CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-001407

WSAS WATER STEWARDSHIP ASSURANCE SERVICES

SITE DETAILS

Site: **Princes Gate Factory**
Address: The Well Fields, SA67 8JD, Pembrokeshire, UNITED KINGDOM
Contact Person: Abigail Meyrick
AWS Reference Number: AWS-000658
Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Core
Date of certification decision: 2025-Jul-28
Validity of certificate: 2028-Jul-27

AUDIT DETAILS

Audited Service(s): AWS Standard v2.0 (2019)
Audit Type(s): Initial Audit
Audit Start Date: 2025-Mar-25
Audit End Date: 2025-Mar-27
Lead Auditor: Neringa Pumputyte

Audit team participants:
Jose Manuel Gonzalez, Observer

Site Participants:
Abigail Meyrick, Sustainability Manager
Sandra Julia, Water Resource Manager - North Europe Cluster
Liette von Cadenhead, Water Resources Manager
Daniel Chick, Water Resource Engineer
Matthew Faulkner, Factory Manager
Andrew Jones, SHE Manager

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ADDITIONAL INFO

Summary of Audit Findings: During the certification audit, 1 major non-conformity, 15 minor non-conformities, and 16 observations were raised.

The Client is requested to perform a root cause analysis and define corrective actions for each of the non-conformities and to submit these to WSAS within 30 days of receipt of the audit report by 08 June 2025.

The major non-conformities must be closed within 90 days of receipt of the report. In order to meet this timeline evidence is to be submitted to WSAS (within75 days) by 23 July 2025.

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

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

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

Scope of Assessment: The scope of services covers the Initial certification audit for assessing conformity of Nestlé Waters & Premium Beverages Princes Gate against the AWS International Water Stewardship Standard Version 2.

The Nestlé Waters & Premium Beverages UK Princes Gate factory is located on The Well Fields site, Princes Gate, Pembrokeshire, UK, around 6.75 km Southeast of Narberth town centre. The total size of the industrial site is 8.19ha. To the South and adjacently connected to the factory is a 5ha block of land which is owned by Nestlé Waters & Premium Beverages UK.

The factory is producing spring, sparkling and still water. The site has groundwater boreholes, water treatment facilities, three production lines, and small wastewater treatment facilities.

The audit was conducted on site on 25-27 March 2025.
The onsite visit included the assessment of the main water infrastructure on site and a visit to the stream that receives the site's wastewater and stormwater.

FINDINGS

NUMBER OF FINDINGS PER LEVEL

Observation	16
Minor	15
Major	1

FINDING DETAILS

Finding No:	TNR-017416
Checklist Item No:	1.1.1
Status:	Closed
Finding level:	Minor
Due date:	2026-Mar-27
Checklist item:	The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including: - Site boundaries; - Water-related infrastructure, including piping network, owned or managed by the site or its parent organization; - Any water sources providing water to the site that are owned or managed by the site or its parent organization; - Water service provider (if applicable) and its ultimate water source; - Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies; - Catchment(s) that the site affect(s) and is reliant upon for water.
Findings:	- The site identified as the site's catchment an area that comprises a sub-catchment of a water body 'Marlais – headwaters to confluence with Taf' and some adjacent villages and towns. I.e. the resulting delineated area does not meet the definition of a catchment. - Marlais is a tributary of Taf and the Taf catchment's boundaries were provided but the site did not consider this as a relevant catchment, using an argument that the site's impact does not extend to that catchment. However, the intent of water stewardship is to understand the catchment in which the site is located.
Corrective action:	1. Scope Review: The Princes Gate team will conduct a thorough review of the definition of the physical scope of the Princes Gate site to ensure alignment with the AWS (Alliance for Water Stewardship) definitions as outlined in the applicable standards. This review will include the identification and inclusion of any significant water-related areas and/or catchments pertinent to the site for effective water stewardship activities and stakeholder engagement. (Relevant areas include, but are not limited to, the Cleddau River, Taff River, and Wallis Pond). 2. Borehole Assessment: The Princes Gate team will also evaluate the status of boreholes that are currently not in use at the Princes Gate site. Detailed information regarding their status will be documented, along with justifications for their inactive status. (Minor challenged in email to Nergina on 27/05/2025) Due date to implement corrective action plan: May 2025. (Corrective action has been completed).
Evidence of implementation:	Corrective action has been completed

Finding No:	TNR-017427
Checklist Item No:	1.2.1
Status:	Closed
Finding level:	Minor
Due date:	2026-Mar-27
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:	There are some gaps and inconsistencies with identification of stakeholders' water-related challenges: - In stakeholder interviews, more water-related concerns are noted than are summarised in the stakeholder table - A sub-set of AWS stakeholders appears not to include some CRP stakeholders that have water-related interests (e.g. Princes Gate community)
Corrective action:	1. Stakeholder Re-assessment: Sustainability Manager to conduct a comprehensive review of all existing stakeholders in the Princes Gate CRP tool. Ensure that all stakeholders are correctly sub-categorised based on their influence, interest, and relevance to water stewardship activities. 2. Review of Stakeholder Interview: Analyse previous stakeholder interviews to extract water-related concerns and identify AWS stakeholders. Based on the review of stakeholder interviews and concerns, identify and categorize stakeholders relevant to AWS initiatives. 3. Stakeholder Interviews- Will reconduct a set of stakeholder interviews, specifically focusing on stakeholders which have identified water related issues in previous interviews . Implementation date of corrective action: May 2025 (Corrective action Completed)
Evidence of implementation:	Corrective action completed

Finding No:	TNR-017410
Checklist Item No:	1.3.2
Status:	Closed
Finding level:	Minor
Due date:	2026-Mar-27
Checklist item:	Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped
Findings:	Outflows to the on-site pond are not depicted in the site water map.
Corrective action:	Routes reviewed, correct route added as "overflow to Pond" on the pathway before the Tank storage. Map now reflects the correct physical layout of the system. Date of implementation of corrective action plan: 18th May 2025 (Corrective action Completed)
Evidence of implementation:	Corrective action has been completed

Finding No:	TNR-017831
Checklist Item No:	1.3.3
Status:	Open
Finding level:	Observation
Checklist item:	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.
Findings:	The values of outflows to the on-site pond in Mass Balance table are not consistent with the difference between abstracted volumes and volumes going to the tanks.
Corrective action:	Reviewed all calculations, throughout the sheet. Corrected issues, Values now correct. Date of implementation of corrective action plan: May 2025 (Corrective action completed).
Evidence of implementation:	Corrective action completed

Finding No:	TNR-017430
Checklist Item No:	1.3.4
Status:	Closed
Finding level:	Minor
Checklist item:	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.
Findings:	The site's system for tracking compliance with permit and Nestlé Waters and Premium Beverages' own limits and analysing deviations from these limits has weaknesses: - Combined effluent is tested against Nestle's own standards. There was e.g. total nitrogen result of 18 against the Nestle's own limit of 10. Explanation provided is that because foul water results are not available this was likely a one-off. However, no record of escalation, notification or investigation was provided. - Trade effluent quality results in a spreadsheet do not show exceedances but the results of internal audit indicates there were COD spikes. No record of further investigation of the internal audit results was provided. All COD deviations have been examined against Nestlé internal standards with non-breaching regulatory limits.
Corrective action:	A non-conformance log has been created to track any deviations from a Nestlé Waters and Premium Beverages' standpoint and a NRW standpoint. 'Go,see, think, do,' is carried out and actions are taken along with Root cause analysis. implementation date of corrective action: May 2025 (Corrective action completed)
Evidence of implementation:	Corrective Action completed

Finding No:	TNR-017431
Checklist Item No:	1.3.5
Status:	Closed
Finding level:	Minor
Due date:	2026-Mar-27
Checklist item:	Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.
Findings:	Transformer had an oil leak incident but is not mapped on the map of pollution sources or listed in the list of pollution sources.
Corrective action:	1. Objective: Add the transformer as a pollution source on the pollution sources document and location on the site map Implementation date of corrective action plan: May 2025 (Corrective Action Completed).
Evidence of implementation:	Corrective action has been completed

