

Alliance for Water Stewardship (AWS)

Audit Number: AO-001643

SITE DETAILS

Site: Nestle Waters Herrera del Duque

Address: Polígono Industrial El Borbollón, num. 7, 06670, Herrera del Duque, SPAIN

Contact Person: Ivan Alvarez

AWS Reference Number: AWS-000391

Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Core

Date of certification decision: 2025-Sep-17

Validity of certificate: 2028-Sep-16

AUDIT DETAILS

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

Audit Type(s): Re-Certification Audit

Audit Start Date: 2025-Jul-01
Audit End Date: 2025-Jul-03
Lead Auditor: Ina Ballik
Audit team participants:
Ina Ballik, Lead Auditor

Site Participants:

Marcos Riviere de Alvear, Factory Manager Herrera del Duque Iván Álvarez del Blanco, NiM Water Resources & NW Sustainability Álvaro Horcajo Rodríguez de la Rubia, Engineering & Sustainability Manager Maria José Muñoz Rodriguez, SHE Manager Jessica Arango Argarita, Quality Manager

AUDIT TIMES

Dates	Audit from	Duration	Auditor	Description
2025-Jul-02	09:30:00 - 17:45:00	08:15	Ina Ballik	
2025-Jul-03		08:15	Ina Ballik	
2025-Jul-01	09:30:00 - 18:00:00	08:30	Ina Ballik	

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ADDITIONAL INFO

Summary of Audit Findings: During the recertification audit three (3) non-conformities and seven (7) observations were raised.

The Client is requested to perform a root cause analysis and define corrective actions for each non-conformity and to submit these to WSAS within 7 days of receipt of the audit report, by 14 August 2025.

The non-conformities must be closed within 90 days of the end of the audit. In order to meet this timeline evidence is to be submitted to WSAS (within 75 days) by 17 September 2025.

The audit team recommends re-certification of Nestlé Waters España (NWE) – Herrera del Duque factory at Core level, pending closure of the non-conformities.

CLOSURE OF FINDINGS AND CORRECTIVE ACTION PLAN:

The Site has successfully closed all Non-conformities.

Scope of Assessment: The scope of services covers the recertification audit for assessing conformity of Nestlé Waters España ('NWE' hereafter), Herrera del Duque factory against the AWS International Water Stewardship Standard Version 2.

The NWE bottled water facility in Herrera del Duque is located in the Extremadura region of Spain, specifically within the province of Badajoz. It is situated directly in the heart of La Siberia Extremeña, a significant portion of which is recognized as a UNESCO Biosphere Reserve. The nearest town is Herrera del Duque itself, with the facility likely located a few kilometres outside the urban centre.

This area is characterized by its unique geo-hydrological features. It lies within the Guadiana River basin, a major river system on the Iberian Peninsula. The landscape is dominated by ancient mountains and is rich in natural water sources, including springs (manantiales), which are the fundamental source for the bottled water production. The region is also notable for numerous reservoirs such as the Cíjara Reservoir, which is close to Herrera del Duque and plays a significant role in the regional water landscape. The presence of these reservoirs and the underlying geology contribute to a complex hydrological network.

The facility's primary process activity is the bottling of natural spring water. This involves extracting water from a designated springs, i.e. Las Jaras for NWE's key product "Nestlé Aquarel" within their brand portfolio, and Encinas for the "Fuente Dehesa" brand. Before bottling, the spring water undergoes minimal treatment to preserve its natural mineral composition. The facility has six (6) production lines, four (4) filling and two (2) injection. The output of the facility is bottled natural spring water.

The audit was conducted onsite from the 01-03 of July 2025.

The onsite site visit included the assessment of the direct surroundings of the factory, including: the public water fountain to the south and next to well #1, the recreational grounds embracing the afforested area adjacent to the creek, on-site water-related infrastructure (such as the surface and rainwater drains, gutters, discharge points etc.), the chemical and waste storage areas including the bottle shredder (for non-conforming products), WASH facilities and production line 1.

FINDINGS

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NUMBER OF FINDINGS PER LEVEL

Observation 7 Non-Conformity 3



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FINDING DETAILS

Finding No: TNR-018650

Checklist Item No: 1.2.1 Status: Open

Finding level: Observation

Checklist item: Stakeholders and their water-related challenges shall be identified. The

process used for stakeholder identification shall be identified. This

process shall:

- Inclusively cover all relevant stakeholder groups including vulnerable,

women, minority, and Indigenous people;

- Consider the physical scope identified, including stakeholders,

representative of the site's ultimate water source and ultimate receiving

water body or bodies;

- Provide evidence of stakeholder consultation on water-related interests

and challenges;

- Note that the ability and/or willingness of stakeholders to participate

may vary across the relevant stakeholder groups;

- Identify the degree of stakeholder engagement based on their level of

interest and influence.

Findings: The site has worked with vulnerable groups like elderly or disabled

population in the past via local NGOs e.g., Cruz Roja, but has not

incorporated these stakeholder groups into their database.

Finding No: TNR-018734

Checklist Item No: 1.3.1 Status: Open

Finding level: Observation

Checklist item: Existing water-related incident response plans shall be identified.

Findings: The site may want to evaluate whether or not updating one of the

water-related responses/response plans in the SOPs is required, based on the fact that one of outcomes of a recent drill (see indicator 3.9.3.), led to the site lowering the set point of the buffer tank from 40m3 to

35m3 to prevent future overflow scenarios.



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Audit Number: AO-001643

Finding No: TNR-018624

Checklist Item No: 1.3.7
Status: Closed

Finding level: Non-Conformity

Due date: 2025-Oct-02

Checklist item: 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.

evaluation of the plan in 4.1.2.

Findings: Whilst the most relevant annual water-related costs associated with the

site's water stewardship activities are identified and documented, costs incurred for stakeholder engagement activities, permit fees, energy costs to move, treat heat or cool water or ongoing maintenance of water resources and water-related infrastructure e.g. the three operational

wells, water meters, pumps, etc. are currently not identified.

There is also no comprehensive quantification of the potential revenues

and/or description of social, cultural, environmental, or economic

water-related value generated by the site.

Corrective action: Update excel file 1.3.7. with a full collection of all potential water related

cost , quantify revenues & social, cultural & environmental water-value

generated

Evidence of implementation: We have added different impact view descriptions beyond the

economical. There is more detail in Social, Culture, Environment, etc. as well as a more detai in the the economical part we devote for the AWS

in our current operation

TR Comment, 16 September 2025: the site has updated its

water-related costs, additionally it has identified the water-related value.

