CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-001638

WSAS WATER STEWARDSHIP ASSURANCE SERVICES

SITE DETAILS

Site: **Nestle Waters Factory H&O LLC Dubai**
Address: National Industries Park,, Jebel Ali, Dubai, UNITED ARAB EMIRATES
Contact Person: Lovelyrose Nebab
AWS Reference Number: AWS-000659
Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Core
Date of certification decision: 2025-Oct-27
Validity of certificate: 2028-Oct-26

AUDIT DETAILS

Audited Service(s): AWS Standard v2.0 (2019)
Audit Type(s): Initial Audit
Audit Start Date: 2025-Jul-15
Audit End Date: 2025-Jul-17
Lead Auditor: Nathalie Karam

Site Participants:
Diya Gablan, Production manager
Haider Ali, Department Head HSE
Refat Jallad, Quality manager
S. M.D. Ashar, Maintenance Engineer
Sion Sunny, Other
Lovelyrose Nebab, Other
Assaad Saadeh, Other
Sarah Francis, Other
Mohammad Abuhantash, Factory Manager
Mohamed Saigu,

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ADDITIONAL INFO

Summary of Audit Findings: During the initial certification audit, 21 non-conformities and 14 observations were raised.

The Client is requested to submit corrective actions for each of the non-conformities to WSAS within 7 days of receipt of the audit report, by 05 September 2025.

The non-conformities must be closed within 90 days of the end of the audit. Due to the number of non-conformities, a remote 1 day further assessment is required to close the non-conformities, to be scheduled before 16 October 2025. Evidence for closure of the non-conformities is to be submitted at least a week before the further assessment date.

The audit team recommends certification of Nestle Waters Factory H&O LLC Dubai at Core level pending closure of the non-conformities at the further assessment.

Scope of Assessment: The scope of services covers the Initial certification audit for assessing conformity of Nestle Waters Factory H&O LLC Dubai against the AWS International Water Stewardship Standard Version 2.

Nestlé Waters plant in Dubai lies in Jebel Ali Free Zone, in the industrial area of Dubai. It's located in Dubai's southwestern part, near major logistical centers and industries. Dubai city is the nearest city center.
The location is in an industrial area, near warehouses, manufacturing plants, and distribution centers and not close to residential, farmlands, nor is it close to any bodies of water. The plant primarily produces Nestlé Pure Life brand bottle water.
The facility is located in the Arabian sea catchment.

The audit was conducted onsite on 15/7/2025 until 17/7/2025.
The onsite site visit included the assessment of production, wastewater storage, laboratory, chemical storage, waste storage areas as part of the audit.

FINDINGS

NUMBER OF FINDINGS PER LEVEL

Observation	14
Non-Conformity	21

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WSAS WATER STEWARDSHIP ASSURANCE SERVICES

FINDING DETAILS

Finding No:	TNR-018767
Checklist Item No:	1.1.1
Status:	Closed
Finding level:	Non-Conformity
Due date:	2025-Oct-16
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 catchment has not been correctly identified, as it was not defined with reference to an officially recognized hydrological, topographic, or watershed boundary, nor supported by a detailed explanation of how operations interact with the broader water system.
Corrective action:	Redefining the catchment as per the AWS guidelines, and to add hydrological, topographic, or watershed boundary,

Finding No:	TNR-018768
Checklist Item No:	1.2.1
Status:	Closed
Finding level:	Non-Conformity
Due date:	2025-Oct-16
Checklist item:	Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall: - Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people; - Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies; - Provide evidence of stakeholder consultation on water-related interests and challenges; - Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups; - Identify the degree of stakeholder engagement based on their level of interest and influence.
Findings:	The site did not initially include all relevant stakeholders in its identification process, notably omitting vulnerable groups. The mapping and analysis of stakeholder interest and influence were incomplete, particularly for stakeholders added during the audit. Additionally, all stakeholders were initially marked as "not applicable" regarding their interest in water management, which does not accurately reflect their potential roles or concerns. While the stakeholder list was updated during the audit, AWS requires a proactive and comprehensive approach to stakeholder identification and engagement, rather than reactive adjustments made during verification.
Corrective action:	Improve stakeholder mapping and take into consideration a broader list of stakeholders in the catchment.

Finding No:	TNR-018876
Checklist Item No:	1.2.2
Status:	Open
Finding level:	Observation
Checklist item:	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.
Findings:	The presented Mapping can be improved once the list of stakeholders is updated

Finding No:	TNR-018788
Checklist Item No:	1.3.7
Status:	Closed
Finding level:	Non-Conformity
Due date:	2025-Oct-16
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:	The site's current financial overview does not distinguish water-specific elements, nor does it describe any social, environmental, or cultural value outcomes linked to water use or management.
Corrective action:	To improve efficiency and accuracy in water-related financial reporting, by implementing integrated reporting tools

Finding No:	TNR-018877
Checklist Item No:	1.4.1
Status:	Open
Finding level:	Observation
Checklist item:	The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be identified.
Findings:	The site provided a register of suppliers and service providers categorized by process stage. This register also differentiates between embedded water use, indirect water use, and suppliers with significant water-related impact. However, it was noted that the terminology for embedded water and indirect water are not used interchangeably in the submitted documents.

Finding No:	TNR-018818
Checklist Item No:	1.5.3
Status:	Closed
Finding level:	Non-Conformity
Due date:	2025-Oct-16
Checklist item:	The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.
Findings:	- The catchment-level water balance was not accurately or appropriately quantified - There was no clear representation of seasonal or annual variability, despite the regional context of high water stress
Corrective action:	Including more data related to the water balance of the catchment.

Finding No:	TNR-018822
Checklist Item No:	1.5.5
Status:	Closed
Finding level:	Non-Conformity
Due date:	2025-Oct-16
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:	The site did not assess or document: -Their value of identified IWRAs;- Status of the identified IWRAs and any existing or potential water-related risks to or from these areas. In addition, stakeholder input or engagement in determining the IWRAs and assessing their status and threats was so far limited to communication with DEWA.
Corrective action:	Update the risk register with complete IWRAs assessment and implement necessary with expand stakeholder engagement

Finding No:	TNR-018823
Checklist Item No:	1.5.6
Status:	Closed
Finding level:	Non-Conformity
Due date:	2025-Oct-16
Checklist item:	Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.
Findings:	The site did not present any information regarding the condition of the identified water infrastructure and there was no assessment of the infrastructure’s vulnerability to extreme events, such as flooding, high temperatures, or system failures.
Corrective action:	- Conduct Water Infrastructure Condition Assessment with stakeholder - Coordinate with authorities shared risk scenarios.

Finding No:	TNR-018829
Checklist Item No:	1.6.1
Status:	Closed
Finding level:	Non-Conformity
Due date:	2025-Oct-16
Checklist item:	Shared water challenges shall be identified and prioritized from the information gathered.
Findings:	The on-site issues listed are not necessarily shared water challenges, and there is no evidence of a structured prioritization process involving relevant stakeholders.
Corrective action:	Focusing on better engagement with the external stakeholders in order to elaborate the list of shared water challenges and enhance the prioritization with a structured approach

Finding No:	TNR-019016
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 has made a partial effort to identify initiatives relevant to shared water challenges. However, due to the lack of prioritization of the challenges (required under 1.6.1), the response under this indicator is incomplete.

