

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-001713

SITE DETAILS

Site: **Nestlé Waters Lebanon: Ras El Meten Falougha**
Address: , Ras El Meten, LEBANON
Contact Person: Elie Sfeir
AWS Reference Number: AWS-000109
Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Core
Date of certification decision: 2026-Feb-09
Validity of certificate: 2029-Feb-08

AUDIT DETAILS

Audited Service(s): AWS Standard v2.0 (2019)
Audit Type(s): Re-Certification Audit
Audit Start Date: 2025-Sep-08
Audit End Date: 2025-Sep-10
Lead Auditor: Nathalie Karam

Site Participants:

Elie Sfeir, Other
Maya Abou Diwan, Quality manager
Simon Abou Naoum, Water Treatment Specialist

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ADDITIONAL INFO

Summary of Audit Findings: During the re-certification audit 7 non-conformities and 13 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 10 December 2025. However, as a new non-conformity was added after the closing meeting, the due date is extended until 31 December 2025. In order to meet this timeline evidence is to be submitted to WSAS by 16 December 2025.

The audit team recommends re-certification of Nestlé Waters Lebanon: Ras El Meten Falougha at Core level pending closure of the non-conformities.

Scope of Assessment: The scope of services covers the recertification audit for assessing conformity of Nestlé Waters Lebanon: Ras El Meten Falougha against the AWS International Water Stewardship Standard Version 2.

The Nestle Waters Falougha Factory is a water bottling facility, producing bottled mineral water products under the brand name of Nestle Pure Life and Sohat which comes from the mountains and is pure water. The factory produces a variety of different bottle types ranging from 0.5L to 6 L, in both plastic and glass. The Falougha Factory is located within the Shouf mountain catchment area and is part of the Shouf Biosphere Reserve. The site is located in Baabda district and is some 25 km east of Beirut.

The audit was conducted onsite on 8-10/9/2025.
The onsite site visit included the assessment of the Falougha Factory, water resource as part of the audit.
The onsite site visit included the assessment of water source, water treatment, production, wash facilities, chemical storage, water disposal locations.

FINDINGS

NUMBER OF FINDINGS PER LEVEL

Observation	13
Non-Conformity	7

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FINDING DETAILS

Finding No: TNR-021112
Checklist Item No: 1.1.1
Status: Closed
Finding level: Non-Conformity
Due date: 2025-Dec-31
Checklist item: The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including:
- Site boundaries;
- Water-related infrastructure, including piping network, owned or managed by the site or its parent organization;
- Any water sources providing water to the site that are owned or managed by the site or its parent organization;
- Water service provider (if applicable) and its ultimate water source;
- Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies;
- Catchment(s) that the site affect(s) and is reliant upon for water.

Findings: The currently identified physical scope is limited to the Shouf Mountain and is defined solely by hydrogeological criteria. The catchment using topographical and hydrological criteria has not been identified.

Corrective action: To identify the catchment using topographical and hydrological criteria.

Evidence of implementation: The Catchment Physical scope is updated including Hydrogeological and geological criteria.
A study done by a third party is uploaded which is showing the Hydrogeological and topographical criteria.
A presentation is provided showing the boundaries and the description regarding the hydrogeology, geology, and topography.

Finding No: TNR-020006
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 site presented evidence of stakeholder influence analysis through both a spreadsheet and the CRP. Inconsistencies were observed between the CRP documentation and the stakeholder analysis spreadsheet: several stakeholders are marked as "Not Applicable" for influence in the CRP tool while the spreadsheet assigns a defined degree of influence to those same stakeholders.

Corrective action: Alignment between the CRP and the stakeholder mapping.

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Finding No: TNR-021132
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: Even though the site is tracking its water quality, the annual variances were not presented.
Corrective action: Provide the required annual variance

Finding No: TNR-019790
Checklist Item No: 1.3.7
Status: Closed
Finding level: Non-Conformity
Due date: 2025-Dec-31
Checklist item: Annual water-related costs, revenues, and a description or quantification of the social, cultural, environmental, or economic water-related value generated by the site shall be identified and used to inform the evaluation of the plan in 4.1.2.
Findings: Water-related revenue is not included, and an analysis of cost versus social, cultural, environmental, and economic value was not performed.
Corrective action: To provide the annual water-related costs, revenues, and a description or quantification of the social, cultural, environmental, or economic water-related value generated by our site shall be identified and used to inform the evaluation of our plan in 4.1.2
Evidence of implementation: The data are provided and Uploaded.
A provided current cost breakdown is available and shared, and a detailed quantification and list of the economic, social and cultural aspects was provided.
The revenue was added to the file , the description or qualification of the social, cultural, environmental, economical water related value is presented through a video (Factory manager) and by an excel showing the quantity of water generated.
The uploaded file includes the value creation.