Finding No: TNR-018640

Checklist Item No: 1.3.8 Status: Open

Finding level: Observation

Checklist item: Levels of access and adequacy of WASH at the site shall be identified.

Findings: It is not clear if the site has considered the number of contractors on site

in their evaluation of adequacy of WASH facilities.

WSAS WATER STEWARDSHIP ASSURANCE SERVICES

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Audit Number: AO-001643

Finding No: TNR-018641

Checklist Item No: 1.5.5 Status: Closed

Finding level: Non-Conformity

Due date: 2025-Oct-02

Checklist item: Important Water-Related Areas shall be identified, and where

appropriate, mapped, and their status assessed including any threats to people or the natural environment, using scientific information and

through stakeholder engagement.

Findings: Although the site has taken steps to improve various Important

Water-Related Areas (IWRAs) based on their status, their identification and mapping within the catchment area remain unclear—including the

public water fountain that provides safe drinking water.

Corrective action: Re-assess & list Important- Water- Related Areas at site & catchment

level, include public fountain service.

Map & evaluate the status, including risks, threats people or the natural environment; identify action/projects to maintain/improve these IWRAs

Evidence of implementation: Important Water-Related Areas (IWRAs) mapping.

TR Comment, 16 September 2025: The site has provided a list of Important Water Related Areas in the catchment area, including the public water fountain. The IWRAs have been mapped and their status

has been assessed.

Finding No: TNR-018629

Checklist Item No: 1.6.1 Status: Open

Finding level: Observation

Checklist item: Shared water challenges shall be identified and prioritized from the

information gathered.

Findings: Whilst the site has identified shared water challenges (SWCs) with their

stakeholders, some of the SWCs are worded in a generic manner e.g. 'water quantity', 'water quality', or 'climate change', which limits the usage value as input to STEP 2 when planning actions to address the

identified SWCs.

The site is considering various factors to determine the prioritization of the identified SWCs and they can justify their reasons behind their resulting prioritisation; however, a systemic method hasn't yet been described and/or clearly documented to allow a replication of these

priorities.



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Finding No: TNR-018733

Checklist Item No: 1.7.2 Status: Open

Finding level: Observation

Checklist item: Water-related opportunities shall be identified, including how the site

may participate, assessment and prioritization of potential savings, and

business opportunities.

Findings: Potential savings of converting the identified opportunities are not yet

comprehensively assessed.

Finding No: TNR-018630

Checklist Item No: 1.8.1
Status: Open

Finding level: Observation

Checklist item: Relevant catchment best practice for water governance shall be

identified.

Findings: The site has identified several good practices for each of the five main

AWS outcomes, but has not yet included the sources of the information. It was also noted that a few examples listed as BP are actually only good practice, common practice, or a minimum requirement of the AWS

Standard.

WSAS WATER STEWARDSHIP ASSURANCE SERVICES

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Audit Number: AO-001643

Finding No: TNR-018651

Checklist Item No: 2.3.2 Status: Closed

Finding level: Non-Conformity

Due date: 2025-Oct-02

Checklist item: A water stewardship plan shall be identified, including for each target:

- How it will be measured and monitored

- Actions to achieve and maintain (or exceed) it

Planned timeframes to achieve itFinancial budgets allocated for actions

- Positions of persons responsible for actions and achieving targets

- Where available, note the link between each target and the

achievement of best practice to help address shared water challenges

and the AWS outcomes.

Findings: (a) In some cases the wording of the targets does not allow an effective

performance evaluation as the performance evaluation and/or results use different metrics, which complicates the site's performance in light

of its actions and targets as required in indicator 4.1.1.

(b) The site's WSP contains targets for four of the five main AWS outcomes; i.e., there is no target set for Safe Water, Sanitation and

Hygiene for all (WASH).

Corrective action: (a) Review & update excel file 2.3.2 Water Stewardship Plan including

better target definition & perfomance evaluation

(b) Complete Nestlé WASH selfassessment tool & update 2.3.2 excel

file with project/actions & targets to improve WASH outcome.

Evidence of implementation: (a) Reviewed & updated excel file 2.3.2 Water Stewardship Plan

including better target definition & perfomance evaluation

(b) update 2.3.2 excel file with project/actions & targets to improve

WASH outcome.

TR Comment, 16 September 2025: The site has updated its Water Stewardship Plan and has included the following points: WASH targets.

goals with specific targets, actions and results.

Finding No: TNR-018652

Checklist Item No: 5.2.1 Status: Open

Finding level: Observation

Checklist item: The water stewardship plan, including how the water stewardship plan

contributes to AWS Standard outcomes, shall be communicated to

relevant stakeholders.

Findings: The site's annual summary of AWS-related performance including the

results of the WSP implementation does currently not contain any information on how the site contributes to one of the five main AWS outcomes i.e. Safe Water, Sanitation and Hygiene (WASH) [related to

non-conformity raised in indicator 2.3.2.]



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Keport	Details	

Report	Value
Report prepared by	Ina Ballik
Report approved by	Monserrath Zamora
Report approved on (Date)	4 August 2025

Surveillance

Proposed date for next audit

2026-May-05

Comment Q2 2025, spring time preferable

Stakeholder Announcements

Date of publication Location

https://empresa.nestle.es/es/gestion-

medioambiental/gestion-agua

Comment The

The announcement of the recertification, initially planned for the end of May 2025, was posted for public display by the Secretary of the Mayor's Office Herrera de Duque City Council, in the local language i.e. Spanish.

Additionally, the stakeholder announcement was published on Nestlé Water's website [https://empresa.nestle.es/es/gestion-medioambiental/gestion-agua].



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Catchment Information

Catchment Information



Benazaire watershed.jpg



Guadiana River basin.jpg



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Comment

The site is located in La Siberia Biosphere Reserve (LSBR) and depends on the Guadiana basin as the main catchment, with its smaller sub-catchment, Benazaire, located within. The site discharges into the small Benazaire stream that runs next to the facility, which then flows into the long Guadiana River flowing westwards through Spain and eventually crosses the boarder with Portugal. It discharges into the Gulf of Cádiz (Atlantic Ocean) between the Spanish town of Ayamonte and the Portuguese city of Vila Real de Santo António).

