://valvert.factory.nestlewaters.com/sites/g/files/xknfdk666/files/2025-02/AWS-000675_Nestle%20Waters%20Benelux%20_StakeholderAnnouncement_Month01_V3.0_fr_SYSTRAN_Generic%20%281%29%201_0.pdf
01/12/2024	https://a4ws.org/wp-content/uploads/2025/01/AWS-000675_Nestle-Waters-Benelux-_StakeholderAnnouncement_Month01_V3.0.pdf
01/12/2024	https://watersas.org/stakeholder-announcements/

Catchment Information



(Source: Evidence from indicator 1.5.4)

Figure 3 - Catchment 2 - “Semois I” sub-catchment (SC08R) (Source Evidence from indicator 1.5.4).jpg

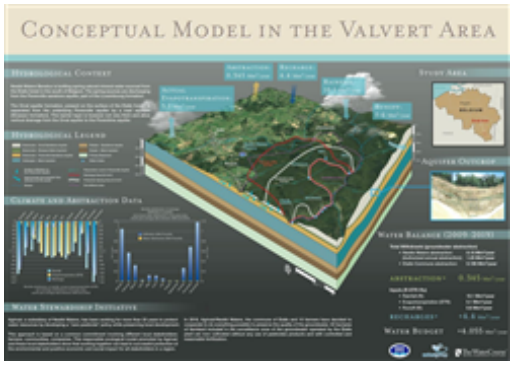


(Source: Evidence from indicator 1.5.4)

Figure 2 - Catchment 1 - “Ruisseau de Laclaireau” (SC01R) (Source Evidence from indicator 1.5.4).jpg

(Source: Evidence from indicator 1.1.1)

Figure 1 - AWS Physical scope (southern region Laclaireau catchment northerne region part of the Semois I sub-catchment) (Source 1.1.1).jpg



(Source: Evidence from indicator 1.5.3)

Figure 4 - Conceptual model in the Valvert area (hydrogeological setting and catchment water balance) (Source indicator 1.5.3).jpg

Catchment Information

Catchment Name
The physical scope includes 2 catchments: the Laclaireau catchment and of part of the Semois I sub-catchment.

Water Supply & Discharge Catchments
The site is included into a physical scope encompassing two catchments:
- Catchment 1: The “Ruisseau de Laclaireau” includes the Laclaireau Stream and its surface catchment (SC01R), a portion of the Orval sandstone aquifer recharge area, the 9 groundwater wells owned by the site and 13 piezometers.

- Catchment 2: The “Semois I” (sub-catchment) includes a section of the Semois River and a portion of its surface water catchment (SC08R), a portion of the Orval sandstone aquifer recharge area, the site and its wastewater service provider.

Groundwater Aquifers
The site’s groundwater wells tap into the surficial Orval sandstone aquifer. This geological formation is composed of an interbedding of yellow to reddish sands, layers of soft and calcareous sandstone, dipping to the south. The aquifer is unconfined and the water table shallow, therefore, the aquifer can be influenced by agricultural activities. It naturally flows towards the south and emerges locally in springs that feed the Chiers hydrographic network (in which the “Ruisseau de Laclaireau” (SC01R) is included). The site’s water wells consist of horizontal slotted drains completed at shallow depth and intercepting the upper section of the groundwater flows from the Orval sandstone aquifer.

Water Supply
The site uses 6 active water wells (10 sources in total) and 15 piezometers (none are located on-site):
- 3 wells for mineral (Valvert) and industrial water;
- 1 for source water (Nestlé Pure Life);
- 2 for back-up supply for the city of Etalle;
- 15 piezometers for groundwater level measurement.

Dischage Catchment & Wastewater Service Provider
A total of 4 outflow points at the site are mapped:
- 2 points handle clear waters and industrial waters and are directly connected to a fishing pond and a stream (ruisseau de la Grosse Fontaine connected to Rivière du Semois);
- 2 points handle domestic wastewater and are connected to the Sainte-Marie-Etalle wastewater treatment plant.

The Sainte-Marie-Etalle wastewater treatment plant receives a part of the site’s effluents. It is located in another catchment (SC08R Semois I). The ultimate water receiving body is the Semois River.

Catchment Features
The “Ruisseau de Laclaireau” catchment (in which the site water sources are located) is minimally developed and consists of 85% forest cover, 14% agricultural fields and meadows and 1% residential areas. The site identified a water-related challenge linked to potential nitrate contamination of the groundwater from the agricultural activities.

This catchment hosts the “Vallées de Laclaireau et du Rabais” Natura 2000* site hosting key features of ecological significance such as alluvial forests, calcareous springs and streams, bocage landscapes and protected biodiversity (birds, insects, chiropters, etc.).

The climate of Wallonia is influenced by the Gulf Stream and oceanic disturbances. It is characterized by moderate temperatures, high cloudiness, and frequent but light rainfall. This

temperate climate is generally marked by cool, humid summers and mild, rainy winters. Therefore, water deficits and tensions related to water quantity are not yet central concerns in this region.

* Natura 2000 is a network of protected areas at European Union scale, established to preserve biodiversity and habitats.

Summary of Shared Water Challenges

Summary of Shared Water Challenges

- SWC 1: Quality of surface and groundwater in the Laclaireau Stream catchment related to agricultural and human activities. Maintain nitrate concentration below 10 mg/L in surface water and groundwater.

- SWC 2: Site's effluent quality. Reduce the concentration of nitrogen of 50% in the effluents released in the Gantaufet pond (IWRA) and Grosse Fontaine stream (IWRA)

- SWC 3: Improve WASH services in the catchment. Restore WWTP facility and secure drinking water provision to the municipality of Etalle.

Client Description and Site Details

(source: https://www.valvert.be)

Landcape of the Valvert area (source www.valvert.be).jpg

(source: https://www.valvert.be)

Valvert forest in which the site's water wells are located (source www.valvert.be).jpg

(source: https://www.valvert.be)

Nestlé Waters Benelux factory in Etalle (source www.valvert.be).jpg

Client/Site Background

Site Location and Physical Setting
Nestlé Waters Benelux, referred to as “the site”, is located in the municipality of Etalle, in the southern part of Belgium, in the Wallonia region. The main cities nearby are Luxembourg (50 km to the E), Metz, France (100 km to the SSE) Brussels, Belgium (170 km to the NNW).

The site is situated in a rural area and mostly surrounded by forests and agricultural landscapes. The topography is gently rolling.

Site’s production
Nestlé Waters Benelux site encompasses one single factory producing two bottled water brands:
- Nestlé Pure Life (spring water);
- Valvert (natural mineral water), created in 1991.

The bottled water is characterized by a light mineralization compared to many natural mineral waters (201 mg/L of dry residue at 180°C). It is therefore also suitable for infants.

The site uses 6 active water wells (9 sources in total) and 15 piezometers (none are located on-site):
- 3 wells for mineral (Valvert) and industrial water;
- 1 for source water (Nestlé Pure Life);
- 2 for back-up supply for the city of Etalle;
- 15 piezometers for groundwater level measurement.

The site is water self-sufficient, and uses the groundwater for the production of their manufactured products, domestic water for the factory workers, and heating. Water can also be intermittently reallocated to the municipality of Etalle upon request.

Water-related Infrastructures
The water wells owned and operated by the site are located in a different catchment (none are located on-site). They are connected to the factory by a pipeline network.

Groundwater from the wells enters the factory and is stored either in tanks connected to the two production lines or connected to the industrial water network. Two production lines are operational for bottling the water.

The site sends its wastewater from the Clean In Place (CIP) process, the laboratory, and the destruction of non-compliant finished products to a neutralization station located within the site boundaries. This station is connected to a buffer basin and discharges the compliant effluents into the natural environment.

