CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-001593

WSAS WATER STEWARDSHIP ASSURANCE SERVICES

SITE DETAILS

Site: **Spadel - Wattwiller**
Address: Rue de Guebwiller 2, 68700, Wattwiller, FRANCE
Contact Person: Maxime Sohy
AWS Reference Number: AWS-000421
Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Platinum
Date of certification decision: 2025-Jul-03
Validity of certificate: 2028-Jul-02

AUDIT DETAILS

Audited Service(s): AWS Standard v2.0 (2019)
Audit Type(s): Re-Certification Audit
Audit Start Date: 2025-May-13
Audit End Date: 2025-May-16
Lead Auditor: Lorenzo Brioschi

Audit team participants:
Lorenzo Brioschi, Lead Auditor

Site Participants:
José Lefort, Factory Director
Sandrine Mouton, Quality manager
Maxime Sohy, Water and Environment Engineer
Arnaud Collignon, Water and Environment Manager
Olivier Crommen, Water and Environment Engineer

AUDIT TIMES

Dates	Audit from	Duration	Auditor	Description
2025-May-13	09:00:00 - 17:00:00	08:00	Lorenzo Brioschi	Day 1
2025-May-14	09:00:00 - 17:00:00	08:00	Lorenzo Brioschi	Day 2
2025-May-15	09:00:00 - 17:00:00	08:00	Lorenzo Brioschi	Day 3
2025-May-16	09:00:00 - 12:00:00	03:00	Lorenzo Brioschi	M&E and closure

ADDITIONAL INFO

Summary of Audit Findings: During the certification audit, two (2) non-conformities and three (3) observations were raised.

The Client is requested to submit a root cause analysis and corrective actions for each of the non-conformities to WSAS within 7 days of receipt of the audit report, by 27/06/2025. Observations require attention from the site but no response to WSAS on them is required.

The non-conformities must be closed within 90 days of the end of the audit. In order to meet this timeline, evidence of implementation of corrective actions is to be submitted to WSAS (within 75 days) by 31/07/2025.

The audit team recommends re-certification of Spadel Wattwiller at Platinum level pending approval of the corrective actions plan and closure of the non-conformities.
CLOSURE OF FINDINGS AND CORRECTIVE ACTION PLAN:

The Client has successfully closed all Non-conformities.

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

The "Grandes Sources de Wattwiller" factory is located in the Wattwiller Municipality, in the Haut-Rhin department and in Grand Est Region, in north-eastern of France. The plant is located just in the South-East of Wattwiller village near the Departmental road D5, North-West of Mulhouse. The site employs approximately 50 FTE, use 2 mineral water boreholes to bottle about 60 millions of water bottles (2024) in 2 production lines. One line is dedicated to PET bottles (0.5 L, 1L or 1,5 L) and the other semi-manual is dedicated to BIB (5 L). Additional non-mineral water boreholes are in use to supply Wattwiller municipal fountains. Waste water is discharged to municipal sewers and treated in the municipal WWTP (Com Com Thann-Cernay) located in the nearby Cernay city. The treated waters are discharged in a big pond which is then overflowing in the Thur river.

The site is located in the left bank of the river ‘La Thur’ which is an affluent of the river ‘l’Ill’. In the Wattwiller areas, two main streams are observed: the ‘Siehlbaechle’ on the south, which flows in the "Parc des Sources" and along the plant; the ‘Silberlochrunz’ on the North which flows through the Wattwiller town. These small rivers have their sources in the mountain (Molkenrain) 3-4 km away and have a strong slope (> 6%) which confer a torrential character. The boreholes are located inside the "Parc des Sources", a small protected area where the boreholes are located.

The following boreholes can be found:
- exploited boreholes for mineral water, called F6 (234 m deep) and F247 (180 m deep) which tap the Muschelkalk aquifer; these boreholes are deep and artesian;
- exploited for a public fountain: ‘Lithinée 1’
- unexploited boreholes, called ‘Lithinée 2’ (unexploited), ‘Jouvence’ (unexploited), ‘Arsène’ (unexploited).

From an Hydrogeological perspective, the springs, tapped by wells and boreholes, are fed by one of the two large deep Triassic reservoirs of the Rhine Gap: the sandstone Triassic (Buntsandstein) and the limestone Triassic (Upper Muschelkalk). They emerge through the edge faults in the Lower Rhine (Morsbronn-
les-Bains, Merkwiller-Pechelbronn and Niederbronn-les-Bains) and in the Upper Rhine (Wattwiller and Ribeauvillé).
In the Wattwiller sector, several formations are likely to be aquifer:
- the Plio-Quaternary scree (thickness of about 20 m): the first groundwater encountered at the site is located in the Oligocene slope colluvium. The flow follows the line of the steepest slope. This water table is tapped in particular at the communal springs (AEP) located to the immediate north-east of the mineral springs.
- the Lettenkohle (possible thickness of 70 m): dolomitic ground,
- the carbonate formations of the Muschelkalk (possible thickness of 100 m): dolomite and grey dolomitic limestone
- the Vosges sandstone of the Buntsandstein (thickness limited to about 50 m)
- the granitic basement.

The audit was conducted onsite on 13-16 May 2025.

The onsite site visit included the assessment of :
- the site water-related facilities, retention basin, water treatment (removal of iron, arsenic, etc.), the sources, on-site chemical storage, the outlet of the municipal WWTP (discharge point), the outlet of rainwater and the Parc des Sources (IWRA and sources).

FINDINGS

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

CERTIFICATION REPORT

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Audit Number: AO-001593

NUMBER OF FINDINGS PER LEVEL

Observation	3
Non-Conformity	2

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

FINDING DETAILS

Finding No:	TNR-018080
Checklist Item No:	1.4.3
Status:	Closed
Finding level:	Non-Conformity
Due date:	2025-Aug-14
Checklist item:	Advanced Indicator The embedded water use of primary inputs in catchment(s) of origin shall be quantified.
Findings:	A water footprint study is available which helps to identify the primary sources of embedded water for Wattwiller site. However, the actual embedded water use of the site primary inputs suppliers in the catchment of origin are not quantified.
Corrective action:	We have already started collecting water consumption data from our main raw material suppliers. This process will take time, as compiling reliable data across multiple suppliers requires coordination and follow-up. As the criterion requires documentation of water use for primary inputs , we consider that the data recently received (see in the evidences of implementation) already enables us to meet this requirement. On this basis, we believe the non-conformity can be closed.
Evidence of implementation:	Mails of our suppliers giving us water intensity (m^3/t) Extract of our calculation file (water intensity x primary input consumption= indirect water use)

Finding No:	TNR-018081
Checklist Item No:	1.6.1
Status:	Closed
Finding level:	Non-Conformity
Due date:	2025-Aug-14
Checklist item:	Shared water challenges shall be identified and prioritized from the information gathered.
Findings:	The stakeholder questionnaire submitted specifically asks about risks to the site water resources rather than shared water challenges.Therefore, the shared water challenges identified are only related to these risks and do not cover other possible stakeholders' water challenges.
Corrective action:	We have begun a more targeted approach by re-engaging with key local stakeholders involved in water and environmental issues. These discussions now include dedicated questions about stakeholders' own water-related challenges, independent of site-related risks. We will continue this process, with a meeting planned with the local community council (ComCom) after the summer period, to further complete and refine the shared water challenge list. These inputs will then be integrated and prioritized in our Stakeholder matrix.
Evidence of implementation:	Please find attached the following documents as evidence: - Meeting minutes with the Municipality (Mayor), including the presentation of our water KPIs and risk action plan, and a direct discussion on their own water challenges. - Minutes from the "Collectif biodiversité" meeting, coordinated by the municipality, where local environmental and water-related issues were discussed (only with the local fishery) - Updated Stakeholder Analysis File ("Analyses Parties Prenantes") – now including a dedicated sheet listing and prioritizing the water challenges identified

Finding No:	TNR-018107
Checklist Item No:	3.7.3
Status:	Open
Finding level:	Observation
Checklist item:	Advanced Indicator Actions taken to address water related risks and challenges related to indirect water use outside the catchment shall be documented and evaluated.
Findings:	Site is sending a procurement control document to sign to their suppliers requesting specifically to use less water and engage themselves to do so. However more actions would be expected in order to address risks and challenges and water usage in their catchment of origin.

