# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001436

WSAS WATER STEWARDSHIP ASSURANCE SERVICES

## SITE DETAILS

Site: **Nestlé Nigeria Plc Agbara Factory**
Address: KM32Lagos Badagry Expressway Agbara Industrial Estate, 112103, Agbara, NIGERIA
Contact Person: Evelyn Dike
AWS Reference Number: AWS-000100
Site Structure: Single Site

## CERTIFICATION DETAILS

Certification status: Certified Core
Date of certification decision: 2025-May-19
Validity of certificate: 2028-May-18

## AUDIT DETAILS

Audited Service(s): AWS Standard v2.0 (2019)
Audit Type(s): Re-Certification Audit
Audit Start Date: 2025-Jan-29
Audit End Date: 2025-Jan-31
Lead Auditor: Ade Adesida

Audit team participants:
Adedamola Adesida, Lead Auditor
Anasse Ait lemkademe, Technical expert

Site Participants:
Fischer Rapheal, Country SHE Manager
Adelanwa Olawunmi, Factory HR Manager
Saheed Kareem, Factory Engineer
Oluwatobi Sanmi, Plant Manager- Culinary
Obumneme Orjika, Project Engineer
Okeola Olanrewaju, Manufacturing Manager - Cereals
Rotimi Owope, Factory Supply Chain Manager
Oluwasola Ipadeola, Maintenance Manager
Evelyn Dike, SHE/ WR Manager
Kayode Adewale, Packaging Development Manager
Semilu Abolore, WT Supervisor
Ajibola Faniyi, IS Manager
Patrick Dibie, WT/WR/AWS Coordinator, Abaji Factory

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001436

## ADDITIONAL INFO

Summary of Audit Findings: During the AWS certification audit of Nestlé Agbara Factory, conducted from 29th to 31st January 2025, 10 minor non-conformities and 8 observations were identified.

The client is required to perform a root cause analysis and define corrective actions for each non-conformity. These corrective actions must be submitted to WSAS within 30 days of receiving the audit report, by 30 April 2025.

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

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

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

Scope of Assessment: The scope of services covers the Recertification audit for assessing the conformity of Nestlé Nigeria Plc, Agbara Factory against the AWS International Water Stewardship Standard Version 2.

Nestlé Nigeria Plc, Agbara Factory is a leading food and beverage manufacturing facility in Nigeria, producing a range of products including Beverages, Cereals, Culinary and Bottled water for distribution and export. The factory is located in Agbara Industrial Estate, Ogun State, Nigeria, approximately 30 km west of Lagos, with coordinates 6°31'35.5"N, 3°10'37.2"E. The facility includes production units, water abstraction infrastructure, wastewater treatment facilities, and storage systems.
- The facility falls within the Ologe Lagoon and River Owo watershed. Ologe Lagoon, a riparian ecosystem, plays a key role in groundwater recharge and is impacted by industrial and domestic activities.
- The Coastal Plain Sand (CPS) aquifer is the primary groundwater source, consisting of confined and unconfined aquifers. The aquifer is vulnerable to saltwater intrusion, requiring continuous monitoring and conservation efforts.

The audit was conducted [onsite] on 29th- 31st of January 2025. The visit included an assessment of the following facilities:
- Boreholes and Water Abstraction Points-Three operational boreholes.
- Filtration and purification systems.
- Evaluation of effluent quality and compliance with discharge regulations.
- Implementation of water-saving initiatives such as cooling water recycling.
- Drinking water access points, staff toilets, and hygiene stations.
- Drainage infrastructure and flood mitigation measures.
- Groundwater monitoring wells for saltwater intrusion detection.

## FINDINGS

**NUMBER OF FINDINGS PER LEVEL**

| | |
|---|---|
| **Observation** | 8 |
| **Minor** | 10 |

### FINDING DETAILS

| | |
|---|---|
| Finding No: | TNR-016795 |
| Checklist Item No: | 1.2.1 |
| Status: | In Progress - CA plan approved |
| Finding level: | Minor |
| Due date: | 2026-Jan-30 |
| Checklist item: | Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall:<br>- Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people;<br>- Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies;<br>- Provide evidence of stakeholder consultation on water-related interests and challenges;<br>- Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups;<br>- Identify the degree of stakeholder engagement based on their level of interest and influence. |
| Findings: | Although the site's Water Resource Team confirmed that engagements were made with RUWASA (Rural Water Supply and Sanitation Agency), RUWASA is not listed as a stakeholder in the site's stakeholder records. The records do not clearly confirm whether their concerns, interests, and challenges were documented and considered. |
| Corrective action: | Schedule another meeting with the program manager for RUWASA and document evidence |

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|---|---|
| Finding No: | TNR-017304 |
| Checklist Item No: | 1.3.6 |
| Status: | Open |
| Finding level: | Observation |
| Checklist item: | On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values. |
| Findings: | Site has identified infrastructures as Important Water-Related Areas. This indicates a lack of understanding between water related infrastructure and Important Water-Related Areas. |
| Corrective action: | Carry out training for AWS support |

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|---|---|
| Finding No: | TNR-017305 |
| Checklist Item No: | 1.4.1 |
| Status: | In Progress - CA plan approved |
| Finding level: | Observation |
| Checklist item: | The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be identified. |
| Findings: | There is no communication with the suppliers about the water quality at their location. |
| Corrective action: | Do a vidoe recording of next meeting with suppliers to serve as evidence of topics disccussed. |

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| Finding No: | TNR-017056 |
| Checklist Item No: | 1.4.2 |
| Status: | In Progress - CA plan approved |
| Finding level: | Observation |
| Checklist item: | The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified. |
| Findings: | Outsourced services that consume water outside the premises such as transport and packaging services, have not been analysed. |
| Corrective action: | Re assess other outsourced services to determine which originates within the catchment and analyse their water consumption |

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|---|---|
| Finding No: | TNR-016797 |
| Checklist Item No: | 1.5.1 |
| Status: | In Progress - CA plan approved |
| Finding level: | Minor |
| Due date: | 2026-Jan-30 |
| 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: | The site lacks a consolidated summary of all relevant water governance policies, plans, and institutions. The site has only presented reports of activities it is directly involved in, without compiling a comprehensive list of relevant water governance policies, plans, frameworks, and institutions that affect the site / catchment.<br>During discussions with Agbara Estate Management, it was revealed that they have initiated a project to enhance wastewater effluent management by upgrading the Central Sewage Treatment Plant (CSTP). This initiative aims to improve effluent treatment standards, reduce pollution risks in nearby water bodies, and support compliance with regulatory requirements. However, this initiative is not referenced in the site's compiled list of water governance policies or frameworks, nor has the site demonstrated its role or contribution to this effort. |
| Corrective action: | Compiling a comprehensive list of relevant water governance policies, plans, frameworks, and institutions that affect the site / catchment. |

