

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)



Audit Number: AO-001703

SITE DETAILS

Site: **Ecolab Suzano Plant**

Address: Rodovia Índio Tibiriçá, R. Giovanni Baptista Raffo, 3201, Suzano, São Paulo, BRAZIL

Contact Person: Amy Mika

AWS Reference Number: AWS-000469

Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Core

Date of certification decision: 2025-Dec-29

Validity of certificate: 2028-Dec-28

AUDIT DETAILS

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

Audit Type(s): Re-Certification Audit

Audit Start Date: 2025-Sep-09

Audit End Date: 2025-Sep-11

Lead Auditor: Rosane Monteiro Borges

Site Participants:

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ADDITIONAL INFO

Summary of Audit Findings: During the re-certification audit, 3 non-conformities and 8 observations were raised.

The Client is requested to submit a root cause analysis and corrective actions for each of the non-conformities to WSAS within 7 days of receipt of the audit report, by 31 October 2025.

The non-conformities must be closed within 90 days of the end of the audit, by 11 December 2025. In order to meet this timeline evidence is to be submitted to WSAS (within 75 days) by 26 November 2025.

The audit team recommends re-certification of Ecolab Suzano Plant at Core level pending closure of the non-conformities.

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

The industrial plant is located on the banks of the Índio Tibiriçá Highway, in an industrial area, in Suzano city, São Paulo State, Brazil.

Ecolab is a global leader in water, hygiene, and infection prevention solutions and services. The site has reaction plants that primarily produces water treatment chemical blends and polymers, along with dispersants, flocculants, and biocides.

The site gets water for production from onsite wells, that is taken from Aquifero Cristalino (Pre Cambrian Aquifer). The water is used for industrial processes, including cooling towers, boilers, production, and equipment washing. The water treatment facilities is based on filter systems and reverse osmosis. Drinking water for employees comes from purchased spring water.

The wastewater is pretreated in site where pH and temperature are measured before being discharged to the municipal effluent treatment (SABESP).

The rainwater is only captured on the roof gutters of the fire system reservatory. For stormwater management infrastructure, the site contains an underground drain system, that works with gravity and pumps this water direct to detention preservatories and further to Una River.

Ecolab Suzano has 135 employees.

The site is located in Alto Tietê catchment, Cabeceiras sub-catchment.

The Suzano facility obtains groundwater from the Pre-Cambrian Aquifer; drinking water is obtained from the Guarani Aquifer. Regarding the Pre-Cambrian Aquifer, the crystal basis is composed of igneous and methamorphe rocks, which makes this aquifer an impermeable layer. Regarding Guarani Aquifer, the water is held below a sandy layer and above a basalt layer, also making this aquifer an impermeable layer.

The audit was conducted onsite on September, 9th to 11th 2025.

The onsite visit included the assessment of:

Administrative restrooms

Men's and Women's locker rooms

Entrances 1 and 2

Well 4 – R99 raw water; Well 5 – R99 raw water

Water distribution point (Sabesp)

Waste Area P2

Permanent Preservation Area (APP)

Detention Reservoir 2 (Masonry pool)

Containment Tanks

Water Treatment Plant (WTP) – R99 raw water, R97 softened water, R98 nobler/demineralized water

Effluent Treatment Plant (ETE)

