CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-001614

WSAS WATER STEWARDSHIP ASSURANCE SERVICES

SITE DETAILS

Site: **Spadel - Ribeauville (Carola)**
Address: Route de Bergheim, 48, 68150, Ribeauvillé, FRANCE
Contact Person: Maxime Sohy
AWS Reference Number: AWS-000422
Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Platinum
Date of certification decision: 2025-Sep-05
Validity of certificate: 2028-Sep-04

AUDIT DETAILS

Audited Service(s): AWS Standard v2.0 (2019)
Audit Type(s): Re-Certification Audit
Audit Start Date: 2025-Jun-03
Audit End Date: 2025-Jun-06
Lead Auditor: Lorenzo Brioschi

Audit team participants:
Lorenzo Brioschi, Lead Auditor

Site Participants:
Oliver Crommen, Water & Environment Engineer Sr.
Arnaud Collignon, Water & Environment Manager
Maxime Sohy, Water & Environment Engineer
Sandrine Mouton, QHSE Manager
José Lefort, Industrial Manager - Carola & Wattwiller
Audrey Mauger, QSE Technician
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ADDITIONAL INFO

Summary of Audit Findings: During the certification audit, 3 non-conformities and 5 observations were raised.

The Client is requested to submit a root cause analysis and corrective actions for each of the non-conformities to WSAS within 7 days of receipt of the audit report, by 16 July 2025.

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

Observations require attention from the site but no response to WSAS at this stage.

The audit team recommends re-certification of Spadel Ribeauvillé (Carola) at Platinum level pending closure of the non-conformities.
CLOSURE OF FINDINGS AND CORRECTIVE ACTION PLAN:

The Site has successfully closed all Non-conformities.

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

The site is a bottling plant of still, sparkling and aromatised spring water. It currently uses one borehole and is located in Ribeauvillé, France. The site is employing about 50 FTE which includes part of administrative staff that is common between Ribeauvillé and Wattwiller sites. The site currently withdraws Spring Water from one artesian borehole, and has two bottling lines, one for PET bottles (still, sparkling and aromatised spring water) and one for re-usable glass. The water treatment consists in the removal of Arsenic as prescribed by their permit. Site is only neutralising their effluent before sending it to sewers and to local WWTP. Rainwater and other "clean" water from process are discharged directly to the nearby Strenbach stream. City water is currently barely used for sanitary inside facility.

The facility is located in the Strengbach and Horgiessen sub-catchment which both flows into the Ill river which is a Rhein affluent. The whole site is located in the "Parc Naturel Regional des Ballons des Vosges" which is a protected natural parc. The aquifer from which the site takes its water is along the Vosges fault and is called the GTi which translates as Grés du Tria inférieur or Grés Vosgiens.

The audit was conducted onsite on 3 to 6 June 2025.
The onsite site visit included the assessment of the production, the water treatment area, the storage of chemicals, the storage of finished products, the WASH access on-site, the biodiversity projects that are ongoing (Forest 2100 Munster and the vineyards in Ribeauvillé). The on-site source CH3 was also part of the visit.

FINDINGS

NUMBER OF FINDINGS PER LEVEL

Observation	5
Non-Conformity	3

FINDING DETAILS

Finding No:	TNR-018715
Checklist Item No:	1.2.1
Status:	Open
Finding level:	Observation
Checklist item:	Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall: - Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people; - Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies; - Provide evidence of stakeholder consultation on water-related interests and challenges; - Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups; - Identify the degree of stakeholder engagement based on their level of interest and influence.
Findings:	The question in the stakeholder survey related to the water challenges ask closed questions to confirm what risks the stakeholders think are the most relevant, rather than enquiring about their water-related challenges in an open manner . This does not sufficiently allow the stakeholder to express what their water challenge is. This is linked to the finding on 1.6.1.

Finding No:	TNR-018359
Checklist Item No:	1.4.3
Status:	Closed
Finding level:	Non-Conformity
Due date:	2025-Sep-04
Checklist item:	Advanced Indicator The embedded water use of primary inputs in catchment(s) of origin shall be quantified.
Findings:	While the site requested a Product Environmental Footprint study on their different products for each site. However, the specific water embedded water use in the catchment of origin was not quantified for primary inputs identified by both PEF and the supplier table.
Corrective action:	We have already started collecting water consumption data from our main raw material suppliers. This process will take time, as compiling reliable data across multiple suppliers requires coordination and follow-up. As the criterion requires documentation of water use for primary inputs , we consider that the data recently received (see in the evidences of implementation) already enables us to meet this requirement. On this basis, we believe the non-conformity can be closed.
Evidence of implementation:	Mails of our suppliers giving us water intensity (m^3/t) Extract of our calculation file (water intensity x primary input consumption= indirect water use)

Finding No:	TNR-018417
Checklist Item No:	1.5.6
Status:	Open
Finding level:	Observation
Checklist item:	Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.
Findings:	Site is encouraged to pursue looking for additional information on the condition and potential exposure to extreme events of the sewers and the municipal WWTP.

Finding No:	TNR-018366
Checklist Item No:	1.6.1
Status:	Closed
Finding level:	Non-Conformity
Due date:	2025-Sep-04
Checklist item:	Shared water challenges shall be identified and prioritized from the information gathered.
Findings:	The stakeholder questionnaire submitted specifically asks about risks to the site water resources rather than shared water-related challenges.Therefore, the shared water challenges identified are only related to these risks and do not cover other possible water challenges in the catchment shared by stakeholders.
Corrective action:	We will re-engage with the main stakeholders involved in water and environmental matters—specifically the Municipality and the SDEA to directly ask them about the water-related challenges they face. This will allow us to better identify and prioritize shared water challenges in our WSP. We are curently trying to plan a formal meeting (probably in september or october) with the mayor to introduce him our water KPI and action plans for 2025. During the meeting, we are going to ask him about his water challenges. All the specific challenges identified will be stored in our file "Analyses parties prenantes".

Evidence of implementation: 22/08/2025 - New CAP

1. Current situation and clarification

- The key stakeholders are clearly identified in the stakeholders matrix (attached as Analyses Parties Prenantes), based on level of interest and influence.
- The shared water challenges have already been updated in our stakeholders matrix , based on our current knowledge of the catchment and stakeholders.
- The key challenges for our main stakeholders are known, based on their official missions and on previous discussions held in recent years
- These challenges were not fully formalized in the original version of the stakeholder matrix but are now clearly included in the updated file.
- Future meetings will serve to validate, update, and prioritize these challenges in direct dialogue with stakeholders.

2. Planned stakeholder engagement in 2025 and 2026

- Municipality and SDEA: Both remain priority stakeholders. Meetings are planned in 2025 to specifically address shared water challenges as a dedicated agenda item.
- ONF (Office National des Forêts): Discussions are foreseen to address water-related challenges linked to forest management and our risk analysis (see attached the water ressource risk analysis).
- Collectif Biodiversité: With the support of a colleague also a member of this local group, we will help revitalize this platform to foster dialogue on local environmental and water issues relevant to citizens.
- Other potential collaborations: We are also exploring opportunities with local organizations such as the Conservatoire des Espaces Naturels d'Alsace (see mail attached) and the Parc Naturel Regional des Ballons des Vosges (already a partner, see mail attached), which could provide additional perspectives on local water and biodiversity challenges.

3. Integration

- All identified and validated challenges will continue to be compiled in the updated stakeholder matrix, with a dedicated sheet for shared water challenges.
- These will be reviewed and prioritized
- The updated file will thus demonstrate both the identification and prioritization process, supported by meeting records and documented exchanges.

4. Timeline

- Q4 2025: Meetings with Municipality and SDEA; reactivation of Collecti Biodiversité; Integration of additional stakeholder input (including potential NGO collaborations) into the stakeholder matrix.
- Q1/Q2 2026: discussions with ONF
- Q2 2026: Consolidation of all shared challenges into the Stakeholder matrix and action plan if necesssary.