Finding No:	TNR-018831
Checklist Item No:	1.7.1
Status:	Closed
Finding level:	Non-Conformity
Due date:	2025-Oct-16
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:	The site identified several water-related risks that could affect operations, primarily focusing on physical, microbial, and chemical risks to the water source. These risks include potential disruptions in supply, raw water contamination, and infrastructure failures. However, the risk assessment lacks comprehensiveness as it does not consider the full spectrum of relevant water-related risks such as: Regulatory risks and Reputational risks (e.g. stakeholder or public perception), Furthermore, while risks are listed, there is no clear framework for prioritization based on likelihood, severity, timeframe, and potential business impact or cost, which is a key requirement of this indicator.
Corrective action:	Enhance the identified risks by including the reputational and regulatory pillars as well and assess their impact, urgency, feasibility and climate resilience.

Finding No:	TNR-019524
Checklist Item No:	1.7.2
Status:	Closed
Finding level:	Non-Conformity
Due date:	2025-Oct-16
Checklist item:	Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.
Findings:	The site has identified certain water-related opportunities, particularly in the areas of potential water savings and water quality improvements. However, the assessment is incomplete, there is no structured identification or prioritization of opportunities based on potential savings, business value, or stakeholder benefit.
Corrective action:	To establish projects governance for clear prioritization of water-related opportunities and potential savings

Finding No:	TNR-018834
Checklist Item No:	1.8.1
Status:	Open
Finding level:	Observation
Checklist item:	Relevant catchment best practice for water governance shall be identified.
Findings:	The site is encouraged to further review available initiatives and identify additional, clearly governance-focused best practices in alignment with AWS outcomes.

Finding No:	TNR-019017
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:	The site is encouraged to further review available initiatives and identify additional, clearly water balance focused best practices in alignment with AWS outcomes.

Finding No:	TNR-019018
Checklist Item No:	1.8.3
Status:	Open
Finding level:	Observation
Checklist item:	Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.
Findings:	The site is encouraged to explicitly present sector and catchment best practices for water quality and not leave it to the auditor to conclude.

Finding No:	TNR-018837
Checklist Item No:	2.2.1
Status:	Closed
Finding level:	Non-Conformity
Due date:	2025-Oct-16
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:	The site identified the team responsible for ensuring compliance with various regulatory aspects and outlined their responsibilities. However, the site did not present the process for regulatory submissions.
Corrective action:	To create documented regulatory submission procedures

Finding No:	TNR-018839
Checklist Item No:	2.3.2
Status:	Closed
Finding level:	Non-Conformity
Due date:	2025-Oct-16
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:	In the water stewardship plan, it is not clear how targets and actions address specific shared water challenges identified in Indicator 1.6.1. Additionally, there is a lack of link between targets and achievement of best practices, where available.
Corrective action:	To link the Water Stewardship Plan with water challenges by creating projects & link between targets and achievement of best practices,

Finding No:	TNR-019019
Checklist Item No:	2.4.1
Status:	Closed
Finding level:	Non-Conformity
Due date:	2025-Oct-16
Checklist item:	A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.
Findings:	Even though the site developed their risk mitigation or adaptation plan they did not provide evidence of coordination or communication on this plan with public-sector and infrastructure agencies.
Corrective action:	Add the risk mitigation, with consulting public-sector and infrastructure agencies and adaptation plan to the SWAY site the assessment of, share it with all stakeholders, and include it in future discussions

Finding No:	TNR-019531
Checklist Item No:	3.2.1
Status:	Open
Finding level:	Observation
Checklist item:	A process to verify full legal and regulatory compliance shall be implemented.
Findings:	The next audit will need to focus on verifying whether a legal framework exists for the site regarding water consumption and effluent discharge.

Finding No:	TNR-019059
Checklist Item No:	3.7.1
Status:	Open
Finding level:	Observation
Checklist item:	Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.
Findings:	The site is encouraged to formalise relevant targets in the WSP where significant indirect impacts are identified and align these targets with the AWS outcomes and incorporate them into future stewardship plans.

Finding No:	TNR-018882
Checklist Item No:	3.7.2
Status:	Open
Finding level:	Observation
Checklist item:	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.
Findings:	The site presented evidence of engagement with both its suppliers and service providers through email correspondence requesting information on water usage volumes and any existing water-related targets. However, no actions were presented that demonstrate how these suppliers or service providers have taken steps within the catchment as a direct result of the site's engagement. It is noted that the site is still in the early stages of AWS certification, and these efforts represent an important initial step. However, to fully meet the requirements of this indicator, more outcomes from the site's engagement are needed.

Finding No:	TNR-018883
Checklist Item No:	3.8.1
Status:	Open
Finding level:	Observation
Checklist item:	Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.
Findings:	Improvement in putting more efforts in the communication with the other stakeholders for example IMDAAD who manage the waste water treatment plant.

Finding No:	TNR-018867
Checklist Item No:	3.9.1
Status:	Closed
Finding level:	Non-Conformity
Due date:	2025-Oct-16
Checklist item:	Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.
Findings:	The site has identified best practice actions related to water governance, primarily focused on awareness-raising activities. Planned actions include: - Conducting awareness sessions for all employees and neighboring industrial stakeholders on the importance and principles of water stewardship; - Continuing awareness campaigns in schools, with some activities already initiated. However, at the time of the audit, no evidence of implementation was available.
Corrective action:	Implement the planned awareness activities and provide documented evidence of execution, such as attendance sheets, photos, training materials, and communication records and share after implementing projects ,and during the next audit to demonstrate implementation

Finding No:	TNR-019525
Checklist Item No:	3.9.2
Status:	Closed
Finding level:	Non-Conformity
Due date:	2025-Oct-16
Checklist item:	Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.
Findings:	The site has identified best practice actions related to water balance, most notably the planned dewatering project, which aims to treat and reuse water within the catchment. However, the dewatering project remains in the planning phase; and evidence of actions related to Aquassay has not yet been fully provided.
Corrective action:	To share the updated file related for dewatering project

Finding No:	TNR-018869
Checklist Item No:	3.9.3
Status:	Closed
Finding level:	Non-Conformity
Due date:	2025-Oct-16
Checklist item:	Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.
Findings:	The site has identified planned actions aimed at achieving best practice in relation to water quality, including: - Conducting water quality testing in various schools within the catchment to assess potential exposure and risks; - Testing water quality in Dubai Creek, a significant local water body, to monitor environmental impact and support broader catchment-level water quality improvements. These planned initiatives demonstrate the site's intention to engage in community-level monitoring and to contribute to water quality improvements beyond its operational boundary. However: - No evidence of implementation or results from these activities was available at the time of the audit; - There is not yet a clear linkage between these planned activities and adaptive actions to improve water quality based on the findings; - The connection to best practice (i.e., going beyond compliance to support shared catchment-level water quality improvements) remains conceptual at this stage.
Corrective action:	Implement the planned water quality monitoring activities in schools and Dubai Creek, document the results, and establish a clear linkage between findings and adaptive actions to improve water quality . Share the outcomes with relevant stakeholders and integrate feedback into the Water Stewardship Plan to demonstrate contribution to catchment level improvements beyond compliance.