Finding No:	TNR-017415
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:	On-site pond is important for the site to manage and to monitor but it hardly has values for the catchment or community or notable value for biodiversity.
Corrective action:	1. Review of onsite IWRA: Sustainability Manager and Water Resources Manager to complete a review of listed IWRA on-site. Information and characteristics need providing for justification of classification also to be reviewed. 2. Further Evidence Provided: If relevant further evidence on justification for the pond needs to be provided or if not evidence can be provided then the pond needs to be removed from the IWRA list for the site. (Observation challenged in email to Nergina on 27/05/2025)
Finding No:	TNR-017832
Checklist Item No:	1.3.7
Status:	Open
Finding level:	Observation
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.
Findings:	Costs incurred for AWS projects and community investment were considered as shared value creation. However, these are costs, whilst value creation is not described clearly.
Corrective action:	1. Re-assessment and add shared value creation in the water related cost document. Date for the Implementation of the corrective action plan: June 2025

Finding No:	TNR-017432
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:	There was a recent update to legislative requirements requiring gender separated toilets where space is available. The explanation provided is that due to space restrictions there are still some gender-neutral (combined) toilets in the offices but a clear evaluation should be provided.
Corrective action:	1. Evaluation of WASH facilities: Evaluation of mixed WASH facilities need to be produced. (Observation challenged in email to Nergina on 27/05/2025) Implementation date of corrective action plan: Sept 2025
Finding No:	TNR-017418
Checklist Item No:	1.5.1
Status:	Open
Finding level:	Observation
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:	A summary of the relevant aspects of the river basin management plan is provided to demonstrate the understanding of relevant goals or management directions, and a shorter summary of a few other water governance initiatives, however there are some other initiatives just listed, and their relevance is not sufficiently clear.
Corrective action:	1. Review: Sustainability and Water Resource Managers to review the initiatives listed. 2. Additional Information: Provide clarification on why they are not specifically related to the site but it's still important that the site is aware of these incitive. Implementation date for corrective action plan: August 2025

Finding No:	TNR-017433
Checklist Item No:	1.5.2
Status:	Open
Finding level:	Observation
Checklist item:	Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.
Findings:	Recent legislative update provided by Corporate shows changes to the Building Regulations but these could not be found on the site's Legal Register Spreadsheet.
Corrective action:	Legal register is reviewed in April and October every year. This review is conducted by the UK&I market team and the factories. Where applicable, the updated legal requirements are then added to the factory legal register. For upcoming reviews, the update will be shared with the factory compliance team to ensure all stakeholders are aligned of any changes to legislation and if action is required. Implementation date of corrective action plan: July 2025

Finding No:	TNR-017419
Checklist Item No:	1.5.3
Status:	Open
Finding level:	Observation
Checklist item:	The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.
Findings:	(a) A conceptual model used for a poster uses a different area than the areas in the studies of water resource assessments, and should not be used for external communications anymore for consistency. (b) Although based on geology it appears analysing the balance for the recharge area of the wells may be sufficient in this case, there is still some concerns about the small area of analysis and lack of the view of a wider aquifer scale.
Corrective action:	1. Internal discussion & review- Internal discussion and review of all current map/ areas used, to decide which area to base water catchment on. Decision to include our groundwater catchment and any exchange with surface water has been decided. 2. Complete water balance- Complete calculations for the agreed area. 3. Update hydrological report- Report is to be updated, the next quarterly report will contain the new diagram showing the correct groundwater catchment. 4. Review 3D conceptual model- Review the 3D model area, ensure the 3D model area reflects the specific area used for the catchment balance. Implementation date of corrective action plan: June 2025

Finding No:	TNR-017414
Checklist Item No:	1.5.5
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2026-Mar-27
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:	There are several inconsistencies and concerns about identification of IWRAs: - many of the areas identified as IWRAs are important for the site (to monitor and/or to manage from risk management perspective), but do not hold a clear importance for the catchment - Status is assigned a category but no description is provided on what are the poorly functioning features or threats that need addressing - An IWRA on which the site is working, was not included in the list.
Corrective action:	1. Investigate IWRA status: Investigate the status of local and names IWRA's, Provide more context on justification of IWRA status. Implementation date of corrective action plan: June 2025

Finding No:	TNR-017447
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:	As the stakeholders in detailed interviews raised more concerns than were summarised in the stakeholder table, and as the stakeholder engagement continues, the shared water challenges should be reviewed.
Corrective action:	1. Implement Regular review: Sustainability Manager & Water Resource Manager to implement a regular review of shared water challenges to ensure they are continuously updated. 2. Review Stakeholder feedback: Review stakeholder feedback from WSP and AWS audit and ensure shared water challenges raised are included in site list of shared water challenges. Details will be captured in our CRP process. 3. Included in WSP: Ensure shared water challenges are included in the 2025 WSP. (Observation challenged in email to Nergina on 27/05/2025) implementation date of the corrective action plan: May 2025

Finding No:	TNR-017448
Checklist Item No:	1.6.2
Status:	Open
Finding level:	Observation
Checklist item:	Initiatives to address shared water challenges shall be identified.
Findings:	The site is in progress to collect information on what other initiatives exist in the catchment that aim to address shared water challenges. Progress should be reviewed at the next audit.
Corrective action:	1. Assess current Progress: Review the current status of information collection efforts. 2. Stakeholder interviews: Engage with key stakeholders involved in water initiatives within the physical scope area or who have spoken about what related initiatives in stakeholder interview discussions. Engagement with stakeholder to be tracked in CRP tool. (Observation challenged in email to Nergina on 27/05/2025) Implementation date of corrective action plan: July 2025

Finding No:	TNR-017446
Checklist Item No:	1.7.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2026-Mar-27
Checklist item:	Water risks faced by the site shall be identified, and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.
Findings:	Longer term risks from droughts and risk of perception that water availability during summers may become an issue, are currently not included in the site's risk assessment. Additionally, with time the site should aim to make cost and business impact estimates clearer or clarify what the categories of low, medium etc mean.
Corrective action:	1. Objective: Implement a comprehensive plan to review the relevant indicators and guidance to ensure all necessary evidence is adequately provided. 2. Gather Data: Review exiting information to ascertain current understanding of flood and draught implications to site and at physical scope level. Additionally, review historical and predicted drought and flood data relevant to the region. 3. Data Analysis: Based on data collected assess the catchments and sites vulnerability to droughts and flooding. 4. Review existing WSP: Evaluate the current Water Stewardship Plan to identify gaps related to drought and flood risks. 5. Developed risk mitigation strategies: Work with Envireau Water to create climate changer scenario's for dry, wet and average years for the site. Revise the WSP to include findings and mitigation strategies. Implementation date of corrective action plan: June 2025

Finding No:	TNR-017435
Checklist Item No:	1.8.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2026-Mar-27
Checklist item:	Relevant catchment best practice for water governance shall be identified.
Findings:	There is a lack of identification of best practices on catchment governance.
Corrective action:	1. Review Best Practices: Water Resource Manager to review current identified best practices for water governance at site. 2. Address Gaps: Water Resource manager to address any gaps and add best practices to list. (Minor challenged in email to Nergina on 27/05/2025) Implementation date of corrective action plan: August 2025
Finding No:	TNR-017434
Checklist Item No:	1.8.2
Status:	Open
Finding level:	Observation
Checklist item:	Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.
Findings:	Identified practices are generic, such as using and tracking water use ratio, and are limited to what the site is already implementing.
Corrective action:	1. Review Best Practices: Water Resource Manager to review current identified best practices for managing water balance. 2. Address Gaps: Water Resource manager to address any gaps and add best practices to list. (Observation challenged in email to Nergina on 27/05/2025) Implementation date for the corrective action plan: June 2025