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| Finding No: | TNR-017057 |
| Checklist Item No: | 1.5.3 |
| Status: | In Progress - CA plan approved |
| 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: | Historical rainfall data was used and the documentation includes graphs showing annual variations of rainfall and considerable seasonal differences. The analysis should extend to understanding seasonal variations in water availability or recharge trends, analysis of how dry and wet seasons affect groundwater recharge, withdrawals, and potential risks |
| Corrective action: | Reasses the analysis of seasonal variation on water availabilty and recharge within the Agbara catchment |

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| Finding No: | TNR-017306 |
| Checklist Item No: | 1.5.4 |
| Status: | In Progress - CA plan approved |
| Finding level: | Minor |
| Due date: | 2026-Jan-30 |
| Checklist item: | 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. |
| Findings: | The Water Quality in Agbara Catchment report includes data up to 2021 but does not provide updates on present conditions. The current water quality scenario of the catchment is not known. |
| Corrective action: | Carry out a study on the water quality of selected water sources within the catchment to determine the current water quality. |

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| Finding No: | TNR-017307 |
| Checklist Item No: | 1.5.7 |
| Status: | In Progress - CA plan approved |
| Finding level: | Minor |
| Due date: | 2026-Jan-30 |
| Checklist item: | The adequacy of available WASH services within the catchment shall be identified. |
| Findings: | The adequacy of available WASH services within the catchment is not identified. |
| Corrective action: | Identify the adequency of available WASH within the catchment |

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|---|---|
| Finding No: | TNR-016798 |
| Checklist Item No: | 1.6.1 |
| Status: | In Progress - CA plan approved |
| Finding level: | Observation |
| Checklist item: | Shared water challenges shall be identified and prioritized from the information gathered. |
| Findings: | Evidence of consultation activities with key stakeholders to identify and prioritize shared water challenges, is limited. The provided evidence includes communication with three (3) stakeholders, but it is unclear whether these engagements included discussions on shared water challenges or whether stakeholder inputs were used in prioritizing these challenges. |
| Corrective action: | Collate the  evidence of interaction with the stakeholders on water related issues and challenges within Agbara ctachment |

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|---|---|
| Finding No: | TNR-016799 |
| Checklist Item No: | 2.3.2 |
| Status: | In Progress - CA plan approved |
| Finding level: | Minor |
| Due date: | 2026-Jan-30 |
| Checklist item: | A water stewardship plan shall be identified, including for each target:<br>- How it will be measured and monitored<br>- Actions to achieve and maintain (or exceed) it<br>- Planned timeframes to achieve it<br>- Financial budgets allocated for actions<br>- Positions of persons responsible for actions and achieving targets<br>- 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 targets set for water reduction, efficiency improvement, and wastewater reuse are not quantified (e.g., "% reduction in consumption" or "liters saved per year").<br>- There are no defined baseline values to compare progress, making it difficult to measure impact. |
| Corrective action: | Make WSP target SMART |

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| Finding No: | TNR-017308 |
| Checklist Item No: | 3.3.2 |
| Status: | In Progress - CA plan approved |
| Finding level: | Minor |
| Due date: | 2026-Jan-30 |
| Checklist item: | 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. |
| Findings: | There appears to be insufficient effort towards achieving the water efficiency target as the site has not been able to meet its target in the last 2 years. |
| Corrective action: | Review major impactors of the water reduction and reflect in the next target setting |

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| Finding No: | TNR-016804 |
| Checklist Item No: | 3.8.1 |
| Status: | In Progress - CA plan approved |
| Finding level: | Minor |
| Due date: | 2026-Jan-30 |
| Checklist item: | Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified. |
| Findings: | Engagement records between the site and Agbara Estate Limited do not explicitly cover wastewater treatment plant concerns, risks, or mitigation measures. There is no documented collaboration efforts on addressing potential pollution issues. |
| Corrective action: | Schedule a meeting with AEL on WWTP concerns, risks and mitigation measures |

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| Finding No: | TNR-017062 |
| Checklist Item No: | 3.9.4 |
| Status: | In Progress - CA plan approved |
| Finding level: | Observation |
| Checklist item: | Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented. |
| Findings: | There is a lack of clear maintenance plan with timelines, responsible teams, and measurable conservation goals. |
| Corrective action: | Draw out maintenance for identified IWRA with relevant details |

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| Finding No: | TNR-016805 |
| Checklist Item No: | 4.1.1 |
| Status: | In Progress - CA plan approved |
| Finding level: | Minor |
| Due date: | 2026-Jan-30 |
| Checklist item: | Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated. |
| Findings: | The plan lacks specific volume reductions, percentage improvements, or cost savings data. The water stewardship plan does not specify quantified performance targets, such as projected cost savings from efficiency initiatives.<br>There is no structured evaluation of progress against specific targets. |
| Corrective action: | Include the unit quantification in the WSP |

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| Finding No: | TNR-016806 |
| Checklist Item No: | 4.1.2 |
| Status: | In Progress - CA plan approved |
| Finding level: | Observation |
| Checklist item: | Value creation resulting from the water stewardship plan shall be evaluated. |
| Findings: | The site has described the value creation from the water stewardship activities but the description is rather generic and should extend to a structured evaluation, with quantification where possible, such as water saved, cost reductions, etc. It is also noted that current description is per each action but evaluation of value creation is more suitable at an objective/goal level. |
| Corrective action: | Carry a structured evaluation of the value creation of the WSP |

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| Finding No: | TNR-016807 |
| Checklist Item No: | 4.1.3 |
| Status: | In Progress - CA plan approved |
| Finding level: | Minor |
| Due date: | 2026-Jan-30 |
| Checklist item: | The shared value benefits in the catchment shall be identified and where applicable, quantified. |
| Findings: | The shared value benefits from the initiatives have not been clearly identified, in terms of social and environmental impact metrics, such as improvements in community water access and reductions in wastewater discharge, or others |
| Corrective action: | Identify and quantify where possible shared value benefits - social and environmental impact metrics, such as improvements in community water access and reductions in wastewater discharge, or others |

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| Finding No: | TNR-016808 |
| Checklist Item No: | 4.3.1 |
| Status: | In Progress - CA plan approved |
| Finding level: | Minor |
| Due date: | 2026-Jan-30 |
| Checklist item: | Consultation efforts with stakeholders on the site's water stewardship performance shall be identified. |
| Findings: | There is a lack of record of structured stakeholder consultations or feedback regarding the site's water stewardship performance. |
| Corrective action: | Put in place a structured filing system for stakeholders consultation records |

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| Finding No: | TNR-016809 |
| Checklist Item No: | 5.1.1 |
| Status: | Open |
| Finding level: | Observation |
| Checklist item: | The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed. |
| Findings: | Stakeholders such as the representatives of the local community face challenges in accessing or understanding this disclosed information. |

### Report Details

| Report | Value |
|---|---|
| Report prepared by | Adedamola Adesida |
| Report approved by | Amit Singh |
| Report approved on (Date) | 21/03/2025 |

### Surveillance

**Proposed date for next audit**
2026-Jan-28

Comment The proposed date for next audit is 28th January 2026.