Finding No:	TNR-018389
Checklist Item No:	3.7.3
Status:	Open
Finding level:	Observation
Checklist item:	Advanced Indicator Actions taken to address water related risks and challenges related to indirect water use outside the catchment shall be documented and evaluated.
Findings:	Site is sending a procurement control document to sign to their suppliers requesting specifically to use less water and engage themselves to do so. However more actions would be expected in order to address risks and challenges and water usage in their catchment of origin

Finding No:	TNR-018392
Checklist Item No:	4.1.2
Status:	Open
Finding level:	Observation
Checklist item:	Value creation resulting from the water stewardship plan shall be evaluated.
Findings:	The cost of water identified in 1.3.7 includes many fixed costs that are not dependent on the amount of water used. As such, the usage of the cost of water calculated in 1.3.7 for calculating value creation might overestimates these benefits, however in the case of Carola, the site has only one borehole and does not want to currently withdrawn more. Site is thinking of a better way to evaluate the (financial) value creation of their WSP.

Finding No:	TNR-018393
Checklist Item No:	4.1.4
Status:	Open
Finding level:	Observation
Checklist item:	Advanced Indicator A governance or executive-level review, including discussion of shared water challenges, water risks, and opportunities, and any water-related cost savings or benefits realized, and any relevant incidents shall be identified.
Findings:	The annual review does not cover water-related cost savings or benefits.

Finding No:	TNR-018419
Checklist Item No:	5.2.1
Status:	Closed
Finding level:	Non-Conformity
Due date:	2025-Sep-04
Checklist item:	The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.
Findings:	The "Gestion Durable de l'Eau 2024" document which contains the site Water Stewardship Plan was finalised and uploaded on the company website but it was not communicated to a list of relevant stakeholders as described in the Standard Water Stewardship.
Corrective action:	We will re-engage with the main stakeholders involved in water and environmental matters—specifically the Municipality and the SDEA to directly introduce them our water stewardship strategy and our report "Gestion Durable de l'Eau".
Evidence of implementation:	emails sharing our "Rapport Gestion Durable Carola" file to the mayor of Ribeauvillé, the DDT and the Parc Naturel des Ballons des Vosges. We will also send it to the SDEA next week. 27/08/2025 - I have shared the report with three additional local entities: the Citizens' Biodiversity Committee, the Chamber of Agriculture, and the Conservatoire des Espaces Naturels d'Alsace (please find attached the emails as proof). Beyond this, there are no further stakeholders for whom this communication would be relevant. I would also like to reiterate that the report is publicly available online to ensure full transparency for any interested organization.

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Report Details

Report	Value
Report prepared by	Lorenzo Brioschi
Report approved by	Ozge Gokmen
Report approved on (Date)	01/07/2025

Surveillance

Proposed date for next audit
2026-Jun-03

Stakeholder Announcements

Date of publication	Location
30/03/2025	Source of Change website
30/03/2025	In "Dernières Nouvelles d'Alsace" local newspaper
30/03/2025	https://a4ws.org/wp-content/uploads/2025/03/AWS-000422-Spadel-Ribeauville_StakeholderAnnouncement_Month3_V3.0.pdf

Catchment Information

Catchment Information

The Grandes Sources de Carola site is located in the Strengbach and Horgiessen sub-catchment which both flows into the Ill river which is a Rhein affluent. The primary supply of water comes from site own borehole (CH3, see below description), however the site is also connected to the municipal water supply (SDEA) which is used for sanitary applications. The SDEA takes water from two boreholes named "Grande verrerie" (n° 27 and n°29) and are located in the Ribeauvillé municipality in the same catchment as site, but different aquifer. The site discharges their neutralised effluents into the municipal sewers which are treated by the municipal WWTP (SDEA) and rejected into the Strengbach stream, while the rainwater and other clean waters are rejected directly into the Muehlbach stream.

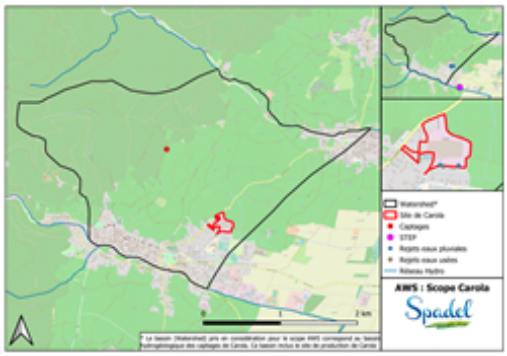
The faulted edge of the Alsatian slope of the Vosges, where it borders the Rhine Graben, is marked by numerous mineral and thermal water springs. These springs, accessed through wells and boreholes, are supplied by two major deep Triassic aquifers within the Rhine Graben: the Buntsandstein (sandstone) and the Upper Muschelkalk (limestone). The springs emerge through fault zones along both the Lower Rhine (at locations such as Morsbronn-les-Bains, Merkwiller-Pechelbronn, and Niederbronn-les-Bains) and the Upper Rhine (notably at Wattwiller and Ribeauvillé).

The local aquifer-bearing geological formations, listed from youngest to oldest, include:

Lettenkohle: This dolomitic formation likely connects to the Upper Muschelkalk aquifer.
Upper Muschelkalk (comprising entrobic limestone and Ceratite layers): The entrobic limestone feeds the original CAROLA springs, while the Ceratite layers are accessed by borehole S3 at depths of 40 to 60 meters.
Middle Buntsandstein (main conglomerate and Vosges sandstone): Known as the GTi aquifer (Grès du Trias inférieur or Lower Triassic Sandstone aquifer), it is tapped by CAROLA's CH3 and F8 boreholes. Borehole F8 reaches the aquifer at depths between 147.5 and 216.5 meters. As of October 2017, the static water level in F8 was approximately 121.2 meters, corresponding to around +246 meters NGF (French national elevation reference). At the CAROLA site, the GTi aquifer exhibits artesian conditions at borehole CH3, with a water level approximately 14 meters above ground level (about +241 meters NGF). In contrast, artesian flow is not observed at borehole F8, indicating a hydraulic gradient from the GTi aquifer towards the Muschelkalk aquifer near the CAROLA facility.

Currently, only the CH3 borehole is exploited to bottle water.

The area is not subject to specific water risks. Flooding or droughts are currently not an issue, this complies with the low risk identified in the Water Risk Atlas (Aqueduct)
The whole site is located in the "Parc Naturel Regional des Ballons des Vosges" which is a protected natural parc. However, the catchment and site are not included in a protected area for hydrogeological features which is considered as a risk by the site.
The catchment (and region) is dominated by tourism and vines as Ribeauvillé is currently on the Alsace wine route.



Carola Catchment.png

Client Description and Site Details

Client/Site Background
Site is located in Ribeauvillé in the middle of the vineyards road, as such the main region activities are wine making and tourism. It employs 50 FTE and uses one borehole (CH3) delivering Spring water.
The site produced about 59 millions bottles in 2024 in their two productions lines, 1 line for PET bottles (1L-1,25L and 1,5L), still, sparking and aromatised and one for re-usable glass.
Site is approximately 40,000 m2 in size and includes offices, production and storage area.

Water inputs and sources: the borehole named CH3 is located within site boundaries and provides the Spring Water. There is another one F8 (that is not in use for production) and several other piezometers installed in the catchment to monitor the water bed level. The site is also using city water provided by local supplier SDEA for the sanitary and some cleaning activities.
No specific energy facilities using water on site.
Water Treatment Facilities: Site uses specific filters for Arsenic removal and then 4 tanks for 600 m3 of buffer tanks before bottling (450 of source water and 150 of industrial water).

Waste water: Site effluents go to the sewers and to the municipal WWTP which is located in the municipality of Ribeauvillé and is discharging the treated water in the Strengbach.
Rainwater and other clean waters from production are discharged directly into the Muehlbach stream. No harvesting of rainwater done.
Fire water tank uses city water.

The site sub-basins are: the Horgiessen and the Strengbach, they both goes into the L'ill which goes into the Rhein in Strasbourg.

