CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-001642

WSAS WATER STEWARDSHIP ASSURANCE SERVICES

SITE DETAILS

Site: **Spadel - Devin, Bulgaria**
Address: 6 Vasil Levski St., 4800, Devin, BULGARIA
Contact Person: Maxime Sohy
AWS Reference Number: AWS-000424
Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Core
Date of certification decision: 2025-Dec-19
Validity of certificate: 2028-Dec-18

AUDIT DETAILS

Audited Service(s): AWS Standard v2.0 (2019)
Audit Type(s): Re-Certification Audit
Audit Start Date: 2025-Oct-21
Audit End Date: 2025-Nov-03
Lead Auditor: Lorenzo Brioschi

Audit team participants:
Dimitar Trifonov

Site Participants:
Maxime Sohy, Water and Environment Engineer
Arnaud Collignon, Water and Environment Manager
Petya Manastirska, Sustainability and Quality Manager
Maksim Tanchovski, Plant Manager
Galina Stefanova-Doganuz, Quality Health and Safety, and Environmental (QHSE) Manager
Adriana Hadgiyska, ISO and Health, Safety and Environmental Coordinator

AUDIT TIMES

Dates	Audit from	Duration	Auditor	Description
2025-Oct-21	09:00:00 - 17:30:00	08:30	Lorenzo Brioschi	
2025-Nov-03	09:00:00 - 17:30:00	08:30	Lorenzo Brioschi	
2025-Nov-03	09:00:00 - 17:30:00	08:30	Lorenzo Brioschi	

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ADDITIONAL INFO

Summary of Audit Findings: During the certification audit, 3 non-conformities and 6 observations were raised.

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

The non-conformities must be closed within 90 days of the end of the audit. Due to the Christmas period, the due date is postponed to 30 January 2026. In order to meet this timeline evidence is to be submitted to WSAS (within 75 days) by 15 January 2026.

The audit team recommends certification of Spadel - Devin at Core level pending closure of the non-conformities.
The Site has successfully closed all Non-conformities.

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

The DEVIN JSC factory is located just in the east of the Devin city which is a spa town in the Smolyan Province in the far south of Bulgaria.
Devin city is located into the valley of the Vacha River, 45 km from the city of Smolyan and 220 km from Sofia. The Devinska river runs through the city and alongside the company site. Numerous other brooks and rivers (namely Krichim, Muglenska and Trigradska) are found nearby, all tributaries of the Vacha river.
Devin is located in a region of diverse lithologies, including volcanic deposits. It is famous throughout Bulgaria and the Balkans for its mineral water, which comes from cold and hot springs ranging from 16 to 76°C.

The site is currently withdrawing water from 2 mineral water wells (C3 and C5) and one spring water source (Baldaran). It bottles mineral water, spring water and flavoured waters through 6 production lines in PET bottles of several formats (from 33 mL to 19L reusables) and employs around 610 FTE (including office and sales persons in Bulgaria).

The audit was conducted onsite on 21-23 October 2025. The onsite site visit included the assessment of:
- Production area
- WASH services on-site
- Storage area
- Mineral water sources (C3 and C5)
- Waste water neutralisation plant
- Water inlets/outlets on site
- Water storage
- Water filtration

FINDINGS

NUMBER OF FINDINGS PER LEVEL

Observation	6
Non-Conformity	3

FINDING DETAILS

Finding No:	TNR-020967
Checklist Item No:	1.2.1
Status:	Open
Finding level:	Observation
Checklist item:	Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall: - Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people; - Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies; - Provide evidence of stakeholder consultation on water-related interests and challenges; - Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups; - Identify the degree of stakeholder engagement based on their level of interest and influence.
Findings:	The complete Devinska catchment was identified as part of the scope, as such the stakeholders analysis of the catchment is still ongoing. Some stakeholders like the dams owner or the neighbouring bottling plant (also using the Baldaran source) was also found to not be part of the stakeholder list while it is an important water user in the catchment. Site to continue its stakeholders identification. This will be verified during next audit iteration.

Finding No:	TNR-021120
Checklist Item No:	1.3.2
Status:	Open
Finding level:	Observation
Checklist item:	Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped
Findings:	The usage of fire water is not indicated in the water balance mapping as it is included in the "Process water". It would be suitable to better clarify what are the water usage in this process water component.

Finding No:	TNR-020970
Checklist Item No:	1.3.4
Status:	Open
Finding level:	Observation
Checklist item:	Water quality of the site's water source(s), provided waters, effluent and receiving water bodies shall be quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be quantified.
Findings:	The quality of the receiving water body for the site's wastewater discharge has not yet been assessed. The site has attempted to obtain data from the authorities but could not identify suitable downstream information yet. Finding information or addressing the information gap via governance actions would be important for the shared water challenge related to the absence of a municipal wastewater treatment plant in Devin.

Finding No:	TNR-020974
Checklist Item No:	1.5.1
Status:	Closed
Finding level:	Non-Conformity
Due date:	2026-Jan-30
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:	The local water governance plans were identified but there was no assessment of major publicly-led initiatives under way, relevant goals and possible opportunities for water stewardship collective action in these plans.
Corrective action:	We reviewed the publicly available water governance documents applicable to the region and river basin using the same criteria and approach as applied on the group's other sites. The results of this review are presented in the proof of implementation.

Evidence of implementation: We reviewed the main publicly available water governance documents applicable to the region and river basin. The review aimed to confirm the scope of these documents, identify any measures that could impact the site, and assess whether tangible site-level opportunities exist.

1. River Basin Management Plans (RBMP – 2022–2027)
- Scope: Strategic river basin–level planning documents developed by public authorities to meet EU Water Framework Directive objectives (ecological and chemical status, long-term water protection).
- Potential impact on the site: The plans define high-level objectives and general measures at basin scale and do not introduce site-specific operational requirements beyond existing regulatory compliance. Water abstractions for bottled water production are not specifically addressed, as they are negligible at basin scale compared to other pressures such as irrigation, energy production, mining, and other industrial uses.
- Opportunities: No concrete or site-level collective action opportunities relevant to the site were identified.

2. Flood Risk Management Plans (FRMP – 2022–2027)
- Scope: Publicly-led plans addressing flood risk assessment, prevention, and mitigation at river basin and regional scale.
- Potential impact on the site: The site is not directly targeted by specific flood protection or mitigation measures. No additional operational requirements beyond general land-use and safety regulations were identified.
- Opportunities: No tangible site-level engagement or collective action opportunities were identified.