La Siberia is a unique landscape defined by its impressive freshwater resources. It is one of Spain's most significant freshwater coastlines, with five large reservoirs (Cíjara, García Sola, Orellana, La Serena, and Zújar) along the Guadiana and Zújar rivers. La Serena, in particular, is the largest reservoir in Spain and the second largest in Europe, holding a significant portion of Spain's water resources. The vast reservoirs create a distinctive landscape with natural beaches and opportunities for water sports like sailing, fishing, and canoeing, which is rare for an inland area. This gives the region the nickname of "the largest inland coast in Spain" and makes it a vital water source for the country.

A significant portion of the reserve (43.27%) is part of the Natura 2000 Network, with four Special Protection Areas for Birds (SPA) and seven Special Conservation Areas (SCA), along with a Ramsar site (Embalse de Orellana).

The site withdraws its water from Encinas and Jaras springs, which draw water from a fractured hard-rock aquifer in the regional aquifer quartzite unit at Herrera del Duque, primarily composed of crystalline quartzite. This geological setting is part of the Iberian Massif, which consists of ancient Paleozoic metamorphic rocks. The spring water is the only water source used at the site, i.e., there is no complementary service provider.

Water shortage or flooding are not identified issues in the catchment, i.e. not in the past nor in the short- to mid-term future. The catchment is located within the La Siberia Reserve, which gives is outstanding water quality features as described above and in the section 'Scope of the assessment'. Whilst Spain has a long history of utilizing inter-basin water transfers (IBWTs) as a primary strategy to address water scarcity, there are no IBWTs applicable to this site. The catchment is within a Mediterranean climate with semi-arid tendencies.



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Client Description and Site Details

Client/Site Background



Site boundary.jpg



NWE aerial.jpg



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Comment

The NWE factory in Herrera del Duque is located in the Extremadura autonomous community of Spain, specifically within the province of Badajoz. Herrera del Duque is a municipality in the southeast of the province of Badajoz, known for being part of the "La Siberia Extremeña" comarca (natural region) and for its natural surroundings, including being integrated into the Cíjara Regional Reserve. The area, known as "La Siberia Extremeña," is part of a natural reserve and is characterized by a rich flora and fauna. The site is located within the La Siberia Biosphere Reserve, which was designated by UNESCO in 2019.

The site produces two brands of bottled mineral water, "Nestlé Aquarel" and "Fuente Dehesa", in different size formats from 33cl up to 8l. All water usage on site is spring water withdrawn from Las Jaras and Encinas springs, including the water used for WASH facilities, fire system, industrial cleaning purposes and the cooling towers. Depending on the use, the site deploys different treatment technologies.

- 1. Water sources on site (wells, connection to municipal water supply, etc): The site withdraws mineral spring water from 3 wells; they are not connected to municipal water supply.
- 2. Water treatment facilities: The site currently uses a two-step filtration and ozone treatment.
- 3. Water use for production: The site's main use of water is for their product, i.e. bottled water. Ancillary water usage is for CIP, cooling towers, fire water system, and WASH facilities.
- 4. Wastewater treatment facilities: The site operates a simple three-step biological treatment plant for the site's sewage water, that is, post-treatment, comingled with process water (mostly non-conforming product, some from industrial cleaning i.e.CIP) before being discharged into the nearby Benazaire stream.
- 5. Cooling towers: the site operates four (4) common i.e. evaporative cooling towers.
- 6. Rainwater harvesting infrastructure: There is no rainwater harvesting in the classical sense; i.e., the rainwater is benefitting the surrounding landscape and replenishes the Benazaire stream. The site's rainwater infrastructure (roofs) collects and discharges to their surrounding.
- 7. Stormwater management infrastructure: same as above.
- 8. Fire water: the site's fire water infrastructure is fed by the spring water.

As of July 2025, the site employs a total of 140 employees, 68 of them in production. The site operates a two shift system with the 'main productivity season' over the summer months. The site's main square footage is occupied by the production area with four (4) production lines, and the logistics and FG warehouse. Ancillary buildings/areas are the offices, a small on-site laboratory, logistics and auxiliary service areas, and outside chemical and waste storage areas including a small recycling area for non-conforming product.

Summary of Shared Water Challenges

Summary of Shared Water Challenges

Comment

The main shared water challenges (SWCs) in the region are:

- sustainable long-term access to sufficient water (water quantity)
- maintenance of good water quality/improvement of water quality (water quality)
- maintaining or restoring local biodiversity (climate change and ecosystem recovery)
- managing risk due to extreme weather events (flood risk/extreme events)
- restoration and maintenance of healthy ecosystems (biodiversity, IWRA

maintenance/improvements, allochthonous Species management)



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STEP 1: GATHER AND UNDERSTAND

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

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



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

Comment

The site has several P&IDs for their water-related infrastructure: two P&IDs for the extraction-related water infrastructure, and a separate map for sewage and process water related infrastructure. Both process and sewage water eventually comingles at the north-eastern corner of the site, before being discharged to the adjacent Benazaire Stream. The site's sewage treatment (from security booth and office complex) is a simple three step biological treatment at the north-western corner of the site. The water composition discharged to the Benazaire stream consists of approximately 99.5% process water and 0.5% sewage.

The site is only extracting from one aquifer, but two distinct water sources, i.e. Encinas and Jaras. They operate three wells: Well 1 and 2 are extracting from the Encinas spring for the Fuente Dehesa brand, and Well 3 extracts from the Jaras spring for their Aquarel brand.

The Armorican Aquifer near the Nestlé Waters plant, particularly around the Jaras 3 well, provides suitable water flows at surface levels. Jaras 3's recharge zone lies entirely within the Armorican Quartzite. This is supported by low mineralization and moderate water temperature. In contrast, wells Encinas 1 and 2 are recharged from the "Pochico beds" south of the Borbollón fault, indicated by higher mineralization, though water temperature suggests possible deep circulation linked to the Armorican Quartzite.

The site's rainwater- related infrastructure is available on paper only, (not digitized yet) in a 2004 plan.

The site relies on the Benazaire sub-catchment for both extraction and discharge, which is part of the larger Guadiana basin. The Guadiana basin is a large, transboundary river basin shared by Spain and Portugal.

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



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1.2.1 Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall:

Q Obs.

- 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.