Site_boundaries.png

Summary of Shared Water Challenges

Summary of Shared Water Challenges
The following shared water challenges were identified by the site through stakeholder consultation:
- Usage and storage of phytosanitary products in the catchment (vines);
- Hydrocarbons leakages/spills on non-protected parking areas in the catchment;
- Hydrocarbons leakages from private diesel tanks;
- Hydrocarbons pollutions during road incidents;
- Hydrocarbons pollutions caused by foresters thermal powered equipment;
- Climate change and particularly the decrease in water availability;

Comment Note the finding raised in 1.6.1.

1	STEP 1: GATHER AND UNDERSTAND	
1.1	*Gather information to define the site's physical scope for water stewardship purposes, including: its operational boundaries; the water sources from which the site draws; the locations to which the site returns its discharges; and the catchment(s) that the site affect(s) and upon which it is reliant.*	
1.1.1	*The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including:* *- Site boundaries;* *- Water-related infrastructure, including piping network, owned or managed by the site or its parent organization;* *- Any water sources providing water to the site that are owned or managed by the site or its parent organization;* *- Water service provider (if applicable) and its ultimate water source;* *- Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies;* *- Catchment(s) that the site affect(s) and is reliant upon for water.*	Yes
Comment	The Physical Scope is mapped in QGIS and can be found in supporting AWS Scope document. It includes the following: - Site boundaries including the CH3 Spring water borehole used for production; - The surface water catchments of Horgiessen and the Strengbach stream where the site is located; - Water piping network (site owned pipes and sewers system); - Sources used by the municipal supplier to provide water for sanitary; - Piezometers used to monitor the water bed level; - Discharge points to sewers and of rainwater; - The Parc Naturel Régional des Ballons des Vosges, the natural park where the site is located; - The Impluvium or recharge area of the groundwater aquifer used for production.	
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.*	Obs.

Comment	The supporting list of stakeholders is analysed as per 1.2.1 requirements. New stakeholders added since previous audit: - Beauvillé - the only other industrial site located in the Ribeauvillé municipality. It is a table linen manufacturer and has probably some challenges related to water. - Nearby Municipal Swimming Pool - the Swimming Pool was managed by the Carola site in the past but is now handled completely by the municipality and does not receive water from the site. Nevertheless, they are a local water user. Note that they were not yet consulted as they were added after the last 2024 stakeholders survey.	
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	Current and "wanted" or potential degree of influence between site and stakeholder is indicated in the stakeholder list uploaded in 1.2.1. For instance the new stakeholder Beauvillé is indicated as very low influence but the site is willing to increase that and is planning to have a meeting with them.	
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	Documents supporting this indicator: - c-env-mo-urg-1 Fermeture des vannes de coupure du réseau eau pluviale - Exercice de Déversement accidentel du 4 Fevrier 2025 - r-env-p-urg1 Deersement accidentel dans l'eaux pluviales - c-sec-s-urg1 plan intervention usine The plan does not cover flooding as the site is not subject to floods. Water is the core business, in the "'Standard exploitation" there is a whole list of procedures to do in case the pressure at the well is too low or if the flow is too high. However if for any reasons the water from the borehole could not be bottled, the site does not have alternatives therefore a business continuity plan is not relevant as per the site activity.	
1.3.2	*Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped*	Yes
Comment	The attached simplified flow chart was supplied for site water balance mapping. A more complete technical PID with all the water inlets, storage and outflows indicated in a technical drawing was also reviewed.	
1.3.3	*Site water balance, inflows, losses, storage, and outflows, including indication of annual variance in water usage rates, shall be quantified. Where there is a water-related challenge that would be a threat to good water balance for people or environment, an indication of annual high and low variances shall be quantified.*	Yes
Comment	No specific seasonality observed in the monthly water balance, the demand is usually quite stable during the year and when some higher consumption is observed it is mainly cause by a production increase in re-usable glass bottles (washing machine uses big amounts of water). There is no sign of water-related challenge for quantity. The site is gathering data for improving the hydrogeological model first made in 2019. The new study based with the new data will be done in 2025 and determine better the most sustainable limit for the CH3 borehole.	
1.3.4	*Water quality of the site's water source(s), provided waters, effluent and receiving water bodies shall be quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be quantified.*	Yes

Comment	Supporting documents to monitor water quality on-site: - Site is monitoring extensively the water from the borehole, the effluent and impact to the river, the water at different steps of production as described in documents CS_Carola, Document "Analyses types eaux conditionnees" provides the test battery that are described in the CS_Carola document. - When city water is used to fill the industrial water tank, that water is analysed daily as per normal monitoring procedure. No other testing is performed on the city water. - Document "c-lab-s-pdc1 Plan de prélèvements et analyses laboratoire" describes the sample location, type of testing and frequency for microbiological testing. - Document "c-env-s-rej1 Plan de contrôle effluents" provides the test plan for the effluents. - Supporting test reports and data was available to review and sampled during the audit. An annual summary including any quality issues are presented to the authorities in a document called "Bilan Synthetique Annuel 2024 - Exploitation eau de source"'.	
1.3.5	*Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.*	Yes
Comment	- The site risk analysis will indicate the potential source of pollution to the water aquifer. To be noted that the infiltration area is higher up from the site and not directly around it as the aquifer is deep and protected. - The "Plan intervention usine" will map the critical places where chemicals are stored on site. - A list of all chemicals stored and their SDS is available in the storage area and in attached "Stock des Produits Chimiques" document. - A plan d'urgences des sources is in the pipeline to be done.	
1.3.6	*On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.*	Yes
Comment	- The borehole is located on-site however it is the aquifer is considered as an IWRA but located outside the site. Therefore, no IWRA identified within site boundaries.	
1.3.7	*Annual water-related costs, revenues, and a description or quantification of the social, cultural, environmental, or economic water-related value generated by the site shall be identified and used to inform the evaluation of the plan in 4.1.2.*	Yes
Comment	The attached cost analysis calculates the cost per m3 of water taking into account all externalities. The current cost is less than Wattwiller. The analysis includes the cost of manpower, consumables (chemicals etc.), energy and related, biodiversity/IWRA projects, environmental protection (of the impluvium), water quality control, waste water treatment, taxes between others.	
1.3.8	*Levels of access and adequacy of WASH at the site shall be identified.*	Yes
Comment	The level of access is identified and compared to the article R.4228-9 of the French Work Code. The attached document shows the shower, WC and sink count. While the shower count is 1 shower per 10 employees, and the French law requires 1 per 8 employees, the count is made for the total FTE of the site which is actually including the admin and office employees. As per the office-type of work, these are not considered by law as requiring access to a shower. Thus, the analysis consider it compliant.	
1.4	*Gather data on the site's indirect water use, including: its primary inputs; the water use embedded in the production of those primary inputs the status of the waters at the origin of the inputs (where they can be identified); and water used in out-sourced water-related services.*	
1.4.1	*The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be identified.*	Yes