3. National / Regional Public Water Infrastructure Programs (Water supply, wastewater, flood protection)
- Scope: Public investment programs implemented by public authorities and municipalities, focusing on water supply infrastructure, wastewater treatment, and large-scale flood protection.
- Potential impact on the site: These programs do not introduce specific measures affecting the site’s water abstraction, discharge, or operational practices.
- Opportunities: A future municipal wastewater treatment plant for the town of Devin is planned by the public water utility (ViK) and was already identified and discussed during the audit. No additional site-level collective action opportunities were identified at this stage.

Finding No:	TNR-020978
Checklist Item No:	1.5.4
Status:	Open
Finding level:	Observation
Checklist item:	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.
Findings:	There remains a significant data gap regarding the ecological and chemical quality of the Devinska river downstream from the site, where the municipal sewer discharges untreated effluent. The site should further investigate whether downstream water quality data is available or, if not, collaborate with local authorities to help fill this information gap. Addressing this issue could support improved local water governance and strengthen the site's understanding of shared water challenges.

Finding No:	TNR-021133
Checklist Item No:	1.7.1
Status:	Closed
Finding level:	Non-Conformity
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 following non controlled risks were observed during the site tour: - Storage of CIP chemicals area – some chemicals were stored without a retention basin. The drain infrastructure is connected to compact installations for neutralizing wastewater before discharge into the city sewer system. - Several IBCs filled with Fructose are stored outside along a building wall without any type of protection in case of spillage. This area is not indicated as a raw material storage area in the site map. The drains outside the buildings are connected immediately to the Devinska river.
Corrective action:	To ensure full control and long-term mitigation of these risks, the following actions will be implemented: 1. Integration into the Risk Analysis: These risks will be formally included in our site's Environmental and Water Risk Assessment to ensure proper monitoring and follow-up. 2. Chemical Management and Mapping: Each chemical product will be clearly identified, stored on appropriate retention basins, and mapped on a dedicated site plan to ensure traceability and compliance. 3. Reinforcement of the established Restricted Zones: Specific zones are clearly defined where any storage of chemicals is allowed. No storage areas are located near drainage system. 4. Regular Inspection Procedure: A monitoring procedure will be established to perform routine inspections of chemical storage areas and verify compliance with retention, labeling, and restricted-area requirements during a weekly management walk-by. Checklist will be filled with the conditions. 5. Awareness and Training: Visual awareness sheets will be displayed in key operational areas, and targeted training sessions will be conducted to raise staff awareness of environmental protection and spill prevention measures. 6. Emergency Preparedness: A chemical spill response drill is already under planning and will be carried out to test response capacity, clarify responsibilities, and improve preparedness.

Evidence of implementation:	Following the audit, retention basins were added in all areas where chemical storage was identified without adequate containment (see attached pictures). The IBCs observed outside during the audit were relocated to designated storage areas, and storage of chemicals or raw materials is now strictly prohibited in the vicinity of drainage systems. The chemical storage locations are clearly defined and up to date, and storage areas are reflected on the site layout. The site management system has been updated to include a new routine for monitoring compliance related to chemical storage. In addition, the site's water and environmental risk assessment has been updated to explicitly include the risk of chemical spillage within the facility. The mitigation actions described above have been integrated into this risk analysis. Docs: - Risk analysis completed with this risk. - chemicals storage locations - Pictures of new retention bassin implementation - Checklist to review weekly by the local management team
Finding No:	TNR-021104
Checklist Item No:	4.3.1
Status:	Open
Finding level:	Observation
Checklist item:	Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.
Findings:	Some information was shared to the stakeholders through an infographic which presents actions from the WSP and latest performance of the WUR. A feedback requesting questionnaire was also attached to the communication. While the questionnaire is valid, the information shared lacks to clearly identify the site identified targets and could be improved. The Sustainable Water Management 2024 document would be a more suitable document to engage stakeholders on site performance.

Finding No:	TNR-021136
Checklist Item No:	5.3.1
Status:	In Progress - CA plan approved
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:	The information shared on the Devin website indicates that the site is certified to AWS Platinum. This statement is false.
Corrective action:	All Devin website pages and external communication materials will be reviewed to ensure that any incorrect reference to AWS certification is immediately removed. The AWS logo and related information will only be reintroduced after official certification is granted, in full compliance with the AWS Claims Policy, and will clearly specify the correct certification level (Core).
Evidence of implementation:	The wrong logo has been removed from every website and document. - Mail to our website manager - docs for the change in the strategy document

Finding No:	TNR-020985
Checklist Item No:	5.4.1
Status:	Closed
Finding level:	Non-Conformity
Due date:	2026-Jan-30
Checklist item:	The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.
Findings:	The shared water challenge analysis was not yet completed when the disclosure of the Water Management 2024 document was issued. The water scarcity issue was identified in the document, however the other shared water challenges identified in 1.6.1 were not included.
Corrective action:	The shared water challenges identified through the consultation will be incorporated into a new dedicated chapter in the next version of the Water Management Report. This section will provide a summary of the identified challenges as well as an overview of the actions already undertaken or planned to address and contribute to each of them. The updated report will be re-published on our website "source of change".
Evidence of implementation:	Updated "report for sustainable water management 2024"

Report Details

Report	Value
Report prepared by	Lorenzo BRIOSCHI
Report approved by	Ozge Gokmen
Report approved on (Date)	9/12/2025

Surveillance

Proposed date for next audit
2026-Sep-01

Stakeholder Announcements

Date of publication	Location
26/06/2025	https://sourceofchange.spadel.com/2025/06/26/devin-public-stakeholder-announcement-aws-eng-bul/
24/06/2025	Otzvuk.bg (local digital newspaper)
Comment	The site shared the stakeholder announcement in through their website and a local newspaper.

Catchment Information

Catchment Information

Catchment name: the site is located in the surface water catchment of the Devinska river catchment, which is an affluent of the Vacha river.

Water Supply & Discharge Catchment: the water receives its mineral waters directly from the C3 (inside factory boundaries) and C5 boreholes (2 km away from the factory) and the source water from the Baldaran source (located in the mountains about 1 hour driving distance). The site also receives the municipal water for their sanitary and for industrial purposes (cleaning, etc). The city water is also sourced from the Baldaran source. To be noted that all the infrastructure of the wells is property of the local authorities through the ViK Smolyan. All the waste waters and collected on site and neutralised before being discharged to the local sewers which are collected with other waste waters from the Devin municipality and discharged without treatment downstream of Devin. The rain waters collected are all discharged immediately in the nearby Devinska river.