Comment

The site has identified their key stakeholders, and documents the results in the Nestlé corporate online tool (CRP2025). One of the site's most important stakeholder relationships is with CEDER La Siberia (La Siberia Rural Development Center Association), which is a non-profit association/Local Action Group responsible for implementing Participatory Local Development Strategies for the La Siberia region, co-financed with European Funds. CEDER promotes the participation of all sectors involved in the economic, social, political, and cultural life of the region: city councils, economic and social associations, and cooperatives, therefore NWE is a core collaborative partner for many years. CEDER's local objectives, such as Improvement in the quality of life and the competitiveness of the rural economy, with special attention to women, the elderly, and youth, are well aligned with NWE's AWS journey, which makes this stakeholder relationship especially constructive and important, also for the future. NWE is not an official partner of CEDER at the time of this Re-certification audit, but the site is striving towards becoming one, as was discussed during the audit.

La Siberia region contains 18 municipalities, of which 11 municipalities are included within the UNESCO La Siberia Biosphere Reserve.

All identified stakeholders are entered into the CRP2025, with the broader categories being local authorities, businesses, or local population. They are then ranked in terms of favourable, neutral, some tensions, or major tensions.

There are no distinct groups within mainland Spain that are typically identified and officially recognized as "Indigenous peoples".

Indicators 1.5.1, 1.6.1 and 3.9.1 contain evidence on the site's ample engagement with stakeholders on water challenges.

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.



Comment

The site also uses the CRP tool mentioned in indicator 1.2.1 to evaluate and determine the current and potential degree of influence between site and respective stakeholder, not limiting their evaluation to the sub-catchment (Benazaire) but extending it to the wider Guadiana basin.

- 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.

Q Obs.

Comment

The site has, based on its ISO14001 assessment, identified eight (8) incident scenarios, three (3) of which are water-related; i.e. oil spill, chemical spill, wastewater spill. The corresponding SOPs outlining the responses/respective response plans are in place, dated 2019.

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

Yes

Comment A simplified mapping of the flows is available in .pptx format < 1.3.2 Balance hídrico Herrera

del Duque 2024>.

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

Yes

and low variances shall be quantified.

Comment The site is upgrading to the Aquassay water efficiency and the digitalization of water management system for water mapping, and providing the input data for the site's water balance. The majority of the site's meters are already hooked up to Aquassay and the site

aims to connect all remaining meters by the end of this year (2025).

The site's 2024 water balance calculations indicate that 85.9% of the water extracted from the Encinas and Jaras springs was used in the product. Meanwhile, 9.3% was discharged through the site's wastewater treatment plant (WWTP) following various industrial uses (e.g., boiler, cooling towers, CIP, purges). The remaining 4.8% is considered "loss," which includes evaporation from the four cooling towers.

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 Well water quality is tested by three different laboratories:

1. In France (Vittel once per year, most recent reports reviewed 12 Mar 24 and 28 Mar 25),

2. On-site laboratory (daily)

3. Independent laboratory in Spain CNTA (every 5 years, most recent report reviewed 19 Oct 20)

Water quality used for the procuct is also tested by three different laboratories:

- 1. On-site laboratory (daily, SAP and .xlsx)
- 2. Vittel (three times a year)
- 3. CNTA (quarterly13Jan25)

Effluent-related discharge water quality testing:

- 1. External lab Tentamus (monthy testing of COD, BSB5, SS and annual summary, most recent summary report reviewed for period Mar24-Feb25)
- 2. On-site laboratory (COD, pH)
- 3. Once a year external unannounced effluent quality parameter check by Guadiana basin Administration (last report reviewed 08 May 2025).

None of the reviewed reports showed abnormalities or gave rise to concern.

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



Comment

The site stores oils, chemicals for water treatment, cleaning and biocides against Legionella in four cooling towers. Additionally, the site operates a shredder outside in the small recycling area, which is a potential source of microplastic pollution.

Additionally, there are two potential sources of hydrocarbon i.e. diesel pollution on site, at the loading bays (one of the trucks loosing diesel) or from the diesel storage tank at the fire pump house (during tank refill).

The potential pollution sources are mapped and the site holds a separate register of chemical substances.

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1.3.6	On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural Yes values.
Comment	There are no on-site Important Water-Related Areas, but the entire site is located in what can be considered an IWRA; i.e. the La Siberia Biosphere Reserve (LSBR).
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.
Comment	The most relevant annual water-related costs are identified and documented; currently identified cost items for - the mineral water source are: canon, process filters, CIP products, Analysis, and for - the residual water/effluent: treatment chemicals. Finding No: TNR-018624
	1 maing No. 1NN-010024
1.3.8	Levels of access and adequacy of WASH at the site shall be identified. Q Obs.
Comment	The site has identified, mapped and quantified the site's WASH facilities. The site has 140 employees, which work in a three shift system, with a maximum shift size of 42 male and 17 female workers between 10-14:00.
	National WASH requirements are stipulated in Royal Decree 486/1997, of April 14, which is supplemented by the Technical Guide for the assessment and prevention of risks related to the use of workplaces. As verified during the site tour, there are enough WASH facilities (basins for all categories of workers, taking account of gender and mobility.
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	There is no embedded water use of primary inputs; not applicable.
1.4.2	The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.
Comment	Not applicable. See indicator 1.4.1.
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.



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Comment

The site identified a plethora of water governance initiatives, including catchment plan(s), water-related public policies, major publicly-led initiatives under way, and aligned relevant goals within their WSP to help them convert feasible opportunities for water stewardship collective action.

Examples include water governance initiatives defined and lead by LSBR, Badajoz Provincial Council, and Ceder Siberia (with EU funding). Those entities form the 'Reserva Foundation' with whom the site is collaborating on a majority of projects and initiatives. The site is also seeking actively pursuing collaboration with Guadiana Hydrographic Confederation for support the their Hydrological Plan for the Guadiana River Basin District for the 2022-2027 Cycle (Plan Hidrológico de la Demarcación Hidrográfica del Guadiana. Ciclo 2022-2027), and working closely with the Extremadura Board (Junta Extremadura) and the City Council. All partnering entities are also listed in the file mentioned in indicator 1.6.1, directly linked to the site's respective initiative to address SWCs. This could even be considered a best practice in terms of direct traceability of shareholder engagement, and transparent water governance initiatives to address SWCs.

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



Comment

Water-related legal and regulatory requirements are identified based on the site's ISO 14001 requirements to identify all relevant environmental legal and regulatory requirements, also known as 'legal register'.

The site is subscribed to an online software "CTAIMA Legal" offered by an independent third party provider. They identified (and keep identifying) all legal requirements for NWE and the site, and also audit the site's compliance on a regular basis. The site can login to their software at any given point in time and request a legal compliance status report. The site last used this service and generated report on the 19 Jun 2025.