Another on-site wastewater treatment facility gathers effluents from the workers’ social premises, ultimately discharging into Gantaufet pond. It consists of an underground oil separator and a wastewater treatment system by sludge aeration.

The rest of the effluents are sent to the Sainte-Marie-Etalle municipal wastewater treatment plant, located in the same catchment.

Site Information (other)
The site is a major economic player in the region, by employing 50 peoples at the plant and representing a significant source of revenue for the local administration. The industrial site covers an area of 16.9 Ha including approximately 3.5 Ha of buildings.

0.1	**General Requirements for Single Sites, Multi-Sites and Groups**	
0.1.1	*Eligibility Criteria*	
0.1.2		
0.1.2.1	*Have any water source locations and water-related discharge locations been visited during the audit, if so, which and where? If none were visited please provide justification.*	✓ Yes
Comment	The following water source locations were visited during the audit on 05/03/2025: - Fond de Volette FDV water well (supplying for Nestlé Pure Life brand); - Gros Ruisseau GR5 water well (supplying for Valvert brand). The following water-related discharge locations were visited during the audit on 04/03/2025: - Gantaufet pond (IWRA); - Grosse Fontaine stream (IWRA).	
0.1.1.1	*The site(s) occupy one catchment OR an exception has been granted.*	🔍 Obs.
Comment	Non-conformity raised in 1.1.1 during the audit showed that the site actually occupied 2 catchments. This criterion had not been identified prior to the audit.	
0.1.1.2	*The scope of the proposed certification shall be under the control of a single management system.*	✓ Yes
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

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

Comment

The site boundaries are clearly outlined and easily locatable on a large-scale map of the region. The site covers and area of 16.9 Ha and covers 4 joined lots.

All water-related infrastructures owned or managed by the site are identified and mapped:
- 6 groundwater sources (including 3 unused, thus 6 active water wells);
- 16 piezometers (14 for groundwater level monitoring / 6 for groundwater quality monitoring);
- The piping network linking the water wells to the site;
- (The site's wastewater treatment plant is not owned or managed by the site).

The site discharges its effluents to the Sainte-Marie-Etalle wastewater treatment plant.

The site physical scope is defined across 2 catchments:

Catchment 1 : The "ruisseau de Laclaireau" encompasses :
- Surface water: The Laclaireau Stream and its catchment (referred to by the authorities as SC01R);
- Groundwater: Portion of the Orval sandstone aquifer recharge area;
- Water sources: The 9 groundwater wells owned by the site;
- Site water-related infrastructure:
13 of 16 piezometers owned by the site,
Part of the piping system connecting the site to its water sources.
- Regulatory landscape: Etalle municipality (section): Buzenol.

Catchment 1 as delineated by the site is compliant with AWS physical scope requirements. This catchment is relevant for water balance.

Catchment 2: The "Semois I" (sub-catchment) encompasses:
- Surface water:
Section of the Semois River and a portion of its surface water catchment (referred to by the authorities as SC08R);
Ultimate receiving water bodies: Gantaufet pond, Grosse Fontaine stream, Semois River
- Site boundaries;
- Site water-related infrastructure:
Part of the piping system connecting the site to its water sources,
3 of 16 piezometers owned by the site.
- Wastewater service provider: Sainte-Marie-Etalle wastewater treatment plant;
- Aquifer: Portion of the Orval sandstone aquifer recharge area;
- Regulatory landscape : Etalle municipality (section) : Etalle, Vance, Chantemelle, Sainte-Marie-sur-Semois, Viller-sur-Semois

Finding No: TNR-017316

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.

closed

Comment

The Site uses the CRP Tool (Community Relation Process) to identify, structure and improve their relations to their stakeholders. A total of 26 stakeholders are identified and 17 are considered “AWS stakeholders”. This includes their group/type:

- 7 local authorities
- 5 local businesses
- 4 local influencers / NGOs
- 1 local population

Stakeholders are located across both ultimate water source areas and ultimate receiving water body area. A mapping of their location was provided.

The stakeholders are managed using the CRP tool. The Site communicates often with the municipality and the intermunicipal group Idelux. These stakeholders would notify the site if a new potential AWS stakeholder were to settle in the catchment.

Recent consultation efforts are shown. The site communicates with the stakeholders in various manners:

- Regular and recent exchanges around common projects related to water, such as the rehabilitation project of the Buzenol wastewater treatment plant (STEP) in partnership with Idelux. An email from October 2024 was reviewed.
- CRP questionnaires are sent each year to a few selected stakeholders, asking for their feedback on key themes such as the quality of their relationship with the site, water resource management, and the site’s local contribution in terms of WASH (Water, Sanitation, and Hygiene). 4 stakeholders were selected to provide feedback in 2024.

The stakeholders have the opportunity to express their water challenges.

The level of interest and influence is characterized in a table and in a graph. The degree of engagement for each category is provided. Data has been collected from the CRP questionnaires since 2020.

The stakeholder interviews conducted by the auditor confirmed the consultation efforts by the site. Their feedback is globally very positive, confirming that the site has generally a positive image and good relationship with its stakeholders.

Finding No: TNR-017317
Finding No: TNR-017319

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

Obs.

Comment

The current degree of influence between the site and its stakeholders is identified.

A process to identify potential degree of influence is identified: the CRP tool (Community Relation Process) is designed to collect feedback over the years and monitor the scoring evolution. The site has collected feedback since 2020 (5 years of data).

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.*

in progress

Comment

Onsite water-related incidents are identified for the following incidents:
- Chemical spill;
- Hydrocarbon spill;
- Neutralization station overflow.

The areas of potential incidents are mapped. A quick emergency response sheet is associated with the above water-related incidents and could be seen onsite by the audit team during site visit.

Onsite incidents on water managed by the site:
- Quality deviation on water source: a plan is written and the person in charge to be alerted identified;
- Quality deviation on effluents: A quick emergency response sheet is identified for water containment and pump shutdown.

Finding No: TNR-017322
Finding No: TNR-017323

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

Yes

Comment

Onsite water flows are identified and mapped. The water map includes:

Water inflow:
- 6 active water wells (10 sources in total);
- The audit team saw during the site visit the 3 pipelines entering the site:

Pipeline FDV (1 well : Fond de Volette) ;
Pipeline HR (7 wells: GR1, GR2, GR3, GR4, GR5, H1 and H2);
Pipeline HdH (2 wells: HDH1 and HDH2);
These pipelines are identified in the water map.

Water storage:
- 6 storage tanks (5 for production / 1 for industrial and WASH waters). These tanks were seen at the site visit.
- The neutralization station. This area was visited during site tour.
- The buffer pond. This area was visited during the site tour.

Water outflow:
- Water outflows used in the manufactured products are identified.
- Losses on 6 key areas are identified (bottling fillers, Clean in Place (CIP) process, etc.)
- Backflow emergence: the site pumps at constant flow and only uses a part of the water. Unused volumes are directly returned back to the environment near the pumping locations.
- Effluents discharges: 4 discharge points are mapped, 2 are connected to the municipal wastewater treatment plant of Etalle (STEP Sainte Marie), one discharges into the neighboring pond (IWRA Etang de Gantaufet), one discharges into a stream (IWRA, Ruisseau de la Grosse Fontaine).

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

Onsite water flows are quantified.

Water inflow:
- Water flows from all water wells are quantified in the water map in m3/year.
- The audit team visited the well and could confirm consistency with the flow indicated on the flow meter screen (19 m3/h).

Water storage:
- Volumes from the 6 storage tanks (6 x 160 m3) are quantified.
- Other small tanks are identified onsite but considered negligeable at the scale of the total water volumes flowing through the site.