Groundwater Aquifers:
The region falls inside the boundaries of Shiroka laka rupture zone, which is one of the biggest fault structures in Bulgaria. The Great Shiroka laka fault is located in north-western direction and all southern areas have been displaced downwards along the rupture. The site is located inside Devin graben valley. The western and northern parts of the graben valley are buried under rhyolite blanket and its southern part is marked with faults with south-southwest to north-northeast direction. The eastern boundary of the graben valley is the Great Shiroka laka fault and in southeast direction the graben valley is open.
Paleogene sediments and volcanic rocks are most widely spread in the region and are represented by tuffaceous sandstones, sandstones, breccia-conglomerates, conglomerates, sandstones with marls, shale, limestone, rhyolites.
Proterozoic rocks are revealed to the south and west of Devin town. They are represented mainly by biotite schists, biotite gneiss, amphibolites and marble. The Proterozoic rocks form the impermeable bed of the bottom of the artesian aquifer of Devin mineral water deposit.
Quaternary sediments include the alluvial sediments formed in the plain of Devinska River (boulders, gravels with sandy and silty filler) and negligible amount of deluvial sediments

The geological layers profile at the site is as follows:
• A surface layer of technogenic top soil – thickness app. 0.5 m;
• Technogenic materials (boulders and large sized construction materials – thickness app. 5.0 m;
• Quaternary alluvial sediments from the plain of Devinska River (boulders, gravels with clay and sand filler) – thickness 20-25 m;
• Paleogene (Oligocene) sandstones with marls, shale and limestone – thickness 30-90 m;
• Paleogene (Oligocene) alternation of sandstone and breccia-conglomerates – thickness 80-120 m;
• Paleogene (Oligocene) conglomerate of granite boulders and blockage – thickness 15-70 m;
• Paleogene (Oligocene) alternation of sandstone and breccia-conglomerates – thickness 100-120 m;
• Paleogene (Oligocene) sandstones with marls, shale and limestone – thickness 200-250 m;
• Paleogene (Oligocene) conglomerate of granite boulders and blockage – thickness 80-170 m;
• Precambrian Biotite schists – thickness 15 m;
• Precambrian Biotite gneiss – thickness unknown.

Beneath the subject site, there is a shallow aquifer formed within the alluvial Quaternary sediments in the plain of Devinska River. The aquifer is unconfined and the static water level is about 1.6 m below the surface, but may be considered to vary during the seasons. The thickness of the alluvial sediments where the aquifer is present is between 20 and 25 m. Based on a topographical estimation, groundwater from the Quaternary aquifer is estimated to flow in east-southeast direction following the changes in direction of the river flow. Given the shallow depth of groundwater from the Quaternary aquifer in the area, groundwater vulnerability is considered to be high (hypothetical likelihood of contaminants reaching groundwater, in case of a surface or near surface contamination source existence).

Bellow the Quaternary sediments, there is app. 700-900 m thick alternations of impermeable Paleogene rocks.
The next aquifer system formed in a depth range from 500-600 m to 1200-1500 m is the thermo mineral water deposit Devin. This artesian aquifer is formed within Paleogene tectonic structure (graben valley) filled with alternations of conglomerates, sandstones, marls, shales and limestones. The bedrock is represented by Precambrian gneiss and marbles. The aquifer consists mainly of conglomerates and sandstones and is confined by a thick layer (~500 m) of impermeable sandstones with shales, marls and clay limestones. The aquifer is fed mainly by storm water infiltrating trough the tectonic rupture systems. The aquifer occupies an area of 20 m2, along the Valley of Devinska River.

Catchment Features: The annual average precipitation is 765 mm/year, with huge variation between years (650-800 mm). While the region is not considered as water stressed by the amount of water received, it has been subject to seasonal droughts which resulted in restrictions in water usage locally. The area is not particularly subject to flooding and water usage is mainly used for bottling water and Spas operation in addition to providing water to the local Devin municipality.

Devinska Catchment.jpg

Client Description and Site Details

Client/Site Background

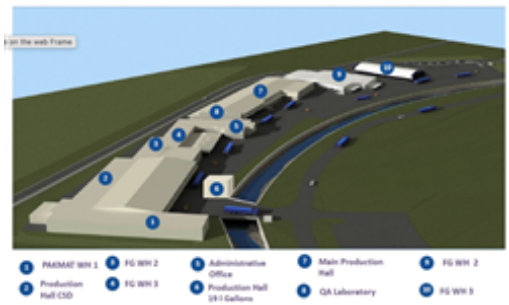
DEVIN JSC was founded in 1992 and since March 2017, is part of Spadel Group. DEVIN's primary scope of activity includes bottling and selling of mineral water, spring water, table and carbonated water and non-carbonated soft drinks. The site is located in Devin, Smolyan in Bulgaria within the Rhodope Mountains. The city is located about 200 km South East from Bulgaria capital city Sofia. It is located at the edge of the Devin municipality next to the Devinska river in a natural setting.

DEVIN JSC produces two different kinds of water :
1. Natural Mineral Water: Hot and deep water coming from both C3 and C5 wells. There is also another C6 well used only for thermal purpose and not managed by Devin.
2. Spring water : Cold spring water coming from Baldaran Spring; the total flowrate is shared between Devin Factory, Baldaran Factory and the municipality.

Previously another superficial well was used to product Table water (osmosed water), this was discontinued.

The production facilities include 5 production lines in 5 workshops, 3 warehouses and auxiliary facilities, such as compressor rooms, boiler rooms.

Description of site infrastructure:
1. Any water sources on site (wells, connection to municipal water supply, etc) C3 mineral water and TK1 industrial water wells are located within site boundaries. C5 (mineral water) is located about 1 km from site and Baldaran (source water) is located in the mountains about 1h driving from the site.
2. Water filtration facilities: except for the mineral water which is ozonated to oxidise the naturally contained sulphur, the incoming water is only being filtrated to remove bigger particles.
3. Water use for production where relevant: site is producing bottled water and beverages.
4. Water use in energy facilities if relevant.
5. Wastewater treatment facilities: only neutralisation (pH).
6. Cooling towers: closed loop cooling towers are used.
7. Rainwater harvesting infrastructure: rainwater collected is simply discharged to the nearby Devinska river through two discharge points.
8. Stormwater management infrastructure, see 7.
9. Fire water: directly provided by the municipal water without fire tanks.
10. Any other. None.



Site Map 3D.jpg

Summary of Shared Water Challenges

Summary of Shared Water Challenges
The following shared water challenges were identified:

- Droughts and water scarcity - tourism create some peaks in the city water usage which use the same water source as site (Baldaran). Sometime the Baldaran source water to the site is shutdown. At that time the ViK municipality warns the that they need more water for the municipal usage as the demand increases.