Finding No:	TNR-018133
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 cost of water identified in 1.3.7 includes many fixed costs that are not dependent on the amount of water used. As such, the usage of the cost of water calculated in 1.3.7 for calculating value creation might overestimates these benefits. Site is thinking of a better way to evaluate the (financial) value creation of their WSP.

Finding No:	TNR-018126
Checklist Item No:	4.1.4
Status:	Open
Finding level:	Observation
Checklist item:	Advanced Indicator A governance or executive-level review, including discussion of shared water challenges, water risks, and opportunities, and any water-related cost savings or benefits realized, and any relevant incidents shall be identified.
Findings:	The annual review does not cover water-related cost savings or benefits.

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WSAS WATER STEWARDSHIP ASSURANCE SERVICES

Report Details

Report	Value
Report prepared by	Lorenzo BRIOSCHI
Report approved by	Ozge GOKMEN
Report approved on (Date)	18/06/2025

Surveillance

Proposed date for next audit
2026-May-12

Stakeholder Announcements

Date of publication	Location
30/03/2025	Dernière Nouvelles d'Alsace (Newspaper), copy available during audit
30/03/2025	Source of Change (website of Spadel group)
30/03/2025	https://a4ws.org/wp-content/uploads/2025/03/AWS-000421-Spadel-Wattwiller_StakeholderAnnouncement_Month3_V3.0.pdf

Comment	Myriam RICHE - ComCom - drinking water and WWTP supplier 1. Can they describe their relationship with the Site? When did it start? They provide water to them and treat their waste water. They worked with them last year about a leakage in their fire water system. They have boreholes just nearby from the one from Wattwiller. 2. Are they familiar with the Water Stewardship process/journey which the site is undertaking/has been. on? Can they describe what they know? Not a lot of knowledge of what the water stewardship is. 3. What is their opinion of the site's management of water? They had a good feeling that is all. 4. What do they think the site has done well? They are not aware, but they are transparent. 5. Where do they think the site can improve or what would they like to see them involved with? Exchange quality data of the boreholes and maybe in water table level. 6. Are there any water-related concerns or challenges in the area? The increase of precipitation in winter and droughts in summers because of climate change. The change of the vegetation on the mountain and possible landslides if that does not happen well. They have different sources so they currently have no issues with quality in their boreholes as they can take more protected water if there. In 2021 a farmer broke a cable and a big amount of a stream hydrocarbons fell into. 7. Has the site shared their Water Stewardship performance each year? Not applicable for initial certification audits. 8. Has the site shared the WS Plan with them in any form? 9. Have they been asked to contribute what they think the Shared Water Challenges are. No but they shared. 10. Anything further to add or questions? No special but they area happy to do more with them.

Catchment Information

Catchment Information

The site is located in the left bank of the river ‘La Thur’ which is an affluent of the river ‘l’Ill’. In the Wattwiller areas, two main streams are observed: the ‘Siehlbaechle’ on the south, which flows in the "Parc des Sources" and along the plant; the ‘Silberlochrunz’ on the North which flows through the Wattwiller town. These small rivers have their sources in the mountain (Molkenrain) 3-4 km away and have a strong slope (> 6%) which confer a torrential character.

Waste water is discharged to municipal sewers and treated in the municipal WWTP (Com Com Thann-Cernay) located in the nearby Cernay city while rainwaters and other clean waters from production are directly discharged to the Siehlbaechle stream.. The treated waters from the municipal WWTP are discharged in a big pond which is then overflowing in the Thur river. A small amount of water is also provided for the sanitary by the municipal water supplier (also managed by the ComCom). The source of the municipal water is also located nearby the site sources but is withdrawing from a surface aquifer. The municipal water network is also connected to the Steinbach water supply in order to be more resilient in case of supply emergency.

The site is located in a bigger natural area called the "Parc Naturel Regional des Ballons des Vosges". The Parc naturel régional des Ballons des Vosges (Ballons des Vosges Regional Nature Park) is a protected area in northeastern France, spanning the regions of Grand Est and Bourgogne-Franche-Comté. Established in 1989, it encompasses approximately 2,921 km² across four departments: Haut-Rhin, Vosges, Haute-Saône, and Territoire de Belfort, making it one of the largest and most populous regional natural parks in France. The other Spadel site in Ribeauvillé is also included in the park.

From an Hydrogeological perspective, the springs, tapped by wells and boreholes, are fed by one of the two large deep Triassic reservoirs of the Rhine Gap: the sandstone Triassic (Buntsandstein) and the limestone Triassic (Upper Muschelkalk). They emerge through the edge faults in the Lower Rhine (Morsbronn-
les-Bains, Merkwiller-Pechelbronn and Niederbronn-les-Bains) and in the Upper Rhine (Wattwiller and Ribeauvillé).
In the Wattwiller sector, several formations are likely to be aquifer:
- the Plio-Quaternary scree (thickness of about 20 m): the first groundwater encountered at the site is located in the Oligocene slope colluvium. The flow follows the line of the steepest slope. This water table is tapped in particular at the communal springs (AEP) located to the immediate north-east of the mineral springs.
- the Lettenkohle (possible thickness of 70 m): dolomitic ground,
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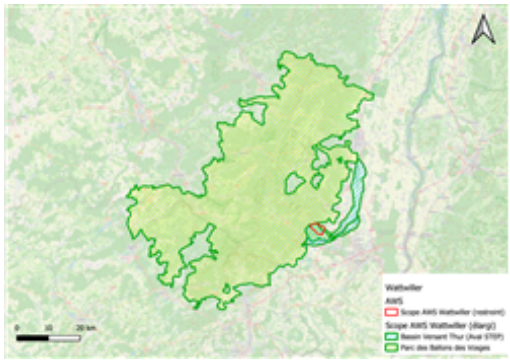
- the Vosges sandstone of the Buntsandstein (thickness limited to about 50 m)
- the granitic basement.

Currently the defined AWS Scope includes the site boundaries & sources, the catchment area of the sources (Siehlbaechle and Silberlochrunz streams) all these are included in the Parc Naturel Regional des Ballons des Vosges which is also included in the scope. Finally the Thur river catchment (starting from the city of Cernay) is taken into the scope as receiving water body.

While the region has a very low water risk overall, the site experience some minor flooding in the past as the Sielbaechle stream runs alongside the site boundaries. This was addressed years ago by re-building the left banks of the river nearby the highest point of the site.



AWS Scope - Wattwiller.png

Client Description and Site Details

Client/Site Background

The "Grandes Sources de Wattwiller" factory is located in the Wattwiller Municipality, in the Haut-Rhin department and in Grand Est Region, in north-eastern of France. The plant is located just in the South-East of Wattwiller village in a small industrial area near the Departmental road D5, North-West of Mulhouse. The site produce still and sparkling mineral water and employs approximately 50 FTE, use 2 mineral water boreholes to bottle about 60 millions of water bottles (2024) in 2 production lines. One line is dedicated to PET bottles (0.5 L, 1L or 1,5 L) and the other semi-manual is dedicated to BIB (5 L). Additional non-mineral water boreholes are in use to supply Wattwiller municipal fountains. The boreholes are located inside the "Parc des Sources", a small protected area where the boreholes are located.