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Finding No:	TNR-020007
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:	<p>The site identified certain announced targets by different ministries, such as the Ministry of Agriculture's aim to plant an additional 40,000 trees, and demonstrated how the site contributes to this goal. The site also referred to the Lebanon Water Strategy for 2024–2035.</p> <p>However, the site did not identify the action plans and policies published by relevant institutions.</p>
Corrective action:	Identify the action plans and policies published by relevant institutions
Finding No:	TNR-020008
Checklist Item No:	1.5.3
Status:	In Progress - CA plan approved
Finding level:	Observation
Due date:	2025-Dec-31
Checklist item:	The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.
Findings:	The water balance covers only the Sohat spring catchment area and not the full catchment. It is also unclear whether the water balance is positive or negative, as no interpretation of the results has been provided.
Corrective action:	To provide the water balance calculation as an annual variance and to perform a quantification and interpret the results.
Evidence of implementation:	<p>An updated water balance was added, including the requirements. 2 water balances are provided to calculate the water balance in each catchment area; Sohat (upper catchment) an the F3 and f1 well, which represent the lower catchment area; both data are interpreted by a third party during the updat provided cover the Sohat spring catchment area Please note that the Area for Falougha Mountain is divided into 2 catchments:</p> <ol style="list-style-type: none">1)Thefirst one for the Sohat where the data are provided2)The second one is the lower one containing Wells F1 and F3, and also the calculation was provided. <p>Both calculation was provided.</p>

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Finding No: TNR-019809
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 description and status of the identified IWRA's misses additional aspects that would provide greater completeness.
Corrective action: To provide all the required data for the IWRA as per the standard requirements.

Finding No: TNR-019810
Checklist Item No: 1.5.6
Status: Open
Finding level: Observation
Checklist item: Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.
Findings: The assessment of potential exposure to extreme events does not include certain risks, such as flooding.
Corrective action: To include flooding in the assessment.

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Finding No: TNR-019811
Checklist Item No: 1.5.7
Status: Closed
Finding level: Non-Conformity
Due date: 2025-Dec-31
Checklist item: The adequacy of available WASH services within the catchment shall be identified.
Findings: The WASH assessment does not include additional parameters such as availability and adequacy of public toilet facilities, sanitation services, wastewater management, and solid waste management.
Corrective action: To include additional parameters such as availability and adequacy of public toilet facilities, sanitation services, wastewater management, and solid waste management.
Evidence of implementation: Evidence was provided based on the Hydrogeological study performed by a third party covering all the requirements.
The provided data is provided based on a study done by the third party to show the needed water quantity , the data shown the quantity of available water quantities in the area, the needed ammount and the situation of the sewage network.
The provided data is extracted from the hydrogeological study performed by a third party to cover the catchment area including the real situation and the demand on water and the condition of the existing networks.
Offer for water testing are also attached showing the strategy followed by Nestle to check and maintanin the sources condition.
The available WASH service in the catchment are listed in the attached presentation.

Finding No: TNR-019813
Checklist Item No: 1.7.1
Status: Open
Finding level: Observation
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 risk assessment does not reference use of existing online scenario□modelling tools for more detailed evaluation and projection.
Corrective action: To use of the existing online scenario□modelling tools for more detailed evaluation and projection.

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Finding No: TNR-020009
Checklist Item No: 1.7.2
Status: Open
Finding level: Observation
Checklist item: Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.
Findings: The opportunities register focuses on actions within the site's direct control; broader collaborative or catchment-level opportunities are not included.
Corrective action: Expend the water saving opportunities to cover all the requirements.