- Poor infrastructure: risks of leakage of water supply network and not ideal cleaning of the water transmission system - aging of the water infrastructure (this is linked with the first shared water challenge).

- Water quality and river pollution - Absence of municipal Waste Water Treatment Plant which treats both the municipality and site waste waters.

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: Mineral water wells C3 and C5 were visited during the audit. The on-site neutralisation basin was reviewed. The waste water are sent to the sewers which are discharged by the municipal sewers into the river without treatment.

1	STEP 1: GATHER AND UNDERSTAND	
1.1	*Gather information to define the site's physical scope for water stewardship purposes, including: its operational boundaries; the water sources from which the site draws; the locations to which the site returns its discharges; and the catchment(s) that the site affect(s) and upon which it is reliant.*	
1.1.1	*The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including:* *- Site boundaries;* *- Water-related infrastructure, including piping network, owned or managed by the site or its parent organization;* *- Any water sources providing water to the site that are owned or managed by the site or its parent organization;* *- Water service provider (if applicable) and its ultimate water source;* *- Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies;* *- Catchment(s) that the site affect(s) and is reliant upon for water.*	Yes
Comment	The following documents and information were provided for indicator 1.1.1: - Pipelines of the different exploited wells (C3, C5 and Baldaran) are mapped in QGIS. - All the on-site are collected and discharged to the municipal sewers, which then discharge without treatment to the Devinska river. There are two direct to river rainwater outlets Storm discharge 1 and Storm discharge. - The pipelines are not shared for confidentiality reasons. - The Baldaran infiltration catchment is mapped, the surface water catchment of the Devinska river too, for the mineral water aquifer the infiltration zone knowledge is less precise however an hydrogeological study is currently ongoing to better define it. The sanitary water is coming from the municipality, but it is actually Baldaran source water that is chlorinated. The other users of the Baldaran source is another bottled water facility neighbouring to the site and a Spa Hotel. - The surface water catchment identified is the Devinska catchment until its mouth to the Vacha river. - The complete site map with drainage network that goes to sewage and rainwater drains indicated. - A new finished product storage building is being commissioned on the eastern side of the site.	
1.2	*Understand relevant stakeholders, their water related challenges, and the site's ability to influence beyond its boundaries.*	
1.2.1	*Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall:* *- Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people;* *- Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies;* *- Provide evidence of stakeholder consultation on water-related interests and challenges;* *- Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups;* *- Identify the degree of stakeholder engagement based on their level of interest and influence.*	Obs.

Comment	- The supporting stakeholder list was identified by the site. This list includes for each stakeholders an analysis of the level of interest and level influence. Based on this the column X would define the level of engagement for each specific stakeholders. - The following stakeholders engagement were provided as supporting evidence: integrated meeting held in 2025 with stakeholders, communications with Basin Directorate requesting information, feedback from questionnaire sent to the stakeholders requesting information on their water challenges and other.	
1.2.2	*Current and potential degree of influence between site and stakeholder shall be identified, within the catchment and considering the site's ultimate water source and ultimate receiving water body for wastewater.*	Yes
Comment	In the stakeholder list, the following can be found for each stakeholder: - Q column identifies the current degree of influence (R and U reciprocally). - AC column will identify the desired level of interest - which the site assess as the potential degree of influence they would like to have on the stakeholder.	
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 existing identified plans and procedures were reviewed: - The General Management procedure in case of Crisis/Emergencies procedure GP13 Version 3. Covers fires, environmental wider procedures on who needs to be contacted following a crisis or an incident. This plan is covering: fire explosions, natural disasters, environmental risks, strikes. In the 2.3.4 section the environmental pollutions are included which includes pollution of water and soil on site. The site would need to contact the external authorities as per procedure. - Emergency Plan in case of disasters - covers chemical spillage and other environmental issues. It includes the general procedure that needs to be done immediately after an incident and safety procedures related from an operation point of view. - The emergency procedure in case of issues with the neutralisation tank (16/08/2023, OPL07-ENVP01). - Chemical spillage and pollution of source procedure (F03-GP09) - Incident reporting form and Incidents Register.	
1.3.2	*Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped*	Obs.
Comment	- A schematic of inflows and outflows was provided. Document Flowchart V4. For Baldaran source water, it enters the site and then goes into filters and smaller filters Then three tanks of 50m3 are storing it as buffers before the filling lines. C5 - 2xbuffers tanks 120m3 each	
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 volumes for each wells are recorded monthly and is compared to the monthly allowed amount.
- The monitored metered inflows/outflows are the following: all the wells, the city water purchased, and the waste water.
- WUR 1.28 is the target for 2024 and the site reached 1.31.
- The Water Extraction Index (WEI) is also calculated and monitored annually as indication of the sustainable water withdrawal from the site. The current value is 1.49%.
- The IN/OUT for year 2024, have been identified as losses or unaccounted water.
- Monthly data does not show a specific trend in seasonality. As such, the municipality which is in charge of the water infrastructure outside of the site is prioritising first to provide water of the Devin inhabitants prior to the industrial applications.

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.*

Obs.

Comment

The site has implemented a monitoring program for its mineral water sources (C3/C5 and Baldaran), defining test parameters and frequency. The Devinska river is analysed once every three years by an accredited external laboratory, and results are reviewed by an external consultant (Raiso). General chemical parameters were tested upstream and downstream of the stormwater discharge point, showing no significant difference in water quality. The site also conducts effluent sampling twice a year as per legal requirements, and a group-level water quality standard has been defined for Spadel.

However, the site's untreated effluent is discharged into the municipal sewer, which subsequently releases into the Devinska river downstream of Devin municipality, where no wastewater treatment plant is currently operational. The available monitoring data from both the site and public sources cover upstream locations, and no downstream analysis reflecting the actual receiving water body has yet been identified.

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

Yes

Comment

A plant map is provided to support this indicator. The name is map of the waste, oil chemical leakages on site. The map is identifying many different pollution sources including chemicals and oils.
A list of on-site chemicals can be found with identification on where they are used. The chemical storage area is clearly identified on site and spill kits are available at the places where chemicals are handled.