### Stakeholder Announcements

| Date of publication | Location |
|---|---|
| 20/01/2025 | The Nation News Paper |
| 20/01/2025 | Vanguard News paper |
| 05/12/2024 | https://a4ws.org/wp-content/uploads/2024/11/AWS-000100-Nestle-Nigeria-Plc-Agbara-Factory_StakeholderAnnouncement25.pdf |

Comment The site has publicly announced its certification to the AWS Standard through various communication channels, including national dailies, company websites, and official letters to community stakeholders. Notifications were sent to key stakeholders, including community representatives, regulatory agencies, and industry partners.

The link for AWS website is :
https://a4ws.org/wp-content/uploads/2024/11/AWS-000100-Nestle-Nigeria-Plc-Agbara-Factory_StakeholderAnnouncement25.pdf

Comment A total of 4 stakeholders were interviewed - 3 external stakeholders and 1 Internal stakeholder.

### Catchment Information

**Catchment Information**
Nestle Nigeria Plc Agbara Factory is located at Km 32 Lagos-Badagry Expressway, Agbara Industrial Estate, Agbara, Ogun State.
The site is located within the Agbara catchment, a sub-catchment of the Ologe Lagoon catchment.

- This catchment lies in the south-western part of the Dahomey Basin, also known as the Benin Basin (Geoconsult, 2024). The geology of the Agbara catchment aligns with the regional geology of the Benin Basin, primarily composed of Coastal Plain Sands (CPS) and recent sediments.

- The site primarily relies on groundwater sources within the Agbara sub-catchment for its water supply. Surface water bodies in the catchment ultimately discharge into the Ologe Lagoon.

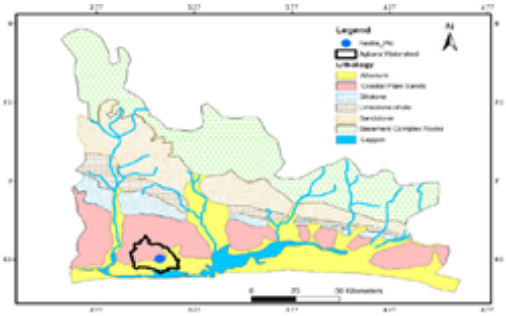
- The aquifer used within the catchment belongs to the CPS system and outcrops approximately 7 km north of the site. This location serves as a direct recharge area to the aquifer. Recharge occurs primarily through rainfall infiltration and lateral groundwater movement from recharge zones.

- Water supply within the catchment is primarily derived from boreholes tapping into the CPS aquifer.
- Treated effluent from social waste is discharged into the Ologe Lagoon through the Agbara estate management Administrators' waste treatment plant. Primarily directed into natural drainage systems leading to the Ologe Lagoon.

Catchment Features:
- The groundwater abstraction rate in the Agbara Industrial Complex is bearable
- Groundwater abstraction in the entire Ologe Lagoon catchment is estimated at 53.3 $Mm^3$/year.
- Annual renewable recharge from rainfall is estimated at 1,317 $Mm^3$.
- Some regions within the catchment experience seasonal flooding due to poor drainage and high rainfall.
- The catchment includes ecologically significant wetlands and forests that contribute to biodiversity conservation.
- No major inter-basin transfers have been identified in the region.
- The catchment falls within a tropical climate zone, characterized by high rainfall and distinct wet and dry seasons.
- The catchment is dominated by industrial water use, particularly within the Agbara Industrial Estate. Other significant water users include agriculture and residential communities.
- Based on a 22-year precipitation analysis (2000-2023), the average annual rainfall is 1,500 mm.

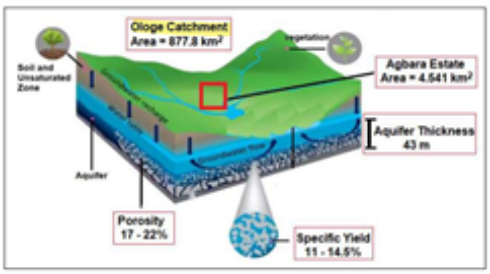
The Nestle site is in the Agbara catchment

Picture3.png



The Nestle site is in the Agbara catchment

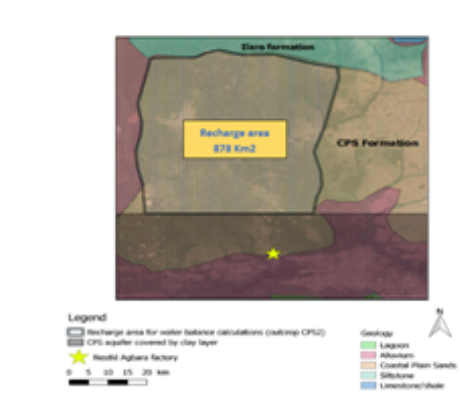
Picture2.png




Conceptual Model diagram of CPS Aquifer in Ologe Lagoon Catchment

Aquifer model

Picture4.png




Recharge Area

Picture1.png

Comment The site is located within the Agbara catchment.

## Client Description and Site Details

**Client/Site Background**

The Nestlé Nigeria Plc Agbara Factory is situated at Km 32, Lagos-Badagry Expressway, Agbara Industrial Estate, Agbara, Ogun State, Nigeria. It is located within the Agbara Industrial Estate, one of the country's major industrial hubs, approximately 30 km west of Lagos. The factory is in an industrial zone, surrounded by manufacturing plants, warehouses, and logistics facilities. While the immediate environment is industrial, nearby areas feature residential communities and small-scale agricultural activities.

Description of Products & Water Usage
The Nestlé Agbara facility is engaged in the production, storage, and distribution of:
Beverages; Milo, Nescafe (and Milo/Nescafe Ready-to-drink)
Cereals; Infant cereals and Golden Morn
Culinary products; Maggi seasoning cubes
Bottled water; Nestlé Pure Life

Water Usage in Production
Water is a key raw material in beverage and food processing.
Used for machinery, production lines, and facility hygiene.
Utilized in boilers, steam generation, and cooling towers.
Packaging & Bottling, particularly for the Nestlé Pure Life bottled water production.

Water Sources & Catchment Overview
The factory is located in the Agbara catchment, a sub-catchment of the Ologe Lagoon catchment, which lies in the southwest Dahomey Basin (Benin Basin). This catchment's geology is primarily Coastal Plain Sands (CPS), consisting of recent sediments.

Water Sources on Site
1. 3 boreholes for the food manaufacturing processes and 2 boreholes for bottling water operation (located- 7 km north of the site).