A total of 73 water-related legal requirements are currently identified, of which 60 are compliant, 0 non-compliant, 2 'in process' and 11 'Pending evaluation'.

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



Comment

NWE has commissioned TARH to conduct a revision of the vulnerability study and well head protection areas of the Herrera del Duque bottling plant. The final report from Dec 2024 was made available and was reviewed during the audit to conclude the status of the catchment water-balance. The report states that, taking into account a safety factor of 30% i,e, not extracting all possible recharged water, overall extractions are already close to the availability of the water resources. However, the monitoring of water levels shows no signs of depletion, as they have remained stable for more than the last 10-year monitoring period.

The report's recommendation is for enhanced monitoring i.e. keeping a sound aquifer monitoring program to understand the effects of natural recharge and withdrawals' impacts, but concludes that the bottling plant continues to operate within the sustainability limits of the regional water resources.

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.





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Comment

There is no threat to good water quality. The report mentioned in indicator 1.5.3 also contains conclusions about water quality, stating e.g., contaminant sources are scarce, making the Herrera del Duque bottling plant site an excellent location from this perspective. Human activity in the area appears to be minimal and stable, with very low levels of anthropogenic influence. No significant changes have been observed since TARH's last assessment in 2017.

The catchment water quality, including physical, chemical, and biological status is publicly available information

https://www.chguadiana.es/cuenca-hidrografica/calidad-y-estado-de-las-masas-de-agua/agua s-superficiales. Excellent data quality is being provided at national level, which is remarkable. An annual summary report is also prepared by the government, with the last available report being from 2023 (2024 data is still processed).

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.



Comment

The site invested significant resources to identify IWRAs within the BRLS, which is remarkably in rich biodiversity, with over 1,000 plant species, over 2,000 animal species, and approximately 50 fungus species. The site financed various studies and most recently a study across 11 villages within the BRLS, identifying 43 new entries into the IWRA inventory (e.g., wetlands, reservoirs, seasonal water systems, etc.). Using the obtained scientific information and working closely with their key stakeholders, the site continues to enhance its understanding of the status of these areas and develops and implements various meaningful initiatives to restore and maintain their local IWRAs, which was positively highlighted in both stakeholder interviews. See section 'Stakeholder interviews' of this report, and indicator 3.9.1 also.

Additionally, during the site tour, the water fountain appr. 100m South of the factory boundary that allows access to safe drinking water to the public was also visited. The site, the site has established a maintenance plan, and keeps a site register of the regular maintenance (weekly) of and upkeep of the fountain and the surrounding area, including tasks such as cleaning, removing litter, gardening, etc. The site has also installed some boards providing information on the aquifer and local biosphere a few years ago.

The site has provided a document that includes the work carried out during the 2024 fiscal year to improve the aquatic habitat and native fish species present in the Benazaire Stream, especially for the jarabugo (Anacypris hispanica), a species classified as "Endangered."

Finding No: TNR-018641

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





Alliance for Water Stewardship (AWS)

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Comment

The site has identified its own wells and pipework, as well as the Canal de las Dehesas, which is of vital importance to irrigators in the area surrounding Orellana la Vieja, Acedera, Navalvillar de Pela, Puebla de Alcocer, and several other towns.

Together with the Comunidad de Regantes del Canal de las Dehesas and CHG, they have identified the compromised status of this canal, specifically, significant leakage and water losses. In response, they collaboratively worked on the canal's impermeabilization using HDPE geomembrane in 2024. Refer to indicator 4.3.1.

The site has also identified a new revision of the Hydrological Plan for the Guadiana river basin district, established for the 2022–2027 period and aligned with the Water Framework Directive. This revision includes updates to water-related infrastructure and a revised Program of Measures that builds on the 2016–2021 plan. The updated plan incorporates new contributions and confirmed financial commitments, primarily from Spain's General State Administration, with a total budget of €1.405 billion for the 2022–2027 period.

Potential exposure to extreme events in the local context has been identified in the revision of the Vulnerability Study and Well Head Protection Areas of the Herrera del Duque Bottling Plant. These events include floods and droughts, landslides and rockfalls, earthquakes, forest fires, and others.

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



Comment

Herrera del Duque is a small village with less than 5000 inhabitants, no refugee shelters or homeless people. WASH services are deemed adequate.

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.



Comment

The site identified the following Shared water challenges (SWCs) with their stakeholders:
- water quality (maintenance and improvement in sub-catchment, and improvement outside Biosphere Reserve)

- sustainable management of water quantity
- climate change and river ecosystem recovery
- extreme events (e.g. flooding)
- biodiversity, IWRA maintenance and improvement, non-native species management and native species protection
- fighting depopulation and promoting sustainable water tourism

1.6.2 Initiatives to address shared water challenges shall be identified.



Comment

The initiatives to address SWCs are identified in the evidence provided for indicator 1.6.1. All initiatives identified in point 1.5.1, which lists all the basin's water initiatives, as well as key documents such as the Hydrological Plan, among others, are included in column I.

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.



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Comment The site identified seven risks, documented in an excel file. Based on a 4 by 4 matrix, for

likelihood and severity, they determined five as high risk, one medium risk, and one as low risk. The file also identifies the potential business impact and costs, not in monetary terms,

but using qualifiers such as moderate, negligible, etc.

1.7.2 Water-related opportunities shall be identified, including how the site

may participate, assessment and prioritization of potential savings, and

business opportunities.

Comment The identified opportunities are contained in the same file mentioned in indicator 1.7.1. in

columns K, L, and M, and how the site can participate is listed in column O.

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.

Q Obs

Q

Obs.

Comment The site's WSP lists the identified good practices on a separate tab (third tab < 1.8 Buenas

prácticas en el site>).

Overall, the site identified eleven (11) BPs related to water governance, examples include: close collaboration with stakeholders/implementation of CRP (Community Relations Process), collaboration with public authorities, participation in sectoral technical and environmental committees, participation in activities on water management and sustainability issues, celebration of World Water Day, internal audit of water resources by corporate expert personnel, etc.

The tab is actually called "good" practices (translated from Spanish), not "best" practices, which the site may want to consider challenging when evaluating the observation that was raised during this audit that applies to all indicators in 1.8.

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 identified seven (7) good practices related to water balance e.g., Monitoring

piezometric levels/meteorological data, climate change vulnerability study, installation of used water recovery system, Analysis of water consumption trends and proposals for annual

improvements, etc.