1.3.6 *On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.*

Yes

Comment

The site is located on the banks of Devinska river. The quality of the river water is tested every year by the site and every three year in another cycle. The river banks at that point is not considered. From cultural values, the river is very important for local fisher and there is also an annual fishing competition in Devin. The threats are pollutions by industrial activities, impact of droughts, hydropower regulations, floods, fluoranthee. Assessment of the quality was done. The site however does not have a specific access to the banks itself or riparian zone as outside the site boundaries. As such, no IWRAs can be found within site boundaries except the C3 well which is monitored daily and guarded.
- Nearby of the site the Devinska Reka Natura 2000 zone (Porechieta na deka Devinska) and Zapanero dopi park can be found, however these are covered as catchment IWRAs.

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 - Economic, environmental and socio-economic impact of Devin EAD. Describes the impact of different projects that the site has made recently.
- The AWS_water costs 2025 - included costs for 2024: labor, electricity, mineral water concession costs, manufacturing (other primary inputs), maintenance, other fixed costs and industrial depreciation. The site identified a cost of m3 of water consumed (mineral+source and industrial). This document was reviewed during the audit but not supplied as considered confidential.

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

Comment Site did a water count and identified all the sanitary and showers on site for both women and men. Site is complying with local legislation (see related regulation tab).

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 - A list of a bit more than 50 primary suppliers were identified. No suppliers of primary inputs identified within the catchment.
- PEF study was performed for the Devin site. The Embedded water consists of 1.14% of the site environmental pact.

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 Suppliers of services within Devin municipality were identified and classed between low, average and high. Only the local carwash was considered as high user but in fact the facility only has 3-4 company cars that require cleaning which is negligible considering the site water consumption.
While the specific service suppliers water usage is not quantified, the usage of water of all these suppliers are included into the water balance since they are using the Baldaran source water which is monitored.
Canteen is an internal service and cleaning of of incoming trucks are already counted in the site water usage and balance.
Overall the outsourced services water consumption is considered as negligible compared with the site water consumption.

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.* closed

Comment - Document "CONSERVATION PROGRAMME ENVIRONMENT OF DEVIN MUNICIPALITY FOR THE PERIOD 2021-2028" was identified as the leading document for the water governance initiatives.
- Direct contact with local stakeholders is the primary way of identifying relevant opportunities Identified Water Governance initiatives:
- Conservation Programme Devin Region 2021-2028.
- The Estern Aegean Water Management plan 2022-2027.
- The Flood Risk Management Plans (FRMPs) for the period 2022-2027.

In addition, direct discussions with the Basin Directorate about their plans to the Devinska river were held. Meeting minutes from 2023 were reviewed during the audit.

Finding No: TNR-020974

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 keeps a big registry of regulations related to water in the Legal Compliance monitoring excel sheet..

More practically the water parameters that the site needs to respect can be found in the following documents:
- Concession Mineral Water C3/C5 - controlled by the Ministry of Ecology. A quarterly report is sent signed and sent in paper version to the authorities.
All the necessary permits and water related legal and regulatory requirements were identified as per the following documents: permit# D-000025 (for C5) and D-000028 (for C3).
- Baldaran source is controlled by Basin Directory: permit amendment# PP-3037/07/02/2017 (based on permits 300626 and 31510113 dated 30/11/2004 was provided.
- Permit #31590430 for the TK1 non-mineral borehole (which is not in use anymore).
- There is permit N03-001/07.11.2023 for waste water to be connected to the sewer. The parameters of the site effluent are indicated and include maximal flow (daily and yearly), pH, Solid content, BOD5, COD. However there is also a contract N03-001 with ViK Smolyan and the site. This was confirmed by stakeholder interview (second). No submission is requested.

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

Comment - The Water Extraction Index is evaluated for the catchment every year for both mineral water and source water. This is done on the complete old AWS Scope, the local rains, evapotranspiration. etc.
- A study for a better understanding of hydrological aspects for mineral water wells. An hydrogeology consultant (Artesia) is currently studying the subject. The first pumping tests were done and the first report on the geology was reviewed issues October 2024. The final scope is to get a modelisation.

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.* 🔍 Obs.

Comment The site has reviewed the 2024 annual report from the Smolyan Regional Inspectorate (RIOSV), indicating that the chemical status of the Devinska river is considered good or sufficient. The Devinska catchment is located within a protected area. Groundwater quality is monitored by the site in accordance with its Standard Quality document, and additional test reports are available for the Devinska river up to the dam level. However, the publicly available data obtained from the authorities mainly refers to sampling points located upstream of the site and the Devin municipality.

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

Comment	Identified IWRAs in the catchment. - Rivers: only the Devinska is considered as relevant stream, the other smaller ones are for the moment not assessed. The data collected shows a good ecological quality status, however the sampling point seems to be way upstream. The river has an ecological importance as it passes in a protected area "Porechieto na deka Devinska" but also an important social importance with fishing especially trouts. - The Porechieto na deka Devinska natural area has a gorge with an eco-trail. Important for tourism (socially and economically). - Groundwater aquifers: The Baldaran source used for delivering potable water to the municipality The mineral water sources to provide water to the Hotel Orphe Spa and C6 by a swimming pool. - The Toshkov Chark Reservoir: aquaculture, camping, fishing and hydropower. - Natural reserves: several natural reserves can be found in the area. The wider Rodopi Zapadni protected area is a Natura 2000 zone with 42 protected species and 43 protected habitats. Many threats are listed into the Natura 2000 website. - All the IWRAs are mapped in QGIS	
1.5.6	*Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.*	Yes
Comment	- All the wells and pipelines are of possession of ViK which handles the water distribution in Devin. - ViK is planning to build a WWTP in the next 2-3 years as it is a requirement from the region. - The municipal sewers are directly discharging to the Devinska river without being treated. The main discharge point is mapped in QGIS, several other smaller discharge points are probably located along the river.	
1.5.7	*The adequacy of available WASH services within the catchment shall be identified.*	Yes
Comment	- Bulgaria file JMP provided. Overall good WASH services at national level. - The Devin municipality does not have a WWTP and discharge the sewer in the Devinska river. This is the main weak point of the area. - Access to drinking water is quite high but some small isolated households probably do not have access to drinking water at home but use unprotected fountains. The exact amount is unknown.	
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.*	Yes

Comment

A consultation was done with stakeholders in 2024 - 20% (5-6) of the stakeholders engaged answered, the rest of identified shared water challenges and challenges of stakeholders is assessed by the site without confirmation and indicated in the stakeholder list. Stakeholders that answered: Ecologists of Devin Municipality, Governmental Hunting (Isvora), Bulgarian NGO Buflek, MD of APBMB, Regional Inspection of Environment and Water.