Finding No:	TNR-017951
Checklist Item No:	1.8.4
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2026-Mar-27
Checklist item:	Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.
Findings:	Volumetric Water Benefit Accounting (VWBA) is identified, which can be regarded as best practice on accounting water benefits of projects. However, no best practice on maintaining or improving IWRAs are identified in the list. In its work and discussions with stakeholders the site likely heard some ideas that could be best practices, but is not yet identifying them as such.
Corrective action:	1 Review: Review stakeholder meeting notes, minutes and questionnaires to extract best practice ideas or implementation on IWRA's 2. Follow up with Stakeholders: Where relevant or lack of clarity on best practice has been provided follow up conversations and meeting will be held with stakeholders. 3. Research: Conduct research on existing best practices in IWRAs from similar projects or organizations and add to the best Practice document. (Minor challenged in email to Nergina on 27/05/2025) Implementation date for corrective action plan: August 2025

Finding No:	TNR-017437
Checklist Item No:	2.1.1
Status:	Open
Finding level:	Observation
Checklist item:	A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments: - That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes - That the site implementation will be aligned to and in support of existing catchment sustainability plans - That the site's stakeholders will be engaged in an open and transparent way - That the site will allocate resources to implement the Standard.
Findings:	The required commitment "That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes" was softened to 'disclosing relevant water related information with our stakeholders', which can be interpreted more narrowly than what the standard intends.
Corrective action:	1. Review & Change Statement: Remove current soften statement in the site commitment letter and replace it with the actual AWS requirement wording. (Observation challenged in email to Nergina on 27/05/2025) Implementation date of corrective action plan: 11th May 2025 (Corrective Action Completed after the DPA submission following feedback and was uploaded to the WSAS system)
Evidence of implementation:	(Corrective Action Completed after the DPA submission following feedback and was uploaded to the WSAS system)

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-001407

Finding No:	TNR-017422
Checklist Item No:	2.2.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2026-Mar-27
Checklist item:	The system to maintain compliance obligations for water and wastewater management shall be identified, including: - Identification of responsible persons/positions within facility organizational structure - Process for submissions to regulatory agencies.
Findings:	Process for submission to municipality on the site's continued compliance with the permit conditions has not been documented.
Corrective action:	1. E-mail: We have evidence of e-mails sent to the NRW in 2025. 2. Procedure Doc: Procedure document will be written up designating the process to be followed and the responsible people. Implementation date for corrective action plan: June 2025

Finding No:	TNR-017438
Checklist Item No:	2.3.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Checklist item:	A water stewardship plan shall be identified, including for each target: - How it will be measured and monitored - Actions to achieve and maintain (or exceed) it - Planned timeframes to achieve it - Financial budgets allocated for actions - Positions of persons responsible for actions and achieving targets - Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.
Findings:	- Only the plan for 2024 was available, a plan for 2025 was still being drafted at the time of the audit although the Q1 of the year was almost finishing. - Some of the targets are rather actions than targets and some are not clearly in line with the objectives. E.g., for understanding seasonal evolution of nitrates in groundwater, a target was to take 1 sample - which would clearly not be sufficient to understand seasonal variances. For understanding public perception around nitrates in groundwater, the site's acceptability survey was planned but it did not include a question about this as it aimed to check if the respondents would raise this issue spontaneously and without prompting - On IWRA and objectives to improve water infiltration (retention), the site actually has considered clearer longer term targets, which are not clear in the site's water stewardship plan.
Corrective action:	1. Review Current WSP: Conduct a thorough review of the 2025 WSP draft to identify areas that need updates based on new information, feedback from stakeholders, and performance metrics. Incorporating findings from the review. 2. Integral review and finalise 2025 WSP: Circulate the draft WSP among internal stakeholders for review and feedback. Revise the draft based on internal feedback and prepare the final version of the 2025 WSP for approval. 3. Communication: Communicate the plan to all AWS stakeholders. Implementation date of corrective action plan: June 2025

Finding No:	TNR-017449
Checklist Item No:	3.1.1
Status:	Open
Finding level:	Observation
Checklist item:	Evidence that the site has supported good catchment governance shall be identified.
Findings:	The site participates in catchment governance, but these activities are not mentioned in the WSP.
Corrective action:	1. Review Current WSP: Conduct a thorough review of the 2025 WSP draft to identify areas that need updates based on new information, feedback from stakeholders, and performance metrics. Incorporating findings from the review. 2. Capture Water Governance Activities: Ensure that water governance activities being conducted at the Princes Gate site and by the Princes gate site are included in the WSP. Implementation date of corrective action plan: June 2025

Finding No:	TNR-017439
Checklist Item No:	3.2.1
Status:	Closed
Finding level:	Major
Checklist item:	A process to verify full legal and regulatory compliance shall be implemented.
Findings:	The process to verify full legal and regulatory compliance is not sufficiently strong to demonstrate compliance with the permit conditions: - There are limits in the permit for maximum daily discharge, separately for treated wastewater and balanced trade effluent. For the treated foul wastewater, there is no flow measurement. The site claims it is able to calculate this effluent flow as a difference between combined and trade effluent. However, no records are available to demonstrate that the flow limit was not breached. - If combined effluent volumes are compared to the sum of limits for the two flows, the results could indicate the total limit was breached for a limited period in 2024. However, there are also illogical results of negative flows in the tracking spreadsheet, indicating that the measurements are not fit for purpose. Clearer evidence of compliance with the permit conditions needs to be provided prior to certification being granted.
Corrective action:	1. Create a specific meeting dedicated to tracking regulatory compliance - Implement a monthly operational review meeting for water management and regulatory requirements. 2. During meeting we will review regulatory issues and track all reporting, KPI's and actions taken/ required. Implementation date of corrective action plan: June 2025
Evidence of implementation:	The Princes Gate site now conducts a monthly meeting to monitor audit and site compliance, which includes a section on Water Resource and Wastewater Management, with each section assigned to a designated personnel on-site; during these meetings, the level of compliance is reviewed, and any actions taken in response to raised deviation are documented. The actions noted in the compliance calendar have additional more detailed actions trackers, that are updated by the responsible personnel more regularly, as actions are completed and progress. The first compliance meeting was held on the 10th July 2025. Since the audit NRW have come to site and discussed the wastewater on the 13th of April 2025 and with their support we are reviewing our installation. Abstraction volumes for July - Please see evidence for further details

Finding No:	TNR-017441
Checklist Item No:	4.1.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2026-Mar-27
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 evaluation was per target for each action, so it checked completion of actions but lacked evaluation against objectives or evaluation of (cumulative) contribution to AWS outcomes.
Corrective action:	1. Add to WPS: An additional column needs adding for performance again the long-term objective to be evaluated. Implementation date for corrective action plan: June 2025

Finding No:	TNR-017450
Checklist Item No:	4.1.2
Status:	Open
Finding level:	Observation
Checklist item:	Value creation resulting from the water stewardship plan shall be evaluated.
Findings:	Value creation was described but the quantification of the value from the improved water use ratio (WUR) could not yet be performed because some of the required data from 2024 was lost when site's systems moved to 'Globe' system of Nestlé Waters & Premium Beverages.
Corrective action:	We will update where possible cost associated with value created relating to water use ratio in the 2025 WSP. (However, standard 4.1.2 does not specify quantification, only evaluation of value created 'Value creation resulting from the water stewardship plan shall be evaluated'.) Implementation date of corrective action plan: June 2025

Finding No:	TNR-017451
Checklist Item No:	4.1.3
Status:	Open
Finding level:	Observation
Checklist item:	The shared value benefits in the catchment shall be identified and where applicable, quantified.
Findings:	The site attempted to described shared value creation for each action, which is then generic. Instead, value created by a combination of actions/objectives could be evaluated.
Corrective action:	1.Review shared value creation for each action: where possible allocate a actual financial value to the shared value. (However, standard 4.1.3 says that where applicable quantification should be provided 'The shared value benefits in the catchment shall be identified and where applicable, quantified'). Implementation date of corrective action plan: June 2025

Finding No:	TNR-017453
Checklist Item No:	4.3.1
Status:	Open
Finding level:	Observation
Checklist item:	Consultation efforts with stakeholders on the site’s water stewardship performance shall be identified.
Findings:	Stakeholder interviews indicate that letters sent by emails are often not read, indicating the effectiveness of engagement has room for improvement.
Corrective action:	Check with stakeholder: Speak and check with stakeholders about best format for making contact and sending information to them. Review current format: Look at alternative methods of communication which maybe more effective. Implementation date of corrective action plan: June 2025