Comment	The site has a list of all suppliers classed by annual costs. No embedded water use of primary inputs located in the catchment.	
1.4.2	*The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.*	Yes
Comment	The site has a list of all suppliers classed by annual costs. No embedded water use of outsourced services located in the catchment.	
1.4.3	*Advanced Indicator* *The embedded water use of primary inputs in catchment(s) of origin shall be quantified.*	closed
Comment	The site had received some feedback from their primary PET material supplier water usage but did not yet calculate the amount related to their own usage. ***Finding No: TNR-018359***	
1.5	*Gather water-related data for the catchment, including water governance, water balance, water quality, Important Water-Related Areas, infrastructure, and WASH*	
1.5.1	*Water governance initiatives shall be identified, including catchment plan(s), water-related public policies, major publicly-led initiatives under way, and relevant goals to help inform site of possible opportunities for water stewardship collective action.*	Yes
Comment	Water Governance initiatives identified by the site locally and at regional level: - Collectif Biodiversité de la commune de Ribeauvillé: a collective to work on biodiversity initiatives locally with agriculture, collectivity, wine makers, bee givers, and environmental protection NGOs. The municipality currently stepped down from the initiative in the past couple of years but the site is planning to work on invigorating the agreement with new projects. Past projects: zone humides, flowers in vineyards, buissons. The collective is currently not active since a couple of years but Spadel is planning to revive it this year. - SAGE "Schema d'Aménagement et de Gestion de l'Eau" Ill nappe Rhin. The SAGE Ill-Nappe-Rhin is a French water management plan for the Ill River, the Alsace aquifer, and the Rhine in eastern France. It aims to protect water quality, ensure sustainable use of water resources, manage flood risks, and preserve ecosystems. Key issues include pollution from agriculture, overuse of groundwater, and the need for cross-border cooperation with Germany. It's coordinated by a local water commission (CLE) and supports the broader Rhine-Meuse basin strategy. The main goals are: Reduce agricultural pollution (nitrates, pesticides). Protect the Alsace aquifer, especially for drinking water. Restore rivers and wetlands (e.g., Ill, Ried areas). Regulate groundwater use and promote water savings. Improve flood risk management using natural solutions. Strengthen cross-border cooperation with Germany. - SDAGE Rhin-Meuse (2022–2027): The SDAGE (Schéma Directeur d'Aménagement et de Gestion des Eaux) is the strategic plan that sets the long-term goals for water management across an entire river basin, guiding local actions like the SAGE. Main goals: Improve water quality, especially by reducing nitrates, pesticides, and micro-pollutants. Restore rivers and aquatic ecosystems, including continuity for fish migration. Protect and manage groundwater, particularly strategic drinking water reserves. Adapt to climate change, focusing on droughts and floods. Preserve wetlands and biodiversity. Promote sustainable agriculture and land use. Engage stakeholders and support good governance in water management - PLU - Plan Local d'Urbanisme: local urban planning which includes local actions in the Ribeauvillé municipality including actions related to water management.	
1.5.2	*Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.*	Yes

Comment

Permit and legal water governance documents supporting the indicator:
- Arrêté (permit) of 01.03.1996 include the permit to withdraw and bottle source water with maximal flow + Updated arrêté (permit) of 2022 - is providing details on the water treatments allowed by the site (As, + CO2 injection), include the auto-monitoring of the parameters requirements and reference to the ARS monitoring program by the authorities.
- Bottling permit: arrêté de 17/10/2006 - provides the details of the right of bottling operations and all the local operations necessary to it.
- Effluents: arrêté 20/12/2019 - paremeters indicated pH, temperature and daily flow, DBO5, DCO, MES, NTK (total nitrates, phosphorus total with charge per day. + Convention with SDEA. It also includes the rainwater where the parameters are MES and total hydrocarbons + it states that any non conformity should be communicated to them immediately.
- SOP for regulatory watch.

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

Yes

Comment

- WEI: calculation of the annual Water Extraction Index shows a 3.8% for 2024 which lower than the 10% threshold that the EEA uses as sustainable water use.
- 2019 hydrogeological study by Antea. The site added piezometers in order to collect additional data and be able to better adjust the model as precaunized by the study. A new study is in the pipeline for this year.

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

Yes

Comment

- The Horgiessen stream quality data is attached and shows an overall good water quality.
- The Strengbach: good quality except for the Benzo(a)pyrene which is making it downgraded to less than good for chemical status. The ecological status is average and the chemical is good if you remove the ubiquitous chemicals).
- Study mandated by the site for the quality of their effluent and the impact on local river.

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

Yes

Comment

List of IWRA available identifies the two streams that are passing around the site, the Parc Naturel Régional des Ballons des Vosges, the Forest of Munster (where project Forest 2100 is happening), the aquifer used by Carola and the vines (important and related to water because biggest water consumer in the region). An assessment of the status and the source used for the assessment is part of the document.

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

Obs.

Comment

- Water-related infrastructure is mapped: municipal WWTP and municipal boreholes, the rainwater, the sewages, the irrigation waters are also identified on the map.
- Some mudslides happened in spring 2016 and 2018 because of extreme rains while the vines and vegetations were not yet big enough.
- The municipal water supply is using less chlorine on a special approach to monitor more and do more prevention in order to avoid the usage of chlorine all the time. Chlorine is used during summertime while the temperatures are higher.
- The municipal WWTP supplier provides the following information for 2024: 96% of compliance of effluents daily check for DBO5 and an indicator of the knowledge of the WWTP of direct to nature discharge (not including the extreme events).
- Minutes of meeting with the municipality showed that site requested information on conformity of the municipal WWTP - so far no feedback was received.

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

Comment - JMP File for France supporting shows a good WASH coverage in the country (and in this case also in the catchment).
- The municipal service SDEA is offering both potable water and the WWT services. The last available management plan is for the 2016-2020 period and does not provide some relevant information except customer satisfaction.

1.5.8 *Advanced Indicator*
Efforts by the site to support and undertake catchment level water-related data collection shall be identified. Yes

Comment - Données piézometriques - Water bed level followed daily in the Bilan Eau document attached, this will be used to calibrate the hydrogeological model and have a better understanding of the local aquifers dynamics. This will be shared with the authorities to support the update of permits.
- Analyses du cours d'eau - Raisô - impact analysis of the rain water discharge on the local stream.
- Antea study on hydrogeological study of the catchment with focus on the minerals in the water and the modelisation of the aquifer recharge.

1.5.9 *Advanced Indicator*
The adequacy of WASH provision within the catchments of origin of primary inputs shall be identified. Yes

Comment The list of suppliers identified in 1.4 identifies three countries of origin: France, Belgium, Luxemburg and Germany. The attached JMP WASH data can show a very good WASH provision country wise.

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

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

Comment - Shared Water challenges identified through the questionnaires sent to stakeholders: ARS, Positiv Energie (consultant), le Parc Naturel Regional des Ballons des Vosges, Antea, Eurodrill, SDIS (fire fighters), Brigade Verte de Vieux-Thann, SDEA, Mairie de Ribeauvillé, Syndicat viticole et les apiculteurs.
- From the 11 stakeholders who received the questionnaire only 4 answered.
- Shared water challenges are also identified in the WSP for some actions (as per site appreciation).
- The identified shared water challenges are indicated in the "Gestion des resources en eau" document and are the following:
The following shared water challenges were identified by the site through stakeholder consultation:
- Usage and storage of phytosanitary products in the catchment (vines);
- Hydrocarbons leakages/spills on non-protected parking areas in the catchment;
- Hydrocarbons leakages from private diesel tanks;
- Hydrocarbons pollutions during road incidents;
- Hydrocarbons pollutions caused by foresters thermal powered equipment;
- Climate change and particularly the decrease in water availability;

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

Comment Initiatives from the site or actions identified by the site are indicated on the "Gestion des resources en eau" document (see 1.6.1). The stakeholders did not propose any specific actions/initiatives to address these identified challenges.

1.6.3	*Advanced Indicator* *Future water issues shall be identified, including anticipated impacts and trends*	Yes
Comment	An extended study was mandated in 2021 to identify through models the possible impact of climate change on the site activities (water resource). The conclusion is that globally the recharged water will probably decrease because of higher temperatures and therefore evapotranspiration, more extreme water events.	
1.6.4	*Advanced Indicator* *Potential water-related social impacts from the site shall be identified, resulting in a social impact assessment with a particular focus on water.*	Yes
Comment	An Environmental Impact Assessment was done in 2005 for the permit request to the authorities for increasing production and finished product storage area. This was the last relevant change in site operations. Chapter 3 of the document includes an analysis of the effects on human health, living conditions, and cultural heritage. To note that the production site exists since 192X, as such the local population has always lived with the production site nearby.	
1.7	*Understand the site's water risks and opportunities: Assess and prioritize the water risks and opportunities affecting the site based upon the status of the site, existing risk management plans and/or the issues and future risk trends identified in 1.6.*	
1.7.1	*Water risks faced by the site shall be identified, and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.*	Yes
Comment	Risk analysis can be found on the attached documents and are identified, prioritised including likelihood and severity of impact within a given timeframe, potential costs and business impact. Identified as higher risks are Geothermal digging that could cause unwanted water exchange between the protected aquifer and others, pollutions caused by private fuel tanks, and un-filled old boreholes that are not used anymore. The proposed actions or opportunities are indicated directly on the risk analysis. It is to be noted that these risks are mainly addressing the risk to the water resources while some other risks related to site activities are not included in the analysis. This said, site addressed risks related to climate change separately. It is however strongly suggested to broaden the scope within the risk analysis document in order to have an exhaustive view on all types of risks.	
1.7.2	*Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.*	Yes
Comment	Opportunities are indicated in the WSP with potential savings. - In Water Use Ratio opportunities: Change of water buses (done), change in the frequency of CIP 3pH to 1 every two weeks (done), optimising the CIP (frequency and time - Ongoing). - Opportunities can also be found in the WSP in the best practices and opportunity tab. The one on-going and done are indicated. Relevant opportunities: establish a project of regenerative hydrology in the vines, improve the site knowledge on organic vineyards in the area (and possibly work to awareness the others). These opportunities are considered by the site as "best practices" but that are only relevant for the Carola site. While the Best Practices identified are valid for all Spadel sites as explained by the site. - Opportunities related to the identified risks are indicated directly in the risk analysis document. Only these opportunities are therefore prioritised.	
1.8	*Understand best practice towards achieving AWS outcomes: Determining sectoral best practices having a local/catchment, regional, or national relevance.*	