The following shared water challenges were identified:

- Droughts and water scarcity - tourism create some peaks in the city water usage which use the same water source as site (Baldaran). Sometime the Baldaran source water to the site is shutdown. At that time the ViK municipality warns the that they need more water for the municipal usage as the demand increases.

- Poor infrastructure: risks of leakage of water supply network and not ideal cleaning of the water transmission system - aging of the water infrastructure (this is linked with the first shared water challenge).

- Water quality and river pollution - Absence of municipal Waste Water Treatment Plant which treats both the municipality and site waste waters.

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

Yes

Comment

The site has several initiatives ongoing for the shared water challenges:
- The plan is to create a municipal WWTP in the next years, this was confirmed by the stakeholder ViK Smolyan during the interview.
- ViK Smolyan and for the WWTP: The site is aware of the planning of building a WWTP for the Devin municipality in a nearly future as they are in constant contact with the Basin Directorate and the ViK.
- In the risk analysis you can find an Action Plan with some initiatives from site perspective to counter that risk. Some of these risks are actually also shared water challenge '(sharing of the resource).
- From a water scarcity point of view the site is looking for ways to increase water efficiency.
- From an infrastructure point of view, the site is in discussion with ViK about maintenance, leakage detection campaigns, research purposes (pumping tests).

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 has a risk analysis matrix which for each risks the P likelihood, G severity, Vulnerability (is it close to protected areas), Business Impact (considered in the Business Impact), Level of control are identified.

Finding No: TNR-021133

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

Yes

Comment

The opportunities can be found in the action plan part of the risk assessment. The higher the risk the short the dead line for the opportunity or the action to be implemented. In the Best Practices sheet is also keeping opportunities that are not specifically linked to a risk.

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

1.8.1	*Relevant catchment best practice for water governance shall be identified.*	Yes
Comment	Examples of relevant best practices identified for water governance: - Put in place a legal conformity Performance Indicator to allow better follow-up of new legislations. - Make a 2025-2030 CSR strategy applicable to each sites. - Install an optic fibre network to communicate with all wells in real-time. - Make an annual meeting with a representative of each production site to review the risk analysis, the opportunities, best practices. - Review the WSP in the annual Management Reviews. - Adopting a Standard Operating Procedure for the exploitation of wells.	
1.8.2	*Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.*	Yes
Comment	Examples of relevant best practices identified for water balance: - Evaluate the water consumption of important suppliers (whether in catchment or not) - Make a complete catchment water balance. - Set-up of a centralised piloting system. - Set-up of constant piezometers monitoring. - Switch to the Water Scarcity Index instead of the current Water Extraction Index.	
1.8.3	*Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.*	Yes
Comment	Examples of relevant best practices identified for water quality: - Adapt the wells in order to make the piping network outside the site and wells sanitable. - Implementing the preventive maintenance standard for the wells - Perform a sampling and river quality testing.	
1.8.4	*Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.*	Yes
Comment	Examples of relevant best practices identified for IWRA maintenance: - Ensuring and monitoring of minimal flow in the rivers to ensure minimal ecological flow (ecological continuity). - Financing LIFE projects related to catchment IWRAs.	
1.8.5	*Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.*	Yes
Comment	Examples of relevant best practices identified for water governance: - Water donations annually to local associations. - Better taking into account the probability of occurrence in the risk analysis.	

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 statement signed by Spadel CEO was published on the Source of Change website: https://sourceofchange.spadel.com/wp-content/uploads/2025/05/Statement-AWS-Marc-du-Bois_V4_2025_05.pdf It includes the necessary indicator requirements and the organigramme of the water responsibilities.	
2.2	*Develop and document a process to achieve and maintain legal and regulatory compliance.*	
2.2.1	*The system to maintain compliance obligations for water and wastewater management shall be identified, including:* *- Identification of responsible persons/positions within facility organizational structure* *- Process for submissions to regulatory agencies.*	Yes
Comment	The responsible person on site is Mrs. Galina Stefanova-Doganu Quality, Health, Safety and Environment Manager. The final responsability falls into the Site Director. - The monitoring data (flows, quality parameters) are recorded into Excel records and kept available in case of request from the authorities (RISOV Smolyan, regional environmental agency).	
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	Spadel has a 2020-2025 strategy for the group. The new strategy 2025-2030 is being finalised and was not yet published. However the draft was reviewed during the audit and contained the following: - Sustainable water management: no over-exploitation of the water resources that will be monitored through the Water Extraction Index (WEI) and for 2027 with the Water Stress Ratio (WSR). Responsible protection and transparent concentration with local stakeholders. - Regenerating water locally: program (projects and scientific support) with aim to regenerate develop the water cycle in every regions where Spadel has operations via their 5% back to society program. - By 2030 seeing targets validated by official frameworks (Science Based Target Network SBTN or similar).

2.3.2	*A water stewardship plan shall be identified, including for each target:* *- How it will be measured and monitored* *- Actions to achieve and maintain (or exceed) it* *- Planned timeframes to achieve it* *- Financial budgets allocated for actions* *- Positions of persons responsible for actions and achieving targets* *- Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.*	Yes
Comment	A new water stewardship plan was created for the re-certification of the site. The new water stewardship -- plan would identify for each targets: - how it will be monitored - planned timeframes - financial budget allocations - person responsible - is it a shared water challenge - The AWS outcome for which the actions are related to - The WSP contains a tab for Best Practices and opportunities, with an indication of if the BP was implemented in the different Spadel sites or not. - The site is also using other ways to track more complex projects: Risk analysis, WUR file, Teams. Make sure to have the general follow-up done in the WSP.	
2.4	*Demonstrate the site's responsiveness and resilience to respond to water risks*	
2.4.1	*A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.*	Yes
Comment	The risk analysis supporting indicator 1.7.1 contains an action plan with several actions to address the identified risks. Some of this actions are made in co-ordination with public authorities. Here are some examples: - Leakage survey of the water pipelines from wells to factory. This actions also requires concertation with the authorities. - Securing the shafts with alarms: the shafts are property of the authorities, same as for all wells infrastructure, the addition of alarms would benefit the security of the water supply. - Raising awareness of pesticide use of nearby football field (neighbouring the site). - An analysis of climate change impact on site activities was done.	