Finding No:	TNR-019526
Checklist Item No:	3.9.4
Status:	Closed
Finding level:	Non-Conformity
Due date:	2025-Oct-16
Checklist item:	Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.
Findings:	The site has identified planned actions related to achieving best practice for the maintenance of IWRAs, including: - Water quality testing in Dubai Creek, a significant local water body within the broader catchment, aimed at understanding environmental health and potential human/ecosystem exposure. - Beach cleaning activities in Palm Jumeirah, intended to support the protection and maintenance of recreational and ecologically sensitive coastal areas. These activities show a commitment toward catchment engagement and enhancement of IWRAs. However: - These actions are currently planned only, and no implementation evidence was available during the audit.
Corrective action:	Accelerate projects' pipeline related to IWRAs while adding their impact

Finding No:	TNR-019155
Checklist Item No:	4.1.1
Status:	Open
Finding level:	Observation
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 site is encouraged to: - Consolidate the most updated version of the WSP. - Demonstrate how performance contributes to the five AWS outcomes.

Finding No:	TNR-019156
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 site's reporting does not elaborate on quantifying social benefits, nor does it provide information on monitoring actual versus planned impact.

Finding No:	TNR-018874
Checklist Item No:	4.1.3
Status:	Closed
Finding level:	Non-Conformity
Due date:	2025-Oct-16
Checklist item:	The shared value benefits in the catchment shall be identified and where applicable, quantified.
Findings:	The site has not provided evidence identifying or quantifying the shared value benefits created in the catchment as a result of its water stewardship activities. While some site-level and internal benefits are presented, these do not extend to clearly defined catchment-level value or demonstrate how external stakeholders or ecosystems have benefitted from the implementation of the WSP.
Corrective action:	Conduct a comprehensive evaluation to identify and quantify the shared value benefits

Finding No:	TNR-019513
Checklist Item No:	4.2.1
Status:	Open
Finding level:	Observation
Checklist item:	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.
Findings:	The site reported one emergency incident during the past year and outlined the corrective actions taken. However, no formal root-cause analysis was submitted as part of the documentation.

Finding No:	TNR-019157
Checklist Item No:	4.3.1
Status:	Closed
Finding level:	Non-Conformity
Due date:	2025-Oct-16
Checklist item:	Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.
Findings:	The site provided an updated version of its WSP and a presentation including information discussed during the audit (e.g., catchment identification). However, there is no evidence of consultation efforts with external stakeholders specifically on the site's water stewardship performance. The indicator requires the site to engage stakeholders in reviewing and providing feedback on its progress and outcomes, which was not demonstrated.
Corrective action:	Engage external stakeholders in a structured consultation process on the site's water stewardship performance by sharing the updated Water Stewardship Plan, progress results, and impacts of implemented actions, actively solicit feedback through meetings, workshops, or formal communication, document all feedback received; and incorporate stakeholder input into future reviews and updates of the WSP.

Finding No:	TNR-019158
Checklist Item No:	5.1.1
Status:	Closed
Finding level:	Non-Conformity
Due date:	2025-Oct-16
Checklist item:	The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.
Findings:	The site presented the structure of its internal water governance team, including roles and responsibilities related to water management and legal compliance. However, no evidence of public disclosure of this governance structure or accountability positions was provided.
Corrective action:	To share the list of roles and responsibilities related to water management externally

Finding No:	TNR-019160
Checklist Item No:	5.3.1
Status:	Closed
Finding level:	Non-Conformity
Due date:	2025-Oct-16
Checklist item:	A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.
Findings:	The site has not provided evidence of a publicly disclosed summary of its water stewardship performance, including quantified progress against targets, as required by this indicator. No annual report, website publication, or stakeholder communication document demonstrating such disclosure was presented.
Corrective action:	Develop and publish a publicly accessible summary of the site's Water Stewardship Plan (WSP) performance.

Finding No:	TNR-019161
Checklist Item No:	5.4.1
Status:	Closed
Finding level:	Non-Conformity
Due date:	2025-Oct-16
Checklist item:	The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.
Findings:	The site did not present any evidence of disclosure regarding its shared water-related challenges or the efforts made to address them. While shared challenges were internally identified and partially addressed through the WSP, no external communication or public documentation was shared with stakeholders or made publicly available.
Corrective action:	To improve external communication and share disclosures on shared water-related challenges,

Finding No:	TNR-019514
Checklist Item No:	5.5.1
Status:	Open
Finding level:	Observation
Checklist item:	Any site water-related compliance violations and associated corrections shall be disclosed.
Findings:	Due to insufficient time on site, this criteria was audited after the onsite audit based on documentation only, which included a statement that violation occurred which would need to be reported to authorities, however, this could not be appropriately assessed and will be reviewed at the next audit.

Report Details

Report	Value
Report prepared by	Nathalie Karam
Report approved by	Ruth Wandera
Report approved on (Date)	28 August 2025

Surveillance

Proposed date for next audit
2026-Jul-15

Stakeholder Announcements

Date of publication	Location
18/05/2025	https://www.nestle-mena.com/en/media/public-stakeholder-announcement-0 on board in the plant WSAS & AWS Websites

Comment The provided evidence for announcement was for the previous audit date schedules

Catchment Information

Catchment Information

The site is located within the Arabian Gulf catchment, also known as the Persian Gulf, a shallow marginal sea of the Indian Ocean situated between the Arabian Peninsula and Iran. The Gulf is characterized by high salinity due to intense evaporation and limited freshwater inflow. The catchment area spans approximately 93,000 square miles (241,000 square kilometers) and includes parts of Iran, Iraq, Saudi Arabia, Kuwait, Bahrain, Qatar, the United Arab Emirates, and Oman. The Gulf itself stretches about 615 miles (990 kilometers) in length, with a width ranging from 210 miles (340 kilometers) to as narrow as 35 miles (55 kilometers). The primary source of water within the catchment is the desalination of seawater, while brine and treated wastewater are typically discharged back into the sea. The region faces severe water scarcity and is vulnerable to urban flash floods caused by rare but intense rainfall events. There are no inter-basin water transfers; instead, water is moved through extensive pipeline networks. The climate is predominantly hyper-arid to arid, and the dominant water uses include urban and domestic consumption, agriculture, industry, and tourism. Notable protected areas within the catchment include Ras Al Khor Wildlife Sanctuary in the UAE, Asir National Park in Saudi Arabia, and the Hawf Protected Area in Yemen.

Picture1.png

Client Description and Site Details

Client/Site Background
Nestlé Waters plant in Dubai lies in Jebel Ali Free Zone, in the industrial area of Dubai. It's located in Dubai's southwestern part, near major logistical centers and industries. Dubai city is the nearest city center.
The location is in an industrial area, near warehouses, manufacturing plants, and distribution centers and not close to residential, farmlands, nor is it close to any bodies of water.

The plant primarily produces Nestlé Pure Life brand bottle water in different format. It is treated with advanced treatment technologies such as filtration, reverse osmosis, and UV disinfection in order to adhere to stringent quality standards.