Cooling tower

Fire tank

Hazardous waste warehouse

Brigade room

FINDINGS

NUMBER OF FINDINGS PER LEVEL

Non-Conformity 1

Observation 8

Non-Conformity 2

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FINDING DETAILS

Finding No:	TNR-020095
Checklist Item No:	Announcement
Status:	Closed
Finding level:	Non-Conformity
Due date:	2025-Dec-11
Checklist item:	<p>At least eight (8) weeks before the start date of the initial certification audit or the re-evaluation audit, AWS will publish on its website the dates of the assessment of the site(s) with the intention to pursue AWS (Re-)Certification. Stakeholder submissions are accepted from this date and during the entire period of validity of the AWS Certificate. Submissions, comments and/or feedback received by AWS will be shared with the CAB so the audit team may use the information for their investigations during the next audit.</p> <p>The site(s) seeking certification shall complete the Stakeholder Announcement Form found on the AWS website, and release it in at least two outlets: published in local language(s) on the site's website(s) and in a local media outlet (if applicable, economical, practical, and available) that is appropriate for the site and the related stakeholders (for example, local newspaper, radio, or websites).</p>
Findings:	<p>The announcement on Ecolab's website was available only in English. No other announcement in a local media outlet was done.</p>
Corrective action:	<p>Develop a process for local language/media publishing for the audit announcement.</p>
Evidence of implementation:	<p>The following are examples of implementation evidence:</p> <ul style="list-style-type: none">1) Publication process (formalized on 12/08/2025)2) Announcement to stakeholders on the public website (published on 12/08/2025)3) Supplementary document - Announcement on the website

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Finding No:	TNR-019997
Checklist Item No:	1.2.1
Status:	Closed
Finding level:	Non-Conformity
Due date:	2025-Dec-11
Checklist item:	<p>Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall:</p> <ul style="list-style-type: none">- 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:	<p>CETESB* and IBAMA** were not identified or mapped as Ecolab Suzano Stakeholders. Both agencies act to regulate the Unit's activities and operations (Regulatory Bodies).</p> <p>- *CETESB is the Environmental Agency that issues the Unit's Operating License, which contains conditions related to water resource management (effluent discharge, pollutant dispersion studies, and restoration of permanent preservation areas, storage of chemical products and waste).</p> <p>- **IBAMA in the state of São Paulo is located according to the website on: https://www.gov.br/ibama/pt-br/composicao/quem-e-quem/ibama-nos-estados/sp.</p> <p>Ecolab Suzano did not engage with Cetesb and IBAMA, trying to understand what water related challenges they see in the basin.</p>
Corrective action:	<p>1 - Review the stakeholder mapping to include CETESB and IBAMA as institutional stakeholders in the context of water management;</p> <p>2 - Record the interaction via official portals and electronic channels, characterizing the existing form of engagement, leaving an open channel to obtain the point of view on the interests and challenges related to water from the stakeholders;</p> <p>3 - Update the mapping documents, ensuring alignment with AWS requirements.</p>
Evidence of implementation:	<p>Bellow are the list of evidences attached</p> <p>1 - Lista Stakeholders Suzano;</p> <p>2 - PA 1.2.1 Stakeholder Mapeamento;</p> <p>3 - PA 1.2.2 Stakeholder Mapeamento;</p> <p>4 - Evidence of communication with the stakeholder (including the open corporate communication channel);</p> <p>5 - Evidence of consolidated evidence indicating the implementation of the action (which also includes evidence of the communication channel available on the Ecolab website (Suzano case study) highlighted);</p>

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Finding No:	TNR-021139
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 current and potential degree of influence between Ecolab Suzano and the CETESB* and IBAMA** stakeholders has not been identified.