Water-Related Infrastructure:
Dedicated water treatment plant
Filtration, softening, and reverse osmosis systems for purification.
Rainwater harvesting system
Stormwater drainage system. It prevents flooding and protects local water bodies.

Water Use in Production & Energy Facilities:
Process water for food & beverage production
Boiler & steam generation
Cooling towers.

Wastewater Treatment & Discharge
On-site wastewater treatment plant (WWTP) treating industrial effluents.
Discharge monitoring to meet environmental regulations.

Fire-Water Supply
Dedicated firewater storage tanks & hydrants for emergency response.

Sustainability & Water Management Efforts
Recycling & reusing process water.
Digital water monitoring systems to track usage, detect leaks, and optimize consumption.

Wastewater Discharge
Nestlé Agbara Factory operates a dedicated on-site wastewater treatment plant (WWTP) that ensures all process wastewater is treated before discharge. The plant is equipped with an online wastewater analyzer that continuously monitors effluent quality to comply with regulatory standards.

Treatment & Compliance Monitoring
The WWTP is designed to treat process wastewater, ensuring it meets regulatory limits for

Chemical Oxygen Demand (COD), Biological Oxygen Demand (BOD), and other key parameters before discharge.
- An external laboratory conducts independent analyses of treated wastewater, and reports are submitted quarterly to the relevant regulatory authorities.
- A significant portion of treated wastewater is reused for cooling purposes within the factory, reducing freshwater demand.
- During WWTP maintenance, wastewater is rerouted to the municipal Agbara Estate WWTP, operated by Agbara Estate Limited.

Discharge Points
- Social (sewage) waste from employee facilities is also directed to the municipal WWTP.
- After treatment at the Agbara Estate WWTP, effluent is discharged into the Ologe Lagoon via River Owo
- The factory has a well-structured stormwater system to prevent flooding and ensure proper drainage.
- Rainwater from a portion of the factory roofs is collected into the fire fighting storage tanks.
- The the rest is directed to into the network of communal drainage system, which connects to the federal municipal drainage network along the Lagos-Badagry Expressway.
- The stormwater eventually flows into a nearby canal, which drains into the sea.

The site manages its industrial services, including:
Power plants for electricity generation
Wastewater Treatment Plant (WWTP)
Stormwater drainage network


agbara map.jpeg

| | Summary of Shared Water Challenges |
|---|---|

**Summary of Shared Water Challenges**
Water Quantity Challenges
- Potential future water shortages due to the absence of a public water supply.
- Unregulated groundwater abstraction which could lead to potential water table decline.
- Growing industrialization, increasing water demand and competition for limited water resources.

Water Quality Challenges
- Potential contamination of water sources due to poor wastewater management from industries and settlements.
- Risk of saltwater intrusion into the aquifer due to the over-extraction of groundwater affects drinking and industrial water quality.
- Protection of surface water bodies (e.g., Ologe Lagoon) from pollution caused by industrial and domestic discharges.

Hygiene and Sanitation Issues
- Limited awareness and inadequate hygiene and sanitation facilities affect public health and water safety.

During the audit, persistent waste disposals by unknown externals at the estate effluent discharge point was noticed which leads to the Lagoon.

Comment: A review of the Site's shared water challenges are documented in the Site's water stewardship plan.

| 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 Agbara Estate limited treated effluent discharge point was visited. This is located close to the community within the sites catchment.

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

Comment: The site is located in One (1) Catchment

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

Comment: The scope is controlled under a central Nestle management system

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

Comment: Scope is Homogenous

| 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:*<br>*- Site boundaries;*<br>*- Water-related infrastructure, including piping network, owned or managed by the site or its parent organization;*<br>*- Any water sources providing water to the site that are owned or managed by the site or its parent organization;*<br>*- Water service provider (if applicable) and its ultimate water source;*<br>*- Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies;*<br>*- Catchment(s) that the site affect(s) and is reliant upon for water.* | Yes |
| Comment | - A catchment map is in place. The map identifies the site's boundaries, water-related infrastructure, water sources, and other catchments linked to the site.<br>The map includes an onsite wastewater treatment plant (WWTP), boreholes, recycled water lines, and a municipal water connection.<br>The site sources water primarily from self-managed boreholes, supplemented by municipal supply during maintenance periods.<br>Municipal supply is available from Agbara Estate Limited, which draws water from groundwater sources.<br>Treated process wastewater and sewage are discharged into the Agbara Estate WWTP.<br>The ultimate receiving body is Ologe Lagoon via River Owo.<br>Both surface and groundwater catchments relevant to the site are identified and mapped. | |
| **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:*<br>*- Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people;*<br>*- Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies;*<br>*- Provide evidence of stakeholder consultation on water-related interests and challenges;*<br>*- Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups;*<br>*- Identify the degree of stakeholder engagement based on their level of interest and influence.* | in progress |
| Comment | Stakeholders were identified based on their influence and dependence on water resources within the Agbara catchment. The site has engaged some stakeholders through consultations and meetings. Evidence of communication with some stakeholders was provided.<br>***Finding No: TNR-016795*** | |
| **1.2.2** | *Current and potential degree of influence between site and stakeholder shall be identified, within the catchment and considering the site's ultimate water source and ultimate receiving water body for wastewater.* | Yes |

| | | |
|---|---|---|
| Comment | The site presented a stakeholder mapping ranking file identifying the influence of stakeholders within its catchment. Records of 3 yearly Community Process Relations (CPR) tools. These includes records of Meetings, consultations, or dialogues with community representatives. | |
| **1.3** | *Gather water-related data for the site, including: water balance; water quality, Important Water-Related Areas, water governance, WASH; water-related costs, revenues, and shared value creation.* | |
| **1.3.1** | *Existing water-related incident response plans shall be identified.* | Yes |
| Comment | The site has a policy in place to ensure water-related incidents are documented in its Emergency Response Plan. The policy covers areas such as flooding, chemical spills, fire, drought, occupational hazards, water supply interruptions, and critical infrastructure failures. | |
| **1.3.2** | *Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped* | Yes |
| Comment | The wastewater treated from the site is discharged outside the premises for further treatment. The site's water balance is mapped and documented in a sketch map. All storm water goes into a storm pit which is later sent to the wastewater treatment plant. | |
| **1.3.3** | *Site water balance, inflows, losses, storage, and outflows, including indication of annual variance in water usage rates, shall be quantified. Where there is a water-related challenge that would be a threat to good water balance for people or environment, an indication of annual high and low variances shall be quantified.* | Yes |
| Comment | The factory sources its water supply exclusively from Deep Well #2. The site has quantified its water inputs, outputs, and losses, with a significant portion of the water used in finished products, primarily Nestlé Pure Life - PET 0.6L | |
| **1.3.4** | *Water quality of the site's water source(s), provided waters, effluent and receiving water bodies shall be quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be quantified.* | Yes |
| Comment | The site provided water quality test report for well, factory effluent, deep well and Ologe Lagoon, which serves as a receiving water body. The report includes physicochemical and microbiological parameters with information on surface water quality before or after effluent discharge. The report includes details such as pH, turbidity, dissolved solids, heavy metals, BOD, COD, and microbial counts. | |
| **1.3.5** | *Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.* | Yes |
| Comment | The site has listed chemicals, diesel, petrol, and waste as potential pollution sources. The site provided an inventory of chemicals stored on-site.<br>Secondary containment, bunded walls, impermeable concrete pits, and spill management procedures are used to reduce pollution risk. Waste is stored under a covered compartment to prevent runoff during rainfall. Pollution sources are located on a site map. | |
| **1.3.6** | *On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.* | Obs. |
| Comment | The site has identified on-site Important Water-Related Areas including Groundwater Boreholes. | |
| **1.3.7** | *Annual water-related costs, revenues, and a description or quantification of the social, cultural, environmental, or economic water-related value generated by the site shall be identified and used to inform the evaluation of the plan in 4.1.2.* | Yes |