Water outflow:
- Water volumes used in the manufactured products are quantified.
- Losses on 6 key areas are quantified in the water map in m3/yr. They occur in several key areas and are easily locatable with a grey color code.
- Backflow emergence (volumes returned to the environment) is quantified in m3/yr and easily locatable with a grey color code and specific mention “retour emergence”.
- Effluents discharges are quantified in m3/yr.

The gap between volumes in and volumes out is -0.35% and is due to the reading uncertainty on the meter readings. This result is considered acceptable by the site as under 5%.

Although water balance is not currently a water-related challenge in the catchment, the site provided evidence regarding variance. The site set their pumping volumes so they can be constant all-year round (no quantity stress in specific seasons). They use more or less water from the pumped volumes for their operations according to their needs and return volumes in excess back to the environment (near the pumping area). Therefore, no variance can be detected.

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

Water sources:

The site has an internal laboratory and proceeds to analysis at all the wells on:
- Microbiology
- Physical parameters: pH, T°C, conductivity);
- Chemical parameters: nitrate, nitrite, ammonium

These analyses are performed according to a written schedule which was provided. Evidence of results was provided for January 2025 with quantification at each well.

The site performs full scan analysis at each well defined by a yearly monitoring plan. This plan was provided as evidence. Samples are sent to the NQAC Vittel lab. The scan incudes:
- Physical-chemical parameters;
- Anions-cations;
- Metals;
- Organic compounds;
- Microbiology.

The site provided evidence of the water quality results at all water sources from February 2024.

All quality data compiled in the PowerBI tool. Example for nitrate parameter in well GR5 between 2020 up to date was provided.

The site identified water-related challenges that could be a threat to good water quality status for people and environment: quality of surface and groundwater in the catchment related to agricultural and human activities (nitrate parameter);

Quality variances were overlooked and no seasonal variance of any parameters occurs.

Effluents:
The regulatory frame defining the quality parameters to monitor is identified. The parameters to monitor are:
- Physical parameters: T°C, pH, TSS
- Metals
- Microbiology: DBO
- Organic compounds : BTEX, hydrocarbons, etc.

The effluents are controlled:
- At the exit of the buffer pond where effluents leave the site and are discharged into the environment.
- At the onsite WWTP where the affluents leave the site and are discharged into the environment

The flows delivered to the municipal WWTP (STEP Sainte Marie – Etalle) are not required to be controlled onsite.

Evidence of effluent quality data was provided until December 2024. Summary data is compiled and show for each parameter, minimum, maximum and average each year. This monitoring is available from 2022 to 2024.

The site identified water-related challenges that could be a threat to good water quality status for people and environment: Site's effluent quality released regarding the nitrogen parameter.

Quality variances were overlooked and no seasonal variance of any parameters occurs as the site operation guarantee year-round stable quality parameters.

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

Yes

Comment

A map of all potential sources of pollution is provided, including:
- Chemicals stored on-site (acid/base);
- Hazardous waste stored on-site (inflammables);
- Leaks of oils from vehicles.

The site map identifies areas where chemicals are stored. Each area is identified with a number and a name. A product listing is provided for each area, including the product name, the supplier and associated hazard symbols.

The site tour allowed the audit team to review the chemicals in the CIP area (acid/base for sanitation) and in the neutralization station (acid/base for pH adjustment). The observations are consistent with the information identified in the 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 IWRA is identified on-site. The site visit confirmed that no visited water-related feature would meet the criteria of an IWRA.

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.* Obs.

Comment

Annual water-related costs are identified:
- Bottling costs;
- Taxes;
- Energy to conduct water to the site;
- Payrolls;
- General functioning costs (water-related infrastructure ;
- Donations (manufactured products);
- Projects to address shared water challenges (rehabilitation of a WWTP in the catchment, STEP de Buzenol).

Stakeholder interviews confirmed that the site donates manufactured products (water bottles) to the municipality, which re-distributes the stock to the local organizations or population).

Annual water-related revenues are identified:
- Net sales.

Water-related value generated by the site is identified:
- Governance: donating water bottles to the local population;
- WASH: financing the rehabilitation of a WWTP in the catchment (not used by the site);
- IWRA: ordering an environmental study for project of a wetland rehabilitation in the catchment.

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

Comment

The site performed a self-assessment using the WBCSD WASH Pledge tool to evaluate access to water, sanitation and hygiene (WASH) at the workplace. The assessment confirmed pledge compliance of 1.8 of 2.0.

All WASH facilities are mapped, including toilets, showers, refectories. Adequacy of WASH at the site is provided against the Belgium regulatory standards and Nestlé Corporate best practice. Number of toilets and showers for male/female is compliant with both.

The audit team could experience the adequacy of WASH facilities on-site during the audit: toilets, refectory area. Facilities are clean and in good condition.

All WASH facilities are connected to the municipal WWTP (STEP Sainte Marie – Etalle).

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 identified the embedded water use of primary input:
- Label;
- Preforms, caps;
- Shrink film, stretch film;
- Tape;
- Wooden pallets, carboard.

A total of 45 suppliers are identified and located by their address. None originate from the catchment.

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

Two outsource services are identified:
- ELIS: cloth cleaning;
- CWS: carpet cleaning.

None of these outsource service companies are located in the catchment. However, as advance practice, the site obtained data on used water volumes. The total annual embedded water use outside the catchment for outsourced services is 70 m3. Both services are certified by EcoVadis, providing CSR expertise and evaluation of site's performance.

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

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

in progress

Comment

The site identified two main water-related public bodies/plans operational in the catchment:
- The SPW (Walloon Public Service) is a regional governmental body that oversees public policies including water management. It elaborated the PGDH (Water Management Plan for Walloon River Basin Districts), developed under the EU Water Framework Directive and aims to protect and improve water quality, ensure sustainable water use, prevent and mitigate flood/drought risks, preserve aquatic ecosystems.
- The SPGE (Public Water Management Agency) operates within the framework set by the SPW. They oversee water governance missions such as water quality protection, wastewater treatment, flood risk management, stakeholder coordination.

The site confirmed that no specific publicly-led initiatives were under way in the catchment.

Finding No: TNR-017326

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 following water-related legal and regulatory requirements applicable to the site are provided and cover the following areas:

- Water volume limits: The operating permits in the form of decrees for the 10 exploited sources have been provided. These documents specify the extraction volume limits, the destination of the extracted water, and the maximum pump flow rate.

- Water quality: The Royal Decrees defining the regulatory framework for the quality of extracted water have been provided. The regulatory limits for all parameters to be tested are identified.

- Wastewater quality: The environmental permit obtained for the site has been provided. It specifically defines the conditions for industrial wastewater discharge, including the parameters to be monitored: BTEX, BOD, detergents, and hydrocarbons.

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

Obs.

Comment

The “Laclaireau River” catchment* water-balance was performed using data from the period 2009-2019. The following flows were considered:

Inflows:
- Precipitation = 10.032 Mm3/yr
- Aquifer inflow = 4.4 Mm3/year
- Surface runoff = 0.593 Mm3/yr

Outflows:
- Groundwater abstraction (site + municipality) = 0.345 Mm3/yr (site = 0.154 Mm3/yr + Town of Etalle = 0.195 Mm3/yr)
- Evaporation/evapotranspiration = 5.1 Mm3/yr

Storage:
- Volume of groundwater stored in the aquifers = 4.246 Mm3/yr

* The “Laclaireau River” catchment (Catchment 1) includes all the water sources and is therefore the one relevant for water balance.

Surface water was not considered in the balance (streams, rivers, ponds, etc.). The site has commissioned a new study to assess and quantify the water balance of the catchment, expected in 2025, and the scope of work for the study includes surface waters. The service proposal from the consultancy firm, dated January 2025, has been provided as evidence.

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

The sources of quality data were identified:
- Site's water wells: internal data on groundwater;
- Agrivair – Site's subsidiary branch: nitrate monitoring program on municipal and private wells;
- SPW (Service Publique Wallonie) – Governmental SH: quality data in the catchments (surface water and aquifer).
- Idelux (Intermunicipal group) – Governmental SH: Outflow data from wastewater treatment plants.