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Finding No:	TNR-019999
Checklist Item No:	1.3.3
Status:	Closed
Finding level:	Non-Conformity
Due date:	2025-Dec-11
Checklist item:	Site water balance, inflows, losses, storage, and outflows, including indication of annual variance in water usage rates, shall be quantified. Where there is a water-related challenge that would be a threat to good water balance for people or environment, an indication of annual high and low variances shall be quantified.
Findings:	The difference between input and output values identified by Ecolab Suzano in the Water Balances for the year 2024 is 10%. For 2025, variations between 6 and 8% from April to August are identified. The differences indicate that there may be accuracy or calculation issues, or potentially some flows may not have been identified. The reasons for the differences were not sufficiently analysed.
Corrective action:	Detailed review of the water balance spreadsheet with its consumption and measurement areas, considering: 1 - Mapping and identifying possible unaccounted flows; 2 - Mapping and identifying possible measurement inconsistencies; 3 - Reviewing the scope and calibration management of all water inlet and outlet meters; 4 - Reviewing formulas and calculation parameters used in the water balance; 5 - Creating a daily indicator of losses/deviations; 6 - Initiating a project for the implementation of automatic measurement (telemetry), aiming for greater reliability and traceability of data (long term); 7 - Initiating a project for rainwater harvesting or drainage (long term).
Evidence of implementation:	Bellow is the list of evidence: 1 - BALANÇO HÍDRICO - DADOS (revisado - NC); 2 - Grafico RTS - Operacional Sustentabilidade: Updated Daily RTS Indicators (deviation indicator); 3 - Revisão da necessidade e frequência de calibração dos medidores de entrada e saída; 4 - Retomada do Projeto de Telemetria Ecolab – Unidade Suzano: Evidence of the start of the telemetry project; 5 - Definição de escopo Projeto Água Pluvial (Evidência projeto revisado) e Reunião definição de escopo Projeto Água Pluvial: Evidence of the resumption of the rainwater harvesting or redirection project.

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Finding No:	TNR-020000
Checklist Item No:	1.3.5
Status:	Open
Finding level:	Observation
Checklist item:	Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.
Findings:	During the visit, it was observed that one area of the site may benefit from additional protective measures. The location is currently being evaluated as part of an ongoing study, and a project to enhance the area is under consideration. Follow up will occur during the next audit cycle."
Finding No:	TNR-020948
Checklist Item No:	1.5.1
Status:	Open
Finding level:	Observation
Checklist item:	Water governance initiatives shall be identified, including catchment plan(s), water-related public policies, major publicly-led initiatives under way, and relevant goals to help inform site of possible opportunities for water stewardship collective action.
Findings:	Ecolab Suzano could also list how these initiatives help inform the site on how it can work in line with or contribute to them.
Finding No:	TNR-020001
Checklist Item No:	1.5.5
Status:	Open
Finding level:	Observation
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 could compile the information from the Excel and Word files presented as evidence for the Indicator, clarifying the status classification of each IWRA evaluated.
Finding No:	TNR-021140
Checklist Item No:	3.5.1
Status:	Open
Finding level:	Observation
Checklist item:	Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.
Findings:	The site could plan for occasional in-person monitoring by Ecolab Suzano team at locations where conservation and restoration work on external IWRAs is carried out.

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Finding No:	TNR-021022
Checklist Item No:	3.9.3
Status:	Open
Finding level:	Observation
Checklist item:	Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.
Findings:	Continuing the investigation into soil and groundwater contamination currently underway at the site is not considered a best practice related to water quality, as it is a condition of the Unit's Operating License.
Finding No:	TNR-021023
Checklist Item No:	3.9.4
Status:	Open
Finding level:	Observation
Checklist item:	Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.
Findings:	Removing the Fire Suppression System from the site's internal APP, as well as planting seedlings to restore this area, is not considered a best practice related to IWRA maintenance, as this item is a condition of the Unit's Operating License.
Finding No:	TNR-020995
Checklist Item No:	5.3.1
Status:	Open
Finding level:	Observation
Checklist item:	A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.
Findings:	There is room to include reporting on the performance of other indicators.

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Report Details

Report	Value
Report prepared by	Rosane Borges
Report approved by	Carla Oberdiek
Report approved on (Date)	23.10.2025

Surveillance

Proposed date for next audit
2026-Sep-09

Stakeholder Announcements

Date of publication	Location	Finding No: TNR-020095
07/07/2025	Ecolab Website: https://www.ecolab.com/corporate-responsibility/environment/water-stewardship	
01/07/2025	AWS Stakeholder Announcement: https://watersas.org/wp-content/uploads/2025/07/AWS-000469_Ecolab-Suzano-Plant_StakeholderAnnouncement_September2025.pdf	