Comment — The site has documented costs for wastewater treatment, water analysis, zero waste projects, and government water-related fees, alongside revenue from water-related product sales. Social, Economic, and Environmental impacts are quantified in areas such as Job creation, improved standard of living, and free clean drinking water for the community.

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

Comment — The sites ensure that Water, Sanitation, and Hygiene (WASH) facilities are adequately provided, strategically located, and accessible to all employees, contractors, and visitors. Nestlé Pure Life bottled water is provided during maintenance activities or factory shutdowns. The site has mapped the location of all social rooms and WASH facilities. The number of toilets, handwashing stations, and potable water access points relative to the workforce size have been identified. The factory has 91 toilets and 59 showers, maintained regularly according to Nestlé's hygiene policy.
20 strategically placed handwashing stations ensure compliance with hygiene standards. Drinking Water: 37 water dispensers in offices and 5 in canteens provide 24-hour access to safe drinking water.

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

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

Comment — Packaging Supplier has set a 5% water reduction target for 2025 compared to its 2024 water abstraction levels.

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

Comment — There are 3 outsourced services onsite, and these include gardening, Canteen and Laundry services. Water supplied to these services is metered.

**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 has engaged in various water governance-related activities in the catchment.

***Finding No: TNR-016797***

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

Comment — The site has documented a list and link to the relevant water-related legislation and regulations.

**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 site has conducted a water balance assessment which covers the Agbara catchment. The estimation of water recharge was based on 22 years of historical rainfall data (2000-2023), with an annual average precipitation of 1,500 mm. Historical rainfall data was used and the documentation includes graphs showing annual variations of rainfall and considerable seasonal differences. The analysis should extend to understanding seasonal variations in water availability or recharge trends, analysis of how dry and wet seasons affect groundwater recharge, withdrawals, and potential risks.

**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.*

in progress

Comment

The site has assessed the water quality of the Agbara catchment, evaluating its physical, chemical, and biological characteristics. The most recent water quality analysis available for the Ologe Lagoon is from December 2021, as provided by the BATO CHEMICAL LABORATORIES LIMITED report.

***Finding No: TNR-017306***

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

Yes

Comment

The site has identified and described Important Water-Related Areas (IWRAs), including their locations, status, and associated risks:

CPS Aquifer – Described as fine with no significant water quality risks identified.
Ologe Lagoon – Identified as an IWRA with potential pollution risks from industrial effluent discharge.
River Owo – Mapped and monitored, with water contamination risks from industrial and agricultural runoff.
Other IWRAs – No significant water risks or environmental impacts identified for the last four IWRA sites.

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

Yes

Comment

The site has compiled a breakdown of existing water-related infrastructure within the catchment, which includes surface water sources (Ologe Lagoon, River Owo, and Iju River) and groundwater aquifers.

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

in progress

Comment

The site has provided details of WASH facilities at site. Onsite WASH Facilities includes:
91 toilets and 59 showers are available to workers.
20 strategically placed handwashing stations ensure hygiene compliance.
37 water dispensers in offices and 5 in canteens provide 24/7 safe drinking water access.
Bottled water (Nestlé Pure Life) is supplied during factory shutdowns or maintenance

Site has also shared the community WASH Initiatives:
Borehole installations in schools and public areas.
Hygiene education programs and sanitation awareness campaigns.
Collaboration with local agencies to enhance public water access.

***Finding No: TNR-017307***

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

| | | |
|---|---|---|
| **1.6.1** | *Shared water challenges shall be identified and prioritized from the information gathered.* | Obs. |
| Comment | The site has identified some shared water challenges in its internal assessments, such as water scarcity risks, groundwater over-abstraction, wastewater management, and WASH gaps. In the process, the site had a joint in-person engagement with stakeholders, only limited evidence is available of the consultation on water-related challenges. | |
| **1.6.2** | *Initiatives to address shared water challenges shall be identified.* | Yes |
| Comment | The site has identified key shared water challenges within its catchment area, including potential water scarcity, contamination risks, inadequate WASH infrastructure, and the need for surface water protection. The site provided a list of initiatives that address these challenges. | |
| **1.7** | *Understand the site's water risks and opportunities: Assess and prioritize the water risks and opportunities affecting the site based upon the status of the site, existing risk management plans and/or the issues and future risk trends identified in 1.6.* | |
| **1.7.1** | *Water risks faced by the site shall be identified, and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.* | Yes |
| Comment | The site has conducted a comprehensive water risk assessment carried out by competent professionals, focusing on physical, regulatory, and reputational water risks. The assessment considers risks associated with water availability, water quality, regulatory compliance, and shared water challenges in the Agbara catchment. The site has identified key water-related risks supported by internal assessments and stakeholder engagement feedback. | |
| **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 | The site has developed a comprehensive list of water-related opportunities, which are prioritized based on their potential impact, feasibility, and alignment with business | |
| **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 | The site has identified, documented, and benchmarked best practices for effective, efficient, and inclusive water governance in the Agbara catchment. These best practices support water security, sustainable management, and equitable access to safe drinking water and sanitation. | |
| **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

The site has implemented best-practice water balance measures that align with sectoral, site-specific, and catchment-wide sustainability objectives.
Water Balance Practices Implemented:
- Implemented to monitor and optimize water consumption across operational processes.
- Enhances water conservation by reducing blowdown rates, chemical dosing, and water demand.
- Daily tracking of borehole water conductivity to prevent over-extraction and maintain groundwater quality.
- CIP rinsing water reused for firefighting and yard cleaning, ensuring resource efficiency.
- Optimization of non-contact process water for secondary applications.
- Enhances reuse of treated effluent for cooling tower operations.
- Provision of safe drinking water stations at the factory entrance and within Korogboji community.