The parameters available are:
- Physical: pH, TDS, TSS (total suspended solids), etc.
- Biological: BOD (biochemical oxygen demand), microbiology, etc.
- Chemical: Anions (chloride, nitrate, sulfate, bicarbonate, etc.), cations (calcium, sodium, potassium, etc.), metals, COD (chemical oxygen demand), hydrocarbons, etc.

A clear baseline on nitrate parameter (which is identify as a shared water challenge) is established. The Agrivair program undertake monitoring and mitigation actions to address this SWC.

General quality data is available with updates several times a year.

The site provided evidence that some data was obtained in collaboration with their stakeholders (SPW and Idelux).

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

A list of IWRA in the catchment was provided and where applicable mapped. Each IWRA is described and categorized according to their value (environmental, economical, cultural). A note on the specific value of each IWRA is provided (ex: hosts sensitive biodiversity, recreational area, landscape formation, etc.).

The identification of the IWRAs was done using existing/internal knowledge. The site hired an intern to identify the IWRAs (map review) and visit them during field work.

Each IRWA is described and a photo is attached. The photos were taken by the site, each IWRA was visited.

The status of each IWRA is provided on a scale from 0 (lost or beyond financially feasible restoration) to 5 (excellent condition and protected, requiring no work (beyond, perhaps, ongoing maintenance and monitoring).

The audit team interviewed Le Gardon Stabulois (local fishing association using the pond "Etang de Gantaufet", in which the site discharges some of their effluents). The stakeholder confirmed the excellent status of the pond although the site rated the status as 3 of 5 ("acceptable condition but could be improved"). According to the stakeholder, the pond water is very pure, and the site's effluents discharged into it ensure a flow of fresh water all year round. This is particularly beneficial for the biodiversity in summer. The stakeholder confirms that there is very little fish mortality in the pond compared to other ponds used by other local fishing associations.

Finding No: TNR-017330

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

No

Comment

A list and mapping of relevant existing water-related infrastructures in the catchment is provided and include:
- Water wells (municipal, private, agricultural);
- Water wells owned and operated by the site;
- Existing municipal waste water treatment plants;
- Municipal sewer networks.

The identification of the water-related infrastructures was done using information from the Geoportal of the Walloon Region, an online platform operated by SPW.

The site confirmed that no water-related infrastructure was planned.

The infrastructures have been mapped against flood risks due to overflow and runoff for return periods ranging from 25 to 100 years (very low risk in the catchment area).

The site tour included a field visit. The audit team could see from the outside the WWTP "STEP de Buzenol". This water-related infrastructure is properly mapped.

Finding No: TNR-017331

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

Yes

Comment

The site has identified the sanitation plan for the Semois-Chiers hydrographic sub-basin, in which the physical scope of the site is included. The data is provided by the SPGE, and the latest update was in 2016. The data shows that 89.9% of the population is served by a collective system, and 10.1% are on an individual system.

The data regarding potable water supply have been identified from the WASH monitoring program of JMP (Joint Monitoring Program) of UNICEF. The latest data provided for Belgium regarding water supply is from 2020. The table identifies 99.2% of the population connected to tap water at national scale.

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

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

Obs.

Comment

Stakeholders were consulted to identify the shared water challenges using:
- Feedback from questionnaires;
- Exchanges with Idelux to find a relevant project to address WASH challenges.

The available feedback questionnaires highlighted the following concerns from the interviewed stakeholders:
- Emerging water stress, increase in water demand (SH: AKT CCI / City of Etalle);
- Impact of industrial wastewater discharge into the natural environment (SH: DNF, Mr Falmagne);
- Leaks on the municipal water distribution network (SH: Mr Falmagne)

Three shared water challenges are identified and described with sufficient details to be understood:

A map provided as evidence shows the surface water bodies impacted by organic nitrogen inputs from agricultural areas. The site's catchment is classified as having a "moderate" (3/5) nitrogen input.

- SWC 1: Quality of surface water and groundwater on nitrate parameter, linked to human/agricultural activities;

A map provided as evidence shows the ecological status of the water body SC08R (downstream portion of the physical scope) rated as moderate, due to the impact of both collective and individual sanitation.

- SWC 2: Effluent quality from the site discharging into two identified IWRAs, Etang de Gantaufet and Ruisseau de la Grosse Fontaine;

- SWC 3: Improve WASH services in the catchment.

The site consulted the Aqueduct Water Risk Atlas to quantify the water depletion challenge (unsustainable use leading to long-term risks to water security). The risk in the area by 2030 and 2050 is low-medium. Thus, no shared water challenge regarding water quantity was identified.

The prioritization of the SWC was done by combining the importance for the stakeholder versus the importance for the site.

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

Comment

Initiatives to address shared water challenges are identified. Some initiatives are identified from the site and some from the stakeholders:

- SWC 1: Quality of surface and groundwater in the Laclaireau Stream catchment related to agricultural and human activities.
The subsidiary branch Agrivair signs partnerships with farmers. Agrivair provides consulting on work methods and mitigation solutions to reduce pesticide use and revise crop types (and use). Monthly meetings are organized to assess the results.

- SWC 2: Site's effluent quality
Nitric acid, a nitrogen generator, is used for cleaning the pipes in the factory (Clean In Place process, CIP room). The project aims to study solutions to reduce the acid concentration in the cleaning process without compromising its effectiveness. This includes revising the cleaning schedule and alternating between 3-phase CIP (acid + base + hot water) and 2-phase CIP (without acid). The expected reduction in nitrogen is 50%.

- SWC 3: Improve WASH services in the catchment
The site has signed a water reallocation agreement with the municipality of Etalle. The site provides water from one of its sources to the community upon request.
The site has contacted the stakeholder Idelux to identify the most urgent need for improving WASH services. The Buzenol wastewater treatment plant (STEP) was degraded and inefficient due to surface water infiltration inside the cracked pipes. The site is funding a project to reline the pipes in order to eliminate the infiltration of these clear waters, which saturate the plant.

The status of initiatives is identified: planned or implemented.

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.* Obs.

Comment

Two water risks faced by the site are identified and their nature qualified. The listing includes likelihood, severity of impact, potential costs and business impact (on a scale from low to extreme high):

- Risk 1: Shutdown of production in case of nitrate contamination:
The nature of the risk is regulatory, social, reputational and financial. The likelihood of occurrence is low, severity of impact on the site is extremely high, potential costs are extremely high and business impact extremely high.

- Risk 2: Decrease in the chemical quality of the stream/pond due to the site's industrial discharges:
The nature of the risk is physical and reputational. The likelihood of occurrence is low, severity of impact on the site is medium to high, potential costs are extremely low and business impact low.

- Risk 3: Deterioration of public WASH services in the catchment:
The nature of the risk is reputational and physical. The likelihood of occurrence is low to medium, severity of impact on the site is medium to high, potential costs are low to medium and business impact extremely high.

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

Comment

The water-related opportunities for the site were identified and listed, the timeframe in which the opportunity can be implemented and potential savings identified:

Opportunities that the site can implement alone:
- To address Risk 2 (decrease in the chemical quality of the stream/pond due to the site's industrial discharges): Development of a new method for inline disinfectant injection (Clean In Place, CIP program):
The opportunity can be addressed within short term. Implementation is rather easy. Priority is high. The value creation is the maintenance of good quality status in the affected IWRAs and control of the reputational risk.

- To address Risk 3 (deterioration of public WASH services in the catchment): securing drinking water supply for the municipality
The opportunity involves short-term program. Implementation is rather easy. Priority is high. The value creation is the maintenance of good quality status in surface waters and the management of reputational risk.