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Comment	<p>Ecolab uses AWS Announcements on its website to inform Stakeholders about the Certifications and Recertifications of its Sites.</p> <p>The website is: Advancing Water Stewardship and Resiliency Ecolab (https://www.ecolab.com/corporate-responsibility/environment/water-stewardship)</p> <p>One can select the region where the Units are located. In this case, change the language to Portuguese is possible, where the website information will be available to Stakeholders in the local language.</p> <p>In the specific case of Recertification of Ecolab Suzano, there are two findings:</p> <p>1- The link is advertising on an earlier date (one week before) than the actual date of the Recertification Audit. Ecolab Suzano rescheduled this date, with WSAS sending a new standard form with the correct date (on July 1st), but it has not been updated on the website.</p> <p>2 - Although it is a valid option to publish the Announcement form in regions where the local language is English, the following disclosure requirement is not met: "The site(s) seeking certification shall complete the Stakeholder Announcement Form found on the AWS website and release it in at least two outlets: published in the local language(s) on the site's website(s) and in a local media outlet (if applicable, economical, practical, and available) that is appropriate for the site and its related stakeholders (for example, local newspaper, radio, or websites)."</p> <p>The announcement on the website was not translated into Portuguese, and no evidence of publication in a second local outlet was provided.</p> <p>Evidences:</p> <ul style="list-style-type: none">- Screenshot in Portuguese from the Ecolab website;- File downloaded from Ecolab website with a date prior to the actual recertification audit date (in English);- New file provided by WSAS related to the recertification audit date (in English).
Comment	<p>Attached Complete Interview.</p>

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Catchment Information

Catchment Information



Site de Suzano na sub-bacia.jpg

Comment The catchment where Ecolab Suzano is located is called the Alto Tietê Hydrographic Basin / Cabeceiras Sub-Basin.

Both water supply and discharge are located in Alto Tietê Basin. The effluents are sent to municipal and industrial collection systems to be treated. After treatment, they are discharged into Tietê River.

The Suzano facility obtains groundwater from Pre-Cambrian Aquifer. Drinking water is obtained from Guarani Aquifer.

More details for each Aquifer:

Pre-Cambrian: its crystal basis is composed of igneous and metamorphic rocks, which makes this aquifer an impermeable layer.

Guarani Aquifer: The water is held below a sandy layer and above a basalt layer, which makes this aquifer an impermeable layer.

The site obtains water for operations from three artesian wells. These wells collect water from Crystalline Aquifer (Precambrian Aquifer). Water for employee consumption comes from a spring: it is purchased from Aqua Fonte (which obtains its water from the Guarani Aquifer).

The site identified important characteristics of the watershed, where water challenges include water scarcity and a tendency to flood. There is also a permanent protection area defined by a Public Agency. The Alto Tietê watershed biome is in the Atlantic Forest, with a predominantly tropical climate characterized by hot, rainy summers and dry winters. Temperatures range from 13°C to 31°C, with the hottest month being February and the coldest month being July. The region is influenced by the São Paulo Metropolitan Region, which has a highly complex water resource management due to urbanization and industrial activity.

The water uses in the Alto Tietê Cabeceira sub-basin are industrial and intensive agriculture. Surrounding the site, in Suzano city, there is heavy industrial use.

Due to these conditions, the demand for water resources may depend on transfers from neighboring river basins; in the case of the Alto-Tietê Cabeceira sub-basin, through the use of the Cantareira reservoirs.