The water is primarily delivered through municipal connections, desalinated water served through Dubai Electricity and Water Authority (DEWA). It is then treated through on-site water treatment for drinking standards. Reject water is stored in underground storage tanks and sold out for construction applications while waste water is stored in septic tanks onsite and subsequently taken out through the certified WWTP.

The factory occupies a total area of roughly 30,000 square meters. It began operation in the year 2010. The site relies on 100% solar energy for their electricity needs.

Picture2.png

Picture1.png

Summary of Shared Water Challenges

Summary of Shared Water Challenges
The site has identified the following as shared water challenges:

- Loss of water supply
- Intermittent disruptions in water availability
- Issues with raw water quality, including chemical and microbial concerns
- Drop in underground tank water levels due to DEWA mainline blockages caused by dust or sand
- Rising costs associated with water charges
- Excessive water extraction either by the site itself or nearby facilities
- Roof leaks during severe weather conditions
- Elevated bromate levels detected in raw water

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

The site provided a factory map and confirmed its location within an industrial area managed by JAFZA (Jebel Ali Free Zone Authority). The site does not manage or own any water sources; instead, it receives water from the Dubai Electricity and Water Authority (DEWA). DEWA supplies desalinated seawater, sourced from its Jebel Ali desalination facility.

A detailed factory layout and water-related infrastructure map were presented, including the piping network for water treatment, firefighting systems, and water storage areas. The discharge infrastructure includes on-site local wastewater tanks and sewage water tanks. Wastewater is tested monthly by a third-party laboratory and approved by Dubai Municipality for reuse in construction activities, as per municipal guidelines.

Sewage is collected by a licensed waste management company (Imdaad) and transported to municipal treatment facilities. The treated sewage is then reused by the authorities for cooling tower operations and roadside irrigation, depending on municipal requirements. However, the site does not have direct visibility over the final use of the treated effluent, as decisions are made centrally by the Dubai Municipality and may vary over time. The site also mentioned that brine and treated water are returned to the sea, but no mapping or specific location of the final discharge point was provided.

To identify its catchment, the site referred to mghydro.com, which delineated a broad region but did not point to a specific hydrological catchment area. Initially, no rivers or natural freshwater sources were identified within the vicinity. The site later classified its location within the Arabian Sea catchment. However, given the vast geographic scale of this catchment, spanning multiple countries, the site has focused its scope of assessment on its immediate geographic context, including water sourcing from DEWA and wastewater discharge pathways.

While the effort to understand the catchment is evident, the site is encouraged to refine its catchment identification, ideally referencing an officially recognized hydrological or watershed boundary, and provide a more detailed understanding of how its operations interact with the broader water system.

Finding No: TNR-018767

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 has implemented a stakeholder identification process using the Community Relation Process (CRP 3.0) tool, which outlines steps for effective engagement, including identification, interview selection, influence assessment, stakeholder mapping, and documentation. Stakeholders were initially identified based on proximity and interaction with the site—primarily neighbors and suppliers. The site is situated in an industrial area, with no residential community directly adjacent.

Evidence was provided of engagement activities with the initially identified stakeholders. These included consultations via CRP data collection forms covering a range of water-related topics such as shared challenges, water quality and quantity concerns, WASH, wastewater impacts, and possible improvements. Additional topics included industrial impacts related to transport and wastewater discharge, as well as the site's local contributions (e.g. improving water access and WASH).

However, the initial stakeholder list was not comprehensive. For instance, while the IWRA was included, its management was not initially identified as a stakeholder. Furthermore, the stakeholder analysis presented only reflected the initially identified stakeholders; newly added stakeholders were not included in the influence/interest mapping. Additionally, although the site donates water to vulnerable groups such as an orphanage (demonstrating a clear water-related engagement) this group was not listed among the stakeholders.

During the audit, the site revised and updated the stakeholder list to include the missing entities. An Excel sheet titled "Stakeholders Contact Details" was provided, which tracked the status of engagement with each stakeholder, including those still to be approached. Photographic evidence of stakeholder engagement was also presented. It was noted that a section of the initial stakeholder table, marking all stakeholders as "not relevant for AWS", was removed from the final version.

While the site presented the influence and attitude of stakeholders towards the site and vice versa, this analysis only covered the initial stakeholders. Interest levels were not mapped, and the newly added stakeholders were not included in the final influence/interest analysis.

Finding No: TNR-018768

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.*

Obs.

Comment

The site has developed a stakeholder map reflecting the current degree of influence between the site and its identified stakeholders. However, this mapping is based on the initial stakeholder list. Following the recent update to the stakeholder identification during the audit, the influence mapping should also be reviewed and updated to include all newly identified stakeholders, particularly those within the catchment.

1.3 *Gather water-related data for the site, including: water balance; water quality, Important Water-Related Areas, water governance, WASH; water-related costs, revenues, and shared value creation.*

1.3.1	*Existing water-related incident response plans shall be identified.*	Yes
Comment	The site has established multiple emergency response procedures relevant to water-related and general safety incidents. During the audit, the site presented documented procedures for medical emergencies, fire emergencies, and chemical spill response, along with a food safety response plan. Additionally, an earthquake response procedure was available. As part of chemical spill preparedness, spill kits were observed on site, indicating readiness to manage potential contamination events.	
1.3.2	*Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped*	Yes
Comment	The site has presented a water balance map that outlines the full water flow starting from the DEWA connection. The map includes key process stages, discharge points, and storage areas. It also identifies points of water loss, such as RO1, RO2, and overflow within the production line, providing a clear representation of inflows, losses, storage, and outflows across the site.	
1.3.3	*Site water balance, inflows, losses, storage, and outflows, including indication of annual variance in water usage rates, shall be quantified. Where there is a water-related challenge that would be a threat to good water balance for people or environment, an indication of annual high and low variances shall be quantified.*	Yes
Comment	The site has quantified its water balance, including detailed calculations for March 2025, covering water inflows, outflows, storage, and losses across different stages of production. Meter readings are recorded daily for key areas, including initial supply, domestic use, and reject water at various production steps. These readings also reflect changes in storage volumes over time. The site tracks its water ratio (i.e. water input vs. production output) on a daily, weekly, and monthly basis. Trend data for the water ratio is available for 2023, 2024, and 2025. An increase in the water ratio was observed in Q3 of 2024, attributed to issues in the RO3 unit, which was taken offline and is currently under renovation.	
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.*	No

Comment

The site has presented an external water quality analysis plan aligned with Nestlé Waters' requirements. Source water is tested annually, while product water undergoes quarterly testing, covering both physical and microbiological parameters.

A third-party testing schedule was also provided, covering raw water, wastewater (reject water), irrigation water, chiller water, and drinking water (product). Most streams are tested monthly, except for raw and chiller water, which are tested annually. All testing parameters are aligned with UAE national regulations and the NER.