Opportunities that the site can participate in joint venture with stakeholders:

- To address Risk 1 (shutdown of production in case of nitrate contamination): partnership between Agrivair* and farmers to implement alternative practices to reduce the use of phytosanitary products. Monitoring to assess the effectiveness of the measures.
The opportunity involves long-term program. Implementation is rather easy. Priority is high. The potential savings are the maintenance of the site's operations. The value creation is the preservation of groundwater quality.

- To address Risk 3 (deterioration of public WASH services in the catchment): improving the performance of the Buzenol WWTP.
The opportunity involves short-term program. Implementation is rather easy. Priority is medium to high. The value creation is the management of reputational risk.

*Agrivair is a subsidiary of Nestlé Waters that works on environmental preservation and sustainable agriculture.

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.*

in progress

Comment

The site listed some examples of best practice for water governance:
- Public disclosure of water use and water quality data for other to use;
- Elaboration of a water stewardship plan;
- Stakeholder engagement;
- Establishing or participating in Public-Private Partnership;
- Supporting coordination among relevant institutions;
- Open house day at the factory.

Finding No: TNR-017337

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.*

Obs.

Comment

The following best practice for water balance is identified:

Relevant at site's scale:
- Review of water usage on the site to help prioritize efforts in implementing technological solutions to reduce consumption;
- Worker training to help reducing water waste;
- Leak detection campaign;
- Monitor the water use ratio (WUR) to track abnormal water consumption;
- Best practice identified in the Volumetric Water Benefit Accounting (VWBA) report: water reuse, rainwater harvesting, etc.

Relevant at catchment's scale:
- Irrigation schedule;
- Switching to or rotating with crops that are less water-intensive.
- Best practice identified in the Volumetric Water Benefit Accounting (VWBA) report: new water supply for crop irrigation, agricultural water demand reduction measures, consumer efficiency measures).

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

Comment

The following best practice for water balance is identified:

Relevant at site's scale:
- Enhance the Clean In Place (CIP) process;
- Site wastewater discharged directly to irrigation;
- Identify and implement a "water safety plan" to protect high quality water bodies and aquifers.

Relevant at catchment's scale:
- Help the farmers to select crops that require less phytosanitary products.

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

Comment

Best practices for maintenance of IWRAs are identified:
- Restoration of a peat bog and a reed bed;
- Establish a monitoring program to observe changes on the IWRAs;
- Support public communication initiatives to raise awareness on IWRAs;
- Other best practice embedded in the Volumetric Water Benefit Accounting (VWBA).

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

Comment

Best practices for maintenance of site provision of equitable and adequate WASH service are identified:
- Provision of sufficient supplies of safe drinking water for all workers especially during the hot season;
- Provide training for workers and their families on good hygiene practices.

The site tour allowed the audit team to identified best practice for WASH such as the provision of hand sanitizer in restrooms, office areas, and cafeterias, although it was not identified in the BP summary.

2	STEP 2: COMMIT & PLAN - Commit to be a responsible water steward and develop a Water Stewardship Plan

2.1 *Commit to water stewardship by having the senior-most manager in charge of water at the site, or if necessary, a suitable individual within the organization head office, sign and publicly disclose a commitment to water stewardship, the implementation of the AWS Standard and achieving its five outcomes, and the allocation of required resources.*

2.1.1 *A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:*
- That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes
- That the site implementation will be aligned to and in support of existing catchment sustainability plans
- That the site's stakeholders will be engaged in an open and transparent way
- That the site will allocate resources to implement the Standard.

in progress

Comment

A letter signed by the Factory Manager is identified, including the following commitments:
- engagement towards implementing and disclosing progress on the five AWS outcomes;
- implementation and disclosure of progress on water stewardship program;
- engagement of stakeholders;
- allocation of resources to implement the Standard.

This letter was signed on February 11, 2025 by the Factory Manager.

The document is publicly disclosed:
- Sent by mail to the 16 identified AWS stakeholders. Receipt acknowledgments are provided.
- Displayed at the site's entrance front desk;
- On the website.

The document can be reviewed by the following people:
- 16 stakeholders (16 receipts identified);
- The site workers and site visitors;
- All people visiting the website.

The site sent the commitment letter to 16 stakeholders (receipts were provided as evidence). However, a total of 17 stakeholders were primarily identified in 1.2.1. Therefore, one stakeholder was forgotten.

Finding No: TNR-017342

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.

in progress

Comment

It is clear in the noted documentation who is in charge (name and/or position) of maintaining compliance obligation for water management:
- Philippe Antoine, Factory Manager, is overall responsible for water stewardship at the industrial site level;
- Maxime Gillet, Quality and Water Resources Manager.

Finding No: TNR-017343

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	A description of the site's mission, vision and goals towards good water stewardship is identified and described on the site's webpage: - Promote regenerative agriculture (protect, renew, restore the environment); - Manage water responsibly (reduce usage in manufacturing, ensure access to water for communities); This strategy is defined at corporate level. General work axis is clear and understandable.	
2.3.2	*A water stewardship plan shall be identified, including for each target:* *- How it will be measured and monitored* *- Actions to achieve and maintain (or exceed) it* *- Planned timeframes to achieve it* *- Financial budgets allocated for actions* *- Positions of persons responsible for actions and achieving targets* *- Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.*	Obs.

Comment	The targets are identified and are consistent with the findings of Step 1. All AWS outcomes are covered: Good water governance (at site level): - Objective: Raise awareness about water resource protection and their use. Target: Organization of an annual open house day at the company, open to all. Sustainable water balance (at site level): - Objective: Optimizing water consumption. Target: Lowering the Water Use Ratio (WUR) to reach 1.2 L/L in 2028. Good water quality status (at site level): - Objective: Improve the chemical quality of industrial wastewater for the total nitrogen parameter. Target: Reduce total nitrogen in industrial wastewater by 50% by 2027. Good water quality status (at catchment level): - Objective: Improve the chemical quality of surface and groundwater regarding the nitrate parameter. Target: Sign an agreement with 100% of the farmers in the catchment for the Agrivair program. Reduce the nitrate concentration below 10 mg/L in surface and groundwater by 2030. Important water-related areas (at catchment level): - Objective: Restore degraded IWRAs in the catchment. Target: Restore and rewet a reed bed in Sainte-Marie and restore three peatland areas. WASH (at catchment level): - Objective: Ensure the water supply on demand for the municipality of Etalle. Target: Provide water from a site's water well on demand. - Objective: Increase performance of the Buzenol WWTP Target: Relining the pipes leading to the wastewater treatment plant subject to infiltration issues. The targets are consistent with risks and opportunities identified in Step 1. Each target is described with the way it is monitored and measured. Specific technics and units are provided. Clear actions to address the targets are described. It is clear whether the target is to achieve or maintain. Specific timeframes are identified and the level of completion of the target noted. The budget for each target is described when available. Responsible persons/positions are attached to each target. It is clear whether each target is best practice or not.	
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 main risks identified were:
- Risk 1: Shutdown of production in case of nitrate contamination;
- Risk 2: Decrease in the chemical quality of the stream/pond due to the site's industrial discharges;
- Risk 3: Deterioration of public WASH services in the catchment.

All the risks are addressed by the WSP which involves specific actions and targets.

- Risk 1: The site provided the Agrivair action plan to address the risk of nitrate contamination on groundwater (ex: sign partnership with farmers, mechanical weeding, establishment of temporary meadows, install porous samplers to assess the effectiveness of the measures, etc.

- Risk 2: A project to develop the method for reducing nitrogen usage in the CIP process has been commissioned. The budget has been approved internally, and a request for quotes has been made to external providers. The site has provided all the evidence (quote, proposal).

- Risk 3: The site provided the signed document for the reallocation of water to the municipality of Etalle, dated in January 2024.