Finding No:	TNR-017442
Checklist Item No:	4.4.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2026-Mar-27
Checklist item:	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.
Findings:	Although the audit was 3 months into 2025, the site's plan for 2025 was not provided, or a longer term plan with longer term objectives and targets (as some projects such as First Milk have longer term objectives and targets)
Corrective action:	1. Review Current WSP: Conduct a thorough review of the 2025 WSP draft and add where appropriate long term goals objectives for the projects/initiatives. Implementation date for corrective action plan: June 2025

Finding No:	TNR-017452
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:	2025 plan was not yet communicated.
Corrective action:	1. We will communicate the 2025 WSP results in Q1 of 2026 with AWS stakeholders. implementation of corrective action plan: December 2025

Finding No:	TNR-017454
Checklist Item No:	5.4.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2026-Mar-27
Checklist item:	The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.
Findings:	Risks to the site and opportunities were disclosed in the water stewardship report the site went to its AWS stakeholders, whilst shared water challenges were not clear in the disclosure.
Corrective action:	1. Add and Remove from WSP: During the drafting process of the 2025 Water Stewardship Plan (WSP), we will ensure that all shared water challenges are comprehensively documented within the plan that is disclosed to AWS stakeholders. Additionally, we will remove any risks associated with the site prior to submitting the WSP for internal and external review and communication. Implementation date of corrective action plan: June 2025
Finding No:	TNR-017952
Checklist Item No:	5.5.1
Status:	Closed
Finding level:	Minor
Due date:	2026-Mar-27
Checklist item:	Any site water-related compliance violations and associated corrections shall be disclosed.
Findings:	Whilst the site has taken steps to rectify some of the deficiencies in the monitoring system on effluent quality and effluent flows that are needed to demonstrate compliance with the permit conditions, it was not clear whether the site was transparent with the regulator on these issues.
Corrective action:	1.Regulators: When the factory site understood they were having issues which could have an affect on their NRW permit. The factory reported the incident to the NRW by E-mail. 2. Actions: The factory site also had face to face discussions on site with the NRW in May 2025. The factory continues to investigate the cause of the problem and implement precautionary measures. 3. SHE-PM: The incidents are reported on SHE-PM for the NER.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-001407

WSAS WATER STEWARDSHIP ASSURANCE SERVICES

Report Details

Report	Value
Report prepared by	Neringa Pumputyte
Report approved by	Ruth Wandera
Report approved on (Date)	30/04/2025

Surveillance

Proposed date for next audit
2026-Mar-25

Stakeholder Announcements

Date of publication	Location
	Princes Gate website: https://www.princesgate.com/environment
13/01/2025	AWS website
10/01/2025	WSAS website

Catchment Information

Catchment Information
The site is located in the Taf river catchment.

The site identified an AWS catchment that includes the sub-catchment of a water body 'Marlais- Headwaters to confluence with Taf', some adjacent villages, and a local town. I.e. the resulting area presented as a catchment does not meet the definition of a catchment.

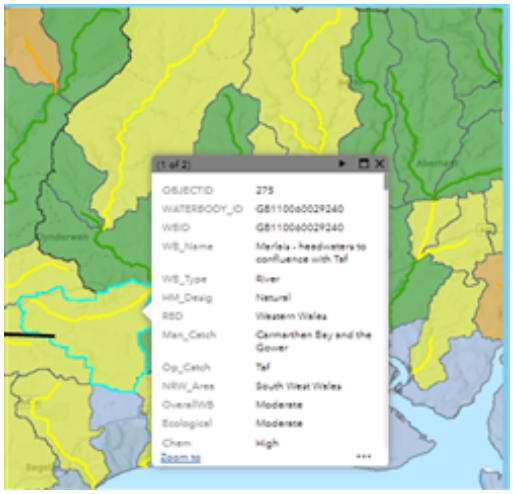
Headwaters to confluence with Taf is a water body identified under the regulations implementing the Water Framework Directive (WFD). It is part of the Taf River operational catchment, which in turn is part of the Carmarthenshire Bay and Gower Management catchment.

The site is located almost on the catchment divide: it is located near the boundary of the Taf river catchment. On the other side of the divide is Cleddau river catchment. This is where municipal water supply's sources are located.

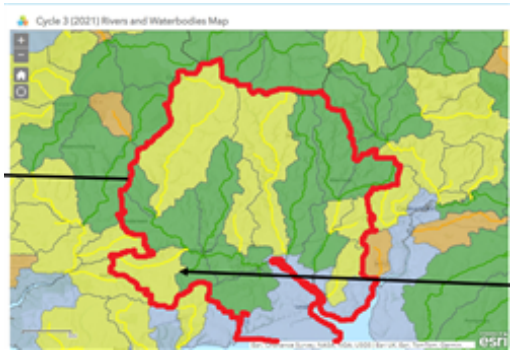
The groundwater layers are discussed in the Water Resources Study. The site is located on a catchment divide. The the aquifer is complex - it is layered and with fractures. During the audit, cross-sections were looked at to better understand the aquifer. Overall, while it is not certain, but anticline seems to indicate that the local aquifer may be quite self-contained. If water was not abstracted, there would be more springs/marshes. To the South, there is divide, to the North streams lead to the River Taf.

Using the groundwater bodies delineated under the WFD, the Site is located within the Water Framework Directive groundwater body of the Tywi, Taf and Gwendraeths.

Site's identified 'AWS catchment'.png



Location of the Marlais- headwaters to confluence with the Taf.png



Taf river catchment.png

Carmarthenshire Bay and Gower Management Catchment.png

Site's location vs groundwater bodies under the WFD.png

Client Description and Site Details

Client/Site Background

The Nestlé Waters & Premium Beverages UK (NW&PB) Princes Gate factory is located on The Well Fields site, Princes Gate, Pembrokeshire, UK. The factory is located around 6.75 km Southeast of Narberth town centre. The total size of the industrial site is 8.19ha. To the South and adjacently connected to the factory is a 5ha block of land which is owned by NW&PB.

The site used to be a stand-alone business and was purchased by Nestlé Waters & Premium Beverages in 2018-2019. Since Jan 2024, the PG factory is only producing spring sparkling and still water Princes Gate water, Still Nestlé Pure Life and Princes Gate sparkling. There are 3 production lines. The site has a wind turbine that provides about half of the electricity needs. Make 3 brands: one spring water and two drinking water. There were about 120 employees at the time of the audit.

The site's main water source is groundwater from owned wells. In addition, municipal water supply is provided for domestic/hygienic purposes.

A total of 8 boreholes and 2 exploratory boreholes are owned by the site; of which 1 borehole and 1 exploratory borehole are located on private land.
Active wells in use: BH4, BH6, BH8.
Wells not in use: BH1 was taken out of commission. BH2 yield is too low but water quality is very good. BH3 and 5 have yields that are too low and pumping sand. BH7 yield is low, it is used for monitoring purposes.
Exploratory wells were dug to find deep water but suitable water was not found. They are used for monitoring purposes.

Water from the active boreholes is piped to the factory via dedicated stainless-steel pipe for each BH. Once at the factory the water passes through water treatment and is then stored in water storage tanks (Tank 1 to 4 have a capacity of 100m3). There is also an industrial water tank (50m3) which contains raw water from the BH. This water is only used for CIP and is made up of a mix of BH4,6 & 8 water. Any raw water from the BH that is not used is redirected to the on-site pond.

Dwr Cymru (Welsh Water) supply the site's municipal water. It is stored alongside the factory in a 5m3 tank, opposite the water treatment plant. Municipal water is used for drinking water and WASH Facilities onsite. Municipal water is also stored in a tank outside the factory and is connected to the sprinkler system for emergency use.

Sewage from the factory buildings discharges into the site foul drainage network which passes through an activated sludge treatment on site and then after that is mixed with the trade effluent.
Trade effluent from the factory is processed to modify the pH. This is then mixed with the Foul effluent and is discharged at outlet B to local stream that runs out of the on-site pond.
Runoff/storm water from paved areas and vehicle parking areas is collected to the stormwater water drainage network which flows through the interceptor and is then directed to the same local stream that runs out of the on-site pond, only in a different location than the outlet B.