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

Yes

Comment

The site adopts some quality management measures, which cover incoming water, production water, and effluent quality

The site puts the following system in place:
- Daily monitoring of raw water from owned boreholes to assess conductivity, pH, microbial content, and chemical composition.
- Two wells near the seashore to track groundwater quality and detect potential saltwater intrusion risks.
- Ensures that effluent meets regulatory discharge standards before release.
- Conducted before discharge to verify compliance with environmental quality regulations.
- In case of onsite WWTP issues, effluent is redirected to the Agbara CSTP for further treatment.

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

Yes

Comment

Best Practices Related to IWRAs:
Continuous groundwater level monitoring within the Agbara sub-catchment to prevent over-extraction and ensure sustainable aquifer management.
Installation of monitoring wells near coastal areas to track saltwater intrusion risks and prevent contamination of freshwater aquifers.
Riparian buffer zone maintenance around surface water bodies to prevent erosion and protect water quality.
Provision of boreholes and drinking water access points in Korogboji and Agbara communities to reduce dependency on contaminated surface water sources.
Collaboration with OPS-WASH to improve sanitation infrastructure and hygiene awareness in underserved areas.

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

Yes

Comment

The site ensures,
- Provision of safe drinking water stations at key factory locations.
- Routine sanitation and hygiene training for workers to maintain industry hygiene standards.
- Installation of restroom and handwashing facilities across the site.
- In partnership with OPS-WASH, eight boreholes have been installed in Agbara communities.
- Provision of Safe Drinking Water at Factory Entrance and Korogboji Community: Enhances access to clean water for community members.

| 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:*<br>*- That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes*<br>*- That the site implementation will be aligned to and in support of existing catchment sustainability plans*<br>*- That the site's stakeholders will be engaged in an open and transparent way*<br>*- That the site will allocate resources to implement the Standard.* | Yes |
| Comment | Agbara Factory has developed a water stewardship strategy outlining its commitment to water stewardship. There is a publicly available, signed site statement explicitly covering all AWS water stewardship commitments. | |
| **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:*<br>*- Identification of responsible persons/positions within facility organizational structure*<br>*- Process for submissions to regulatory agencies.* | Yes |
| Comment | The site has a structured compliance management system that assigns clear responsibilities for water and wastewater management. The key personnel involved include:<br>- Factory Operations Manager<br>- Laboratory & Quality Control Officers.<br>- Health, Safety, and Environment (HSE) Office.<br>The site has a tool for tracking and reporting on compliance issues | |
| **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 | There is a vision, mission and goals documented by the site. The water stewardship strategy aligns with the AWS Standard with a focus on efficient water use, wastewater treatment, water reuse, and community engagement. | |

| | | |
|---|---|---|
| **2.3.2** | *A water stewardship plan shall be identified, including for each target:*<br>*- How it will be measured and monitored*<br>*- Actions to achieve and maintain (or exceed) it*<br>*- Planned timeframes to achieve it*<br>*- Financial budgets allocated for actions*<br>*- Positions of persons responsible for actions and achieving targets*<br>*- Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.* | in progress |
| Comment | The site has developed a water stewardship plan outlining key initiatives aimed at improving water efficiency, reducing consumption, and enhancing wastewater treatment.<br>***Finding No: TNR-016799*** | |
| **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 | Water Risk Mitigation and Adaptation Plan has been developed in coordination with relevant public-sector and infrastructure agencies. The risk Mitigation and Adaptation Plan, includes, strategies to address water scarcity, over-abstraction, and contamination risk.<br><br>The plan addresses identified water risks (as outlined in Indicator 1.7.1).<br>The discharge of untreated wastewater is coordinated with Agbara Estate Limited.<br>Water, Sanitation, and Hygiene (WASH) provision is being implemented in collaboration with OPS-WASH. | |

| | | |
|---|---|---|
| **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 | A file was presented which contains information and an archive of areas the site contributed to good catchment governance through partnerships with public agencies, investment in WASH facilities, water quality initiatives, waste management, and educational programs. | |
| **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 | Nestle has shown commitment to respecting the water rights of local communities and Indigenous peoples through infrastructure support, community engagement, responsible groundwater management, and pollution control initiatives. | |
| **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 implemented a process to verify full legal and regulatory compliance with water-related laws and policies. Compliance is ensured through regular internal audits, external regulatory inspections, and reporting mechanisms to relevant authorities, including:<br><br>Ogun State Environmental Protection Agency (OGEPA)<br>National Environmental Standards and Regulations Enforcement Agency (NESREA)<br>Standards Organization of Nigeria (SON)<br>National Agency for Food and Drug Administration and Control (NAFDAC) | |
| **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 | Nestlé Agbara Factory recognizes and respects the water rights of local communities, including their social and cultural access to water, through thprovision of free drinking water access points for employees and community members at the factory entrance and in Korogboji,<br>Installation of boreholes and water infrastructure to support community water access, and Engagement with local stakeholders to ensure water rights are respected and conflicts are mitigated. | |
| **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 site has actively tracked its water balance per the AWS Standard, setting annual water consumption targets based on
The site has not fully met its water balance targets for 2023 and 2024, as actual water consumption exceeded the set targets across multiple months.
Comparison of Targets vs. Actual Usage
2023 Target: 1.25 m³/t - Actual YTD: 1.70 m³/t
2024 Target: 1.65 m³/t - Actual YTD: 1.88 m³/t

The site aimed for a 3% reduction in 2024 but instead recorded an increase in actual water use.
The highest deviations were recorded in October (2.29 m³/t), November (2.22 m³/t), and December (2.35 m³/t).
Some months showed improvement (March 2024 actual was 1.41 m³/t, below target), but others significantly exceeded targets (May 2024 = 2.04 m³/t).

**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.*

in progress

Comment

The site has established annual water efficiency targets as part of its water stewardship plan; For 2023 and 2024, the site set a Target of 1.25 m³/T for 2023 and 1.65 m³/T (3% reduction over 2023 actual results) for 2024. Site has installed a digital water monitoring system to monitor water consumption data.

***Finding No: TNR-017308***

**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

The site currently reallocates water for social use through initiatives, such as providing drinking water access points and borehole installations for local communities. However, there is no legal binding on site to provide / reallocate water.

**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 site's water quality targets align with regulatory and operational requirements and are within range. For example.
PH is within the range of 6.5 – 8.5
Conductivity: ≤ 500 µS/cm
Total Dissolved Solids (TDS): ≤ 500 mg/L
Biological Indicators: Absence of E. coli and total coliforms within permissible limits
Progress towards targets:

pH levels have remained within acceptable limits in most cases, except for slight deviations recorded in specific monitoring periods.
Conductivity and TDS levels have shown fluctuations, particularly in industrial areas.
Microbiological indicators have been largely compliant, with occasional increases in total plate counts.