The following boreholes can be found:

- exploited boreholes for mineral water, called F6 (234 m deep) and F247 (180 m deep) which tap the Muschelkalk aquifer; these boreholes are deep and artesian;
- exploited for a public fountain: ‘Lithinée 1’
- unexploited boreholes, called ‘Lithinée 2’ (unexploited), ‘Jouvence’ (unexploited), ‘Arsène’ (unexploited).

Waste water is neutralised and then discharged to municipal sewers and treated in the municipal WWTP (Com Com Thann-Cernay) located in the nearby Cernay city while rainwaters and other clean waters from production wastes are directly discharged to the Siehlbaechle stream.. The treated waters from the municipal WWTP are discharged in a big pond which is then overflowing in the Thur river. A small amount of water is also provided for the sanitary by the municipal water supplier (also managed by the ComCom) and discharged to the sewers.

The source of the municipal water is also located nearby the site sources but is withdrawing from a surface aquifer. The municipal water network is also connected to the Steinbach water supply in order to be more resilient in case of supply emergency. A basin can be found on site that is only use as storm basin or in case of incident as retention basin.

Site aerial view.png

Summary of Shared Water Challenges

Summary of Shared Water Challenges

Identified share water challenges are:

- Fuel pollutions to groundwater resources by non-protected parking lots
- Fuel pollutions to groundwater resources by oil tanks
- Fuel pollutions to groundwater resources by road/car accidents
- Climate change and issues with water availability

Comment Note non-conformity raised in indicator 1.6.1.

1	STEP 1: GATHER AND UNDERSTAND

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

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

Yes

Comment

- The site boundaries are clearly defined and can be found in both technical drawings (see attached Plan réseaux EU et EP usine) and in QGIS. Note that the Parc des Sources, the zone where the sources and boreholes are located along with a pond and the Siehlbaechle stream is of property of Spadel.
- On QGIS the site has mapped the site boundaries, the water piping from the sources to the site, the IWRAs, the different natural zones and risk zones in the catchment and the discharge points.
- City water is used for sanitary only and is provided by local supplier ComCom which has boreholes located nearby the site own boreholes (same catchment, but different aquifers as mainly surface aquifers). It has its water network connected to the nearby Steinbach municipal water network in case of need.
- The surface water is discharged directly into the Siehlbaechle stream while the site waste water is discharged in the municipal sewer which is treated in the municipal WWTP (in Cernay) and ultimately discharged in the Thur river which flows in the l'ill river in Ensisheim (north of Mulhouse) which finally flows into Rhine river in Strasbourg. For the physical scope, the Thur river is considered from the Cernay city to the affluent with Ill river.
- The catchment from which the site is relying on is determined by the groundwater aquifers from which the site withdraws mineral water from two boreholes (one artesian, one classical). and is defined by the two mountain streams catchments.
- The "Parc Naturel Regional des Ballons des Vosges" is a big natural parc including the sources and that also includes the Carola site. This was added lately to the AWS Scope as an experimental reforesting project was done by Spadel in collaboration with the natural park is ongoing.

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

1.2.1	*Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall:* *- Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people;* *- Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies;* *- Provide evidence of stakeholder consultation on water-related interests and challenges;* *- Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups;* *- Identify the degree of stakeholder engagement based on their level of interest and influence.*	Yes
Comment	Last stakeholders added to the list: Uffholtz municipality and the sub-prefecture, Eurofins (laboratory), the French Agriculture Chamber. The site is currently adding new stakeholders when opportunities pop up depending on the opportunities. It covers local groups like local fishermen, campings, hotels and local associations. No indigenous or vulnerable groups are identifiable in the area which is mainly a natural protected area covered by forests. - A column of the matrix shows the communication and engagement efforts. - Site does not automatically engage on shared water challenges but did an engagement event in 2024 with questionnaire sent to 10 of relevant stakeholders (identified through the analysis). - Degree of engagement is identified and depends on three level of interests: water challenges, frequency of interactions and geographical scope.	
1.2.2	*Current and potential degree of influence between site and stakeholder shall be identified, within the catchment and considering the site's ultimate water source and ultimate receiving water body for wastewater.*	Yes
Comment	The degree of influence is identified in the stakeholders list along with the desired level of interest.	
1.3	*Gather water-related data for the site, including: water balance; water quality, Important Water-Related Areas, water governance, WASH; water-related costs, revenues, and shared value creation.*	
1.3.1	*Existing water-related incident response plans shall be identified.*	Yes
Comment	Supporting existing water-related incidents response plans: - Plan d'intervention de l'Usine - lists the liquids and chemicals, maps the alarms and fire water, and drain pipes for where the pipes that could carry contaminated water are, mapping of incidents related equipment - Procedure " Basculement des vannes eaux pluviales en cas de déversement accidentel ou d'incendie Wattwiller" - procedure to close the valves when there is spillage or environmental unfriendly event. - Déversement accidentel dans les eaux pluviales" : all risks inside and outside of side in case of environmental pollution. - Exercice of pollution - 8 March 2025 - report of mock pollution exercise to train and test procedures. No business continuity plan possible here as if both source need to be stopped, the production must stop.	
1.3.2	*Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped*	Yes

Comment

Supporting documents:
- Simplified Flowchart - includes the "eaux autres"' (old boreholes used in the past that are currently used for public fountains of Wattwiller), rain water, water, bottling process, storage.
- PID: complete and technical mapping of all water pipes and pipelines from boreholes to the exit of the site.

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

Site water balance for 2024 can be found attached. Production losses are calculated as the difference between the water withdrawn and the bottled water. These mineral waters are rejected into the Siehlbaechle stream along with the rain waters collected from the parking lot and the site roof. There is a storm basin that is used as retention bassin too in case of uncontrolled spillage.
No specific seasonality is observable as indicated in the production seasonality graphic in the uploaded water balance 2024 exercise. The amount withdrawn depends on the market demand and not on the season.

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

Supporting documents:
- The "Standard analyse eau" document is providing the frequency and type of testing requested on water and is a Spadel corporate standard. The document allows site to adapt to local legislative requirements.
- The annual analysis done on the "direct-return-to-nature" effluent that contains rainwater and industrial mineral water losses. It includes an analysis of the stream.
- Plan de contrôle des eaux usées - control plan for waters effluent that goes to the sewers. CHECK ANALYSIS
- Annual water sources - Done by Spadel Laboratoire Central Henrijean (accredited by BELAC) dated 13/01/2025 (water collected in October 2024). Physico-chemical. Boreholes that are not used anymore are still monitored.
- Annual water sources for mineral water (arthesia F06 - F247) full test report dated 13/01/2025.
- Test reports as per the different test plans were readily available.
- Note that site encountered difficulties to comply with some effluent parameters (especially phosphates and pH) when specific CIP activities are conducted (happened a couple of times in 2024). These non-compliances were communicated to the authorities through the monthly report submitted and are being addressed as per CAP requested by the authorities. A specific line in the WSP is addressing the issue.

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

Yes

Comment

The "Plan d'intervention de l'Usine" contains plans of the different sources of pollution punctual and non-ponctual. The following can be found: list and map of chemical storages, piping, gas/oil containers, etc
- During the site tour it could be verified that spill kits were effectively available in the critical areas. The chemical storage area separates the acid and base and has specific bounded dripping containers linked with underground retention tanks. The external area of the chemical supply storage was also equipped with specific drains and underground retention tanks.