The municipal supply to the site comes from the Canesten Bridge Pumping station, 10.02km from the Princes Gate site. Water supplied by the Canesten Bridge stations is received from Bolton Hill groundwater wells owned by the supplier, which are located 23.82km from the Princes Gate site.

Site map.png

Site map and discharge locations.png

Summary of Shared Water Challenges

Summary of Shared Water Challenges

The following shared water challenges were identified:

- Water Quality - Nitrate level in groundwater
- Poor quality status of IWRAs
- Soil erosion and run off

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	One of the site's on-site wells was visited, an on-site pond, and wastewater and stormwater discharge locations to the local stream.	
0.1.1.1	*The site(s) occupy one catchment OR an exception has been granted.*	Yes
0.1.1.2	*The scope of the proposed certification shall be under the control of a single management system.*	Yes
0.1.1.3	*The scope of the proposed certification shall be homogeneous with respect to primary production system, water management, product or service range, and the main market structures.*	Yes

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

Comment

Most of the physical context is explained on a presentation with a number of maps.
- Site boundaries are mapped, including the locations of the wells. Active and dormant wells are indicated. There is a further map of monitoring wells - this shows not only the site's wells used for monitoring, but also wells owned by others and springs on other owners lands.
- Piping within the site boundaries is indicated and was explained on site
- The location of the municipal water supplier's umping station and primary source water location are mapped.
- Discharge locations are mapped. Receiving water body is a local stream that flows into the river Taf.
- Maps and a full study were provided to show information on the groundwater sources used by the site. These were extensively discussed on site.

The site identified an AWS catchment that includes the sub-catchment of a water body 'Marlais- Headwaters to confluence with Taf', some adjacent villages, and a local town. I.e. the resulting area presented as a catchment does not meet the definition of a catchment.

Headwaters to confluence with Taf is a water body identified under the regulations implementing the Water Framework Directive (WFD). It is part of the Taf River operational catchment, which in turn is part of the Carmarthenshire Bay and Gower Management catchment. The maps are provided.

The site is located almost on the catchment divide: it is located near the boundary of the Taf river catchment. On the other side of the didvide is Cleddau river catchment. This is where municipal water supply's sources are located. Stakeholder consultation and catchment data collection indicates that this adjacent catchment of Cleddau River is also relevant for parts of water stewardship.

The groundwater layers are discussed in the Water Resources Study. The site is located on a catchment divide. The the aquifer is complex - it is layered and with fractures. During the audit, cross-sections were looked at to better understand the aquifer. Overall, while it is not certain, but anticline seems to indicate that the local aquifer may be quite self-contained. If water was not abstracted, there would be more springs/marshes. To the South, there is divide, to the North streams lead to the River Taf.
Using the groundwater bodies delineated under the WFD, the Site is located within the Water Framework Directive groundwater body of the Tywi, Taf and Gwendraeths.

The 'Conceptual model of Princes Gate Area' (a poster) was also provided and indicates catchments different from the site's identified 'AWS catchment'.
This poster was dome by a previous water resource engineer. It uses a different area and should be updated - should not be presented anymore. The knowledge on the geology has improved since then.

Finding No: TNR-017416

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

1.2.1 *Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall:*
- Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people;
- Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies;
- Provide evidence of stakeholder consultation on water-related interests and challenges;
- Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups;
- Identify the degree of stakeholder engagement based on their level of interest and influence.

closed

Comment

The site uses Community Relations Process (CRP) process for identifying, understanding and managing relations with stakeholders. The process was explained on site and is indicated in two presentations.

The identified stakeholders include authorities, local administration, local community, local businesses and neighbours.

A sub-set of stakeholders are identified as AWS stakeholders, i.e. stakeholders for water stewardship. These are surveyed and then interviews are held wit ha sample of AWS stakeholders.

The site has conducted consultation with identified stakeholders.

In terms of consultation to identify water-related challenges of different stakeholders, the information provided across both presentations includes some concerns likely expressed by stakeholders, although in some cases the column on water-related challenges of a stakeholder has comments on the role of a
stakeholder or common projects/ideas rather than concerns, although that information is also relevant and needed. More water-related concerns are noted than are summarised in the stakeholder table

The site maps influence of site on the stakeholders vs influence of stakeholders on the site, and interest of stakeholders on water issues vs power of stakeholders on the catchment. Based on this, stakeholders are categorised into types of attitude: favourable, neutral, some tensions, or major tensions.

Finding No: TNR-017427

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 maps influence of site on the stakeholders vs influence of stakeholders on the site, and interest of stakeholders on water issues vs power of stakeholders on the catchment. Based on this, stakeholders are categorised into types of attitude: favourable, neutral, some tensions, or major tensions.

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

Emergency response procedure, issue 14.06.2024, was reviewed. It covers how the site should respond - mostly reaction, who should inform whom etc.

SHE-PR-15 23.03.2024 Environmental Emergency Procedure covers more detail for reporting procedures in the event of a spillage and actions to be taken in the event of an environmental incident.

If mains supply was disrupted, the site does not have a procedure - it would need to stop work.

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

closed

Comment

The site has a site water balance map and quantification on an excel spreadsheet. It covers all inflows (groundwater wells and municipal supply) and outflows (water going to product, water discharged)

Some of the flows were reviewed in more detail and the following observations were noted
- The water map does not make it clear that there's also water taken from boreholes but not going to the building and instead discharged to the environment (to the on-site pond). There is some calculation error of that amount.
- Overflow from the tanks is also not clearly shown on the map - it also gets discharged to the on-site pond/
- Unusable water bottles go to the crusher -from the crusher the water goes to stormwater drains.
- Flavoured unusable bottles get taken off site. don't have the value for 2024 but was small amount

Discharge to the stream and discharge to a local pond are not clearly depicted in the map.

Finding No: TNR-017410

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.*

Obs.

Comment

Annual water balance is depicted on the site map. It shows which flows are metered, and which ones are estimated. Some estimated values are colour-coded as metered values, although the reliability is different. This was amended already during the audit.

Water withdrawals are monitored constantly. Water withdrawn from wells: water availability vs production graph shows seasonality.

There were some inconsistencies noted in part of water 'losses' (water withdrawn but not going to product) between the water map and mass balance tabs of the spreadsheet.

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.*

closed

Comment

Well water is tested daily. There have been no deviations for the last 4 years.
There is sampling plan and water is tested at various points in the piping network for providing data-driven cleaning decisions. Product water gets tested at various points for legal compliance and Nestlé requirements.

Municipal water's quality is identified from the supplier information.

Effluent quality:
The site's permit has limits for treated foul effluent quality and for balanced trade effluent quality. The site also applies internal (Nestlé Waters & Premium Beverages corporate) limits for the combined effluent after the foul and balanced trade effluents are joined. The site was taking monthly samples of balanced trade effluent and the combined effluent to test quality.
The quality of the foul wastewater was calculated using flow and quality data.
COD is monitored daily.

Foul water quality was not sampled previously and was calculated based on results of trade effluent and combined effluent. The calculated values were likely not reliable. Now the site has put sampling in place and the first sample was just taken on March 25th .

The effluent is discharged into a local stream which flows into Marlais river. The site samples the local stream before the bridge and the on-site pond for nitrates with the aim of identifying if there are any issues. Do it quarterly. Test report for January 2025 was shown. The quality of the Marlais river was identified (see catchment quality description).

Finding No: TNR-017430

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

closed

Comment

A presentation shows locations of chemical storage and spill kits on site.
COSHH register lists all hazardous materials and their hazards.
Spreadsheet 'Potential sources of pollution' lists possible pollution sources on site and off-site in the identified AWS catchment, listing their location, contaminants of concern, pathway, receptor, and existing mitigation measures. The off-site sources are also mapped in a presentation.
I.e. the identification of potential sources of pollution is extended to cover not only site but the local groundwater aquifer as well.
However, the on-site map of pollution sources does not indicate the transformer, although there was a recent incident with oil leak from the transformer.