The site maintains a comprehensive internal quality monitoring scheme, including:
- In-house testing of ACF, CIP, SDI, piping, and distribution systems
- A site-specific QMS for the production line, detailing sampling procedures, testing frequency, and assigned responsibilities
- A deviation action plan for out-of-specification results
- Regular testing conducted by local municipal authorities, with associated results and trend data shared by the site

However, the following gaps were identified:
- No trend analysis is currently performed for key internal water quality parameters (e.g. source, effluent), limiting the site's ability to identify seasonal or annual high/low variances that could pose risks to people or the environment.
- Sewage water quality is not tested, and there is no monitoring of septic tank integrity. No pressure or leak detection tests have been conducted to confirm that septic tanks are not leaking or contaminating surrounding soil or groundwater.

Finding No: TNR-018999

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

Yes

Comment

The site has identified and mapped the various locations where waste is generated across its operations. In addition, a list of all chemicals used within the facility has been provided, detailing their respective locations and intended uses. This information supports the identification of potential pollution sources within the site boundary.

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

No IWRAs were identified on-site. This was confirmed during the site tour, and no areas with ecological, cultural, or Indigenous significance related to water were observed or reported within the facility boundary.

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.*

closed

Comment

The site provided a general overview of its operational costs, including utility expenses where water-related costs are embedded. However, the information does not allow for the isolation or detailed assessment of water-related costs. As a result, the site has not clearly identified or quantified the social, cultural, environmental, or economic value generated specifically through water-related activities.

Finding No: TNR-018788

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

Yes

Comment	The site has conducted a WASH self-assessment and presented relevant documentation confirming that adequate water, sanitation, and hygiene facilities are in place. Safe drinking water is available throughout the site, with regular testing confirming its safety. Water dispensers are cleaned and sanitized every six months as part of the hygiene protocol. Sanitation services and facilities are available, supported by a documented cleaning and inspection schedule. The site provided data on the number of toilets, categorized by gender, in relation to the total workforce. The ratio complies with the UAE and Gulf region hygiene regulations for food plants and personnel.
1.4	*Gather data on the site's indirect water use, including: its primary inputs; the water use embedded in the production of those primary inputs the status of the waters at the origin of the inputs (where they can be identified); and water used in out-sourced water-related services.*
1.4.1	*The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be identified.* Obs.
Comment	The site presented a list of suppliers and their respective locations, as well as a more detailed register of suppliers and service providers categorized by process stage. This register also differentiates between embedded water use, indirect water use, and suppliers with significant water-related impact. However, it was noted that the terminology for embedded water and indirect water are not used interchangeably. in the submitted documents which needs to be corrected and the differentiation should rather be between: - Embedded water in primary inputs, as required under Indicator 1.4.1 (e.g. raw materials, ingredients, packaging) - Embedded water in services or operations, which is more relevant to Indicator 1.4.2 The site has reached out to its raw material providers to obtain information on the quantity of water used in their processes. The site provided 2 excel sheets in the same document tracking indirect water from their suppliers and service providers.
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 identified truck cleaning as the only outsourced service involving water use. The service provider has provided data on the quantity of water used for this operation. No other outsourced services involving water use were reported.
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	The site has identified several water governance initiatives and strategic frameworks relevant to its catchment and national context. These include: - DEWA Strategic Plan 2050 - UAE Water Security Strategy In addition, the site has demonstrated awareness of publicly-led initiatives supporting these strategies, including: - Water quality testing at the household level (42 households across 10 areas), conducted in collaboration with the Community Development Authority. - Installation of smart meters to enable customers to monitor their consumption online and receive alerts for high usage, promoting more efficient water use. - Deployment of DEWA's Smart Ball leak detection technology to identify and reduce network leakages, thereby improving water loss 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	The site has developed and presented a comprehensive legal register, listing all applicable water-related legal and regulatory requirements, including: - Direct references and links to the official legal texts, - A description of site-specific obligations arising from these regulations, - A list of evidence and documentation maintained by the site to demonstrate compliance. The register includes laws and regulations covering environmental protection, water use, wastewater discharge, and other relevant areas. The site uses this register as part of its compliance monitoring process. No customary or stakeholder-verified water rights were identified, which aligns with the context of the site (industrial setting in UAE) where water rights are formally regulated.	
1.5.3	*The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.*	closed
Comment	The site initially presented a study on national water balance, with a focus on Abu Dhabi, which did not reflect the specific catchment or physical scope relevant to the site. The catchment was identified as the Arabian Gulf, and the study lacked relevance to the site's local hydrological conditions. During the audit, the site revised its submission and attempted to update the water balance using information gathered from multiple sources. However, the calculated water balance showed equal inflows and outflows with no indication of deficit, surplus, or seasonal variance, which is not aligned with the known arid nature of the UAE and the recognized national water scarcity. ***Finding No: TNR-018818***	
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 site presented a scientific study assessing the water quality in the Arabian Peninsula, specifically covering regions within Dubai and the wider UAE. The study evaluated approximately 46 physical, chemical, and biological parameters of seawater, including pH, TSS, EC, TDS, pollutants, and pesticides. It also included information on soil and groundwater quality. Additionally, the site provided a more recent water quality assessment conducted by DEWA, which offers insight into current conditions in Dubai. Water quality in the catchment varies according to population density. Studies indicate that areas with higher population have elevated salinity and TDS levels, while less populated locations generally exhibit better water quality	
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.*	closed

Comment

The site identified several IWRAs within its catchment through desktop research and communication with DEWA. These include:
- Dubai Creek
- Ras Al Khor Wildlife Sanctuary
- Dubai Water Canal
- Palm Jumeirah

The site provided Google Maps screenshots to demonstrate proximity between the facility and the identified IWRAs. However, mapping could be significantly improved by noting them on a catchment map.
During the audit, the site offered descriptions of the IWRAs and their significance, but this information was omitted from the final submission. The site stated that these IWRAs pose "not threating people or natural environment" but did not provide sufficient evidence to substantiate this claim.
Furthermore, the site did not assess or document:
- The status of the IWRAs (e.g., good, deteriorating, polluted);
- Their value (e.g., ecological, social, cultural);
- Any existing or potential water-related risks to or from these areas;
- Stakeholder input or engagement in determining relevance or value.

Finding No: TNR-018822

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

closed

Comment

the site identified the following water related infrastructure:
Stormwater tunnel project launched recently in 2025 and still under construction
DEWA desalination plant
Imdaad wastewater treatment plant
the site did not present any information relevant to the condition of the water infrastructure and the potential exposure to extreme events

Finding No: TNR-018823

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

Yes

Comment

The site conducted an assessment of the availability and adequacy of WASH (Water, Sanitation, and Hygiene) services within the catchment. The assessment included mapping public amenities such as:
- Public toilets
- Free drinking water stations

In support of their assessment, the site presented:
The Dubai Municipality Sustainability Report (2023), which indicates:
- 100% access to safe water and sanitation
- 84.74% of the area connected to the sewage network
- 8.58% connected to a stormwater system

The State of Environment Report (2020) for Dubai
A clean water and sanitation study, which summarized key government initiatives, such as:
- Expansion of desalination plants
- Children's awareness campaigns on water conservation and sanitation
- Broader initiatives related to waste management, food safety, veterinary services, and environmental conservation

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

The site provided evidence of engagement with stakeholders by sharing email correspondences in which stakeholders were invited to identify shared water challenges. However, the stakeholder response appeared limited and not well-integrated into a broader participatory or analytical process.