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	The nearby stream is passing just along the site but is located outside the site boundaries.. The stream is indicated in the list of IWRA, the ecological quality is not determined (too small to be tested by authorities), however site conducted an analysis of the stream water in 2023 (see document) that showed good quality. Note that the stream was dry at the time of the analysis.	
1.3.7	*Annual water-related costs, revenues, and a description or quantification of the social, cultural, environmental, or economic water-related value generated by the site shall be identified and used to inform the evaluation of the plan in 4.1.2.*	Yes
Comment	- Spadel is keeping an Excel sheet called Coût de l'eau (cost of water) with a complete analysis of all costs. It includes the projects, the manpower, energy, quality analysis, maintenance etc. It allows to compare with the other Spadel sites. - In the gestion durable de l'eau 2024 document - Wattwiller - the water-related value generated by the site are identified as water donated, free access to mineral water through the water fountains, bee inventory (2018-2019), inventory of biodiversity at Wattwiller (done collectively), Parc des Sources (protected trees and pond with batryciens), eradication de la renouée du Japon, projet Forest 2100 (dans le parc des Ballons des Vosges; planting trees resistant to climate change).	
1.3.8	*Levels of access and adequacy of WASH at the site shall be identified.*	Yes
Comment	List of WC shower and sink on site are identified for both man and women and comparison with legal requirements is included (Code du travail, articles R4228-7 à R4228-10).	
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	A list of primary input and services suppliers (by cost) is available. None can be found in the catchment as identified in the list. The primary inputs embedded water represent 1.33% of the total water use, from which 90,66% is for packaging and 8,31% for distribution.	
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	A list of primary input and service suppliers (by cost) is available. None can be found in the catchment as identified in the list. The primary inputs embedded water represent 1.33% of the total water use, from which 90,66% is for packaging and 8,31% for distribution.	
1.4.3	*Advanced Indicator* *The embedded water use of primary inputs in catchment(s) of origin shall be quantified.*	closed ***Finding No: TNR-018080***
1.5	*Gather water-related data for the catchment, including water governance, water balance, water quality, Important Water-Related Areas, infrastructure, and WASH*	
1.5.1	*Water governance initiatives shall be identified, including catchment plan(s), water-related public policies, major publicly-led initiatives under way, and relevant goals to help inform site of possible opportunities for water stewardship collective action.*	Yes

Comment	Water governance initiatives (indicated in the rapport gestion durable) where Wattwiller site is participating: - Collectif biodiversité: biodiversity collectif with Wattwiller municipality, the ONF (forest rangers), local farmers, fishers and civil society. - Projet Plan urgence Source: on the pipeline by Wattwiller, a joint incident management plan with local authorities and the Wattwiller municipality in case of environmental incidents on the protected area. Other identified initiatives: - Schéma directeur d'aménagement et de gestion des eaux (SDAGE) – District Rhin - To be noted that there is no river contract currently in charge of the Thur as it was closed 12 years ago. The river actually falls under the Rhine-Meuse. - 12e Programme d'Intervention de l'Agence de l'Eau Rhin-Meuse (2025-2030) - Schéma d'Aménagement et de Gestion des Eaux (SAGE) Ill-Nappe-Rhin	
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 four attached permits delivered by the authorities are relevant for this site: - The permit to bottle water industrially - The permit for waste and effluents (both clean water to Nature and effluent to WWTP) - The permit for the boreholes exploitation - The permit from the municipal WWTP	
1.5.3	*The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.*	Yes
Comment	- In 2021 an extensive hydrogeological study was done by Belgian hydrogeologist Artesia as the site is willing to submit a request for a new borehole to the authorities. The result of this 165 pages document is that the calcium formation of the aquifer exploited by the site is OK. In point 2.4.3 the reports uses the Thornwaite methodology to calculate the available water. - The report also includes the amount of the AEP municipal borehole. - The Water Extraction Index is calculated monthly to get the amount of water available with the Thornwaite formula. Currently the amount of water withdrawn 2.47% for 2024. - Antea - Impact study analysed 200,000 m3 for all waters used on the municipality (in 2022, including the site usage).	
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	- Water from the boreholes are analysed at a fixed frequency as per document ins 1.3.4. - The water from the receiving stream is tested once every 3 year by the site and a report of the impact of the site effluent on the stream is requested to a third party consultant. No analysis is performed by the authorities on the streams as they are too small to be in their scope. - The attached Thur river quality file compiled by the authorities identifies a good chemical and general quality except for the ubiquitous pollutants (Benzo(b)fluoranthène ;Benzo(g,h,i)pérylène ;Benzo(k)fluoranthène, Mercury and PFOS) and for Fluoranthène and Hexachlorobenzène. The ecological status is identified as Average because for biology parameters only diatomaceous were assessed and were found avarage. - Page 106 of the Artesia report shows the physicochemical analysis of the stream made by Laboratoire Paul Henri Jean (page 105). - The quality of the Thur river is identified	
1.5.5	*Important Water-Related Areas shall be identified, and where appropriate, mapped,and their status assessed including any threats to people or the natural environment, using scientific information and through stakeholder engagement.*	Yes

Comment	The IWRA are listed in the attached document and their quality is assessed indicating the source. They are all mapped in QGIS and were reviewed during the audit. The following - The Parc des Sources and its importance for amphibians populations (visited during the audit). An Eco-pasture project started years ago with sheep introduced to help eradicate the Japanese Knotweed. The project included a tree census and a renovation of the pond that was sagging threatening to disappear. - The Forest 2100 project located in a private property in the Parc Naturel Regional des Ballons des Vosges. Th project of reboisement (on-going). It was discussed during the audit that some of the identified IWRAs are currently not eligible as such. For instance the production site itself cannot be considered as an IWRA, however the mineral water tap at the site entrance that provides water to local population could clearly be claimed as such., Site is encouraged to take time to remove the non relevant lines in the list and to continue identifying new ones through stakeholder engagement and scientific information.	
1.5.6	*Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.*	✓ Yes
Comment	- Only shared infrastructure is related to the municipal water supply the sanitary water (which is not critical for the site as the consumption is very low (about 1000 m3 per year in average compared to 120-130k m3 from boreholes, site can always switch to their own supply). - For the municipal WWTP, no specific data was available. Interview with stakeholder in charge of the WWTP did not seem to have any challenges related to the WWTP itself, site is nevertheless encouraged to further engage the stakeholder to identify condition and potential exposure to extreme events.	
1.5.7	*The adequacy of available WASH services within the catchment shall be identified.*	✓ Yes
Comment	- WASH JMP report for France showed 100% of safely managed drinking water and 90% of safely managed sanitation as per attached file.	
1.5.8	*Advanced Indicator* *Efforts by the site to support and undertake catchment level water-related data collection shall be identified.*	✓ Yes
Comment	Data collected by site: - Quality data of the stream once every 3 years. - Analysis in the Artesia report of the two streams in the catchment. - Table level and quality data of the managed boreholes (not only the one used for mineral water bottling).	
1.5.9	*Advanced Indicator* *The adequacy of WASH provision within the catchments of origin of primary inputs shall be identified.*	✓ Yes
Comment	Primary inputs of France available in 1.5.7. Other primary inputs come from Belgium, Germany and Luxembourg. Site collected the necessary data available to show that the inputs all come from countries with outstanding WASH adequacy as per attached JMP files.	
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.*	✓ closed

Comment - Identified shared water challenges were identified through an engagement of 10 stakeholders. The attached questionnaire provides a summary of the answers. The identified shared water challenges are related to risks of water pollutions to the groundwater resources (diesel tanks in the catchment, road accidents and unprotected parking lots) and availability of water resources caused by climate change.
- Shared water challenges are also identified in the WSP for some actions (as per site appreciation).