Finding No: TNR-019864
Checklist Item No: 1.8.1
Status: Open
Finding level: Observation
Checklist item: Relevant catchment best practice for water governance shall be identified.
Findings: It was noted that these best practices are all site-led best practices.
Corrective action: To identify best practices other than the site led ones.

Finding No: TNR-019865
Checklist Item No: 1.8.2
Status: Open
Finding level: Observation
Checklist item: Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.
Findings: It was noted that these best practices are all site-led best practices.
Corrective action: To identify all the best practices performed site- led os otherwise

Finding No: TNR-019866
Checklist Item No: 1.8.3
Status: Open
Finding level: Observation
Checklist item: Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.
Findings: It was noted that these best practices are all site-led best practices.
Corrective action: The best practices should be identified for the one-led -site and the other one.

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Finding No: TNR-020010
Checklist Item No: 2.3.2
Status: Open
Finding level: Observation
Checklist item: A water stewardship plan shall be identified, including for each target:
- How it will be measured and monitored
- Actions to achieve and maintain (or exceed) it
- Planned timeframes to achieve it
- Financial budgets allocated for actions
- Positions of persons responsible for actions and achieving targets
- Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.
Findings: Actions highlighted for other stakeholders are included in the plan and are not differentiated or revised to indicate applicability to the site.
Corrective action: to include, differentiated or revised to indicate applicability to the site for the highlighted actions.

Finding No: TNR-019816
Checklist Item No: 2.4.1
Status: Closed
Finding level: Non-Conformity
Due date: 2025-Dec-31
Checklist item: A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.
Findings: The plans were developed by the site independently, without coordination with public sector or infrastructure agencies.
Corrective action: To develop the plan with coordination with the public sector and infrastructure agencies and all the concerned people.
Evidence of implementation: The WSP was created based on many inputs as Stakholders formal meetings, stakholders frequent meetings, internal diagnosis done through the Nestlé tool (CRP software), and the risk assessment done.

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Finding No: TNR-019867
Checklist Item No: 4.1.1
Status: Closed
Finding level: Non-Conformity
Due date: 2025-Dec-31
Checklist item: Performance against targets in the site’s water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.
Findings: Achievement against each target was not presented. Furthermore, the analysis regarding progress toward water stewardship outcomes has not yet been conducted or evaluated.
Corrective action: To present achievement against each WSP target, conduct and evaluate the analysis regarding progress toward water stewardship outcomes.
Evidence of implementation: The WSP for Ain zhalta factory is updated and added to the system and the WSP Summary consolidate the progress toward water stewardship outcomes.

Finding No: TNR-020296
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: Even though the disclosure includes high level performance it does not include a consolidated annual summary reporting quantified performance against WSP targets as required.
Corrective action: to consolidate the annual summary reporting quantified performance against WSP targets as required.

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Finding No: TNR-019869
Checklist Item No: 5.5.1
Status: Closed
Finding level: Non-Conformity
Due date: 2025-Dec-31
Checklist item: Any site water-related compliance violations and associated corrections shall be disclosed.
Findings: The site has issued a statement indicating that no water-related compliance violations have occurred at the factory requiring the application of the BCP. However, the site recorded deviations in three parameters within the neutralization process, which prompted the upgrade. These deviations were neither disclosed nor accompanied by a statement confirming that disclosure could be provided upon request, along with details of any corrective actions taken to prevent future occurrences.
Corrective action: To include in the statement that any requested data will be available upon request.
Evidence of implementation: During the Open House and formal and informal meetings with the stakeholders, the disclosure of any deviation is declared upon request, a new study for wastewater was conducted, and the data are available, and the study will be shared with the stakeholders in Cooperation with the Shouf Biosphere Reserve team.
The Statement of disclosure was shared with the stakeholders through email and the screenshot evidence is uploaded.
The Email share with stakeholders is attached as requested.

Finding No: TNR-019870
Checklist Item No: 5.5.2
Status: Closed
Finding level: Non-Conformity
Due date: 2025-Dec-31
Checklist item: Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.
Findings: No public disclosure of these corrective actions or confirmation of stakeholder/regulator notification was presented. The site indicated such records can be provided on request but such a possibility is not disclosed or communicated.
Corrective action: The site will disclose and communicate that records can be provided on request
Evidence of implementation: During the Open Day at the Ain zhalta factory the site indicated that any record is available upon request and its communicated on each meetings with each stakeholder and it will be shared on an email with all the stakeholders.
A study was conducted with a Third party and it will be shared to public, including wastewater test results.
the disclosure statement was shared with the stakeholders.
The email shared with stakeholders is attached.