The site listed the following on-site water challenges:
- Loss of water supply
- Intermittent disruptions in water availability
- Raw water quality issues, including chemical and microbial contamination
- Drop in underground tank levels due to DEWA mainline blockages (dust/sand)
- Increasing water costs
- Over-extraction by the site or nearby users
- Roof leaks during heavy rainfall
- Elevated bromate levels in raw water

It is not clear what the site identifies as their own challenges and what is identified as shared water challenges. While some of these issues are important for operational continuity, they largely reflect site-level risks and not shared catchment-level challenges, which is the focus of this indicator. for the above identified challenges the site specifies the relevance, severity and impact levels.

The site also presented catchment-level shared water challenges, citing scientific and government sources:
- UAE is the 5th driest country globally
- Groundwater depletion by an average of 60 meters in various regions
- Risk of groundwater exhaustion by 2030 due to agricultural overuse
- High per capita consumption and limited water conservation culture
- Low annual rainfall (< 100 mm)
- High environmental and energy cost of desalination
- Concerns around regional water quality

However, the site did not prioritize the identified challenges, as required by the indicator. There was no clear methodology or framework for prioritization based on risk severity, likelihood, stakeholder impact, or mitigation potential.

Finding No: TNR-018829

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

Obs.

Comment

The site presented several initiatives in the catchment aimed at addressing water-related challenges, including government-led actions and public campaigns related to water conservation, desalination, and awareness. These were supported by references to UAE national strategies and sustainability programs.

However, a complete and prioritized list of shared water challenges has not yet been finalized (as noted under Indicator 1.6.1). Without a clear prioritization, it is not possible to assess whether the identified initiatives effectively target the most critical shared challenges. Additionally, the site has not clearly demonstrated how it is contributing or planning to contribute to these initiatives, nor how they align with the site's water stewardship goals or stakeholder engagement strategy.

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.*

closed

Comment

The site identified several water-related risks that could affect operations, primarily focusing on physical, microbial, and chemical risks to the water source. These risks include potential disruptions in supply, raw water contamination, and infrastructure failures.
However, the risk assessment lacks comprehensiveness as it does not consider the full spectrum of relevant water-related risks such as: Regulatory risks and Reputational risks (e.g. stakeholder or public perception),
Furthermore, while risks are listed, there is no clear framework for prioritization based on likelihood, severity, timeframe, and potential business impact or cost, which is a key requirement of this indicator.
It is to be noted that much of the submitted evidence under this indicator appears to be more relevant to Indicator 2.4.1

Finding No: TNR-018831

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

closed

Comment

The site has identified certain water-related opportunities, particularly in the areas of potential water savings and water quality improvements.
However, the assessment is incomplete, there is no structured identification or prioritization of opportunities based on potential savings, business value, or stakeholder benefit.

Finding No: TNR-019524

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.*

Obs.

Comment

The site has identified several best practices related to catchment water governance. These include:
- Educational and awareness programs targeting schools and universities, addressing water challenges, water balance, and water quality.
- Additional practices related to water balance and quality, though these have been broadly categorized under governance.
The classification of practices specifically under water governance requires improvement. Many of the actions presented are more accurately associated with water balance and do not clearly demonstrate governance-specific practices.

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

The site has identified several best practices that contribute to improved water balance, including: Installation of smart meters and use of smart ball leak detectors to reduce losses within the distribution network.
However, these initiatives were previously categorized under water governance rather than under water balance, which may lead to confusion regarding their relevance to this specific AWS outcome.
Additionally, the site referenced governance-related best practices such as the policy goal of achieving 100% recycled water use by 2030, which, falls more under governance outcome.

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

Obs.

Comment	The site submitted evidence under this indicator that aligns more closely with the requirements of Indicator 1.5.4, which focuses on identifying catchment water quality status, rather than on identifying sector or catchment best practices for improving water quality. However, some best practices relevant to water quality were indirectly referenced under Indicator 1.8.2, including: - Water testing initiatives in schools. - Household water quality monitoring conducted by public authorities. - Water quality assessments within IWRAs. The site is encouraged to explicitly present sector and catchment best practices for water quality.	
1.8.4	*Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.*	Yes
Comment	The site identified certain practices related to Important Water-Related Areas (IWRAs), such as: - Participation in cleaning activities within identified IWRAs. - Monitoring and testing of water quality in those areas.	
1.8.5	*Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.*	Yes
Comment	The site identified relevant best practices related to the provision of equitable and adequate WASH services, including donation of safe drinking water to vulnerable communities, such as the Red crescent and local orphanages.	

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 site has presented a formal water stewardship commitment statement, signed by both the Factory Manager and the Business Continuity Manager. The commitment is publicly disclosed via the Nestlé MENA website and meets the individual requirements listed in the indicator.

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.

closed

Comment: The site identified the team responsible for ensuring compliance with various regulatory aspects and outlined their responsibilities. However, the site did not present the process for regulatory submissions.

Finding No: TNR-018837

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: The site has clearly defined its mission and vision for water stewardship in alignment with the AWS Standard:
Vision: To create a positive water impact by improving communities and striving for a well water-secure future.
Mission: To generate a positive impact by improving operational efficiencies, introducing sustainable practices, enabling access to safe water and sanitation, and collaborating with stakeholders to build a healthier environment.
To operationalize this vision and mission, the site developed a Water Stewardship Strategy for 2025–2027, which includes the following strategic objectives:
- Ensure a sustainable business by prioritizing quality, safety, environmental performance, and people.
- Deliver sustainable and efficient services to meet current and future demand.
- Focus on business and cost optimization while maintaining market sustainability.

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.

closed

Comment

The site has developed a WSP that outlines the objectives, actions, targets, KPIs, frequency of monitoring, expected outcomes, responsibilities, and timelines for each target. The plan is aligned with the AWS outcomes and includes the designation of responsible personnel and budget allocations.

The WSP makes clear references to shared water challenges; however, instead of linking actions to the specific shared water challenges identified under Indicator 1.6.1, the plan broadly references “clean water and sanitation (SDG 6)” or uses generic terms such as “shared water challenges.” A clearer and more direct alignment to the identified and prioritized shared challenges would strengthen the WSP.
The connection between WSP actions and best practices identified under Indicator 1.8 is was not reflected in the plan.
The WSP comprehensively addresses the five AWS outcomes as follows:
1- Good Water Governance
- Awareness sessions in schools
- Additional initiatives such as water footprint training and collaboration with the Swiss Embassy (not yet included in the WSP)
2- Sustainable Water Balance
- Reject water reduction
- Improved water ratio in water treatment
3- Good Water Quality
- Site-level water quality improvement actions (e.g., ozone analyzer activation, TDS control)
4- IWRA
- Beach cleaning initiative
5- Equitable Access to WASH
- Continuous improvement through CIP and facility-level hygiene actions

Finding No: TNR-018839

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.*

closed

Comment

The site presented the same evidence as under Indicator 1.7.1, which outlines various risk scenarios (e.g., water supply disruption, quality concerns, underground tank issues, etc.) and corresponding mitigation measures at the site level. While this demonstrates internal risk awareness and mitigation planning, no evidence was provided of coordination with relevant public-sector or infrastructure agencies, as required by the indicator.
The absence of documented communication or collaboration with authorities such as DEWA or civil defense limits the ability to demonstrate an integrated and resilient water risk response aligned with catchment-wide or public infrastructure planning.