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

Comment - Initiatives - the risks are classified by a score, the higher the risk the more important it is for the site to handle it. The initiatives are site initiatives as this is a risk based approach.
- The "Gestion durable de l'eau 2024"' document that is shared with stakeholders identify the shared water challenges and the initiatives that the site did or plan to do to address them. However please see NC raised in 1.6.1.

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

Comment Climate change study performed in 2021 identifies the possible trends of the future: mean and maximal temperatures are rising both in observation and models, precipitations are decrease (-470 mm from 1980 to 2020) but should not go further down, however extreme precipitations should happen. Less snow. More evapotranspiration, water content in ground will be less, -28 to -38% of water recharge between 1980 and 2020, tendency should remain the same. Table level to decrease, however site measurement shows an light increasing trend since 2007.

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

Comment In 2004 an extensive Environmental Impact Assessment was requested by the authorities. Point 1.3 of the report done provides a view of the socio-economical situation while point 2.5 covers the impact on the landscape and 2.6 the socio-economical impact. No specific issues were identified at that time, and while the study is 20 years old, no relevant changes could be identified that would change that assessment.

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

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

Comment Supporting Risk analysis attached. Risks are prioritised and gravity, probability, vulnerability and business impact are used to prioritize them. The type of risks is identified in the "Danger" column (includes some reputational, physical and other). Overall the analysis is centred on the sources risks as it is the main factor that would damage Spadel Wattwiller business.

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

Comment Opportunities:
- Technical opportunities related to water balance and WUR can be found in the document Water_Use_ration_Watt projects. Example of opportunity: study the possibility to decrease the amount of water use for rinsing the aluminum filters. The potential savings are here identified.
- in the WSP there is a tab with best practices and opportunities. These opportunities are not including potential savings as they are usually not related to savings.

1.8	*Understand best practice towards achieving AWS outcomes: Determining sectoral best practices having a local/catchment, regional, or national relevance.*	
1.8.1	*Relevant catchment best practice for water governance shall be identified.*	Yes
Comment	Best practices are identified in the site WSP. Examples of governance best practices: - Establishment of a Performance Indicator for legal conformity (done in 2024) - Establishment of a CSR strategy for 2025-2030 (ongoing) - Establishment of a Steerco for Aqua projects (CAPEX) (done) - Establishment of the Source Urgency Plan (ongoing)	
1.8.2	*Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.*	Yes
Comment	Best practices are identified in the site WSP. Examples of governance best practices: - Hydrogeological Balance study to be performed (ongoing by third party) - Optical fibers network to communicate and record data from boreholes in real time (not started yet) - WUR improvement plan (ongoing)	
1.8.3	*Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.*	Yes
Comment	Best practices are identified in the site WSP. Examples of governance best practices: - Analysis of TFA (PFAS) on every borehole (done) - Standardising the sanitation of the preventive maintenance of boreholes - Addition of analysis after the filtration stage - Analysis every 3 year of the stream at the discharge point	
1.8.4	*Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.*	Yes
Comment	Best practices are identified in the site WSP. Examples of governance best practices: - Ensure flow in the stream to help the ecological status (currently dry in the summer months) - Doing a full biodiversity.analysis at catchment level (ongoing with other sites)	
1.8.5	*Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.*	Yes
Comment	Currently no WASH services best practices identified as the level of WASH adequacy in catchment and at the site is considered to be good and is not a priority.	

2	STEP 2: COMMIT & PLAN - Commit to be a responsible water steward and develop a Water Stewardship Plan	
2.1	*Commit to water stewardship by having the senior-most manager in charge of water at the site, or if necessary, a suitable individual within the organization head office, sign and publicly disclose a commitment to water stewardship, the implementation of the AWS Standard and achieving its five outcomes, and the allocation of required resources.*	
2.1.1	*A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:* *- That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes* *- That the site implementation will be aligned to and in support of existing catchment sustainability plans* *- That the site's stakeholders will be engaged in an open and transparent way* *- That the site will allocate resources to implement the Standard.*	✓ Yes
Comment	Statement signed and disclosed on Spadel website (source of change) signed by Spadel CEO Marc du Bois on 12/05/2025 include the different 2.1.1 commitments. Link: https://sourceofchange.spadel.com/wp-content/uploads/2025/05/Statement-AWS-Marc-du-Bois_V4_2025_05.pdf	
2.1.2	*Advanced Indicator* *A statement that explicitly covers all requirements set out in Indicator 2.1.1 and is signed by the organization's senior-most executive or governance body and publicly disclosed shall be identified.*	✓ Yes
Comment	The statement was signed by Spadel CEO and disclosed on the Source of Change Spadel website https://sourceofchange.spadel.com/wp-content/uploads/2025/05/Statement-AWS-Marc-du-Bois_V4_2025_05.pdf.	
2.2	*Develop and document a process to achieve and maintain legal and regulatory compliance.*	
2.2.1	*The system to maintain compliance obligations for water and wastewater management shall be identified, including:* *- Identification of responsible persons/positions within facility organizational structure* *- Process for submissions to regulatory agencies.*	✓ Yes
Comment	- ARS (agence régionale de la santé): is the one that will set the parameters and frequency of testing of the raw mineral waters and bottled waters. This is recorded in a "Plan de Contrôle Sanitaire". Every year a new list of requirements is sent to the sites. The testing laboratory is sending the results to the ARS themselves and the ARS is sending back a feedback report. Once per year there is a summary that needs to be sent to the ARS with all non-conformities that were found during the year with the corrective actions plans. - Regulatory Watch: site is using Red-On-Line to keep track of regulatory changes related to their business (and other environmental regulations). - Plan de contrôle rejets: indicate the analysis to be done on rainwater and effluents. The data needs then to be submitted to GIDAF authorities platform. - In addition, for quality and mineral water legal requirements or food requirements the QHSE manager is member of the "Maison des Eaux Minérales Naturelles MEMN, send all the news and to "Alsace Qualité" does a regulatory watch bulletin that is sent monthly.	

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 new water stewardship strategy/vision and goals appears in the new CSR document. As vision/strategy, Spadel aims to "Strengthen nature's resilience by preserving and regenerating water resources through sustainable management and water related ecosystem restoration and commit to set credible targets driven by science-based framework'.

The three general goals are;
- A sustainable use of the resource: no overexploitation (through WUR and WSR) of resources and responsible protection and transparent concertation with local stakeholders
- Regeneration of water cycle locally through projects and supporting science
- Use of scientific based targets validated by official frameworks (SBTi or other scheme)

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.
✓ Yes

Comment The attached WSP identifies the actions planned for 2025 and the actions done and assessed for year 2024. Many actions are set annually and can be recurrent actions. These can be filtered adequately to check for the one-time projects.

The bigger "industrial" CAPEX projects are recorded in a separate file called AQUA. They are handled separately than the WSP as they require bigger investments.
Aqua projects for 2024:
- Change the cleaning process of filters with a new media to be used
- Avoid the change of water tanks during the bottling operations as it causes rejection of bottles that are not filled enough.

Note that there is also a shared planning folder of opportunities technical (CAPEX) that keeps track of possible technological opportunities to be assessed prior to be added to the Aqua plan. This is located in Microsoft Teams group members and was reviewed during the audit.

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

Comment Current partnership and activities in 2024 with other sites in the catchment:
- Projet collectif biodiversité: a partnership between the Wattwiller municipality, the ONF, local farmers and fishermen and local citizens. This partnership aims first to make a biodiversity inventory on the Wattwiller municipality (report not yet available). Promote biodiversity projects from citizens and boards to advertise the actions.