1.8.1	*Relevant catchment best practice for water governance shall be identified.*	Yes
Comment	Best practices identified that were not yet completed: - Establishment of the Source Emergency Plan in collaboration with local authorities. - Doing an annual meeting with one representative of each Spadel site to review the risk analysis of all sites and brainstorming	
1.8.2	*Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.*	Yes
Comment	Best practices identified that were not yet completed: - Use the Water Scarcity Index as a Performance Indicator for sustainable water balance. - Re-do the numerical model of 2019 but with new data gathered in the past 5 years (should be done in 2025). - Evaluate the water consumption of the bigger primary suppliers (indirect water use).	
1.8.3	*Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.*	Yes
Comment	Best practices identified that were not yet completed: - Implementation of a Source Urgency Plan. - Implementation of a standardised maintenance plan for the boreholes.	
1.8.4	*Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.*	Yes
Comment	Best practices identified that were not yet completed: - Plan d'urgence sources - Ensure pace flow of the stream to maintain ecological continuity - Request closure reports for biodiversity projects.	
1.8.5	*Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.*	Yes
Comment	Nothing was currently identified for WASH as it is not considered as a priority in this catchment (both from a site and catchment perspective).	

2	STEP 2: COMMIT & PLAN - Commit to be a responsible water steward and develop a Water Stewardship Plan	
2.1	*Commit to water stewardship by having the senior-most manager in charge of water at the site, or if necessary, a suitable individual within the organization head office, sign and publicly disclose a commitment to water stewardship, the implementation of the AWS Standard and achieving its five outcomes, and the allocation of required resources.*	
2.1.1	*A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:* *- That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes* *- That the site implementation will be aligned to and in support of existing catchment sustainability plans* *- That the site's stakeholders will be engaged in an open and transparent way* *- That the site will allocate resources to implement the Standard.*	✓ Yes
Comment	The AWS commitment is available on the Source of Change website at the following address: https://sourceofchange.spadel.com/wp-content/uploads/2025/05/Statement-AWS-Marc-du-Bois_V4_2025_05.pdf It is a Spadel Group level document and it contains the necessary commitments along with an organigramme of the water stewardship team of Spadel.	
2.1.2	*Advanced Indicator* *A statement that explicitly covers all requirements set out in Indicator 2.1.1 and is signed by the organization's senior-most executive or governance body and publicly disclosed shall be identified.*	✓ Yes
Comment	The commitment in 2.1.2 is signed by Marc du Bois, CEO of Spadel group.	
2.2	*Develop and document a process to achieve and maintain legal and regulatory compliance.*	
2.2.1	*The system to maintain compliance obligations for water and wastewater management shall be identified, including:* *- Identification of responsible persons/positions within facility organizational structure* *- Process for submissions to regulatory agencies.*	✓ Yes
Comment	- An excel document "Normes et PDC rejets Carola" is used to track the necessary analysis to be done on both effluent water (to sewers) and rain water. The site is doing self-monitoring and is submitting to authorities through the GIDEF portal the results every 3 months. In addition the SDAE comes by surprise to take samples and do the same analysis. - The Excel file from ARS called CS Carola will detail the sampling point and test battery for the different points in the facility (raw water, filters, product water). Internal analysis for auto-control, for instance a full analysis is done once per year in Henri Jean laboratory (for source), Arsenic is analysed once per month, all the parameters of finished product (twice per year). The authorities test both source and finished product. The full analysis is on the finished product. - A monthly report on auto-controlled data for the effluent is submitted to authorities through the GIDAF portal. - A summary of all year environmental compliance obligations and incidents (if any) called '"Bilan synthetique annual 2024" is provided annually to the ARS (Agence Régionale de Santé).	

2.3 *Create a water stewardship strategy and plan including addressing risks (to and from the site), shared catchment water challenges, and opportunities.*

2.3.1 *A water stewardship strategy shall be identified that defines the overarching mission, vision, and goals of the organization towards good water stewardship in line with this AWS Standard.*

Yes

Comment

A new group level strategy is currently being published and it defines the following overarching mission/vision:
" We strengthen nature's resilience by preserving and regenerating water resources through sustainable management and water related ecosystem restoration. We commit to set credible target driven by science-based framework".
The underlying goals are the following:
- Sustainable Water manager: no over-exploitation (monitored through WEI and WSR) and responsible protection and transparent concentration with local stakeholders.
- Regenerating water locally: program to regenerate develop water cycle in every regions where spades has operations via their 5% back to society program (through projects and scientific support)
- Setting targets validated buy official framework (SBTN or similar) for 2030.

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

Yes

Comment

- The attached WSP includes the target and how actions are measured and monitored. The timeframes, if any financial budgets is necessary (more detailed budgets can be found for Capex projects), the responsible person and a column that tells you if the it is related to a shared water challenge. For Best Practices, a separate tab is in use in the WSP, when it becomes an actual task, it will copied into the WSP tab and that will be indicated in the N column of the Best Practices and Opportunities tab.

Some of the relevant actions of 2024:
- calculation of the WEI with target of staying below 10% - result for 2024 is 3.9%
- water distribution to associations target 80% of budget - result for 2024 is 100%
- 90% of compliance verification of new environmental legislation on Red-On-Line - result for 2024 is 99%
- Water Use Ration of 1,57 - result for 2024 is 1,55
- Risks management of at least 75% of the annual risks plan - result for 2024 is 22%. Target was not reached as it was considered as too ambitious. The site handled to refill all un-used boreholes in the catchment which took out their budget and time available for this task.
- Project of forest restoration Forest 2100: the project was finalised and the clear cutted land located in the Parc Naturel des Ballons des Vosges was replanted with specific attention to make a resilient prototype forest with other wood species and local ones.
- No effluent non-compliances (2025, added following issues in 2024 - see 3.4.1).