Client Description and Site Details

Client/Site Background

Comment Information has been redacted for confidentiality reasons

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Summary of Shared Water Challenges

Summary of Shared Water Challenges
Information has been redacted for confidentiality reasons

Comment Information has been redacted for confidentiality reasons

0.0.1 Water Source & Discharge Locations

0.01 *Have any water source or discharge locations been visited during the audit, if so, which and where? If none were visited, please provide justification.*


Yes

Comment Information has been redacted for confidentiality reasons

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1 STEP 1: GATHER AND UNDERSTAND	
1.1	<i>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.</i>
1.1.1	<i>The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including:</i> <ul style="list-style-type: none"> - Site boundaries; - Water-related infrastructure, including piping network, owned or managed by the site or its parent organization; - Any water sources providing water to the site that are owned or managed by the site or its parent organization; - Water service provider (if applicable) and its ultimate water source; - Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies; - Catchment(s) that the site affect(s) and is reliant upon for water.
Comment	Information has been redacted for confidentiality reasons
1.2	<i>Understand relevant stakeholders, their water related challenges, and the site's ability to influence beyond its boundaries.</i>
1.2.1	<i>Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall:</i> <ul style="list-style-type: none"> - Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people; - Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies; - Provide evidence of stakeholder consultation on water-related interests and challenges; - Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups; - Identify the degree of stakeholder engagement based on their level of interest and influence.
Comment	Information has been redacted for confidentiality reasons
Finding No: TNR-019997	
1.2.2	<i>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.</i>
Comment	Information has been redacted for confidentiality reasons
1.3	<i>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.</i>
1.3.1	<i>Existing water-related incident response plans shall be identified.</i>
Comment	Information has been redacted for confidentiality reasons

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1.3.2	Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped	 Yes
Comment	Information has been redacted for confidentiality reasons	
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.	 closed
Comment	Information has been redacted for confidentiality reasons	
Finding No: TNR-019999		
1.3.4	Water quality of the site's water source(s), provided waters, effluent and receiving water bodies shall be quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be quantified.	 Yes
Comment	Information has been redacted for confidentiality reasons	
1.3.5	Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.	 Obs.
Comment	Information has been redacted for confidentiality reasons	
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	Information has been redacted for confidentiality reasons	
1.3.7	Annual water-related costs, revenues, and a description or quantification of the social, cultural, environmental, or economic water-related value generated by the site shall be identified and used to inform the evaluation of the plan in 4.1.2.	 Yes
Comment	Information has been redacted for confidentiality reasons	
1.3.8	Levels of access and adequacy of WASH at the site shall be identified.	 Yes
Comment	Information has been redacted for confidentiality reasons	
1.4	Gather data on the site's indirect water use, including: its primary inputs; the water use embedded in the production of those primary inputs the status of the waters at the origin of the inputs (where they can be identified); and water used in out-sourced water-related services.	
1.4.1	The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be identified.	 Yes
Comment	Information has been redacted for confidentiality reasons	
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	Information has been redacted for confidentiality reasons	
1.5	Gather water-related data for the catchment, including water governance, water balance, water quality, Important Water-Related Areas, infrastructure, and WASH	

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1.5.1	<i>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.</i>	Q Obs.
Comment	Information has been redacted for confidentiality reasons	
1.5.2	<i>Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.</i>	✓ Yes
Comment	Information has been redacted for confidentiality reasons	
1.5.3	<i>The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.</i>	✓ Yes
Comment	Information has been redacted for confidentiality reasons	
1.5.4	<i>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.</i>	✓ Yes
Comment	Information has been redacted for confidentiality reasons	
1.5.5	<i>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.</i>	Q Obs.
Comment	Information has been redacted for confidentiality reasons	
1.5.6	<i>Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.</i>	✓ Yes
Comment	Information has been redacted for confidentiality reasons	
1.5.7	<i>The adequacy of available WASH services within the catchment shall be identified.</i>	✓ Yes
Comment	Information has been redacted for confidentiality reasons	
1.6	<i>Understand current and future shared water challenges in the catchment, by linking the water challenges identified by stakeholders with the site's water challenges.</i>	
1.6.1	<i>Shared water challenges shall be identified and prioritized from the information gathered.</i>	✓ Yes
Comment	Information has been redacted for confidentiality reasons	
1.6.2	<i>Initiatives to address shared water challenges shall be identified.</i>	✓ Yes
Comment	Information has been redacted for confidentiality reasons	
1.7	<i>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.</i>	