- Risk 3: The site provided evidence of email exchanges regarding the organization of the closure and acceptance of the work at the Buzenol WWTP.

Public-sector was involved in the elaboration of the plan (Municipality of Etalle, Idelux). The plan involves site's action in coordination with relevant stakeholders.

3	STEP 3: IMPLEMENT - Implement the site's stewardship plan and improve impacts	
3.1	*Implement plan to participate positively in catchment governance.*	
3.1.1	*Evidence that the site has supported good catchment governance shall be identified.*	Yes
Comment	The site could provide evidence of good catchment governance such as: - Open house day at the factory in 2023 where 500 people visited the site. The video of this day was reviewed by the auditor during the audit. - Data sharing with the community: the board summarizing the water balance of the catchment is displayed on a municipal board in the municipality of Etalle. - As part of the site's Water Pledge projects, Agrivair has engaged 12 farmers (up to 2024) from the catchment to sign an agreement committing to the 'zero pesticides' policy.	
3.1.2	*Measures identified to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be implemented.*	Yes
Comment	The site reallocates water from one of its well to the municipality of Etalle upon request. The first reallocation agreement was signed in 2012 and has been renewed at the municipality's request. The latest agreement was signed in January 2024. In November 2023, the Etalle municipality requested the site to supply 15 m³/h of water for two weeks. The supply contract signed by both parties was provided as evidence. The volume supplied by the site during this period was identified as 48,486 m³.	
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 site has a regulatory monitoring contract with Red-on-Line* to ensure constant legal compliance. The site provided an extraction of their Red-on-Line results related to the topic of water us to the 28/01/2025, as well as their compliance status with the identified legal articles.

The site's compliance report is extracted from the Red-on-Line platform and shows an overall compliance rate of 99.34%. The non-compliance with one article is not related to the topic of water.

The site provided a log of compliance submissions to regulatory agencies regarding the following areas:

- Wastewater: The site reports the effluent quality results to the SPW. The sampling program is identified, and an example of a report to the SPW** from April 2024 is provided.

- Water sources:

Quantity: The data on withdrawal volumes is sent to the SPW. An email from February 2025 (sent to the SPW), reports the data from the flow meters at each source. The attached document includes weekly data.
Quality: The data on the quality of the extracted water is communicated to the SPF***. An email from February 2025 (sent to the SPF), reports the results of annual quality results and any source contamination events.

Where there were identified incompliances, corrective actions were implemented and reported. All evidences were provided.

The site has not had any inspection or audit so no records exist up do date.

* Red-on-Line is a compliance and risk management service specializing in environmental, health, and safety (EHS) regulations. It provides regulatory monitoring, legal compliance support, and software solutions to help companies manage EHS risks across multiple jurisdictions.
** The SPW (Service Public de Wallonie) is the public administration of Wallonia, Belgium. It oversees various regional matters, including environment, water management, infrastructure, and public services.
*** The SPF (Federal Public Service for Public Health, Food Chain Safety, and Environment), is the governmental body overseeing environmental regulations, drinking water quality, and public health policies.
**** The AFSCA (Federal Agency for the Safety of the Food Chain) is a Belgian government agency responsible for ensuring food safety, animal health, and plant health. It oversees the regulation and control of food products, drinking water, and animal feed to protect public health and the environment.

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

In the target area defined by the site, there are no Indigenous peoples present, and nor local/national legal provisions that recognize or allocate water rights to other parties beyond regulatory framework exist. All water usages are covered by existing legal and regulatory requirements. Therefore, this indicator is not applicable in the context of the site.

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

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

Yes

Comment	The water balance target set in the WSP is lowering the Water Use Ratio (WUR) to reach 1.2 L/L in 2028. Current site's performance (in 2024) is 1.32 L/L. Annual WURs are tracked and reported in the WSP since 2020. A detailed analysis of the WUR is provided in a separate dedicated excel sheet extracted from the SHE-PM tool*. A graph shows annual performance of the WUR towards meeting the ultimate target. *The SHE-PM tool (Safety, Health, Environment, and Product Management) is used to ensure compliance and maintain effective management of health, safety, environmental, and product-related issues.	
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 challenges however, the site implemented actions to track and reduce the water use efficiency. A target of the water use ratio (WUR) is set and an action plan defined. The action plan to reach the target consists of optimizing production and disinfection schedules. The plan to optimize the disinfection program is still in the sizing phase and has not yet been implemented. This explains why the trend is not yet decreasing. The year 2024 shows a higher WUR. The site has identified the cause, which is related to the installation of new filling machine compliant with the European requirement for bottle caps attached to the bottles*. The installation of these new machines was accompanied by exceptional cleaning programs that had a punctual negative impact on the site's performance in relation to the WUR. *The regulation requiring plastic bottle caps to be attached to the bottles is a European Union standard, part of the EU's efforts to reduce plastic waste and promote more sustainable packaging. This regulation, which is effective from July 2024, mandates that all plastic bottles under 3 liters must have caps that are tethered to the bottle to prevent caps from being littered and reducing their impact on the environment.	
3.3.3	*Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.*	Yes
Comment	Not applicable. The water re-allocation agreement with the municipality of Etalle is not a legal obligation.	
3.4	*Implement plan to achieve site water quality targets*	
3.4.1	*Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.*	Yes

Comment

The water quality targets set in the WSP are:

- Target 1: Reducing total nitrogen in industrial wastewater by 50% by 2027. Two actions are implemented to meet this target:

> Action 1: Switch the current disinfectant based on nitric acid, used in the CIP process to Oxonia*, which does not contribute to nitrogen in wastewater.
The site requested a quote from Ecolab on 06/07/2024 for the installation of an Oxonia Active dosing system in the CIP lines and a quote from STIC on 10/25/2024 for the connection of Oxonia to the CIP pipelines. The quotes are provided as evidence.
> Action 2: Create the specifications to define the method for measuring total nitrogen concentrations, establish the weekly sampling protocol, and project the gains related to the reduction of nitric acid use. The projected gains are simulated in a spreadsheet provided as evidence. The ultimate expected reduction of nitrogen in the wastewater is 52%.

- Target 2: Sign an agreement with 100% of the farmers in the catchment for the Agrivair program. Reduce the nitrate concentration below 10 mg/L in surface and groundwater by 2030.

> Action 1: A total of 12 farmers of 14 were enrolled by 2023. Verbal discussions have been initiated with one of the two remaining farmers. No consultable evidence has been provided.
> Action 2: Porous samplers for monitoring nitrate concentrations in agricultural soils have been installed, one on a land under Agrivair contract and the other one not, in order to assess the effectiveness of the actions. Nitrate concentrations (in mg/L) are monitored and evidence is provided up to October 2024.

*Oxonia is used as a disinfectant in the CIP (Clean-In-Place) process, without leaving harmful residues. As part of a nitrogen reduction plan, the use of Oxonia can help minimize the nitrogen load in wastewater.

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 a shared water challenge. Several best practices were identified in Step 1, some relevant at site's scale and others at catchment scale. The following best practices were added to the WSP and implemented:

- Best practice 1: Reducing total nitrogen in industrial wastewater by 50% by 2027.
The site implemented actions to switch the current disinfectant based on nitric acid, used in the CIP process to Oxonia. The project is at its beginning in 2024 and quotes from external service providers have been obtained regarding the implementation of the system in the factory for the CIP process. Potential nitrogen reduction was modeled and the anticipated ultimate performance is a reduction of 52% of the nitrogen released in the effluents.

- Best practice 2: Reduce and/or maintain the nitrate concentration below 10 mg/L in surface and groundwater by 2030.
Agrivair (subsidiary branch of NW) has implemented the project in 2016. In 2023, 12 farmers of 14 signed an agreement work under the Agrivair framework. Porus samplers were installed in 2023 to evaluate the performance of actions against a site not enrolled in the program. Regular monitoring shows the effectiveness of the program.
The external consultant Bluerisk approved the volumetric water benefits (VWB*) for the Agrivair program in November 2024, quantified at 75,454 m3/year.