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

Comment	- Forêt 2100 project: located in the Parc Naturel Regional des Ballons des Vosges, this project funder by les Grandes Sources de Wattwiller worked with a private land owner and the Agricultural Chamber to restore a 6,5 ha forest land that was clear-cutted into an experimental forest. The pilot forest includes local tree species (fir, chestnut, beech and sessile oak) but also more southern Mediterranean ones in order to make a more climate change resilient forest. The experiment separates the area in different zones in order to assess the resiliency of the different mixes. This private wood parcel is located in the other side of the mountain and is not the same catchment than the site.	
2.3.5	*Advanced Indicator* *Stakeholder consensus shall be sought on the site's water stewardship plan. Consensus should be achieved on at least one target. A list of targets that have consensus and in which stakeholders are involved shall be identified.*	Yes
Comment	Stakeholders were invited to answer to a survey, 6 answered. On the general question on whether the site is managing correctly the water: 3 answered excellent water management, 1 4/5 and one answered average management of water. Those 6 that answered: - Wattwiller municipality - ComCom - ARS (State Health Agency) - Two consultants - A service provider	
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	Most of the water risks identified are related to the pollution of the sources. An actual plan is being worked on to protect the zone along with the authorities (fireworks, police, foresters and municipality) in order to act as quickly as possible in case of spillage. A couple of activities in the recharge area are considered also critical and would help to have coordination from the public-sector (ongoing verification of presence of diesel tanks in the catchment). Site is working on establishing a Source Urgency Plan (plan d'urgence des sources) to help mitigate the pollution risks in the catchment caused by incidents. This plan coordinates the emergency services, the municipality and the site in order to have clear processes in case of critical incidents.	
2.4.2	*Advanced Indicator* *A plan to mitigate or adapt to water risks associated with climate change projections developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.*	Yes

Comment	Site did a study on impact of climate change on the water resources. Reanalysis of past recharge trends shows a decrease in infiltration ranging from 140 to 190 mm between 1980 and 2020. This corresponds to an average observed decrease ranging from -28% to -38%. However, projections up to 2100 do not show any significant downward or upward trends. Furthermore, the study on the impact of climate change on groundwater places Wattwiller in an area with low impact from climate change, which corroborates the results of the modeling projection. It is therefore reasonable to expect a limited effect of climate change on Wattwiller's water resources. However, this should not prevent Spadel from pursuing its strategy of adapting to global changes in the long term. This strategy is a real added value for the group in order to ensure an optimal estimate of available resources in the future and thus obtain an additional guarantee of sustainability in a context prone to a decrease in aquifer recharge at the regional and global levels. The current plan to mitigate is in their WSP itself: WUR, aiming to increase the water regeneration by improving infiltration of water in the soils, etc. and Forest 2100 project to improve the recharge of aquifers.

3	**STEP 3: IMPLEMENT - Implement the site's stewardship plan and improve impacts**
3.1	*Implement plan to participate positively in catchment governance.*
3.1.1	*Evidence that the site has supported good catchment governance shall be identified.* ✓ Yes
Comment	Evidence observed during audit: - meeting minutes of meeting with local Deputy, Wattwiller Mayor, fire commander, Responsible of Incidents and Crisis Management in the Prefecture to discuss about fire water capacities and usage of fire retardants in case of forest fire in catchment. Meeting held the 12 March 2025 at the Wattwiller municipality. - 11/06/2024 meeting with 'Domaine du Hirtz' hotel about unprotected parking lot. The hotel is located in the recharge area. - letter and emails exchange with a local camping where two old boreholes were located. They were filled and site also requested information on fuel tank on camping site and requested to remove it. ` - meeting with Mayor June 2024 to discuss about WS performance and ongoing projects. - minutes of biodiversity collectif meetings with ONF, Wattwiller municipality, every 4 months the team meet to discuss about.
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	No water rights identified outside the legal or regulatory requirements.
3.1.3	*Advanced Indicator* *Evidence of improvements in water governance capacity from a site-selected baseline date shall be identified.* ✓ Yes
Comment	- Maxime Sohy started working in 2024 the Spadel Group as Group Water & Environment Engineer. His roles is amongst others to support Water Stewardship activities and certifications between the certified Spadel sites. He does not replace an existing position but occupies a new one. - Water Risks are analysed and trended with a target of controlling 80% of them for 2030. This way of formalising and targeting risk management started in 2024. - Update of following water-related documents: Standard Water Stewardship (updating the general water stewardship activities that should be done by all Spadel sites in order to follow the AWS or as Standard for Water Stewardship), Procedure for Sanitation of boreholes (new SOP, dated 31/01/2025, first version). - The WSP allows to classify per year and per 'water governance' this allows to follow the new water governance improvements in time.
3.1.4	*Advanced Indicator* *Evidence from a representative range of stakeholders showing consensus that the site is seen as positively contributing to the good water governance of the catchment shall be identified.* ✓ Yes
Comment	- The interviewed stakeholders were both agreeing that they were invited to join working groups (Biodiversity for ONF and meetings on site with ComCom) and as such were participating to a good water governance at the catchment level. - The questionnaire asked if the site could be considered as participating to good water governance (and other WS outcomes) and the site received a 4.33/6 average score by the 6 stakeholders which answered.
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	Observed documents for mineral waters: - Test reports from ARS stating that the borehole water tested is compliant. - There are many internal and external control plans that specify the samples and the test that are done - Once per month there is a meeting where they summarise any non compliances in the analysis. - Some 36°C total count flora can be found in the mixer after the air intake to precipitate the FE and MN, however none were found in the finished product and therefore the issue is under control. - The ARS annual summary prepared by the site and sent by email the 2025/30/04 to the ARS representative. For effluents: - Test report 17/18 March 2025 - complete analysis of the effluents. All was fine except for pH on one of the samples. Caused by a CIP event that occurred that day. The data is then submitted annually to the authorities through a portal called GPIE.	
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	- There is a convention with the city of Wattwiller to provide water for the ornamental fountains. Catchment tour allowed to see that the fountains indeed are running correctly (see picture evidence). - Site provides water to villagers through a water fountain at the entrance of the site, as requested by the bottling permit (Arrêté). The auditor could observe during the whole week of auditing that there was nearly always someone at the fountain filling water in their bottles.	
3.3	*Implement plan to achieve site water balance targets.*	
3.3.1	*Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.*	Yes
Comment	- Water Use Ratio : 2024 target was 1,14 and site over performed with 1,09. - WEI: long term target is to stay < 10% and current 2024 performance is 2,5. - other water balance targets are followed-up directly into the WSP, for 2024 as not recurrent project the stop of shifting between buffer tanks during bottling operations was done. This allows to decrease production losses because of under-filling.	
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	While water scarcity is not a shared water challenge in the catchment (and region), the site has an annual target on their Water Use Ratio (WUR) as part of their long term plan to tackle climate change.	
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	No legally binding documentation except for the obligation to provide mineral water through a tap at the entrance of the site for the population (this is identified in the permit delivered by the authorities). Site is also providing bottled water donations to local sport & cultural activities and associations.	
3.3.4	*Voluntary Advanced Indicator* *The total volume of water voluntarily re-allocated (from site water savings) for social, cultural and environmental needs shall be quantified.*	Yes