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

Yes

Comment	- A project with the vineyards owners, the vineyards syndicate and the municipality of Ribeauvillé: sowing flowers in between vines to promote biodiversity. Spadel funded the project in 2021. The mix of flowers included local perennial flowers and grasses that should last for 10 years with an annual mowing done by the winegrowers. This would help the biodiversity especially for pollinators. Some parcels were visited during the audit and we could observe that some of the identified parcels were still flowered. - Collectif Biodiversité is in a halt since 2022 but site is planning to restart it. Water stewardship actions done: hedge planting, Trame verte/trame bleue - decreer des corridors de passages de la biodiversité, this last project stopped in 2022. This project is still working in 2024, they identified some zones in the vineyards that have not a good ecological corridor. NGO, Carola, la municipality, le syndicate viticole and Vineyards. Helped by association BUFO that did the analysis (ecological corridors), and INRA which study the biodiversity. And appiculteurs. Carola is in all this.	
2.3.4	*Advanced Indicator* *The site's partnership/water stewardship activities with other sites in another catchment(s) (either under same corporate structure or with another corporate site) shall be identified.*	✓ Yes
Comment	The Forest 2100 project is performed with a local land owner, the Parc Naturel Regional des Ballons des Vosges, Spadel, "Forêt d'ici" (ex-Cosylval) a foresters cooperative and the Chamber of Agriculture (Alsace region). This parcel is part of the site physical scope, but not located in the same sub-catchment as the site (both are in the bigger Rhine catchment). The project was finalised in 2024.	
2.3.5	*Advanced Indicator* *Stakeholder consensus shall be sought on the site's water stewardship plan. Consensus should be achieved on at least one target. A list of targets that have consensus and in which stakeholders are involved shall be identified.*	✓ Yes
Comment	The stakeholder questionnaire included the following question related to the general WSP: In a general way, considering the aspects of water quantity, quality, governance and protection of environment, do you think that Carola can be considered a good water steward (or sustainable manager of the water resource to translate literally)? Of the four stakeholders that answered the questionnaire, three answered 5/5 and 1 answered 4/5.	
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

As part of the risk analysis presented in 1.7.1, meetings with the municipality of Ribeauvillé are held to discuss and coordinate the actions that the site does to control or mitigate the risks. These risks are mainly focused on avoiding the decline of the source water. The meeting minutes of 10/06/2024 were reviewed and confirmed the following discussions:
- the presence of old boreholes not use anymore and possibility to be a source of underground aquifer pollution. The site in collaboration with the municipality contacted the owners of the land where the boreholes are located and asked support to make the necessary to fill-in the boreholes. This action was identified in the risk analysis and opportunities finalised in 2024
- Discussion about the usage of salts during winter for snow removal.
- The possibility to participate in the replacement of old fuel tanks used by the population
- Ban the usage of phytosanitary products in the nearby football stadium. This was nearly completed.
- Make a contract within the Plan Local d'Urbanisme (PLU) to include the prohibition of geothermal drilling in the impluvium as it is too risky for the site water resources.
- The site asked to get information on the conformity of the municipal WWTP to the authorities, without success. From a water perspective, the site is currently only depending on the shared infrastructure related to the sewers and the municipal WWTP. The small amount of city water used in sanitary is not critical as the site mainly uses the source water for its operations.
- Site still has in the pipeline to establish a Source Emergency Plan in collaboration with local authorities to formalise actions and procedures in case of pollutions in the infiltration area. First contacts with municipality started.

2.4.2 *Advanced Indicator*

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

Yes

Comment

The company did in 2021 a study to assess the impact of climate change on the availability of the resource. It was identified that the increase in temperature and change of distribution of rainfall will probably cause a decrease in the amount of water available. As such, the site included different actions in their WSP to adapt to this:
- Water Extraction Index: stay under 10%
- Water Use Ration: 1.57 for 2024
- While the permit allows a flow of a set amount, the site did and is still conducting pumping test and monitoring of piezometers to gather data and request additional expertise to hydrogeological consultants. Currently the site fixed maximum is fixed, which the last study performed in 2019 as per Spadel group request considers as maybe not sustainable. However site conducted other data collections as prescribed by the site and will submit it this year for a further analysis. Depending on the results, the site might request a new permit for another borehole in order to make sure to use the water sustainably.

3	STEP 3: IMPLEMENT - Implement the site's stewardship plan and improve impacts	
3.1	*Implement plan to participate positively in catchment governance.*	
3.1.1	*Evidence that the site has supported good catchment governance shall be identified.*	Yes
Comment	- Minutes with the municipality of Ribeauvillé dated on the 06/06/2024 for a risk analysis. During this meeting a request to make some changes in the PLU was discussed. - The site is sharing the water bed level data in their annual report. - Project of resilient forest 2100 was done in collaboration with the French Chamber of Agriculture. - Carola is still in the "Collectif Biodiversité" meetings to promote local actions related to biodiversity.	
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	During the audit it was observed that the site does not have any water rights others than those part of 3.2 and water is available to all users in the catchment.	
3.1.3	*Advanced Indicator* *Evidence of improvements in water governance capacity from a site-selected baseline date shall be identified.*	Yes
Comment	- The improvements can be monitored through the WSP by filtering by year and comparing with the previous years. Note that the "repetitive" actions should also be filtered for clarity. - New employee Maxime Sohy was added as group engineer for water resource. He is in charge of supporting all water stewardship activities of the group. - New SOPs: Standard Water Stewardship - aims to standardise the WS activities for all Spadel sites, Standard Commissioning of New Borehole.	
3.1.4	*Advanced Indicator* *Evidence from a representative range of stakeholders showing consensus that the site is seen as positively contributing to the good water governance of the catchment shall be identified.*	Yes
Comment	The questionnaire answered by 4 stakeholders received a feedback of 4.67/5 for the governance and water stewardship questions.	
3.2	*Implement system to comply with water-related legal and regulatory requirements and respect water rights.*	
3.2.1	*A process to verify full legal and regulatory compliance shall be implemented.*	Yes

Comment

EFFLUENT
- For effluent 4 non-compliances were identified in 2024: once DBO5, twice DCO and once total phosphorus. For phosphorus it was identified that it came from a CIP agent that the site used which contained Phosphoric Acid. They engaged with their supplier to find an alternative. The incident analysis QSE 1/23/2024 document and then 10/03/2024 for the corrective action were reviewed during the audit.
For DCO it was the cleaning of the Caustic Soda bath that was not performed correctly (not completely emptied). These were resolved by updating the procedure to make sure it was verified to be fully empty before cleaning.
- The site also sends the monthly data of DCO and MES to SDEA, monthly communication was observed. --Their flow probe was found defective and the site communicated it to the relevant stakeholders (email reviewed).

Source WATER
The annual summary sent to ARS for 2024 was reviewed during the audit and did not show any quality concerns on the raw water or analysis the finished products.
The site is following all the requirements from the authorities in order to pursue its activities.
- For regulatory watch, the site has a goal to reach 90% of compliance/review of new environmental legislation and reach 99%. Note that this includes many things that are not related to water.

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

While site was providing water to the nearby municipal swimming pool, it is not the case anymore. The review of the permits showed that no water rights requirements are included in the documents and interview with local drinking water supplier confirmed that site activities do not impinge access to water to local population as both withdraw from different aquifers anyway.

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

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

Yes

Comment

- The Water Balance targets in the WSP are set with the WUR (target 1.57, result 1.55) and WEI (target < 10%, result 3.86%). The water balance is followed monthly in the "Bilan Eau Carola" Excel spreadsheet.
- The piezometric follow-up of the water bed level in 5 different locations in the catchment, this will allows an update in the modellisation of the hydrological feature of the exploited aquifer. The study is meant to be done this year.
- Addition of a on-line monitoring of the source borehole (CH3) where conductivity, flow and pressure, volume of water and temperature are now monitored continuously.

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

No volumetric total use in place as it is not conform with organisation business however Water Use Ration (WUR) is currently one of the main targets of Carola WSP.

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

Yes

Comment

No re-allocation of water identified during the audit through document review (permits and conventions) and interviews.
Bottled water donations to associations (sport and cultural) are an annual target and are monitored.