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	Evidence of site supporting good catchment governance: - Cleaning and disinfection of the water pipelines w/ ViK Smolyan (owner of the infrastructure). - Communications with ViK about the fact the site is looking for the infrastructure of the wells. - Integrated meetings - with ViK Smolyan and the directorate. - Meetings with the basin directorate and Ministry of Environment in order to request technical operations on infrastructure of the wells.	
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 waters used by the site are also shared by other stakeholders/people but are covered by legal/regulatory requirements (see 3.2.1).	
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	The following compliance data was reviewed during the audit: - Quarterly readings of the water meters to the Basin Directorate (for Baldaran). - Mineral waters C3/C5 - Yearly submission to the Ministry of Environment requires monthly reading of quantities, temperature and pressure. - The ministry of environment and water (MEOW) audit the site twice a year and is covering the water, environment, work regulations. - Annually chemical testing of mineral and source waters by accredited laboratory. - All the daily and weekly quality data of testing performed by the local quality department.	
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	The wells and pipelines infrastructure is of property of the authorities, currently both the mineral water and the source water is shared with other stakeholders in the catchment: - Mineral water is shared with l'Hotel Orpheus and public fountains (one fountain for C5 and three fountains for C3). - Source water is shared with the municipality and another bottling site nearby. ViK Smolyan (municipal water supplier) is in charge of the infrastructure and of the sharing of the resources to the different stakeholders. As such, the water rights of all parties are enforced by them.	
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	Projects can be reviewed in both the WSP and the WUR projects list documents. - Study for better understanding of the water cycle and the hydrogeological processes of the catchment. Focused on both the mineral and the Baldaran sources. - Related to the water savings the following projects were completed: Automatic CIP Process - completed in 2024 - water savings of 6000 m3/year Sirup manufacturing for beverages - automation of the production of sirup - completed in 2024 - water savings of 6000 m3/year Matrix Water Treatment Plant (WTP) both mineral and spring water fully automated - completed in 2022 - 40200 m3/year. Ongoing projects: Washing module to be updated, planning of drains, chiller for ozonators.	
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 cannot use a volumetric total use as target as water is the product. - The site had a water use ratio (WUR) target is 1.28 and the site reached 1.31 in 2024. The WUR is highly dependent on the type of production ongoing. The site has a re-usable 19L PET bottles line with a washing machine that is consuming a high amount of water. - Water Extraction Index (WEI) target is to stay under 10%, the site reached 1.34%.	
3.3.3	*Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.*	Yes
Comment	There is no reallocation as the site does not has this right, the water is actually provided to them by the municipality which distributes it also to other users. ViK Smolyan is actually the one allocating the water.	
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	These are the projects that were identified for quality projects since last audit: - Soil survey about old fuel tanks (decommissioned) - a first study identified some soil pollution from the past, now they are trying to identify the extent. - On the site effluent: piping adaptation to avoid discharge direct in the river, neutralisation treatment for waste water, implementation of back-up pump in the waste water pit. All were completed end 2023 except the neutralisation system that was completed end of 2024. This allows the site to respect the pH requirements of the waste water as prescribed by the contract with ViK. - Set up emergency procedures with local stakeholders (due date for 2027) and secure the shafts with alarms (2027). - Beeodiveristy study report of 2024 (no pesticide around through pollen identification) will be re-done in 2026.	
3.4.2	*Where water quality is a shared water challenge, continual improvement to achieve best practice for the site's effluent shall be identified and where applicable, quantified.*	Yes
Comment	Water quality is not indicated as a shared water challenge, however it was identified that the waste water of the municipality sewers is not treated and requires further investigation (see observation in indicator 1.5.4). The site finalised the neutralisation of effluents in 2024.	
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 participates in river clean-up projects annually, currently there no other project ongoing on the Devinska river as the quality data collected by the site does not indicate any particular concern.

- The site has a project for Chairski (Chairite) lakes that is a 3-year long project. This is not located in the site catchment but is also in the Rhodopes mountains.
The project started in 2023 and aims to study and improve the peatlands named Chairski lakes. No information on what kind of species. It is a project leaded by the Biodiversity Foundation NGO (Biodiversity.bg) - The first step was to characterise the biodiversity of the habitat.
The tree implanted in the peatlands island posed problems in the risk of drying up the land and destroying that habitat. Some species that are in the Red Book EU were identified in that area. From the first analysis, the idea was to remove the trees as they were drying the peatlands, but it was decided to keep them and regulate their population and size instead.. At the moment the next phase is to identify the carbon pit of these peatlands. Then a guideline will be written on how to manage and maintain this important habitat. The project is funded by the EU.

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
- Water was donated to local associations in Bulgaria (34k €).
- No on-site projects related to WASH access as the access is considered as correct (respects the local regulations).
- There is a water fountain at the C3 site, fridges with Devin water at the entrance of the site and buildings and necessary access to sanitary to drivers and employees.

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 When the municipal supplier does not have enough water for the inhabitants in high tourism periods, it is the site that does not receive source water anymore, as such this proves that the site is not impinging on the human right to safe water.

3.7 *Implement plan to maintain or improve indirect water use within the catchment:*

3.7.1 *Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.* ✓ Yes

Comment No primary suppliers identified in the catchment. However PEF analysis was performed to assess the water consumption of supply chain.
Currently no targets were set in the water stewardship plan related to indirect water use.

3.7.2 *Evidence of engagement with suppliers and service providers, as well as, when applicable, actions they have taken in the catchment as a result of the site's engagement related to indirect water use, shall be identified.* ✓ Yes

Comment No primary suppliers identified in the catchment. From a service supplier point of view, the analysis performed by the site concludes that the amount of water consumed is negligible compared to the annual water uses of the site. As such the engagement for indirect water use is not considered a site priority.

3.8 *Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have.*

3.8.1 *Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.* Yes

Comment
- Proofs of engagement for sanitation of Baldaran pipe - report from site sanitation with ViK and Devin.
- Implementation of new pressure probe in C3 borehole.
- The pending : projects - inspection and change in well head, leakage inspection in the Baldaran pipe, alarms in shaft, valve at the Orpheus hotel.
- The ViK Smalyan has submitted an official request for the construction of the WWTP municipal, it was submitted to the Bulgarian authorities.

3.9 *Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.*

3.9.1 *Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.* Yes

Comment
Actions towards best practices for water governance implemented:
- Implementation of regulatory compliance Performance Indicator Completed and reviewed
- Water Risk Analysis - Completed in 2024
- Steerco for Aqua meetings (started in 2025) - hydrogeology department, plant manager and quality and industrial projects - review of water resources project between all different parts.
- Annual incident review - Implemented

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

Comment
Actions towards best practices for water balance implemented:
- Simplified flowchart of water usage
- Implement the Water Use Ratio and Water Extraction Index along with the WUR improvement plan.

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

Comment
Actions towards best practices for water quality implemented:
- Risk analysis for source and a Performance Indicator follow-up for the level of controlled risk.
- Analysis of the ultimate reception body every 3 years - implemented with test report by Raiso.
- Analysis of TFA in raw waters (wells).