Finding No: TNR-017431

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 identified an on-site pond as an IWRA. It was identified as an IWRA because it helps feed neighbouring ponds/ streams for livestock purposes, and because it is important for the site to manage from pollution prevention perspective.

1.3.7 *Annual water-related costs, revenues, and a description or quantification of the social, cultural, environmental, or economic water-related value generated by the site shall be identified and used to inform the evaluation of the plan in 4.1.2.*

Obs.

Comment

The site has compiled costs, revenues and what it considers as values generated by the site.
As the site is a water bottling facility, basically all costs and revenues are water-related.
Costs for water pledge projects are included. Community investment costs like additional monitoring are included - for that one breakdown is available.
For value creation, now costs incurred for AWS projects and community investment were considered as shared value creation. These are costs - value creation is not described clearly.

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

Obs.

Comment	The site has provided a table with the comparison of the WASH facilities and the UK legislative requirements. It has also completed a WBCSD self-assessment tool. There was a recent update to legislative requirements requiring gender separated toilets where space is available. The explanation provided is that due to space restrictions there are still some gender-neutral (combined) toilets in the offices but a clear evaluation should be provided.	
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	Vendors were taken from the approved vendors list. No supplier of materials is located in Wales.	
1.4.2	*The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.*	Yes
Comment	Vendors were taken from the approved vendors list. Laundry service is in Cardiff, which is outside of even the management catchment. Closer to the site is provider of services for meters etc - no real water use. The site also got information on estimated water use by Sodexo but they consume water on site - it is captured in on-site water use.	
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.*	Obs.
Comment	Most relevant governance initiatives were identified and summarised: - Caramethenshire Bay Abstraction Licensing Strategy governs issuance of abstraction licences. - Management priorities for Carmarthen Bay and Grower management catchment and operational Taff River catchment were summarised. Diffuse pollution is an issue in Taff catchment. This aligns with the site's work with the farmers. - Some other governance initiatives are also summarised. The site was able to explain its understanding further during the audit. E.g. West Wales rivers trust is set up to manage rivers, wetlands in Pembrokeshire. The site worked with them on scope for water pledge projects but no ideas came up so far.	
1.5.2	*Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.*	Obs.
Comment	Premiting requirements: the site has a water abstraction licence and a permit for discharge. Letters were shown regarding the transfer of licences to new legal entity. The site maintains legal register (SHE-FRM-004 - Legal Register issue 8 17.10.2024), which includes water-related legal acts applicable in the UK. It cascades down from corporate – they send updates in April and October. During the site visit, October 2024 legislative update was seen. UK market have a call with sites where they go through the changes and sites make notes on what needs to be changed in the legal register. Recent legislative update provided by Corporate shows changes to the Building Regulations but these could not be found on the site's Legal Register Spreadsheet.	

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

As most Nestlé Waters & Premium Beverages sites, the site conducts water resource studies regularly. Such study was also needed for obtaining the abstraction licence.

Older water resource study was prepared by AECOM in 2018, finalised in January 2019. Then water resource study by Envireau was done in April 2024 for the 'catchment' area of the site's wells - recharge area of the wells. The study indicates a small surplus in the groundwater system. It also says: 'Water level data for the site does not indicate an overall decreasing trend in groundwater levels, suggesting that historic abstraction rates are sustainable with respect to the annual water balance, other than during sustained dry periods, where the data suggests that the site may struggle to produce the required yields in summer months and be vulnerable to drought owing to low pumping water levels in boreholes relative to the screened sections of the boreholes.'

Then in preparation for AWS audit, the site extended the physical scope to add some villages to the sub-catchment of Marlais headwaters, and a draft new study was done in January 2025 to calculate balance for this 'physical scope' area (only spreadsheet was available as evidence, and pdf study was not provided as it was a draft). This area's boundaries do not really follow hydrology or hydrogeology, so the calculation is somewhat artificial.

The aquifer is complex - it is layered and with fractures. During the audit, cross-sections were looked at to better understand the aquifer. Overall, while it is not certain, but anticline seems to indicate that the aquifer is quite self-contained. If water was not abstracted, there would be more springs/marshes. To the South, there is divide, to the North, streams drain water and lead to the river Taff.

Poster (conceptual model) was dome by previous water resource engineer. It uses a different area and should be updated - should not be presented anymore. The knowledge on the geology has improved since then.

As the official data show the groundwater body (as delineated under the WFD) where the site is located, has good quantitative status, the current balance analysis can be accepted.

The abstraction licence will need to be renewed by March 2030. In preparation, the site has implemented the monitoring system to assess potential impacts from their abstraction on the surrounding water environment. Consultancy Envirowater come every quarter and take telemetry readings of water depths of boreholes and water levels in the wells and springs outlined in the monitoring plan. They produce annual reports and the recent one was provided. Currently reports just go to the site, they are not passed on to authorities.

1.5.4 *Water quality, including physical, chemical, and biological status, of the catchment shall be identified, and where possible, quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be identified.*

Yes

Comment

Site obtained water quality data for the Marlais river - before the confluence with Taff, and compared with category limits in WFD. Dissolved organic carbon is a problem. It also collected information on how many water bodies in the management catchment have which category of ecological status and the main reasons for not achieving the good status. In Taff catchment, agricultural pollution, and leaching from mines is issue for groundwater.
In the groundwater body where site is located, qualitative status is poor because of abandoned mines.

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

in progress

Comment

IWRAs were identified by considering which water-related areas are important for the site, screening for areas of special interest or special protection areas in the identified catchment, and asking stakeholders if they consider any IWRAs. As a result:
- an onsite pond, a stream where wastewater is discharged, a pond further downstream, and Bellevue spring are considered IWRAs by the site. They are important for the site (to monitor and/or to manage from risk management perspective) and are rightly identified for close management, but do not hold a clear importance for the catchment.
- A quarry as area of special scientific interest, however it is of special interest for other reasons, not really water related.
- Cladeau river - special area of conservation. For water quality, because of phosphates. It was designated as SAC because of pollution incidents. A few stakeholders mentioned concerns about this river (a group of scientists). This area is outside of the smaller 'catchment' the site identified but in the catchment where the municipal water supply is sourced from. This area more clearly meets the definition of an IWRA.

The site has an improvement project on Wallis Pond but did not include this pond in the list of IWRAs. The site worked with Pembrokeshire county council and Pembrokeshire renaturing community to identify water pledge areas. They suggested Wallis pond. Wallis pond had been silted up and letting only a small water out (via sluice gate). Important for water quality downstream for the pond.

It was discussed during the audit that a question in the stakeholder survey asking 'Are there important water related areas around? What is their status?' may not be an effective way of collecting information about IWRAs because stakeholders are most likely not familiar with the term 'IWRAs'. However, during the interviews and discussions with AWS stakeholders, the site explains the term.

Finding No: TNR-017414

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

Comment

The site identified the water supply infrastructure and its status. The presentation 'Information on existing and planned water related infrastructure' indicates the public water supplier identified leaks in the system as a problem area and that the supplier plans to reduce water loss through leakage by 15% by 2025.
The site does not have a shared stormwater infrastructure.

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

Comment

The site provided summary information that shows adequate access to WASH at the catchment level.

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 shared water challenges were identified based on stakeholder consultations and the site's analysis of the catchment issues. The following shared water challenges were identified in the shared water challenges and risks table of the spreadsheet on the water stewardship plan:
- Water Quality - Nitrate level in groundwater
- Poor quality status of IWRAs (on-site and off-site)
- Soil erosion and run off

There was some discussion whether some perception among parts of stakeholders whether the site may be impacting the water balance in the area, would be a water-related challenge. Currently assessment of groundwater levels locally due to climate change is identified as a strategic objective, and factory and business perception is identified as a risk to the site, but the lingering perception is not identified as a shared water challenge. This should be looked at further in the next audits

As the stakeholders in detailed interviews raised more concerns than were summarised in the stakeholder table, and as the stakeholder engagement continues, the shared water challenges should be reviewed.