3.3.4	*Voluntary Advanced Indicator* *The total volume of water voluntarily re-allocated (from site water savings) for social, cultural and environmental needs shall be quantified.*	N/A
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	- Internal audit of site - OK but no Gold reached because no Source Urgency Plan established yet and no on-line monitoring (this last one was fixed between the internal audit and the AWS audit). - Implementation of the risk reduction action plan - 22% instead of 75% completed - the objective was too ambitious and it took too much resources to close the old boreholes. - 3 environmental water incidents review per year (presented to Spadel Group) - Done. - 1 full analysis of source water per year (covering more than legal requirements) - Done. - Effluent conformity issues: 4 over concentration (1xBOD, 2xCOD, and Phosphates). once DBO5, twice DCO and once total phosphorus. For phosphorus it was identified that it came from a CIP agent that the site used which contained Phosphoric Acid. They engaged with their supplier to find an alternative. The incident analysis QSE 1/23/2024 document and then 10/03/2024 for the corrective action were reviewed during the audit. For DCO it was the cleaning of the Caustic Soda bath that was not performed correctly (not completely emptied). These were resolved by updating the procedure to make sure it was verified to be fully empty before cleaning.	
3.4.2	*Where water quality is a shared water challenge, continual improvement to achieve best practice for the site's effluent shall be identified and where applicable, quantified.*	Yes
Comment	Water quality is not a shared water challenge in the catchment as identified for indicator 1.5.4.	
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	Recent IWRAs projects implementations: - Forêt 2100 - add rational here (see other comments already written). - Vines project : flowers and grasses sowed in between vines in order to increase biodiversity (insects) and decrease runoff in case of heavy rainfall. Note that the project was done in 2021 but the viability of it is expected to be 10 years and the founding of sowing new parcels is still ongoing.	
3.5.2	*Advanced Indicator* *Evidence of completed restoration of non-functioning or severely degraded Important Water-Related Areas including where appropriate cultural values from a site-selected baseline date shall be identified. Restored areas may be outside of the site, but within the catchment.*	Yes

Comment	- Munster Forêt 2100 project was visited during the audit. The parcel is within the bigger Rhein catchment but not inside the site sub-catchment. The whole Parc Naturel Régional des Ballons des Vosges is considered in the physical scope. It was observed on the parcel that the tree planted were protected with wooden fences to avoid animal grazing. The forest dynamics will however take some time before being able to conclude if the mixing of more southern wood essences mixed with local ones will increase the forest resiliency to climate change. - The flower seeding project: the vines are located within the site sub-catchment in the Ribeauvillé municipality. The city had issues with mudslides in the past during heavy rains. The project aimed both to mitigate the issue and to improve the pollen availability for pollinators, which are important for the vines survival and of great economical and social importance locally. Some of the parcels were visited during the audit and, while the mowing just occurred on some (as prescribed by the study) a grass cover was visible in between the vines in these steep parcels.	
3.5.3	*Advanced Indicator* *Evidence from a representative range of stakeholders showing consensus that the site is seen as positively contributing to the healthy status of Important Water-Related Areas in the catchment shall be identified.*	✓ Yes
Comment	Only 4 out of 11 stakeholders answered to the questionnaire, here are the results: - 3/4 Forest 2100 was worth. The site thinks that it is because the project is located outside the catchment. - 4/4 were supporting the flowering of the vineyards projects - 4/4 on the analysis of bees honey to monitor the environment (not considered in the 3.5.2 as conducted in 2019).	
3.6	*Implement plan to provide access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers at all premises under the site's control.*	
3.6.1	*Evidence of the site's provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers onsite shall be identified and where applicable, quantified.*	✓ Yes
Comment	The WASH count is available and confirms that it conforms with local legislation. - Site tour demonstrated that both employees and contractors have access to WC, sinks and showers and that free bottled drinking water is available for all.	
3.6.2	*Evidence that the site is not impinging on the human right to safe water and sanitation of communities through their operations, and that traditional access rights for indigenous and local communities are being respected, and that remedial actions are in place where this is not the case, and that these are effective.*	✓ Yes
Comment	No evidence that site is impinging on the human right to safe water and sanitation was observed during the audit. France has historically a very high WASH adequacy access to the population, the local water supplier is taking its water from underground resources located in different aquifers than the site. In addition, everyone in France has the legal right—enshrined in the Environmental Code, Public Health Code, Social Action Code, and EU law—to safe, affordable, and uninterrupted access to drinking water, with guaranteed daily availability, public transparency, and free access points in public places and restaurants.	
3.6.3	*Advanced Indicator* *A list of actions taken to support the provision to stakeholders in the catchment of access to safe drinking water, adequate sanitation and hygiene awareness shall be identified.*	✓ Yes
Comment	A total of 174000L of water (and aromatised water) donated to different sport and cultural but also Hospitals as observed through site records during the audit.	

3.6.4	*Voluntary Advanced Indicator:* *In catchments where WASH has been identified as a shared water challenge, evidence of efforts taken with relevant public-sector agencies to share information and to advocate for change to address access to safe drinking water and sanitation shall be identified.*	N/A
3.7	*Implement plan to maintain or improve indirect water use within the catchment:*	
3.7.1	*Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.*	Yes
Comment	No indirect water use targets were set in the water stewardship plan as no suppliers were identified within 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	No evidence of engagement with suppliers and service providers as no suppliers were identified within the site catchment.	
3.7.3	*Advanced Indicator* *Actions taken to address water related risks and challenges related to indirect water use outside the catchment shall be documented and evaluated.*	Obs.
Comment	The procurement policy (attached) states that "Spadel expects from its suppliers measuring and reducing use and discharge of water".	
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	Supporting evidence observed during the audit: - Minutes of meeting showing that Carola asked for compliance data of the municipal WWTP. - In March 2024, site presented to SDEA (the supplier of municipal water and WWTP) their risk analysis, the power point presentation was reviewed during the audit. - The proof of meeting with the shared water-related infrastructure is available however the content seems to cover only the presentation of the bigger risks of the site (which do not contains concerns on the sewers and WWTP) but not about requesting information on any concerns as no major issues happened in the catchment (flooding, droughts, etc.) in the past years.	
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	Actions towards achieving best practices done in 2024: - Implementation of a Performance Indicator for the regulatory watch - Implementation of a CSR strategy for 2025-2030 (currently being finalised - pair reviewed) - Implementation of the Steerco Water (Aqua Group) to approve and implement CAPEX projects related to water resources. - Visit of other bottling facilities (not Spadel) to share knowledge (1 visit in 2024 at Evian). - Annual review of WSP in the local management reviews. - Standard for pumping test at site level.	

3.9.2	*Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.*	Yes
Comment	Actions towards achieving best practices done in 2024: - Implementation of an optic fiber network to communicate and monitor borehole parameters in realtime. - Implementation of simplified water balance flowchart to facilitate understanding of the sites water usages. - Collection of data of piezometers put in place in 2022 - the piezometers need to be manually collected and scanned to gather the data (PZ Chateau, PZ F1, PZ S3 and PZ 1).	
3.9.3	*Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.*	Yes
Comment	Actions towards achieving best practices done in 2024: - All the air inlets filtered with HEPA filters (microbiology) - Analysis of the TFA on raw water (source) - Analysis of the impact of the site rainwater on the local stream (however done in 2023)	
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	Actions towards achieving best practices done in 2024: - CSR Strategy 2025-2030: will include a clear strategy of biodiversity and IWRA projects. The strategy is currently being peer-reviewed before finalisation.	
3.9.5	*Actions towards achieving best practice related to targets in terms of WASH shall be implemented.*	Yes
Comment	Actions towards achieving best practices done in 2024: - Sponsoring of events by donating bottled water (sport, cultural, hospitals, etc.) 174k donated in 2024.	
3.9.6	*Voluntary Advanced Indicator* *Achievement of identified best practice related to targets in terms of good water governance shall be quantified.*	N/A
3.9.7	*Voluntary Advanced Indicator* *Achievement of identified best practice related to targets in terms of sustainable water balance shall be quantified.*	N/A
3.9.8	*Voluntary Advanced Indicator* *Achievement of identified best practices related to targets in terms of water quality shall be quantified*	N/A
3.9.9	*Voluntary Advanced Indicator* *Achievement of identified best practices related to targets in terms of the site's maintenance of Important Water-Related Areas have been implemented.*	N/A
3.9.10	*Voluntary Advanced Indicator* *Achievement of identified best practice related to targets in terms of WASH shall be quantified.*	N/A
3.9.11	*Voluntary Advanced Indicator* *A list of efforts to spread best practices shall be identified.*	N/A

3.9.12	*Voluntary Advanced Indicator* *A list of collective action efforts, including the organizations involved, positions of responsible persons of other entities involved, and a description of the role played by the site shall be identified.*	N/A
3.9.13	*Voluntary Advanced Indicator* *Evidence of the quantified improvement that has resulted from the collective action relative to a site-selected baseline date shall be identified and evidence from an appropriate range of stakeholders linked to the collective action (including both those implementing the action and those affected by the action) that the site is materially and positively contributing to the achievement of the collective action shall be identified.*	N/A

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

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

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

Comment: WSP actions for 2024 shows that the following targets were not met:
- Analysis of risk - action plan to mitigate risk - 75% target and 22% result because of target was too ambitious and the management of the old boreholes risk (fill them) took more resources than expetcted.
The contribution to water stewardship actions is identified in the Gestion Durable de l'Eau document.
- The internal audit of site - the facility should reach "Gold" status (as per internal Spadel auditing grading, nothing to do with AWS), but met only Core. The reason is the lack of Source Urgency Plan and the lack of continuous pressure monitoring of the source.
- The comment column is used to indicate some kind of lesson-learned (if any) or the reason behind the missed target.