Please also refer to the observation raised in 1.8.1 that applies to all indicators in section 1.8.

1.8.3 Relevant sector and/or catchment best practice for water quality shall be

identified, including rationale for data source.



Comment The site has identified five (5) good practices related site/catchment water quality e.g., NQAC

analysis of wells, water quality improvement projects (CIP system + treatment plant), conducting environmental drills: discharge of wastewater, discharge of raw water, etc.

Please also refer to the observation raised in 1.8.1 that applies to all indicators in section 1.8.

1.8.4 Relevant catchment best practice for site maintenance of Important

Water-Related Areas shall be identified.



Comment The site identified five good practices (5) related to the maintenance of IWRAs, e.g.,

Alignment of priorities with those of the basin and important water areas, IWRA inventories,

recovery of riparian forests on the Benazaire River, etc;

Please also refer to the observation raised in 1.8.1 that applies to all indicators in section 1.8.

1.8.5 Relevant sector and/or catchment best practice for site provision of

equitable and adequate WASH services shall be identified.



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Comment

The site identified four (4) good practices related to WASH, e.g. continual maintenance of public water sources, like the spring water fountain south of the facility; collaboration with city councils on water supply during periods of excessive municipal water demand (please refer to indicator 3.9.5); collaboration with PROMEDIO on the regeneration project to improve the quality of wastewater treatment plants; and the regular review of the site's WASH checklist, analysis of results, and resulting action plan, if necessary.

Please also refer to the observation raised in 1.8.1 that applies to all indicators in section 1.8.



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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.

Comment The publicly available commitment is signed by Business Executive Officer (BEO) NWE, and

the Factory Director, dated March 2025. https://empresa.nestle.es/sites/g/files/pydnoa431/files/2025-04/2-1-1-compromiso-liderazgo-c ustodia-aqua-hdd.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.
- Comment See indicator 1.5.2 regarding the system to maintain com

See indicator 1.5.2. regarding the system to maintain compliance obligations.

The responsible persons/positions within facility are identified documented in an organizational structure > organizational chart AWS Factory Organization, reviewed during the on-site assessment.

The process for submissions to regulatory agencies is a shared responsibility between SHE Manager/Sustainability champion and the site's Quality Manager.

Annual reporting to Confederación Water quality reporting> SHE Manager Annual reporting Tecminsa each Q1 for water quantity/ extraction QA Manager a Dept Minas last sent in May 2025.

- 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.



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Comment

The overarching NWE water stewardship strategy is inherently aligned with The Nestlé Waters Pledge [https://www.nestle.com/sustainability/water/pledge-positive-water-impact], and as such the overarching strategy for al NWE facilities globally. The pledge encompasses five steps:

- 1. saving water,
- 2. protecting the quality of natural water sources and catchment,
- 3. sharing knowledge,
- 4. contributing to communities and
- 5. certifying all sites to the Alliance for Water Stewardship Standard by 2025.

At site level, the more tailored local strategy and corresponding objectives are captured on the second tab < Estrategia AWS 2025-27> of the site's WSP. The Nestlé Waters Pledge objectives translate into the site's objectives as follows:

- 1. saving water > Water Usage Ratio (WUR) of 1.14 for 2025
- 2. protecting the quality of natural water sources and catchment > Discharge water quality within compliance parameters i.e. zero non-compliances/deviations in 2025
- 3. sharing knowledge > Increase meetings or communications with key stakeholders, at least 5 in 2025
- 4. contributing to communities > Comply with the actions and activities committed to with stakeholders, at least 8 in 2025
- 5. certifying all sites to the Alliance for Water Stewardship Standard by 2025 > site seeking recertification with this audit.

The link to the 5 main AWS outcomes is made to the first tab < Plan AWS 2024-2025 HDD> in the WSP.

2.3.2 A water stewardship plan shall be identified, including for each target:



closed

- 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.

Comment

The second tab of the WSP contains the site's strategy objectives (column D), the 2025 targets (column H81:H86) and the respective monitoring in (K36:O41). Progress against targets is captured every month, rolling. At the time of the recertification audit all monitoring results up to Apr 2025 were transcribed into the WSP.

Actions to achieve and maintain are documented on the first tab of the WSP in column J, timeframes to achieve each target are established in columns R&S, financial budgets allocated for actions in column M, and positions of persons responsible for actions and achieving targets in column P.

Column I contains "good practices" and the WSP contains a separate third tab < Buenas prácticas en el site>, but those identified are not all necessarily "best" practices, just good ones. This is linked to the observation in 1.8 in relation to BPs.

Finding No: TNR-018651

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.



Comment

The site's initiatives and actions to mitigate or adapt to identified water risks that the site identified as suitable candidates to be developed in co-ordination with relevant public-sector and infrastructure agencies are listed on the first tab of the site's WSP, their collaboration partners are clearly identified in column O.

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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.
Comment	The site is demonstrating excellent engagement with key stakeholders such as their local CEDER (Centers for Rural Development) who is implementing rural development policies, especially those funded by the European Union, the Guadiana River Basin Authority, a public body in Spain responsible for the integrated water management of the Spanish part of the Guadiana river basin, and Junta de Extremadura, which is the regional government of the autonomous community of Extremadura in Spain, to name a few examples of successful and proactive engagement. Please also see indicator 3.9.1, showcasing a successful project implemented in collaboration during the past certification cycle (2023 tree planting and habitat restoration for vulnerable fish species).
	Other examples of stakeholders approaching the site with local development proposals were reviewed via various emails in 2024 and 2025 with examples being a program for the comprehensive management of endangered aquatic birds in Extremadura from the Extremadura Delegation Green Transition Advocacy Unit (May 25), a peatland intervention and conservation project proposal from the University (April 25).
	The collaboration agreement 2025-2027 for the conservation, research, and promotion of the 'La Siberia' Biosphere Reserve between the Badajoz local council and NWE further demonstrates the site's commitment to maintain fruitful collaborations and practice excellent water governance practice.
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	Not applicable, there are no distinct groups within mainland Spain that are typically identified and officially recognized as "Indigenous peoples".
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.
Comment	The site's process to verify full legal and regulatory compliance is described in indicator 1.5.2. The site can, at any given time access the software "CTAIMA legal", and draw reports on their regulatory compliance status.
3.2.2	Where water rights are part of legal and regulatory requirements, measures identified to respect the water rights of others including Yes Indigenous peoples, shall be implemented.
Comment	Not applicable; water rights are not part of legal and regulatory requirements.
3.3	Implement plan to achieve site water balance targets.
3.3.1	Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.