Comment	As per provided list of donations, in 2024 Wattwiller Grandes Sources donated 62000 litres of water for sport and cultural events but also to medical forums etc.	
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	Activities done for 2024: - 1 full water analysis per borehole (completed) - Reaching 75% of risk action plan done (not-reached, 53% of the planned risks to control were done) - plan was too ambitious, some actions were moved to 2025. See the risk analysis plan for detailed actions and progression. For 2025, site is working on fixing the non-compliances on the effluents as a priority.	
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	The site effluent is not treated by site but sent to the municipal treatment plant. Water quality is not considered as a shared water challenge in the catchment. As such, no particular target is set except from compliance with effluent permit which showed three small non-compliances in 2024. While these needs to be addressed, the municipal WWTP was not impacted by the exceedances as the dilution factor in the sewers is high.	
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	- In 2024 site focused its IWRAs actions on a project called Forest 2100. This project aims to reforest a private parcel located in the Parc Naturel des Ballons des Vosges with an aim to make it a more resilient forest to climate change. - The Parc des Sources is still being maintained along with the pond inside of it. The IWRA was visited during the audit and no Japanese Knotweed could be found thanks to the pasture of the sheep. In addition the sources and the pond were visited. Attached pictures prior to the pasture project. - Wattwiller fountains and mineral water fountain: these are of cultural importance in the village, especially the drinking water fountain which is highly frequented by locals. The site is ensuring it's safe by monitoring testing and maintenance of the equipment.	
3.5.2	*Advanced Indicator* *Evidence of completed restoration of non-functioning or severely degraded Important Water-Related Areas including where appropriate cultural values from a site-selected baseline date shall be identified.* *Restored areas may be outside of the site, but within the catchment.*	Yes
Comment	- To note that the site's catchment is located in a natural park. The previous forest was cut-clear during the First World War as it was place of heavy battles. The current forest is unique in the sense that it is an example of a land that was re-colonized by forest without any human intervention. As such, no non-functioning or severely degraded IWRA was identified in the area. - Parc des Sources: Pictures provided of the situation prior to the pasture showed a substantial difference with the complete lack of presence of the invasive species. - Pond with tadpoles and frogs visited during the audit. While amphibians were not visible at that time, the migration of frogs could be observed on the nearby road.	

3.5.3	*Advanced Indicator* *Evidence from a representative range of stakeholders showing consensus that the site is seen as positively contributing to the healthy status of Important Water-Related Areas in the catchment shall be identified.*	Yes
Comment	The 6 stakeholders that asked to the questionnaire provided feedback: - Pond for Batrachians 4/6 excellent efficacy, 2 do not know - Eco-pasturing to remove Japanese knotweed (invasive) 2/6 efficacy, 1 middle efficacy, 3 do not know - Forest 2100: 4 very efficace and 2 do not know.	
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	List of WC and showers provided and the site tour showed adequate WASH provision with free water available for all employees and soap and paper towels in all bathrooms.	
3.6.2	*Evidence that the site is not impinging on the human right to safe water and sanitation of communities through their operations, and that traditional access rights for indigenous and local communities are being respected, and that remedial actions are in place where this is not the case, and that these are effective.*	Yes
Comment	No evidence of site impinging on human right to safe water and sanitation observed both during audit, catchment visit, and stakeholders interviews. To note that site is also maintaining a drinking water fountain at the entrance of the site boundaries where citizens can get free mineral water.	
3.6.3	*Advanced Indicator* *A list of actions taken to support the provision to stakeholders in the catchment of access to safe drinking water, adequate sanitation and hygiene awareness shall be identified.*	Yes
Comment	- Donation of bottled water for a total of 62000 litres was done in 2024. - As stated in 3.6.2, site is maintaining a fountain and monitoring its quality.	
3.6.4	*Voluntary Advanced Indicator:* *In catchments where WASH has been identified as a shared water challenge, evidence of efforts taken with relevant public-sector agencies to share information and to advocate for change to address access to safe drinking water and sanitation shall be identified.*	N/A
Comment	WASH is not a shared water challenge in the catchment.	
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 suppliers of primary inputs or services are located in the catchment. Currently no targets are set in the water stewardship plan.	
3.7.2	*Evidence of engagement with suppliers and service providers, as well as, when applicable, actions they have taken in the catchment as a result of the site's engagement related to indirect water use, shall be identified.*	Yes

Comment	No engagement on embedded water in the catchment since no suppliers were identified there.	
3.7.3	*Advanced Indicator* *Actions taken to address water related risks and challenges related to indirect water use outside the catchment shall be documented and evaluated.*	Obs.
Comment	Currently data is lacking for indirect water use data outside the catchment.	
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	- Shared water infrastructure is only related to the WWTP. Last meeting done with them was in 2023 to present the water stewardship activities of the site. Interview with ComCom did not show any concerns on the municipal WWTP and capacity of it. - Site did a meeting with the authorities to discuss about the emergency incidents at catchment level. While it is not a shared infrastructure, the use of emergency services is primordial and is a shared service. That meeting was about fire fighting products that can or cannot be used in the protected forest. There is also an initiative to create a plan with emergency services to have them trained for special action if an incident happens in the catchment.	
3.9	*Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.*	
3.9.1	*Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.*	Yes
Comment	Ongoing actions towards identified best practices: - establishment of CSR strategy for 2025-2030 (at final stage). - establishment of Plan d'Urgence des Sources (an urgency management plan to protect the sources in collaboration with local stakeholders, stakeholders were contacted to submit the plan) - contact other bottling plants (competition) to organise visits and talk about water stewardship. One site in France was visited by Arnaud Collignon along with the Bottled Water European Federation.	
3.9.2	*Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.*	Yes
Comment	Ongoing actions towards identified best practices: - create a simplified water balance schematics to help understanding - request a measurement of catchment water balance by third party hydrogeological consultants - establishment of a WUR improvement plan (Aqua Plan)	
3.9.3	*Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.*	Yes
Comment	Ongoing actions towards identified best practices: - establishment of Plan d'Urgence des Sources (an urgency management plan to protect the sources in collaboration with local stakeholders, stakeholders were contacted to submit the plan) - creating a standard (SOP) for commissioning boreholes - addition of HEPA filters to all air intakes (boreholes)	

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	Ongoing actions towards identified best practices: - establishment of Plan d'Urgence des Sources (an urgency management plan to protect the sources in collaboration with local stakeholders, stakeholders were contacted to submit the plan). The sources are considered as IWRAs and as such, the plan is meant to protect them.	
3.9.5	*Actions towards achieving best practice related to targets in terms of WASH shall be implemented.*	Yes
Comment	Currently no new best practices towards WASH adequacy were done. It is to be noted that WASH adequacy on site and at catchment level are considered excellent and that the site continues to provide mineral water to citizens through a fountain (quality monitored by site) and does donations of water (62000L in 2024) to sports and cultural events and associations.	
3.9.6	*Voluntary Advanced Indicator* *Achievement of identified best practice related to targets in terms of good water governance shall be quantified.*	N/A
3.9.7	*Voluntary Advanced Indicator* *Achievement of identified best practice related to targets in terms of sustainable water balance shall be quantified.*	N/A
3.9.8	*Voluntary Advanced Indicator* *Achievement of identified best practices related to targets in terms of water quality shall be quantified*	N/A
3.9.9	*Voluntary Advanced Indicator* *Achievement of identified best practices related to targets in terms of the site's maintenance of Important Water-Related Areas have been implemented.*	N/A
3.9.10	*Voluntary Advanced Indicator* *Achievement of identified best practice related to targets in terms of WASH shall be quantified.*	Yes
Comment	62000 L of bottled water donated in 2024 and supply of water donated through the fountain.	
3.9.11	*Voluntary Advanced Indicator* *A list of efforts to spread best practices shall be identified.*	N/A
3.9.12	*Voluntary Advanced Indicator* *A list of collective action efforts, including the organizations involved, positions of responsible persons of other entities involved, and a description of the role played by the site shall be identified.*	N/A
3.9.13	*Voluntary Advanced Indicator* *Evidence of the quantified improvement that has resulted from the collective action relative to a site-selected baseline date shall be identified and evidence from an appropriate range of stakeholders linked to the collective action (including both those implementing the action and those affected by the action) that the site is materially and positively contributing to the achievement of the collective action shall be identified.*	N/A

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

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

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

Comment
- The WSP contains a column that allows the performance to be monitored and evaluated against the targets.
- For the Water Use Ratio, the additional Aqua document would list the yearly projects that save water and evaluate the amount of water saved. Note that it usually take a full year in order to evaluate if the expected savings are reached or not. For instance, the change of media used to filter Fluoride should allow to increase the volume of water treated before regenerating the media, it should help save 16380 m3 of water per year, but this will be evaluated at the end of 2025. The site points out the difficulty to quantify the contribution of each actions separately to the WUR.