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

Obs.

Comment

The site has primarily identified own initiatives to address shared water challenges. Regarding initiatives initiated by others, the site is already planning to collect more information on what is being done on nitrates, as well as other initiatives.

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.*

in progress

Comment

The site has identified risks stemming form or related to shared water challenges and a few site-related risks, such as degradation of public perception of the factory, and discharge of non-compliant effluents. It was discussed why draughts and possible increase in them is not considered a risk, although seasonality and possible increase in it is analysed in the water resources study and the annual monitoring report.
Costs and business impact are currently indicated in categories of low, medium, high, but it was not clear what ranges the categories mean.

Finding No: TNR-017446

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

Identified opportunities are linked to risks and are identified in the same table, with the description of possible impact and a description of either savings or value creation. This can be improved as the site progresses but is a reasonable start.

1.8 *Understand best practice towards achieving AWS outcomes: Determining sectoral best practices having a local/catchment, regional, or national relevance.*

1.8.1 *Relevant catchment best practice for water governance shall be identified.*

in progress

Comment

The list of best practices identifies:
water pledge - that is corporate pledge is relevant for the general approach sites take.
- ISO 14001 standard - however, it does not cover catchment governance
- Water operational standards - these are relevant for site water management but not really on catchment governance.
- Princes Gates Water Resource Study - it considers aquifer but is focusses on resource sufficiency for the site and risks to the site, rather than about catchment governance.

Practices for catchment governance have not really been identified.

Finding No: TNR-017435

1.8.2 *Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.*

Obs.

Comment

Identified practices are generic, such as using and tracking water use ratio, and are limited to what the site is already implementing.
Water abstraction licence is identified as best practice for water balance but it is a regulatory requirement.

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

Yes

Comment

Nestlé Environmental Requirements are identified and may be relevant, only time during the audit was not sufficient to discuss what in those standards goes above legal and regulatory requirements and can be considered as best practice.
Nestlé Cleaning and Disinfection standards and Nestlé Waters & Premium Beverages Operational Standards were also identified as best practice. However, they are for product quality and would hardly have an impact on water quality in the catchment.
The site actually considered other best practices for the catchment water quality, which were not identified in the list.

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

in progress

Comment

Volumetric Water Benefit Accounting (VWBA) is identified, which can be regarded as best practice on accounting water benefits of projects. However, no best practice on maintaining or improving IWRAs are identified. In its work and discussions with stakeholders the site likely heard some ideas that could be best practices, but is not yet identifying them as such.

Finding No: TNR-017951

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

Yes

Comment

Nestlé Guidelines on respecting the Human Rights to Water and Sanitation; Product Donation guidelines; BCSD Pledge for Access to safe Water, Sanitation and Hygiene (WASH) at the workplace. This is suitable for the ste context.

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.

Obs.

Comment: Statement 'Together, we care for water' signed by the factory manager and the water resources manager for the site was provided. It is disclosed on the site's website.
Most of the required commitments are covered, only the required commitment "That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes" was softened to 'disclosing relevant water related information with our stakeholders', which can be interpreted more narrowly than what the standard intends.

2.2 *Develop and document a process to achieve and maintain legal and regulatory compliance.*

2.2.1 *The system to maintain compliance obligations for water and wastewater management shall be identified, including:*
- Identification of responsible persons/positions within facility organizational structure
- Process for submissions to regulatory agencies.

in progress

Comment: Legal register is provided marks the results of compliance evaluation done by the site SHE Manager.
Annual functional compliance audits are then undertaken. Latest compliance audit was July 2024. Spreadsheet Princes Gate July 2024 was shown during the audit.
Regarding ensuring continued compliance with the conditions of the permits:
- The new Water Resources Manager put in place a spreadsheet that gets filled out monthly. Once a year that information should go to municipality.
- The procedure including how, by whom and when reports should be sent to municipality, is not yet documented.

Finding No: TNR-017422

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: Strategy is at the start of the letter sent to stakeholders.

2.3.2 *A water stewardship plan shall be identified, including for each target:*
- How it will be measured and monitored
- Actions to achieve and maintain (or exceed) it
- Planned timeframes to achieve it
- Financial budgets allocated for actions
- Positions of persons responsible for actions and achieving targets
- Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.

in progress

Comment

The site provided a water stewardship plan for 2024 (evaluated), which includes:
- objectives related to shared water challenges and risks
- targets per objective and associated metrics
- actions,
- indication which ones are regarded as best practice,
- budget,
- start and end date,
- responsible persons.

However, when details were reviewed, some inconsistencies or gaps were noted:
- Only the plan for 2024 was available, a plan for 2025 is being drafted although the Q1 of the year was almost finishing.
- Some of the targets are rather actions than targets and some are not clearly in line with the objectives. E.g., for understanding seasonal evolution of nitrates in groundwater, a target was not take 1 sample.
- On IWRA and objectives to improve water infiltration, the site actually has considered clearer longer term targets, which are not clear in the plan.

The inconsistencies are reflective also of the personnel changes: the initial ideas were put in place by the previous person managing water stewardship, whilst the new sustainability manager worked to sustain and progress the actions whilst filling the gaps against the standard.

Finding No: TNR-017438

2.4 *Demonstrate the site's responsiveness and resilience to respond to water risks*

2.4.1 *A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.*

Yes

Comment

The site's environmental monitoring plan, explained in the indicator on catchment balance, is the main current plan, aimed first at better identifying the risks. During the site walkaround the site also explained the operational changes the site has been doing to manage seasonality. As further annual environmental monitoring reports are received, the site should see if the results indicate the need for further mitigation or adaptation measures.

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.*	Obs.
Comment	Examples of participation in catchment governance (evidences were reviewed on site): - NRW have various meetings where the site participates. E.g. a panel discussion where water quality was discussed with various stakeholders. March 21 "Panel Event and Q&A "What's wrong with the Cleddau"" - LLanteg renaturing comunity (LARC) also have various meetings and they asked if the site could do one on First Milk project, which the site agreed to.	
3.1.2	*Measures identified to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be implemented.*	Yes
Comment	The site's environmental monitoring plan aims to monitor possible site's impact on the local water environment.	
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.*	closed
Comment	The site's legal tracker indicates full compliance. Latest compliance audit was July 2024 - spreadsheet Princes Gate July 2024 was shown during the audit. Some gaps were noted on compliance with permits but no records were shown of analysing the deviations or escalation. There are limits in the permit (Package treatment plant and holding tank) for maximum daily discharge, separately for foul and balanced trade effluent. The remainder of the information has been removed for confidentiality reasons. ***Finding No: TNR-017439***	
3.2.2	*Where water rights are part of legal and regulatory requirements, measures identified to respect the water rights of others including Indigenous peoples, shall be implemented.*	Yes
Comment	There are no specific requirements other than maintaining conditions of the licences and permit.	
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 a yearly target on water use ratio (WUR). It achieved 6% reduction of WUR in 2024 vs 2023. Target for 2025 is the same as was for 2024. Reductions came mainly via better visibility of water availability, where data is regularly tracked and reviews and operational changes are done on how withdrawals, production and warehousing decisions are managed - a variety of these changes were explained by the Quality manager during the site walkaround.	