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Comment

The site evaluates and documents its progress towards meeting water balance targets on the first tab of the WSP, in column T, using a simple traffic light system (green=realised, orange=ongoing, red=not started). Additionally, where quantitative targets are established, they are monitored each month and tracked in the second tab (K36:N41) of the WSP.

Many of the outcomes of the implemented actions were observed during the site tour, which included surrounding areas such as the riverbank, fish ponds, newly planted trees, and the maintained public spring water well. During stakeholder interviews, the collaborative efforts were also acknowledged and commended. Additionally, the tour included a visit to the new project area dedicated to process-water reuse.

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,

Yes

reduce volumetric total use shall be implemented.

Comment

A comprehensive evaluation of the annual targets to improve the site's water use efficiency will be conducted at the end of the year, and the WSP will be updated accordingly. Whilst water scarcity is potentially a shared water challenge, enhanced by climate change, NWE has been monitoring the SWL of the aquifer since 2008, showing a stable SWL management throughout the period up to April 2025.

The site's most important KPI in relation to maintaining aquifer health and managing water efficiently is WUR = (Total Volume of Water Used in Production) / (Total Volume or Mass of Finished Product). The site made a file with daily rainfall data available for review, containing daily monitoring data from Mar 2014 to Apr 2025, based on which monthly and annual data are calculated and used by the site as input for their WSP. Please also refer to indicator 3.9.2.

3.3.3 Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.



Comment There is no legal obligation to re-allocate water social, cultural or environmental needs.

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.



Comment

The site tracks its status of progress towards meeting water quality targets on the second tab of the WSP (K38:N41).

The collaborative initiatives significantly contribute to maintaining and improving water quality within the catchment area. Additionally, the 2024 external laboratory report on effluent parameters was reviewed and found to be compliant, with all values falling within the applicable regulatory limits.

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.



Comment

Whilst water quality is potentially identified as a shared water challenge, it is a lesser concern within the BRLS and more of a concern outside of the BRLS. The site's actions to maintain and improve water quality in the catchment are included in the WSP, column J on the first tab. The site is improving the effluent quality monitoring, increasing the measurement frequency of their BSB5, SS, and BOD, to enable quicker reaction times in case of a parameter drift.

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.



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Comment	The site is involved in several collaborative practices (afforestation, species relocation, wetlands inventory, reducing leaks of agricultural channels etc.) to maintain and enhance the local IWRAs. There is no on-site IWRA as such. Please refer to indicators 3.1.1 and 3.9.4.
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 yes workers onsite shall be identified and where applicable, quantified.
Comment	The site operates a shift system, with the most populated shift between 10:00-14:00, i.e. 17 women 42 men. The site has adequate WASH services, compliant with "Decree 486/1997 de 14 de abril" and the technical guidelines (page 49 of 'Guía Técnica para la evaluación y prevención de los riesgos relativos a la utilización de los lugares del trabajo'). Please refer to the observation raised in indicator 1.3.8 though.
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 Yes 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.
Comment	The site is not impinging on the human right to safe water and sanitation of communities through their operations, nor are there distinct groups within mainland Spain that are typically identified and officially recognized as "Indigenous peoples". Please refer to information provided in indicator 3.1.2.
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	Not applicable, see indicator 1.4.1. There is no indirect water use.
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.
Comment	Not applicable, see indicator 3.7.1.
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	Not applicable; there is no shared water-related infrastructure for this site.
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



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Comment

Please refer to indicator 1.5.1 suggesting overall BP for the site successfully implementing best water governance practice.

One example worth highlighting as BP in terms of water governance, addressing shared water challenges (SWCs) in a collaborative manner, is the planting of 1,500 trees along the local Benazaire stream in 2023, plus an additional 400 trees in 2025 to account for the number of saplings that didn't survive. The project achieves positive holistic local impacts such as safeguarding the survival of local fish species, the Jarabugo, which is classified as Near Threatened on the IUCN RL, increased tree cover leading to more shade, lower water temperature and evaporation rates of the stream, increased resilience against soil erosion and a general restoration of the degraded habitat. The multiple benefits of this initiative are captured in a short video available to the public [https://www.youtube.com/watch? v=MakVBkEeis8].

The site has also sponsored regional ecosystem studies to allow establishing an inventory of wetlands in the area, has fostered collaborations with educational and academic institutions for enhancing ecological awareness amongst the younger generation and building a reliable foundation for collaborative programs, underpinned by scientific data.

In the past years, the site has also been involved in the annual celebrations of the International Water Day, bringing large parts of the the local community together. For example, on 01 Apr 2025 the site organised and attended the event together with the Biosphere Reserve La Siberia, attracting approximately 500 students. In 2024, the event was held on the 21st of March and was well attended by several stakeholders. The aim is to hold these annual celebrations in different villages with the biosphere reserve each year, fostering environmental education and raising awareness of the regions importance.

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



Comment

The site has been monitoring the Static Water Level (SWL) of the aquifer continually since 2008, i.e., monitoring data (every two month) is available for the period between Aug 2008 and Apr 2025, and a plotted graph showing a stable SWL was shared during the audit.

The stable SWL is a good indicator for aquifer health, and confirming sustainable extraction by the site, as a declining SWL can indicate over-extraction or drought conditions. Additionally, the site is gathering daily rainfall data at Herrera del Duque since at least 2014, based upon which they calculate monthly and annual rainfall, replenishing the underlying aquifer. The use these data as input into their WSP and set their three year rolling targets accordingly to ensure a continued sustainable management of the aquifer. The data driven exploration of the aquifer can be considered best practice.

For 2025, the site is planning further improvements to meet their challenging WUR of 1.1.4, installing a process water recuse system (quality reject and internal cleaning) with technology provider NALCO. The 'regained' water shall be used in the site's cooling towers, and/or for irrigation purposes. This project may yield up to 2,500m3 water savings, and is scheduled for imminent commissioning i.e. in July 2025.