* The VWB concept focuses on the volume of water that is saved, reused, or better managed, offering a way to quantify the positive impact of water conservation or sustainable water management practices.

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

The target set in the WSP to maintain or improve IWRAs is the restoration and rewetting of a reed bed in Sainte-Marie and restoration of three peatland areas. The site commissioned a technical and financial proposal in 2023 from the consulting firm ANTEA for the restoration of the "roselière de la Gravière" reed bed. This proposal includes the work to be carried out and the program. The project has not been yet implemented.

The implementation of a new method for the pipe disinfection (Clean In Place, CIP) aims to reduce by 50% the total nitrogen in the industrial waters. The effluents are discharged in two identified IWRAs: Gantaufet pond and Grosse Fontaine stream. One of the water risks identified on these IRWA is "decrease in water quality due to wastewater discharge, harmful consequences for aquatic organisms / impact on biodiversity". This implemented project is therefore compliant with the maintenance of Important Water Related Areas.

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

Comment

The number of facilities is in adequacy with the number of workers, including visitors. A summary table records the number of toilets and showers within the factory, as well as the number of male/female workers. The numbers are compared to regulatory thresholds and internal best practices. These are compliant. Visitors are very few in the factory thus counting them is not relevant. The sanitary areas are mapped by zone.

Drinking water is supplied to the factory workers from the water sources and the internal storage "Tank 6". Monthly quality analyses are carried out internally on the microbiological parameters, pH, and conductivity and results for year 2024 are provided.

The factory has a Legionella water sampling schedule certified ISO 11731. Various sampling points are defined in the plan (showers, faucets, boiler room, cafeteria). The samples are sent to the Nestlé Quality Assurance Center Vittel (laboratory). Results for 2024 are provided at each sampling point.

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

Considering that:
— The site provided evidence of a positive water balance at catchment scale;
— It is developing a joint venture with farmers of the impluvium to control phyto-products and warrants safe drinking water for site's operation and production and the local communities;
— Traditional access rights for local communities are not compromised;
— The stakeholder interview has supported the fact that no case of impingement was raised.
The indicator is considered compliant.

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 indirect water use is identified within the site's catchment.

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: A total of 45 suppliers and 2 service providers were identified. None originate from the catchment. However, the site provided evidence of communication by email with the 2 service providers (ELIS and CSW) to gather data related to indirect water use.

The service providers sent data on their annual water use:
- ELIS = 50 m3/year
- CSW = 20 m3/year

Both service providers are certified EcoVadis*.

* EcoVadis certification is a sustainability rating assessing companies on environmental, social, and ethical performance. It evaluates businesses across key areas such as environmental impact to promote corporate social responsibility (CSR).

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

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

Comment: The site is participating in a joint project to restore the Buzenol wastewater treatment plant. The minutes of the project launch meeting on February 7, 2024 organized by Idelux (SH), have been identified. Evidence of email exchanges has been provided as part of the pipeline relining project, with the latest exchanges regarding the completion of the work dating from December 2024.

Several site's stakeholders are involved in the discussions: Idelux, Municipality of Etalle (Mr Thiry, Mr Falmagne).

The confirmation of receipt is identified through email responses from the beneficiaries.

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.* Obs.

Comment: The site implemented an open house day at the factory in 2023. A video recorded during this event, which welcomed around 500 people, was viewed during the audit.

As part of the site's Water Pledge project, Agrivair has engaged 12 farmers (up to 2024) from the catchment to sign an agreement committing to the 'zero pesticides' policy.

3.9.2 *Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.* Yes

Comment

The objective and target set in the WSP regarding best practice on water balance are:
- Objective: Optimizing water consumption.
- Target: Lowering the Water Use Ratio (WUR) to reach 1.2 L/L in 2028.

The project started in July 2024 and the target must be met by 2028.

The actions to reduce water consumption and lower the WUR will consist of optimizing production and disinfection schedules. The first phase of the project, began in July 2024, and involved the definition of the new production and disinfection schedules. A simulation was conducted to optimize the actions, which include:
- Minimize and secure external/temporary workforce;
- Minimize start & stop of the lines (vs. cleansings);
- Anticipate stocks before the season;
- Build buffer stock to cave a risk in autumn/winter.

Actual actions will be soon implemented thus the WUR is expected to follow a lowering trend from 2025.

3.9.3 *Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.*

Yes

Comment

The objective and target set in the WSP regarding best practice on water quality are:

At site level:
- Objective: Improve the chemical quality of industrial wastewater for the total nitrogen parameter.
- Target: Reduce total nitrogen in industrial wastewater by 50% by 2027.

The project is not yet deployed in 2025 but is at the sizing stage. The site requested a quote from Ecolab on 06/07/2024 for the installation of an Oxonia Active dosing system in the CIP lines and a quote from STIC on 10/25/2024 for the connection of Oxonia to the CIP pipelines. The quotes are provided as evidence.

At catchment level:
- Objective: Improve the chemical quality of surface and groundwater regarding the nitrate parameter.
- Target: Sign an agreement with 100% of the farmers in the catchment for the Agrivair program. Reduce the nitrate concentration below 10 mg/L in surface and groundwater by 2030.

The project started in 2018. In 2024, 12 farmers signed an agreement with Agrivair which represent 86% of the target. The last 2 conventions signed in January 2023 are provided.
The site has started discussions with the last two identified farmers to involve in the program.
The approach and actions taken in early 2025 are summarized in a report sent by email to the site by Agrivair.
Agrivair completed the installation of porous samplers on 2 plots (one under agreement and the other none) to initiate a monitoring program and assess the effectiveness of the measures. A field report including photos of the installations is provided.

3.9.4 *Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.*

Yes

Comment

The objectives and targets set in the WSP regarding best practice on site's maintenance of IWRAs are:

- Objective: Restore degraded IWRAs in the catchment.
Target: Restore and rewet a reed bed in Sainte-Marie and restore three peatland areas.

- Objective: Improve the chemical quality of industrial wastewater with regard to the total nitrogen parameter.
Target: Achieve a 50% reduction in total nitrogen levels in industrial wastewater by 2027.

The site commissioned a technical and financial proposal in 2023 from the consulting firm ANTEA for the restoration of the "roselière de la Gravière" reed bed. This proposal includes the work to be carried out and the program. The project has not been yet implemented.

The implementation of a new method for the pipe disinfection (Clean In Place, CIP) aims to reduce by 50% the total nitrogen in the industrial waters. The effluents are discharged in two identified IWRAs: Gantaufet pond and Grosse Fontaine stream. One of the water risks identified on these IRWA is "decrease in water quality due to wastewater discharge, harmful consequences for aquatic organisms / impact on biodiversity". Upgrade wastewater treatment beyond regulatory limits is considered best practice towards maintenance of Important Water-Related Areas. This project has been implemented.

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

Yes

Comment

The objective and target set in the WSP regarding best practice on WASH are:
- Objective: Increase performance of the Buzenol WWTP.
- Target: An average of 168 m³ per day (61,000 m³ per year) to be returned to the natural water cycle in the Moulin de Buzenol stream.

The project of relining the pipes leading to the wastewater treatment plant subject to infiltration issues started in 30/03/2024 and was completed in 08/09/2024. Field work photos were provided along with the confirmation of project completion by email.

4	STEP 4: EVALUATE - Evaluate the site's performance.

4.1 *Evaluate the site's performance in light of its actions and targets from its water stewardship plan and demonstrate its contribution to achieving water stewardship outcomes.*

4.1.1 *Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.* ✓ Yes

Comment: The targets and timelines (start/end dates) from the WSP are identified. The current performance against each target is clearly evaluated with relevant units (volumes, non-conformity count, etc.) and timeframe. It is easy to compare where the site is at against the targets.