3.3.2	*Where water scarcity is a shared water challenge, annual targets to improve the site's water use efficiency, or if practical and applicable, reduce volumetric total use shall be implemented.*	Yes
Comment	The site has seen yearly improvements of its WUR for several years: 2021 - 2.19 L/L, 2022 - 1.79 L/L, 2023 - 1.68 L/L, 2024 - 1.57 L/L.	
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	There is no re-allocation of water on site.	
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 had several objectives in its WSP related to water quality: 1) "Understand Natural Resources Wales (NRW) initiatives regarding Nitrate Vulnerable Zones (NVZ) and nitrate level in groundwater locally." - for this , the site aimed to organise a meeting with Natural Resource Wales, and email communications were reviewed. Purpose of the meeting that the site wanted to have with NRW on nitrates was to understand what NRW are doing, how the site could work also to support it. Because the NRW don't publish much. Just received an email with a summary of what they are doing (have an email). 2) "Understand seasonal and annual evolution of nitrate level in groundwater locally." - as indicated in 2.3.2, the site planned to have one sample completed in 2024, which naturally would not have been sufficient to understand seasonal variances. I.e., objective and target were not matching. At the evaluation of the 2024 results, the frequency of sampling planned for 2025 will increase. 3) "Understand public awareness regards to nitrate issue in GW". For this, the site conducted a poll survey in Narberth town, about 100 people. Completed in Sep 2024, it was done by a 3rd party. The review of the survey shows there were no questions about nitrates. The site was aiming to check the awareness by seeing how many people would raise this issue spontaneously without prompting. Not in the plan, but relevant for catchment water quality: LARC (citizens group) bring river samples to the site for testing in the laboratory to cross-check against the results of their sampling kits that they use for testing water quality of rivers. There were samples tested until March by Kamil. He left and now a new lab person came in - testing would resume.	
3.4.2	*Where water quality is a shared water challenge, continual improvement to achieve best practice for the site's effluent shall be identified and where applicable, quantified.*	Yes
Comment	The information in this section has been removed for confidentiality reasons.	
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	On-site pond yearly maintenance was done in 2024, starting one for 2025. Wallis pond project: The pond is a historic feature that used to be the water source for a mill, and is part of the Cladeau SSSI (site of special scientific interest). Because it's a man-made structure, it fills up with silt. The pond was last cleared out in 90s. It then filled up and became so bad that if it was left for any more years, it would have become a willow scrub site. The local population have been asking for the silt to be cleared for a long time. Nestlé Waters & Premium Beverages provided funding for the project. Wallis pond project was started in 2023 but delayed because of weather. Phase 1 was removal of a third of the silt and replacement of the sluice gate. Phase 2 was removal of the rest of the silt. Work for phase 1 was done in August. Phase 2 was completed in November. Target is 250 thousand m3/year volumetric benefit and for 4 years. There was a baseline survey done and results will be evaluated once monitoring post-implementation progresses.	
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	WASH facilities on site meet the UK legislative requirements. The site has also completed a WBCSD self-assessment tool. The site maintains legionella measures. Evidence of the quality of the provided municipal water was also provided.	
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	The site has a monitoring system in place to monitor well and spring levels around the site to evaluate if the site's withdrawals have an effect on the local waters.	
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 not set indirect water targets as no suppliers or service providers are located in the catchment.	
3.7.2	*Evidence of engagement with suppliers and service providers, as well as, when applicable, actions they have taken in the catchment as a result of the site's engagement related to indirect water use, shall be identified.*	Yes
Comment	The site has engaged with Sodexo, although they are on-site service provider.	
3.8	*Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have.*	
3.8.1	*Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.*	Yes
Comment	The site contacted the Welsh Water asking for information to better understand shared water infrastructure and its status. No response was received yet.	

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	The stakeholders had very positive feedback on the site's engagement and referred to a very notable change compared to previous ownership. That on its own can be considered best practice, there is just a lack of documented links with identified best practices in 1.8.1.	
3.9.2	*Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.*	Yes
Comment	Water resource assessment is considered as best practice. That was updated in 2024. Having and tracking a WUR is indicated as best practice – that is generic and on its own hardly a best practice. However, a number of practices described by quality manager during the walkaround can be considered best practice.	
3.9.3	*Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.*	Yes
Comment	What is identified as best practices for water quality, are more practices for product quality. However, the site's project on improving water retention and reducing the run-off should improve catchment quality via reduced soil erosion. Projects to reduce soil compaction can be regarded as best practice. The project is at the planning and modelling phase, and progress will be evaluated at the next audit.	
3.9.4	*Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.*	Yes
Comment	Based on the feedback about the Wallis Pond project provided by the Natural Resource Wales, the project, in the way it was executed with the planning how to minimise impact during the reconstruction phase, can be considered as best practice.	
3.9.5	*Actions towards achieving best practice related to targets in terms of WASH shall be implemented.*	Yes
Comment	Donations of water bottles - a list of donations is provided.	

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 tracks performance of most of its water stewardship objectives and targets in the site's water stewardship plan - the evaluation for was provided. Only the water use ratio is tracked monthly and discussed separately. The evaluation was per target for each action, so it checked completion of actions but lacked evaluation against objectives or evaluation of (cumulative) contribution to AWS outcomes. ***Finding No: TNR-017441***	
4.1.2	*Value creation resulting from the water stewardship plan shall be evaluated.*	Obs.
Comment	Value creation was described in the completed 2024 WSP, but the evaluation of value from the improved water use ratio (WUR) could not be performed because some data from 2024 was lost when site's systems moved to 'Globe' system of Nestlé Waters & Premium Beverages.	
4.1.3	*The shared value benefits in the catchment shall be identified and where applicable, quantified.*	Obs.
Comment	The site attempted to described shared value creation for each action, which is then generic.	
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 was an incident in July 2024 - a transformer leaked. The site was aware of an oil leak, as oil witnessed at the site was cleaned appropriately by the Princes Gate team and spill response onsite initiated, the extent of the oil spread underground was not known to the site until raised by neighboring farmer. The incident response procedure was initiated, Spill Response Wales were contacted and came to do the clean up. Spill Response Wales did a report on the case. 'SHE-FRM-005 - Incident Investigation - Transformer Oil Leak' shows analysis of the incident. Corrective actions: - installation of screens to monitor voltage - implemented - installing bunding or replacing the transformer to the one without oil - in progress, discussions with corporate are ongoing. No procedures were changed on site.	
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.*	Obs.

Comment

In January 2025, the site sent out a newsletter that included the main actions the site did in 2025, on water stewardship as well as other environmental/sustainability actions.
Then at the beginning of March 2025, the site sent to its AWS stakeholders a document that included the water stewardship plan and performance to date. The letter sent to stakeholders asks for feedback and has a link to a questionnaire.

Stakeholder interviews indicate that letters sent by emails are often not read, indicating the effectiveness of engagement has room for improvement.

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.*

in progress

Comment

The site presented the evaluated plan for 2025 and indicated some changes planned for 2025, however the plan for 2025 was not provided, or a longer term plan with longer term objectives and targets (as some projects such as First Milk have longer term objectives and targets).

Finding No: TNR-017442

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	Governance is disclosed on the site's website: https://www.princesgate.com/sites/default/files/2025-02/princes-gate-water-governance.pdf	
5.2	*Communicate the water stewardship plan with relevant stakeholders.*	
5.2.1	*The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.*	🔍 Obs.
Comment	A letter containing both plan and performance for 2024 was sent to AWS stakeholders at the beginning of March 2025. 2025 plan was not sent yet.	
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	Letter was sent to AWS stakeholders. So e.g. Princes gate community did not receive it. Some were printed as hard copies and handed to neighbours. 2024 recap from Princes gate was however sent to all CRP stakeholders.	
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.*	↗ in progress
Comment	Risks to the site and opportunities were disclosed in the water stewardship report the site went to its AWS stakeholders, whilst shared water challenges were not clear in the disclosure. ***Finding No: TNR-017454***	
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's water stewardship report mentions cooperation with some stakeholders. The site did not have the type of coordination with public sector agencies that would be appropriate to be disclosed.	
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.*	✓ closed

Comment	Whilst clear compliance violation were not noted (evidence was inconclusive), as indicated in non-conformities on 1.3.4 and 3.2.1, there were or are concerns about the site's ability to demonstrate compliance to permit conditions in a verifiable way. Whilst the site has taken steps to rectify some of the deficiencies in the monitoring system on effluent quality and effluent flows, it was not clear whether the site was transparent with the regulator on these issues. ***Finding No: TNR-017952***	
5.5.2	*Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.*	Yes
Comment	Clear compliance violations were not noted.	
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	Clear compliance violations were not noted.	

Photographic Evidence from Audit

Yes

Comment: The photographs were taken by the site representatives on lead auditor's request during the walkaround.

Previous Findings

	All non-conformities raised in the previous audit have been satisfactorily closed.	N/A
Comment	Not applicable as it is initial audit.	