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





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Comment

Comment

The site is regularly testing their emergency preparedness, to identify any measures to potential further improvements relating to the operation of their on-site water WWTP, which in turn, can affect the water quality as it's being discharged to the local Benazaire stream since the site is not connected to a municipal sewer network. The last drill was on 25 Nov 24, where they simulated a failure of a pump for the chemical treatment dosage (i.e. caustic) during acid water neutralization at the on-site WWTP. The failure of the said pump would trigger an overfilling of the treatment basin and this consequently would lead to potentially polluted water (outside the legal limits) to spill onto the surrounding unmade grounds. As a result of the learning from this simulation, the site lowered the set point of the buffer tank, which stops water entering the treatment plant from 40m3 to 35m3 to prevent future overflow scenarios. The Electromechanical Engineer, Technical Manager and SSAA Manager participated in this exercise.

The site also increased the frequency with which they measure their sewage parameters to allow them guicker detection of parameters drifting outside the spec.

Actions towards achieving best practice, related to targets in terms of 3.9.4

the site's maintenance of Important Water-Related Areas shall be

implemented.

Most of the site's collaborative programs are associated to the maintenance and improvement of IWRAs, please see examples in indicator 3.9.1.

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

Yes

The site financed studies to improve WWTPs operations in Guadalupe and Sta Maria, which Comment will result, if implemented by the respective municipalities, in improved water-related services,

including WASH, for the population in these municipalities.



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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 Yes evaluated.
Comment	The monthly evaluation of performance against targets and against the five main AWS outcomes is documented on second tab of the site's WSP. The most challenging target this year (2025) is the WUR of 1.14, corresponding to the target of saving water (water quantity). The process water reuse project that's currently underway is expected to address this challenge and allow the site to reach their target by the end of the year.
4.1.2	Value creation resulting from the water stewardship plan shall be evaluated.
Comment	The site's value creation (qualitative) resulting from the water stewardship plan is determined and documented on the first tab of the WSP, in column V.
4.1.3	The shared value benefits in the catchment shall be identified and where applicable, quantified.
Comment	The site's fruitful collaborations with its stakeholders, specifically the financial support to conduct ecosystem studies as well as the 'hands on' support in rescuing the Jarabugo fish (please refer to indicator 3.9.1) to other unpopulated or suitable ponds in publicly managed forests to safeguard the survival of the species over the hot and dry summer months are noteworthy examples of shared value benefits in the catchment.
	The sponsored study results provide new insights into the breadth of local ecosystems, i.e. identifying 43 different ecological features across 11 surrounding municipalities. The site also supported further studies and data collection to quantify the decrease in evaporation (I/m2) and water retention in the ground as results of prior interventions/actions like the planting of 1,500 trees along the Benazaire stream. Until now, the value created is qualitative assessment. The studies were just completed last year.
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 yes response to the incident(s) shall be evaluated and proposed preventative and corrective actions and mitigations against future incidents shall be identified.
Comment	No written annual review and root-cause analysis necessary; there were no water-related emergency incidents in the last certification cycle.
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



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Comment

Several email exchanges with stakeholders were reviewed during the audit, e.g.

- June 2025 Email to arrange a meeting with the regional government of the autonomous community of Extremadura in Spain to review the actions related to the water stewardship program, such as fish barriers, inventory of ponds, rescue of native fish farms, monitoring of fish populations, natural refuge and reproduction, use of tertiary water, and the proposal to repair of the Benazaire walkway and picnic area.
- May-June 2025 email exchange with Confederación Hidrográfica del Guadiana, the Guadiana River Basin Authority, a public body in Spain responsible for the integrated water management of the Spanish part of the Guadiana river basin on sharing first monitoring results of a collaborative action taken in 2024 to waterproof regional agricultural canal (Canal de las Dehesas Irrigation Community) to minimise water losses through leakages.
- Oct 2024 email from Regional Government of Extremadura (Directorate General of Forestry, Hunting, and Fishing Management) thanking NWE for attendance at the last Fisheries and Aquaculture Council meeting.
- 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.



Comment

The site reviews the WSP annually, typically at the end of the year. The lessons learnt are not directly documented in the WSP. The site keeps separate files for the the lessons learnt on their share drive (in 4.2), from where they are transcribed into next years actions in the WSP.



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5	STEP 5: COMMUNICATE & DISCLOSE - Communicate about water stewardship and disclose the site's stewardship efforts	
5.1	Disclose water-related internal governance of the site's management, including the positions of those accountable for legal compliance with water-related local laws and regulations.	
5.1.1	The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.	₹ Yes
Comment	The site sends a short annual summary report to each of their stakeholders, individually via email. The last report was shared in May 2025 and it contains those accountable for compliance water-related laws and regulations on Page 2.	
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.	Q Obs.
Comment	The short annual summary report that the site shares annually with its stakeholder (see indicator 5.1.1) depicts how the actions of the site contributes to each AWS Standard outcomes, with the exception of outcome 5: WASH, as the site hadn't set specific targets fo in the WSP; please refer to the NC raised in 2.3.2.	r it
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's water stewardship performance, including quantified performance against targets shared with stakeholders each year (please see indicator 5.1.1). Page 3 of the report contains a traffic light system to indicate performance against the targets and the AWS outcomes. Where targets were quantifiable, the results achieved are shared in the last column of the table.	
5.4	Disclose efforts to collectively address shared water challenges, including: associated efforts to address the challenges; engagement with stakeholders; and co-ordination with public-sector agencies.	
5.4.1	The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.	⊘ Yes
Comment	The site's shared water-related challenges are, as previously explained, almost identical wit the SWCs and the site's chosen objectives and targets. The efforts made to address these challenges are found on page 3 of the summary report (see indicator 5.1.1) in the last column	
5.4.2	Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.	⊘ Yes
Comment	Please refer to indicator 3.9.1, showcasing one of the successful initiatives that the site implemented in the past certification cycle, engaging key stakeholders and in broad coordination and support public sector agencies. These fruitful collaborations are continuing as confirmed during the stakeholder interviews.],



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5.5.1	water-related compliance violations available upon request as well as any corrective actions the site has taken to prevent future occurrences. Any site water-related compliance violations and associated corrections	
0.0.1	shall be disclosed.	Yes
Comment	There were no water-related compliance violations in the past couple of years.	
5.5.2	Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.	Yes
Comment	Not applicable, please see indicator 5.5.1.	
5.5.3	Any site water-related violation that may pose significant risk and threat	\bigcirc
	to human or ecosystem health shall be immediately communicated to relevant public agencies and disclosed.	Yes
Comment		Yes
Comment	relevant public agencies and disclosed.	Yes
Comment	relevant public agencies and disclosed. Not applicable, please see indicator 5.5.1.	Yes Ves