Finding No: TNR-019019

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	The site provided evidence of its contribution to catchment governance through several initiatives. These include awareness campaigns such as: - A water footprint training session - Educational factory tours and awareness sessions for schools - A campaign conducted in partnership with the Swiss Embassy focused on water stewardship and conservation.	
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 has implemented measures to respect the water rights of others, particularly vulnerable communities. Evidence was provided showing efforts to: - Reduce overall water consumption at the facility to help preserve water availability in the catchment. - Donate safe drinking water to vulnerable groups, including charitable contributions to organizations such as the Red crescent and orphanages. Although there is no Indigenous population directly impacted in this context, the site's actions demonstrate an effort to uphold equitable access to safe water.	
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.*	Obs.
Comment	The site has implemented a process to verify full legal and regulatory compliance however it does not relate to water . Evidence presented includes: Valid environmental and operational permits such as: - Air emission permit from PCFC - Environmental clearance from Dubai Municipality - Health and safety certification from DCD - Industrial license from the Ministry of Industry and Advanced Technologies - Operational fitness certificate from the HSE Department (PCFC) Annual Management Review Meeting minutes showing review of legal compliance, including discussions on internal and external audit findings. Recent inspection reports from the Dubai Municipality's Food Safety Department demonstrating high compliance scores.	
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 legal or regulatory requirements applicable to the site regarding the allocation or management of water rights. The site sources all its water through the municipal supply provided by DEWA, which centrally manages water distribution and usage allocations in the Emirate. The site holds a valid water usage permit and does not operate a private well or abstract groundwater. As such, the site's water use does not interfere with or affect the water rights of others, including Indigenous peoples. Compliance with DEWA regulations ensures adherence to national water governance and equitable distribution frameworks.	

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 identified three main actions related to water balance under its WSP:
- Water Mapping of the Site: Completed. The water flow diagram and mapping were reviewed under Indicator 1.3.2 and provide a solid foundation for understanding water use and identifying efficiency opportunities.
- Reactivation of RO3 Unit: In Progress. The site has presented a preparation dossier that includes the financial feasibility analysis, action plan, and internal assessments. The site is currently awaiting internal approvals to proceed with the next phase of the application process.
- Improving Water Ratio and Use of Hot Water for CIP: In Progress. This initiative shares objectives with the RO3 reactivation project, and similar documentation was provided for both. The site aims to enhance process efficiency and reduce overall water use in cleaning operations.

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 recognized water scarcity as a shared water challenge and has implemented annual targets aimed at improving water use efficiency. Specifically, the site has set a target to reduce its water ratio by 1.5% by 2025. To support this target, the site is undertaking several initiatives:
- Improvement in RO2 System Efficiency – Efforts are ongoing to optimize the performance of the existing reverse osmosis unit, which will contribute to reducing reject water and improving water recovery.
- Water CIP Validation – The site is validating and refining its CIP procedures to minimize water consumption without compromising hygiene standards.
- RO3 Reactivation Project – The target and water balance actions may be adjusted upon successful implementation of the RO3 unit, which is currently under internal review and approval.

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

Yes

Comment

The site does not extract water directly from any natural source and does not operate a well. All water used on-site is supplied by DEWA, and as such, the site does not manage or control water reallocation.
There is no legally-binding documentation related to the reallocation of water for social, cultural, or environmental needs, as this function falls under the authority of DEWA.

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 presented evidence demonstrating progress towards achieving several water quality targets outlined in their WSP. The following actions were verified during the audit: - Underground tank cleaning: A target of biannual cleaning is in place. Evidence of the first cleaning conducted by a third-party on March 2, 2025, was provided, along with the corresponding inspection report. The next cleaning is planned for September 1, 2025. - Prevention of high bromate values: The site installed an interlock for ozone reading in the washer to ensure compliance. A work order dated April 24, 2025, was presented, along with monitoring data correlating ozone readings with bromate and microbial levels. - Control of TDS levels: The site installed an interlock based on conductivity readings in the washer. Supporting data showing the relationship between conductivity values and TDS levels were reviewed during the audit. - CIP validation review: This action is listed in the WSP but is still in the planning phase. No supporting evidence was presented at this stage. - Installation of automatic chlorination: This target is also in the planning phase, with no implementation evidence provided as of the audit date.	
3.4.2	*Where water quality is a shared water challenge, continual improvement to achieve best practice for the site's effluent shall be identified and where applicable, quantified.*	Yes
Comment	The site conducts monthly analysis of reject water to ensure it meets the quality standards for reuse in the construction sector, in line with local governmental directives. This demonstrates compliance with current regulatory expectations, particularly in terms of industrial reuse. However, no specific improvement initiatives have yet been undertaken concerning sewage water, therefore during the audit, the site revised its WSP to include pressure testing of the septic tank as a planned activity, which is a positive development.	
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	The site has included one activity related to IWRAs in its WSP: - Completed: A beach cleaning activity was carried out in April 2025 at an IWRA near the Abu Dhabi factory, which lies within the defined catchment. - Planned: Additional activities are scheduled, including future beach clean-ups and water quality testing.	
3.6	*Implement plan to provide access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers at all premises under the site's control.*	
3.6.1	*Evidence of the site's provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers onsite shall be identified and where applicable, quantified.*	Yes
Comment	The site presented several initiatives that demonstrate efforts to ensure adequate access to safe drinking water, effective sanitation, and hygiene (WASH) for workers onsite, including: - Awareness-raising initiatives on the importance of water use and sanitation (e.g., school visits). - Installation of hygiene infrastructure such as hand sanitizers, washers, and shoe-cleaning systems. - Regular cleaning and sanitizing of areas where washers are installed. - Sanitization of water dispensers within the factory. - An activity where management staff worked as helpers for a day noting that this is more aligned with internal process improvement than WASH provision itself. While these activities support internal WASH provision, the activities relevant to WASH in the catchment are still very limited	

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 provided evidence that its operations do not impinge on the human right to safe water and sanitation, as follows: The site does not extract water; it is fully dependent on the municipal supply (DEWA), thereby minimizing potential direct impacts on local or indigenous communities' access to water. The site demonstrated positive contributions to the community, such as: - Donating clean water to vulnerable groups. - Distributing drinking water during recent flooding events to support the affected population. No adverse impacts on traditional access rights were identified, and no remedial actions were required or reported.	
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.*	Obs.
Comment	The site's WSP does not currently include any formal targets related to indirect water use. Nevertheless, the site has engaged with its input material providers and service providers to collect data on their respective water use. This is a positive initial step toward understanding and potentially managing indirect water impacts.	
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.*	Obs.
Comment	The site presented evidence of engagement with both its suppliers and service providers through email correspondence requesting information on water usage volumes and any existing water-related targets. However, no actions were presented that demonstrate how these suppliers or service providers have taken steps within the catchment as a direct result of the site's engagement. It is noted that the site is still in the early stages of AWS certification, and these efforts represent an important initial step. However, to fully meet the requirements of this indicator, more outcomes from the site's engagement are needed.	
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.*	Obs.
Comment	The site presented evidence of engagement with DEWA, specifically regarding water quality concerns related to the supplied water. Email correspondence confirms that the site communicated specific issues, and responses from DEWA included water test results and clarification of actions taken, confirming receipt and acknowledgement of the site's messages.	
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.*	closed

Comment

The site has identified best practice actions related to water governance, primarily focused on awareness raising activities. Planned actions include:
- Conducting awareness sessions for all employees and surrounding industrial stakeholders on the importance and principles of water stewardship.
- Continued awareness campaigns for schools, with some activities already initiated.
However, evidence of implementation is not yet available and is expected to be presented at the next audit.