Where the timelines were not respected or targets nor reached, the site was able to provide explanations. Progress is tracked regularly.

Each target is linked to an AWS Outcome. It is clear how the site is contributing to achieving the five AWS outcomes.

The site is encouraged to remain proactive regarding projects that had to be canceled or postponed.

4.1.2 *Value creation resulting from the water stewardship plan shall be evaluated.* 🔍 Obs.

Comment: The value creation for the site and the shared value created are identified in a qualitative aspect in the WSP and described with sufficient details.

4.1.3 *The shared value benefits in the catchment shall be identified and where applicable, quantified.* 🔍 Obs.

Comment: The shared value benefit in the catchment was evaluated, described with sufficient details. An evaluation of the quantitative and qualitative benefits has been done were applicable.

4.2 *Evaluate the impacts of water-related emergency incidents (including extreme events), if any occurred, and determine the effectiveness of corrective and preventative measures.*

4.2.1 *A written annual review and (where appropriate) root-cause analysis of the year's emergency incident(s) shall be prepared and the site's response to the incident(s) shall be evaluated and proposed preventative and corrective actions and mitigations against future incidents shall be identified.* ✓ Yes

Comment: The site uses the SHE-PM tool to report all incidents. The extraction of the SHE-PM tool provided compiled data from January 2020 to January 2025 on the following areas:

- Environmental complaints;
- Environmental fines;
- Environmental incidents;
- Water-related incidents;
- Total cost of environmental fines;
- Volume of spills to the environment.

No incident occurred in 2024.

4.3 *Evaluate stakeholders' consultation feedback regarding the site's water stewardship performance, including the effectiveness of the site's engagement process.*

4.3.1	*Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.*	Yes
Comment	The site's water stewardship performance was shared to 16 stakeholders identified in 2024 via a commitment letter dated on 03/02/2025 and sent by email. Proof of receipts is provided well as the original email. The communication clearly requests feedback at the end of the document and provides contact name and email address. Water stewardship performance can clearly be identified and evidence of recent data is identified.	
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 site is at initial certification so this indicator is not yet relevant. However, The site was able to explain that it planned to duplicate its WSP and adapt/modify it each year to allow for easy comparison from one year to the next. The water stewardship plan will be evaluated 4 times a year.	

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: Water-related internal governance is overseen by designated persons/positions within the water stewardship organization. This document includes an organizational chart defining the positions of those accountable for compliance. Hierarchy between those accountable is clearly identified and the senior-most leadership at the site level (factory manager) is identified. This document is disclosed/visible to:

- At the factory reception: workers, visitors, external workers;
- On the site's website: everyone consulting the website;
- To the AWS stakeholder, sent by email (the original email containing the attachment and proof of receipts was provided);
- Upon request: everyone.

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 commitment letter titled "NWB committed to better water governance", was disclosed by email to the 16 AWS stakeholders. It is a translation of the WSP. This letter is common to all stakeholders and was validated by the corporate communication department. This department, not being an expert in the field, approved the wording and considered that the text was sufficiently understandable for everyone.

The last communication was written on 03/02/2025 and sent to the stakeholders on 07/02/2025. Proof of receipts were gathered from all the SH between 07/02/2025 and 18/02/2025.

The site intends to communicate on their WSP performance each year.

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 WSP performances are disclosed in the letter sent to all the stakeholders on 07/02/2025.This letter is intended to be sent once a year with yearly performance against targets.

Finding No: TNR-017354

5.4 *Disclose efforts to collectively address shared water challenges, including: associated efforts to address the challenges;engagement with stakeholders; and co-ordination with public-sector agencies.*

5.4.1 *The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.* ✓ Yes

Comment

The site's shared water challenges and efforts made to address them are disclosed.

- SWC 1: Quality of surface water and groundwater on nitrate parameter, linked to human/agricultural activities;

The site communicated the number of farmers engaged by Agrivair in a zero-pesticide policy and responsible practices. A total of 12 farmers were engaged in 2023.

- SWC 2: Effluent quality from the site discharging into two identified IWRAs, Etang de Gantaufet and Ruisseau de la Grosse Fontaine;

The site reported the start of a testing phase in October 2024.

- SWC 3: Improve WASH services in the catchment.

The site disclosed the water volume reallocated to the Etalle municipality between 09/01/2024 to 21/05/2025 (48,486 m3).

The rehabilitation project of the Buzenol wastewater treatment plant was documented with a full page of explanations and on-site field pictures to summarize the actions taken. The target was achieved in 2024.

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

Comment

The stakeholders from public-sector agencies were engaged through the CRP questionnaires sent between February 2024 and January 2025:
- Municipality of Etalle, 16/02/2024
- DNF (Department of Nature and Forests), 29/01/2025
- AKT Chambre de commerce (regional Chamber of Commerce), 29/01/2025
- Jean-Luc Falmagne (municipality of Etalle and farmer), 16/02/2024

Idelux, another public-sector agency as engaged in the Buzenol WWTP rehabilitation project carried out in 2024.

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

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

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

Photographic Evidence from Audit

Yes

Photo 03 - Chemical product storage areas (acid and base) (source Nestlé Waters Benelux).JPG

Photo 02 - Pipelines entering the factory (FDV and HOSS) (source Nestlé Waters Benelux).JPG

Photo 05 - 3 tanks for the CIP process (base, acid, hot water) (source Nestlé Waters Benelux).JPG

Photo 09 - Buffer pond area (pond isolation valve, sampling point, flow meter, continuous pH and temperature monitoring screen) (source Nestlé Waters Benelux).JPG

Photo 10 - Fond de Volette FDV wellhead, water sampling tap and flowmeter (source Nestlé Waters Benelux).JPG

Photo 07 - 6 storage tanks of 160m3 each, to store water used in production and industrial processes (source Nestlé Waters Benelux).JPG

Photo 11 - Gros Ruisseau GR5 wellhouse and fenced area of the close protection zone (source Nestlé Waters Benelux).JPG

Photo 01 - Pipelines entering the factory (GR and HdH) (source Nestlé Waters Benelux).JPG

Photo 06 - Pipeline and associated flow meter for the “retour source”, returning unused water to the environment (loop) (source Nestlé Waters Benelux).JPG

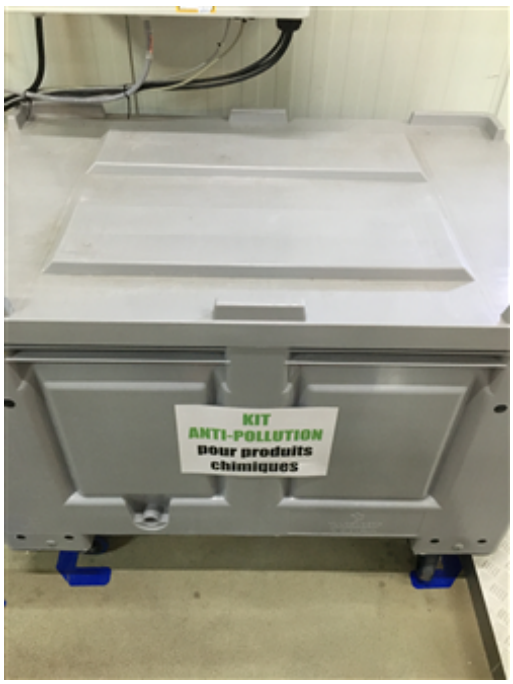


Photo 04 - A pollution control kit spill kit (source Nestlé Waters Benelux).JPG

Photo 08 - Neutralization station, sedimentation basin (source Nestlé Waters Benelux).JPG

Previous Findings

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

N/A