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1.7.1	<i>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.</i>	 Yes
Comment	Information has been redacted for confidentiality reasons	
1.7.2	<i>Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.</i>	 Yes
Comment	Information has been redacted for confidentiality reasons	
1.8	<i>Understand best practice towards achieving AWS outcomes: Determining sectoral best practices having a local/catchment, regional, or national relevance.</i>	
1.8.1	<i>Relevant catchment best practice for water governance shall be identified.</i>	 Yes
Comment	Information has been redacted for confidentiality reasons	
1.8.2	<i>Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.</i>	 Yes
Comment	Information has been redacted for confidentiality reasons	
1.8.3	<i>Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.</i>	 Yes
Comment	Information has been redacted for confidentiality reasons	
1.8.4	<i>Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.</i>	 Yes
Comment	Information has been redacted for confidentiality reasons	
1.8.5	<i>Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.</i>	 Yes
Comment	Information has been redacted for confidentiality reasons	

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2	STEP 2: COMMIT & PLAN - Commit to be a responsible water steward and develop a Water Stewardship Plan	
2.1	<i>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.</i>	
2.1.1	<i>A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:</i> <ul style="list-style-type: none"> - 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	Information has been redacted for confidentiality reasons	
2.2	<i>Develop and document a process to achieve and maintain legal and regulatory compliance.</i>	
2.2.1	<i>The system to maintain compliance obligations for water and wastewater management shall be identified, including:</i> <ul style="list-style-type: none"> - Identification of responsible persons/positions within facility organizational structure - Process for submissions to regulatory agencies. 	 Yes
Comment	Information has been redacted for confidentiality reasons	
2.3	<i>Create a water stewardship strategy and plan including addressing risks (to and from the site), shared catchment water challenges, and opportunities.</i>	
2.3.1	<i>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.</i>	 Yes
Comment	Information has been redacted for confidentiality reasons	
2.3.2	<i>A water stewardship plan shall be identified, including for each target:</i> <ul style="list-style-type: none"> - How it will be measured and monitored - Actions to achieve and maintain (or exceed) it - Planned timeframes to achieve it - Financial budgets allocated for actions - Positions of persons responsible for actions and achieving targets - Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes. 	 Yes
Comment	Information has been redacted for confidentiality reasons	
2.4	<i>Demonstrate the site's responsiveness and resilience to respond to water risks</i>	

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2.4.1	<i>A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.</i>	<div><div></div><div>Yes</div></div>
Comment	Information has been redacted for confidentiality reasons	

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3 STEP 3: IMPLEMENT - Implement the site's stewardship plan and improve impacts	
3.1	Implement plan to participate positively in catchment governance.
3.1.1	Evidence that the site has supported good catchment governance shall be identified. ✓ Yes
Comment	Information has been redacted for confidentiality reasons
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	Information has been redacted for confidentiality reasons
3.2	Implement system to comply with water-related legal and regulatory requirements and respect water rights.
3.2.1	A process to verify full legal and regulatory compliance shall be implemented. ✓ Yes
Comment	Information has been redacted for confidentiality reasons
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	Information has been redacted for confidentiality reasons
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	Information has been redacted for confidentiality reasons
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	Information has been redacted for confidentiality reasons
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	Information has been redacted for confidentiality reasons
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	Information has been redacted for confidentiality reasons
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