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

Comment
While global water savings cannot be used as a metrics by site (as their commercial goal is too sell more water), the value creation by the plan can be identified as the amount of water saved thanks to water saving projects (see 4.1.1 WUR plan) multiplied by the cost of water identified in 1.3.7. However, the cost of water identified in 1.3.7 includes many fixed costs that are not dependent on the amount of water used. As such, the usage of the cost of water calculated in 1.3.7 for calculating value creation would overestimate the benefits.

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

Comment
Site uses their "Gestion durable de l'eau" document to record and share their shared value in the catchment. Here is what the analysis identified for 2024:
- Donation of 62000L of Water for local sports, cultural events.
- Provision of water to local population through fountain (evaluated slightly less than 800m3/year)
- Doing an inventory of biodiversity on the Wattwiller municipality along with the Biodiversity Collective (municipality, ONF, citizens, etc.). This will allow to identify what improvements can be made in nature and biodiversity projects locally.
- Pond du Parc des Sources: the rehabilitation of this pond is recognised as an official batrachians pole, which means that every year a person comes to help for the migration of batrachians.
- Grassland in Parc des Sources: removal of Japanese Knotweed and replacement with endemic grasslands is an environmental benefit for the locality.

4.1.4 *Advanced Indicator*
A governance or executive-level review, including discussion of shared water challenges, water risks, and opportunities, and any water-related cost savings or benefits realized, and any relevant incidents shall be identified. 🔍 Obs.

Comment
- An annual review with Spadel Environmental ressources team and local management team (Sandrine Mouton and José Lefort - site director). The slides can be found attached and cover risk & opportunities, discussions on the resource availability, water challenges (pollution risk and resource availability because of less precipitations) and the annual WSP performance.
- On the general annual management review the following is analysed, the WUR is reviewed, the risk analysis is reviewed, and actions plan of the biggest actions to be done.

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
- In the management review all incidents are recorded and reviewed as helicopter view.
- Three levels of environmental issues: accident, critical incidents and non respect. There were 3 critical incidents (issue contained) and no accidents in 2024. All three were related to small exceeding in effluent parameters (pH and Phosphorus) it happens when the flow at the sewers is low and a chemical for CIP or other is used.
- Three Incident Analysis happened in 2024: 240221 (ph=4 and N), 240515 (pH:5, flowmeter problem) and 240808 (Phosphorus, Arsenic, Zinc). Authorities audited the site about the incidents and a working group was set to start finding solutions about these exceedances.

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
- Performance is shared in the "Gestion Durable de l'Eau". This document is made public on the Source of Change website but is also shared during meetings with the Wattwiller municipality (presentation dated 2024 06 11).
- When sending the questionnaire, the Gestion Durable de l'Eau is sent with. Add the list of stakeholders about it. Check stakeholder list to see which stakeholders.

4.3.2 *Voluntary Advanced Indicator*
The site's efforts to address shared water challenges shall be evaluated by stakeholders. This shall include stakeholder reviewing of the site's efforts across all five outcome areas, and their suggestions for continual improvement. N/A

4.4 *Evaluate and update the site's water stewardship plan, incorporating the information obtained from the evaluation process in the context of continual improvement.*

4.4.1 *The site's water stewardship plan shall be modified and adapted to incorporate any relevant information and lessons learned from the evaluations in this step and these changes shall be identified.* Yes

Comment
- Modifications of the WSP are recorded in the "Updates" tab. Note that the new WSP Group format (same document for all Spadel group sites) was adopted at the beginning of 2025.
- During the annual review of performance, the site also add in the comments if there is any lessons learned on it or not. If any changes following an actions is necessary, this will be indicated in the updated tab.

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	The site water-related internal governance including positions are shared within the Spadel AWS commitment document which is shared publicly on the Source of Change website.	
5.2	*Communicate the water stewardship plan with relevant stakeholders.*	
5.2.1	*The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.*	Yes
Comment	- The WSP is shared through the "Gestion durable de l'eau 2024" document. The document also indicate for the biggest targets what is the related AWS outcome. Note that not all the AWS outcomes are documented, the biodiversity projects (IWRAs) are not presented as such but could be. The Plan itself contains the related AWS outcome, but these columns were not included in the document by lack of space. - The document was also actively communicated along with questionnaire for feedback to 10 stakeholders as indicated by the stakeholders list.	
5.3	*Disclose annual site water stewardship summary, including: the relevant information about the site's annual water stewardship performance and results against the site's targets.*	
5.3.1	*A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.*	Yes
Comment	See supporting attached document "Gestion durable de l'eau 2024'- this document is also available on Source of Change website. It includes the WSP for the year and a summary of the most relevant actions along with the performance against targets. A copy of the 2024 WSP is also added to the document.	
5.3.2	*Advanced Indicator* *The site's efforts to implement the AWS Standard shall be disclosed in the organization's annual report.*	Yes
Comment	In the CSR 2024 annual report of the Spadel Group, the AWS certification is indicated several times. The group intention to keep the platinum certification for all sites is clearly stated. This document is available on the Source of Change website.	
5.3.3	*Voluntary Advanced Indicator* *Benefits to the site and stakeholders from implementation of the AWS Standard shall be quantified in the organization's annual report.*	N/A
5.4	*Disclose efforts to collectively address shared water challenges, including: associated efforts to address the challenges;engagement with stakeholders; and co-ordination with public-sector agencies.*	
5.4.1	*The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.*	Yes

Comment	Shared water challenges can be found in the Gestion durable de l'eau 2024 indicated as "Risks". The table on page 5 also indicate the actions that site is doing to tackle them. Note that this risk instead of shared water challenge misinterpretation is already addressed in the 1.6.1 founding.	
5.4.2	*Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.*	Yes
Comment	All the meetings with municipality, ARS, and biodiversity collective. - Municipality of Wattwiller is invited often to discuss about water management - Invited the WWTP supplier for a visit on-site. - Municipality of Uffholtz was invited to discuss about the building of nearby Poney Club. Planned new engagements: - inviting the ONF (national forest organisation) and Brigade Vertes (environmental and biodiversity enforcement). - starting a partnership with firefighters. - organising a cleaning event with the municipality of Wattwiller.	
5.5	*Communicate transparency in water-related compliance: make any site water-related compliance violations available upon request as well as any corrective actions the site has taken to prevent future occurrences.*	
5.5.1	*Any site water-related compliance violations and associated corrections shall be disclosed.*	Yes
Comment	Three minor compliance violations happened in 2024 were communicated to the authorities through the normal submittal channels. Facility has the necessary records on the incidents and were available as requested. Audit from DREA to check effluent. There is no CARs raised in the ISO 14001 audit.	
5.5.2	*Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.*	Yes
Comment	The three environmental incidents (effluent over concentration) were analysed during an audit by authorities. Site is currently working on finding solutions to avoid problems in pick concentrations that happens after specific operations (CIPs).	
5.5.3	*Any site water-related violation that may pose significant risk and threat to human or ecosystem health shall be immediately communicated to relevant public agencies and disclosed.*	Yes
Comment	In France it is mandatory to submit any data of effluent and of course violations. No violations that may pose significant risk to human or ecosystem health were identified as the violations that occurred are related to effluent that is sent to the municipal WWTP through sewers with little to no identified consequence.	

Previous Findings

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