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

Comment:
- The value created in 2024 by the WUR projects (change of buses in the washer and CIP phase 3 process) was calculated to be 29,500 EUR.
- It was discussed that the site could also consider the revenue of their whole business as their product is water, but this would be only valid if the site would be at the limit of their permit withdrawal, which is not the case here.

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

Comment: Document "Gestion durable de l'eau" will detail the identified shared value benefits.
- Inventory of pollens with the bees and identification of pesticides concentration depending on the season. Better understanding of pollen availability/scarcity seasonality and presence of pesticide in a nearly pesticide-free agriculture (vineyards here are 90% organic).
- 20 ha of vines were sowed - better for pollinators as the bee study identified problems in pollen availability especially in autumn. This is good for the local biodiversity (and for the vineyards too).
- Projet 2100 - will bring knowledge on how an experimental plantation of forest with new wood species will handle climate change.

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

Comment: An annual water management meeting was held on the 02/06/2025, presentation of the meeting was reviewed during the audit. Water topics covered:
- closure of the meteorological station used for the Water Extraction Index calculation. Where to find precipitation data for the next years.
- Following-up of piezometers, flow and pressure, KPIs performance, WSP for 2024 closure, for 2025, and the risk management plan what was done in 2024 and what is planned 2025.

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	- Three time per year there is the "comité environment and Comité Security" COSEC/COSENV where are reviewed incidents and CAPlans with Gilles Oehler (Production Manager) José Lefort (Site Director) and the local quality team. - Main Management review annually where all the year incidents are reviewed along with their corrective action plan. The related incident files were also available to review. Especially the non-compliance of the effluent and their analysis were reviewed during the audit.	
4.3	*Evaluate stakeholders' consultation feedback regarding the site's water stewardship performance, including the effectiveness of the site's engagement process.*	
4.3.1	*Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.*	Yes
Comment	- In 2024 a questionnaire was sent to stakeholders was sent to 11 stakeholders to gather feedback but only 4 replied to the call. - Site held some meeting with selected stakeholders and presented that provide the KPIs (WEI, WUR, risk analysis, content is selected as per stakeholder interest): municipality, SDEA and local fire fighters S10 - The Spadel "Standard Water Stewardship" indicates that the "Gestion resources en eau" document must be communicate actively to the stakeholders.	
4.3.2	*Voluntary Advanced Indicator* *The site's efforts to address shared water challenges shall be evaluated by stakeholders. This shall include stakeholder reviewing of the site's efforts across all five outcome areas, and their suggestions for continual improvement.*	Yes
Comment	- The shared water challenges and the projects that are done or planned to be done are indicated in the gestion des resources en eau document. However, to be noted that the document was not yet actively shared at the time of the audit as scheduled by site. In addition, a non-conformance was raised about the identification of shared water challenges in 1.6.1. - In the 2024 questionnaire sent to stakeholders, the score of the question related to the site handling the risks related to the water resources scored a 4.25/5.	
4.4	*Evaluate and update the site's water stewardship plan, incorporating the information obtained from the evaluation process in the context of continual improvement.*	
4.4.1	*The site's water stewardship plan shall be modified and adapted to incorporate any relevant information and lessons learned from the evaluations in this step and these changes shall be identified.*	Yes
Comment	The site water stewardship document (see 2.3.2 for the document) contains a column with the year of the action and is completely updated annually. the recurrent tasks are copied one year after the other, the new tasks are added to the list with the next year. Any lesson learned from the site evaluation and/or stakeholders feedback would be indicated in the comment column and integrated in the next iteration of the WSP.	

5	STEP 5: COMMUNICATE & DISCLOSE - Communicate about water stewardship and disclose the site's stewardship efforts

5.1 *Disclose water-related internal governance of the site's management, including the positions of those accountable for legal compliance with water-related local laws and regulations.*

5.1.1 *The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.* ✓ Yes

Comment: The internal governance of Spadel group and the relevant site employees is communicated through the commitment that is shared of Spadel Source of Change sustainability website. This commitment is public (see link in 2.1.1).

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.* ✓ closed

Comment: - The WSP is shared through the "Gestion durable de l'eau 2024" document. The document also indicate for the biggest targets what is the related AWS outcome. Note that not all the AWS outcomes are documented, the biodiversity projects (IWRAs) are not presented as such but could be. The Plan itself contains the related AWS outcome, but these columns were not included in the document by lack of space. Note that the report for year 2024 was issued end of March and was not yet actively sent to the stakeholders yet.

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5.3 *Disclose annual site water stewardship summary, including: the relevant information about the site's annual water stewardship performance and results against the site's targets.*

5.3.1 *A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.* ✓ Yes

Comment: See supporting attached document "Gestion durable de l'eau 2024'- this document is also available on Source of Change website. It includes the WSP for the year and a summary of the most relevant actions along with the performance against targets. A copy of the 2024 WSP is also added to the document.

5.3.2 *Advanced Indicator*
The site's efforts to implement the AWS Standard shall be disclosed in the organization's annual report. ✓ Yes

Comment: In the CSR 2023 annual report of the Spadel Group, the AWS certification is indicated several times. The group intention to keep the platinum certification for all sites is clearly stated. This document is available on the Source of Change website. Note that that document covers the results of 2023, the newest version of the CSR 2024 annual report was yet to be published at audit time but was nearly finalised as per interviewed personnel.

5.3.3 *Voluntary Advanced Indicator*
Benefits to the site and stakeholders from implementation of the AWS Standard shall be quantified in the organization's annual report. ↓ N/A

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

5.4.1	*The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.*	Yes
Comment	Shared water challenges can be found in the Gestion durable de l'eau 2024 indicated as "Risks". The table on page 5 also indicate the actions that site is doing to tackle them. Note that this risk instead of shared water challenge misinterpretation is already addressed in the 1.6.1 founding.	
5.4.2	*Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.*	Yes
Comment	Supporting evidence for the indicator presented during the audit: - Meeting minutes with S10 (local firefighters) to discuss about risks to the source and incident response plan. - Meeting with the municipality of Ribeauvillé to share information on risks (fuel tanks, parking issues, use of pesticides on the nearby football pitch, etc.).	
5.5	*Communicate transparency in water-related compliance: make any site water-related compliance violations available upon request as well as any corrective actions the site has taken to prevent future occurrences.*	
5.5.1	*Any site water-related compliance violations and associated corrections shall be disclosed.*	Yes
Comment	Compliance violations are communicated immediately to the SDEA (stakeholder), as observed during the audit. Site confirmed that the information would be made available to other stakeholders upon request if requested by a relevant stakeholder. In addition, effluent data is submitted to the authorities monthly through the GIDAF portal.	
5.5.2	*Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.*	Yes
Comment	The corrective action plans are recorded and available upon request. These are also communicated to the SDEA as observed during the audit through emails correspondence. In addition, effluent data is submitted to the authorities monthly through the GIDAF portal. Proof of communication were reviewed during the audit with email exchange and confirmation reception from the stakeholders.	
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	No violations that may pose signifiant risk and threat to human or ecosystem health were identified during the audit.	

Previous Findings

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