3.9.4 *Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.* Yes

Comment
Actions towards best practices for IWRA maintenance implemented:
- River quality testing.
- Helping in funding an EU funded project (LIFE).

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

Comment
Actions towards best practices for WASH implemented:
- Annual donation of water to associations.

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

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

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

✓ Yes

Comment

- The risk analysis document is tracked by percentage of risk controlled. The risks that have a score more or equal to 8 are counted, for each risk many actions can be done to control it. The performance is calculated as part of risks that are handled (risk control M = 1). The target is 50% of risks managed safely for 2030. A comment section would indicate the assessment of the action that was done to address the risks.
- For the non-risk related actions, these are monitored in the WSP with the target indicated in the Q column and the tracking in the R column. The achievement of the goal is assessed in column U. Any specific commentary on the action would be indicated in the Comments column.
- The link to the AWS Outcomes are indicated in the A to E column of the WSP.
- Monitoring of the main targets like the WUR is done continuously.
- To track daily operations of the WSP the site use Planner of Teams, each project has its own open discussion in planner with sub-tasks. The advancement are monitored in the Aqua meetings and the plan is then updated accordingly. Water Balance document is tracked monthly directly in the document.

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

✓ Yes

Comment

As a mineral/source water bottling plant, all Spadel Devin costs calculated in 1.3.7 are to be considered as related to water management and water stewardship. As such, the value generated could also be linked to the site turnover. Nevertheless, the site identified the value generated by the water savings that were identified iin the WUR document and an economical value of the savings is calculated with the real cost of water calculated in 1.3.7. The value is presented in the attached document.

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

✓ Yes

Comment

Shared value benefits in the catchment are evaluated in the document Economical, environmental and socio-economic impact of Devin EAD. The document emphasise the impact of the site activities and in a general way how the site is addressing the issues. One of the first one would be the water scarcity in the region and the way.
- For impact of environment and biodiversity: monitoring of pesticides level in the beehives. The 2024 results showed that 83% of pollen came from endemic wild species of flowers, no pesticides were found,. The traces of heavy metals level found in the pollens were also all under the maximal permissible limits.
- Disinfection of the Baldaran source infrastructure, which is also providing water to local community. These disinfection and maintenance operations are done by the site and ensure also a good water supply to the local population.
- Chair Lakes biodiversity capsules in the Rhodope Mountains, increasing the understanding of a unique wetland habitat and identifying the best ways to maintain/enhance these habitats.
- A biodiversity footprint analysis of the impact of the site on the local biodiversity was done. The result is calculated in the MSA. It also assess other impacts.
- Socio-economic: donation of mineral water bottles to associations (34k€ in 2024), employing 200+ FTE an economical impact of 21millions euro approx., projects of supporting environmental education in Bulgarian Schools --> Project Enter the Green Circle".

4.2 *Evaluate the impacts of water-related emergency incidents (including extreme events), if any occurred, and determine the effectiveness of corrective and preventative measures.*

4.2.1	*A written annual review and (where appropriate) root-cause analysis of the year's emergency incident(s) shall be prepared and the site's response to the incident(s) shall be evaluated and proposed preventative and corrective actions and mitigations against future incidents shall be identified.*	Yes
Comment	- The annual incidents are reviewed during the annual management review as requested by the ISO 14001/9001 certification. Five minor environmental incidents were recorded in 2024, all were contained (small leakages). The incident forms with the corrective actions and preventive actions were reviewed. The incidents in 2024 and 2025 were properly contained and did not require to inform the authorities. - The incident reporting records for 2024 were reviewed.	
4.3	*Evaluate stakeholders' consultation feedback regarding the site's water stewardship performance, including the effectiveness of the site's engagement process.*	
4.3.1	*Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.*	Obs.
Comment	A consultation with about 20 stakeholders was actively done with the sharing of the summary of water stewardship activities for 2024 (https://devin-bg.com/доклад-устойчивост-2024/). In addition, the added value document was shared with a link to a questionnaire requesting feedback of Devin's water stewardship.	
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	Note that this is the first iteration of the new WSP of the site since the site dropped the certification in the two past years. As such, the WSP available is only for year 2025 and no records of plan for 2024 is available. The site will be keeping the actual plan but indicate in column G the year of the action, this will allow to keep track of previous version and the assessment of pluri-annual projects and annual projects that are recurring. Once a year the performance of the WSP is discussed during a meeting between the Spadel corporate team and the local AWS team.	

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

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

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

Comment: The water-related internal governance is publicly shared through the Commitment that is available on the Spadel Source of Change website (https://sourceofchange.spadel.com/wp-content/uploads/2025/05/Statement-AWS-Marc-du-Bois_V4_2025_05.pdf).

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

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

Comment: The WSP is shared on the Sustainable water management report is shared on the Spadel Source of Change website.

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.* — in progress

Comment:
- A summary of the biggest achievements of year 2024 is available at the following link: https://devin-bg.com/доклад-устойчивост-2024/, it includes KPIs like the WUR and WEI but also feedback on some actions completed related to the risks analysis.
- The WSP is also shared on the sustainable water management Devin 2024 report is shared on the Spadel Source of Change website. This annual reports presents the results of 2024, including performance against targets.

Finding No: TNR-021136

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 document Sustainable Water Management Devin 2024 explains the water scarcity situation in the region and shares the WSP and actions that the site is doing to save water. However the other identified water challenges are not presented in the document.

Finding No: TNR-020985

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

Comment: The site has a long lasting relationship with ViK Smolyan, the local water supplier 100% state owned. The topics discussed goes from the exchange of data, the maintenance and enhancement of the infrastructure.

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	Annual incidents report for 2024 was reviewed and showed no compliance violations but only minor contained leaks inside the site boundaries (lubricant, refrigerant, water).	
5.5.2	*Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.*	Yes
Comment	Annual incidents report for 2024 was reviewed and showed no compliance violations. However the small incidents reviewed are recorded and corrective actions and preventive actions (if relevant) are available.	
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	In august 2023 an incident occurred with direct discharge of water used in CIP process to the Devinska river. This resulted in the death of fishes. The issue was caused by the failure of the pump used to discharge the waste water to the sewers during a maintenance of it. The operator performing the CIP was not aware of that maintenance operation and the CIP water was sent to the Waste Water tank. Because of the non-functioning pump, the effluent was discharged to the river. The review of the corrective actions that followed No incidents occurred since that time.	

Previous Findings

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