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Comment	Information has been redacted for confidentiality reasons	
3.5	<i>Implement plan to maintain or improve the site's and/or catchment's Important Water-Related Areas.</i>	
3.5.1	<i>Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.</i>	Q Obs.
Comment	Information has been redacted for confidentiality reasons	
3.6	<i>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.</i>	
3.6.1	<i>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.</i>	✓ Yes
Comment	Information has been redacted for confidentiality reasons	
3.6.2	<i>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.</i>	✓ Yes
Comment	Information has been redacted for confidentiality reasons	
3.7	<i>Implement plan to maintain or improve indirect water use within the catchment:</i>	
3.7.1	<i>Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.</i>	✓ Yes
Comment	Information has been redacted for confidentiality reasons	
3.7.2	<i>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.</i>	✓ Yes
Comment	Information has been redacted for confidentiality reasons	
3.8	<i>Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have.</i>	
3.8.1	<i>Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.</i>	✓ Yes
Comment	Information has been redacted for confidentiality reasons	
3.9	<i>Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.</i>	
3.9.1	<i>Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.</i>	✓ Yes
Comment	Information has been redacted for confidentiality reasons	

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3.9.2	<i>Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.</i>	 Yes
Comment	Information has been redacted for confidentiality reasons	
3.9.3	<i>Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.</i>	 Obs.
Comment	Information has been redacted for confidentiality reasons	
3.9.4	<i>Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.</i>	 Obs.
Comment	Information has been redacted for confidentiality reasons	
3.9.5	<i>Actions towards achieving best practice related to targets in terms of WASH shall be implemented.</i>	 Yes
Comment	Information has been redacted for confidentiality reasons	

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4 STEP 4: EVALUATE - Evaluate the site's performance.	
4.1	<i>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.</i>
4.1.1	<i>Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.</i>
Comment	Information has been redacted for confidentiality reasons
4.1.2	<i>Value creation resulting from the water stewardship plan shall be evaluated.</i>
Comment	Information has been redacted for confidentiality reasons
4.1.3	<i>The shared value benefits in the catchment shall be identified and where applicable, quantified.</i>
Comment	Information has been redacted for confidentiality reasons
4.2	<i>Evaluate the impacts of water-related emergency incidents (including extreme events), if any occurred, and determine the effectiveness of corrective and preventative measures.</i>
4.2.1	<i>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.</i>
Comment	Information has been redacted for confidentiality reasons
4.3	<i>Evaluate stakeholders' consultation feedback regarding the site's water stewardship performance, including the effectiveness of the site's engagement process.</i>
4.3.1	<i>Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.</i>
Comment	Information has been redacted for confidentiality reasons
4.4	<i>Evaluate and update the site's water stewardship plan, incorporating the information obtained from the evaluation process in the context of continual improvement.</i>
4.4.1	<i>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.</i>
Comment	Information has been redacted for confidentiality reasons

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5	STEP 5: COMMUNICATE & DISCLOSE - Communicate about water stewardship and disclose the site's stewardship efforts	
5.1	Disclose water-related internal governance of the site's management, including the positions of those accountable for legal compliance with water-related local laws and regulations.	
5.1.1	The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.	✓ Yes
Comment	Information has been redacted for confidentiality reasons	
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	Information has been redacted for confidentiality reasons	
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.	Q Obs.
Comment	Information has been redacted for confidentiality reasons	
5.4	Disclose efforts to collectively address shared water challenges, including: associated efforts to address the challenges; engagement with stakeholders; and co-ordination with public-sector agencies.	
5.4.1	The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.	✓ Yes
Comment	Information has been redacted for confidentiality reasons	
5.4.2	Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.	✓ Yes
Comment	Information has been redacted for confidentiality reasons	
5.5	Communicate transparency in water-related compliance: make any site water-related compliance violations available upon request as well as any corrective actions the site has taken to prevent future occurrences.	
5.5.1	Any site water-related compliance violations and associated corrections shall be disclosed.	✓ Yes
Comment	Information has been redacted for confidentiality reasons	
5.5.2	Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.	✓ Yes
Comment	Information has been redacted for confidentiality reasons	


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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	Information has been redacted for confidentiality reasons	

Previous Findings

	All non-conformities raised in the previous audit have been satisfactorily closed.	 Yes
Comment	Information has been redacted for confidentiality reasons	