Finding No: TNR-018867

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

closed

Comment

Additionally, the site is engaging with Aquassay, a digital water efficiency monitoring provider, which indicates proactive steps toward improved water balance through smart monitoring and control.
However, as of the audit date:
- evidence of the Aquassay-related actions have not yet been fully provided.

Information in this section has been redacted for confidentiality reasons.

Finding No: TNR-019525

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

closed

Comment

The site has identified planned actions towards achieving best practice related to water quality, including:
- Conducting water quality testing in various schools within the catchment to assess potential exposure and risks.
- Testing water quality in Dubai Creek, a significant local water body, to monitor environmental impact and support broader catchment water quality improvements.
These planned initiatives demonstrate the site's intention to engage in community-level monitoring and contribute to improving water quality beyond their operational boundary.
However:
- No evidence of implementation or results from these activities was presented during the audit.
- There is no linkage yet between these planned activities and adaptive actions that would improve water quality based on findings.
- The connection to best practice (i.e., going beyond compliance and supporting shared catchment water quality improvements) is still conceptual at this stage.

Finding No: TNR-018869

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.*

closed

Comment

The site has identified planned actions related to achieving best practice for the maintenance of IWRAs, including:
- Water quality testing in Dubai Creek, a significant local water body within the broader catchment, aimed at understanding environmental health and potential human/ecosystem exposure.
- Beach cleaning activities in Palm Jumeirah, intended to support the protection and maintenance of recreational and ecologically sensitive coastal areas.
These activities show a commitment toward catchment engagement and enhancement of IWRAs.
However:
- These actions are currently planned only, and no implementation evidence was available during the audit.

Finding No: TNR-019526

3.9.5	*Actions towards achieving best practice related to targets in terms of WASH shall be implemented.*	Yes
Comment	The site has implemented actions aligned with achieving best practice in relation to WASH, including: - Provision of safe drinking water for all workers, with particular attention to increased hydration needs during hot weather, which is critical in the regional climate. - Availability of clean and well-maintained toilet and washroom facilities for both men and women, demonstrating consideration for gender equity and hygiene standards. - Accessibility for persons with disabilities has also been considered, in line with inclusive best practice.	

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.* Obs.

Comment: Although the WSP version submitted under this indicator does not clearly present performance evaluation against the defined targets, the site provided 2 versions of the WSP under Indicator 2.3.2. One of these versions includes:
- Classification of actions as "done," "in progress," or "open".
- Indication of the percentage of target completion for each action.

However, there is limited direct evaluation of how these targets contribute to the achievement of AWS water stewardship outcomes.
The site is encouraged to:
- Consolidate the most updated version of the WSP.
- Demonstrate how performance contributes to the five AWS outcomes.

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

Comment: The site provided an evaluation of value created through its Water Stewardship Plan, covering environmental, social, economic, and governance aspects. Examples include wastewater quality improvements, WASH outreach, stakeholder engagement, and cost-effective risk mitigation measures.

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

Comment: The site has not provided evidence identifying or quantifying the shared value benefits created in the catchment as a result of its water stewardship activities. While some site-level and internal benefits are presented, these do not extend to clearly defined catchment-level value or demonstrate how external stakeholders or ecosystems have benefitted from the implementation of the WSP.

Finding No: TNR-018874

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.* Obs.

Comment: The site presented its minutes of meeting for the annual review for 2024, including the UAE Safety Pyramid report covering both the Dubai and Abu Dhabi factories. During the audit, the site described one emergency incident that occurred within the reporting period and provided details on the corrective actions taken.
The site confirmed that this was the only incident recorded in the past year. While a formal root-cause analysis was not submitted, the corrective response was explained and appears to address the issue.

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.*	closed
Comment	The site provided an updated version of its WSP and a presentation including information discussed during the audit (e.g., catchment identification). However, there is no evidence of consultation efforts with external stakeholders specifically on the site's water stewardship performance. The indicator requires the site to engage stakeholders in reviewing and providing feedback on its progress and outcomes, which was not demonstrated. ***Finding No: TNR-019157***	
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 provided multiple versions of its WSP, showing the evolution and adaptation of the plan over time. A final version was produced after the audit, incorporating lessons learned and insights gained through the audit process and a deeper understanding of AWS indicator requirements.	

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.* ✓ closed

Comment: The site presented the structure of its internal water governance team, including roles and responsibilities related to water management and legal compliance. However, no evidence of public disclosure of this governance structure or accountability positions was provided.

Finding No: TNR-019158

5.2 *Communicate the water stewardship plan with relevant stakeholders.*

5.2.1 *The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.* ✓ Yes

Comment: The site provided a presentation of its WSP and evidence of communication with 10 identified stakeholders via email dated 14 July 2025. The communication included the WSP.
While this demonstrates initial efforts toward stakeholder engagement, the reach and depth of communication could be strengthened to ensure all relevant stakeholders are informed and understand how the plan supports broader catchment and stewardship goals.

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.* ✓ closed

Comment: The site has not provided evidence of a publicly disclosed summary of its water stewardship performance, including quantified progress against targets, as required by this indicator.
No annual report, website publication, or stakeholder communication document demonstrating such disclosure was presented.

Finding No: TNR-019160

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.* ✓ closed

Comment: The site did not present any evidence of disclosure regarding its shared water-related challenges or the efforts made to address them. While shared challenges were internally identified and partially addressed through the WSP, no external communication or public documentation was shared with stakeholders or made publicly available.

Finding No: TNR-019161

5.4.2 *Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.* ✓ Yes

Comment	Throughout the audit, the site provided evidence of ongoing communication and coordination with public-sector agencies, including DEWA and Trakhees. These interactions covered topics such as water quality, infrastructure planning, and collaboration on potential water reuse initiatives. This reflects the site's effort to engage relevant authorities and align with public-sector priorities related to water management.	
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.*	Obs.
Comment	No evidence of disclosure was provided regarding site water-related compliance violations or confirmation that no violations occurred. The site did not present any public statement or stakeholder communication that would satisfy the requirement to disclose violations and corrective actions, if any, or affirm compliance status.	
5.5.2	*Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.*	Yes
Comment	Please refer to observation in 5.1.1.	
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	Please refer to observation in 5.1.1.	

Previous Findings

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