**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

Regular assessments of Chemical Oxygen Demand (COD) and Biochemical Oxygen Demand (BOD) are conducted, with results consistently below regulatory limits.

**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 | - Management of CPS Aquifers 1-4) by Installing monitoring wells near the factory and within the catchment to track water levels and quality.<br>- Implementation of E-Water Efficiency Tools to reduce groundwater abstraction.<br>- Periodic assessments to detect and prevent potential saltwater intrusion.<br>- Reuse of treated effluent for non-potable applications, such as cooling systems, cleaning, and fire hydrant services.<br><br>Others are;<br>Regularly track water quality parameters (pH, conductivity, TDS, and biological indicators) for IWRAs.<br>Monitor biodiversity trends to detect ecosystem changes and potential threats.<br>Maintain records of collaborations with government agencies, local communities, and NGOs focused on IWRA conservation.<br>Organize community awareness programs on water stewardship and best practices.<br>Aligns with catchment-level water governance discussions to ensure IWRA protection is integrated into broader regional water management strategies. | |
| **3.6** | *Implement plan to provide access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers at all premises under the site's control.* | |
| **3.6.1** | *Evidence of the site's provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers onsite shall be identified and where applicable, quantified.* | Yes |
| Comment | The site has implemented WASH initiatives, including year-round drinking water access, borehole installations in schools and communities, and hygiene education programs.<br>The site ensures that Water, Sanitation, and Hygiene (WASH) facilities are adequately provided, strategically located, and accessible to all employees, contractors, and visitors. for example, the site has.<br>Toilets: 91 (with some dedicated for personnel with special needs).<br>Showers: 59 (available for workers).<br>Handwashing Stations: 20, strategically placed to ensure hygiene compliance.<br>Drinking Water Access:<br>37 water dispensers in offices.<br>5 dispensers in canteens, ensuring 24-hour access to safe drinking water.<br>Nestlé Pure Life bottled water is provided during maintenance activities or factory shutdowns.<br>Hygiene event series in communities and among workers | |
| **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 | There are currently no imposed customary rights on the factory. The site has a policy in place to ensure its operations do not infringe on community water rights, provides year-round access to safe drinking water, respects traditional access, and implements remedial actions where necessary. | |
| **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 The site has taken steps to promote responsible water stewardship among its suppliers. While no indirect water use targets were set in 2024, efforts have been made to build awareness. In 2025, Segani Nigeria Ltd, a key packaging materials vendor, has committed to a 5% reduction in water abstraction compared to 2024 levels.

**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 Record of engagement with service providers within the catchment was provided. As part of this effort, awareness sessions on water conservation and catchment stewardship were held. Stakeholder engagement meeting was held on 20/12/2024.

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

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

in progress

Comment The site has engaged Agbara Estate Limited on general water management issues. Engagement records were provided

***Finding No: TNR-016804***

**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 It has implemented structured water stewardship initiatives that promote sustainable water use. Some of these are;
Collaboration with Ogun State Ministry of Environment and the Ogun-Osun River Basin Development Authority to advocate for responsible water use and management.
Participation in World Water Day events to raise awareness of shared water challenges.
Benchmarking governance practices with Reckitt Benckiser and Beta Glass to align with industry best practices.
Use of E-Water Efficiency Tools to track water usage and enhance regulatory compliance.

The site has taken several steps to improve water efficiency and maintain a sustainable water balance in the Agbara catchment
Key actions include:
- Reducing groundwater abstraction while ensuring water availability.
- Implementing water-saving technologies and real-time monitoring to track usage.
- Detecting and fixing leaks to prevent unnecessary water loss.
- Conducting ongoing hydrogeological studies to monitor storage and abstraction trends.
- Engaging with regional stakeholders to promote sustainable water management.

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

Yes

| | | |
|---|---|---|
| Comment | The site has taken several steps to improve water efficiency and maintain a sustainable water balance in the Agbara catchment<br>Key actions include:<br>- Reducing groundwater abstraction while ensuring water availability.<br>- Implementing water-saving technologies and real-time monitoring to track usage.<br>- Detecting and fixing leaks to prevent unnecessary water loss.<br>- Conducting ongoing hydrogeological studies to monitor storage and abstraction trends.<br>- Engaging with regional stakeholders to promote sustainable water management.<br>- Collaboration with Ogun State Ministry of Environment and the Ogun-Osun River Basin Development Authority to advocate for responsible water use and management.<br>- Participation in World Water Day events to raise awareness of shared water challenges.<br>- Benchmarking governance practices with Reckitt Benckiser and Beta Glass to align with industry best practices.<br>- Use of E-Water Efficiency Tools to track water usage and enhance regulatory compliance. | |
| **3.9.3** | *Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.* | Yes |
| Comment | The site has established strict water quality management pol and procedures, ensuring compliance with NESREA water quality standards. Onsite and third-party water quality testing to ensure compliance with regulatory limits. | |
| **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.* | Obs. |
| Comment | The site has taken several steps to protect and maintain Important Water-Related Areas (IWRAs) like Ologe Lagoon, River Owo, and the CPS Aquifers.<br><br>Key actions include:<br>Borehole maintenance for PBL-1 and PBL-2, including cleaning, disinfection, and CCTV inspections to ensure groundwater quality.<br>Hydraulic testing and pumping assessments to monitor groundwater recharge and prevent overuse.<br>Regular water quality analysis of Ologe Lagoon and River Owo to track pollution levels.<br>Hydrogeological risk assessments to evaluate aquifer sustainability and industrial impact.<br>Collaboration with Agbara Estate Limited and local authorities to address water management challenges and discuss controlled groundwater abstraction.<br>Monitoring land-use changes to detect environmental degradation around key water bodies.<br>Developing pollution control and restoration plans to protect water-dependent ecosystems. | |
| **3.9.5** | *Actions towards achieving best practice related to targets in terms of WASH shall be implemented.* | Yes |
| Comment | The site ensures adequate access to safe drinking water, sanitation, and hygiene (WASH) facilities for all workers and the surrounding community, with 91 toilets, 37 drinking water dispensers, 20 handwashing stations, and dedicated facilities for physically challenged workers. | |

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

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

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

Comment: The site has developed a water stewardship plan focused on sustainable water management and efficiency improvements.
Key actions include:
- Aligning with regional and global sustainability frameworks to promote responsible water use.
- Investing in water-saving technologies, leak detection programs, and infrastructure upgrades to reduce consumption and losses.
- Collaborating with Agbara Estate Limited and regulatory agencies to support best practices and participate in regional water governance discussions.
- Tracking water usage trends, abstraction levels, and hydrogeological conditions to guide decision-making.

***Finding No: TNR-016805***

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

Comment: The site has invested in water-saving technologies, leak-detection programs, and process optimization to reduce water consumption.
These initiatives have lowered operational costs by reducing water and energy use.
The site has engaged with stakeholders on water resource sustainability but has not quantified the social and economic impact.
The site participates in regional discussions on water management, contributing to long-term water security in the Agbara catchment.

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

Comment: The site has implemented water efficiency projects, water reuse initiatives, and community water access programs to create shared value.

Actions taken include:
Process optimization and water-saving technologies have been deployed to reduce overall water consumption.
Treated effluent is reused for non-potable applications such as cooling and cleaning, minimizing reliance on freshwater sources.
The site has contributed to local water security by supporting borehole installations and WASH initiatives in nearby communities.
The site actively engages with stakeholders, regulators, and industry peers to promote sustainable water management practices.

***Finding No: TNR-016807***

**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 | There is a documented system in place to review emergency incidents such as flooding, water contamination, or supply disruptions. |
| **4.3** | *Evaluate stakeholders' consultation feedback regarding the site's water stewardship performance, including the effectiveness of the site's engagement process.* |
| **4.3.1** | *Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.* — in progress |
| Comment | The site has engaged in community projects and partnerships related to water stewardship, including:<br>- OPS-WASH initiatives to support community access to clean water and sanitation.<br>- Collaboration with Agbara Estate Limited on shared water resource management.<br>- Implementation of water efficiency projects within factory operations.<br>***Finding No: TNR-016808*** |
| **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's Water Stewardship Plan has been updated to incorporate lessons learned from past evaluations and stakeholder feedback. The site also Conducts an annual review of the water stewardship plan, and incorporated evaluation results. |

| 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.* | Obs. |
| Comment | The site has disclosed its internal water governance structure through the publicly available link. This is available on the Nestlé 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 site has documented records of stakeholder engagement on the Water Stewardship Plan (WSP). Evidence of engagement activities and implementation efforts can be found in the following documents:<br>- Nestlé Agbara Water Stewardship Efforts (2024)<br>- AWS Step 5 2025 Report<br>- Publicly Disclosed AWS Standard Document – Available at: Nestlé AWS Standard Disclosure<br><br>Key Stakeholder Engagements Documented:<br>- Collaboration with Ogun State Ministry of Environment on sustainable water governance.<br>- OPS-WASH partnerships to address shared water challenges in local communities.<br>- Periodic stakeholder consultations focused on water conservation efforts, wastewater quality monitoring, and community water access programs.<br>- Annual World Water Day events, engaging government agencies, NGOs, and industry stakeholders on collective water stewardship. | |
| **5.3** | *Disclose annual site water stewardship summary, including: the relevant information about the site's annual water stewardship performance and results against the site's targets.* | |
| **5.3.1** | *A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.* | Yes |
| Comment | The site has disclosed a summary of its quantified performance against targets for the past year. | |
| **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 has disclosed its shared water challenges and the efforts taken to address them. There is a documented record of stakeholder engagement or coordination with public-sector agencies. | |
| **5.4.2** | *Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.* | Yes |

| | | |
|---|---|---|
| Comment | The site has disclosed its shared water challenges and the efforts taken to address them. There is a record of stakeholder engagement record. There is also a Coordinating relationship with Ogun State Environmental Protection Agency on the OPS-WASH project. | |
| **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 | Site has no record of water-related compliance violations. | |
| **5.5.2** | *Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.* | Yes |
| Comment | Site has no record of water-related compliance violations | |
| **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 | Site has no record of water-related compliance violations. | |

**Photographic Evidence from Audit**

Deep well site 2.jpg

Water quality monitoring center.jpg

Filling room.jpg

Emergency shower.jpg

Water effluent.jpg

Female wash facility.jpg

Yes

Comment Key locations visited during the site tour, include borehole sites, effluent treatment facilities, water storage areas, and other relevant operational locations related to water management.

Wash Facility.jpg

Inside deep well building 2.jpg

Deep well site 2.jpg

Fire equipment.jpg

Firefight hydrant pipeline.jpg

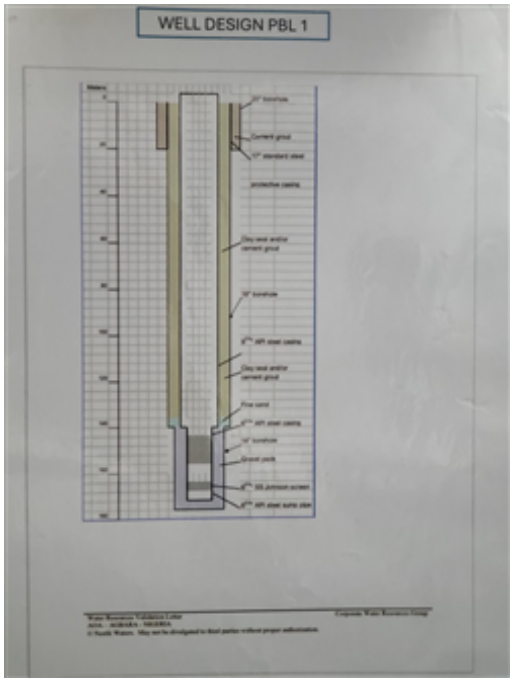
Drain.jpg


Water quality chart.jpg

effluent discharge end point filled fith debris.jpg

Borehole monitoring panel.jpg

Automated waper Map Overview.jpg




Well design.jpg

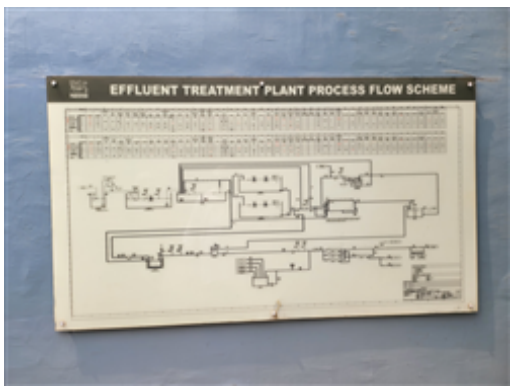
Well Room.jpg

water treatment map.jpg


Water tank.jpg

Improved Assessibility wash room.jpg


SOP maintenance log on display.jpg




Effluent treatment process flow.jpg


Borehole permit.jpg

Agbara estate ltd effluent discharge end point.jpg


Filtration system.jpg

Water quality monitoring center.jpg

Packing room.jpg

Wastewater treatment plant.jpg

Female wash facility.jpg

Inflow- WWTP.jpg


Borehole permit 2.jpg

Emergency shower.jpg

Water pump.jpg

Document review in progress.jpg


Maintenance SOP.jpg

| Previous Findings | | |
|---|---|---|
| | *All non-conformities raised in the previous audit have been satisfactorily closed.* | Yes |
| Comment | All previous findings have been closed. | |