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Report Details

Report	Value
Report prepared by	Nathalie Karam
Report approved by	Anasse Ait Lemkademe
Report approved on (Date)	23 October 2025

Surveillance

Proposed date for next audit

Stakeholder Announcements

Date of publication	Location
01/08/2025	Emails to all stakeholders
01/08/2025	Announcement at municipality

Catchment Information

Catchment Information

The Falougha factory is located in the Jebel Al Knesseh (Shouf Mountain) catchment within the Shouf Biosphere Reserve (Baabda district, ~25 km east of Beirut). The site sources water from the Sohbat spring and on-site production wells (F1 and F3, with F2 used for regeneration) and uses municipal supply from the district water provider as backup; site effluent is routed to the Falougha sewage network and ultimately discharges to the Beirut River, while neutralized effluent is tested and partially reused on-site for toilets and irrigation where quality permits. Groundwater is abstracted from local shallow aquifers that support springs (Sohat, Lahoud and others); these upper aquifer layers are recharged seasonally by precipitation and surface infiltration in the mountainous catchment, and springs and wells appear hydrologically connected, seasonal high flows in spring contribute to natural recharge and occasional surplus returns to groundwater (BTD hydrogeological study reports inflow/outflow and storage change for Sept 2023–Aug 2024 and climate simulations indicate increased precipitation variability and potential deficits in dry years). The district municipal supplier provides treated water for domestic/industrial backup, while the Falougha sewage network conveys effluent to the Beirut River; other catchment infrastructure includes Qaysamani Dam and Kfarselwan Lakes (both identified as IWRAs), most publicly managed except Kfarselwan Lakes which are privately owned and used for irrigation, and the Batloun chlorination station, a public-sector facility supported by the site. The catchment is water-sensitive with marked seasonal variability and potential for deficits in dry years; flood exposure requires further assessment. It lies within/adjacent to a protected area (Shouf Biosphere Reserve) with multiple IWRAs identified, no evidence of inter-basin transfers has been found, and the climate is mountainous Mediterranean with projected increased variability (2025–2100). Dominant water uses in the catchment include bottled water production (Sohat/Nestlé lines), local irrigation (including private lakes), and municipal/domestic supply, alongside agricultural and community service demands (hotels, hospitals, restaurants).

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Picture1.png

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Client Description and Site Details

Client/Site Background

The Falougha factory is a high-altitude ($\approx 1,200$ m) bottled-water facility located in Falougha, Baabda district, within the Jebel Al Knesseh (Shouf Mountain) catchment and inside the Shouf Biosphere Reserve, approximately 25 km east of Beirut. The site sits in a predominantly natural/mountainous setting adjacent to rural communities and agricultural land (hotels, restaurants, churches) rather than an industrial estate. It produces Sohat natural mineral water and Nestlé-branded water products; water is the primary production input and is used for source treatment (simple filtration for Sohat; multi-stage filtration and CIP for Nestlé lines), bottling, cleaning-in-place (CIP), rinsing and rejection streams, and non-product uses such as toilets, hand-washing and irrigation. The factory draws water from the Sohat spring and on-site production wells F1 and F3 (with F2 used for regeneration) and uses municipal supply from the district provider as backup. On-site infrastructure includes filtration and treatment systems, an upgraded neutralization station (two mixing tanks plus chemical injection) with reuse trials for toilet flushing and irrigation, boilers and a mapped cooling system (chillers, compressors, cooling tower and blowers), chemical and diesel storage (with MSDS), solid-waste segregation, and a well room for F2; stormwater and firefighting piping networks are mapped and rainwater-harvesting measures are planned. Process and industrial wastewater, after neutralization where applicable, are discharged to the Falougha sewage network that ultimately conveys effluent to the Beirut River, while neutralized effluent that meets reuse criteria is retained on-site for non-potable uses; stormwater is collected and routed via the site drainage system as documented. The site operates routine internal and third-party water-quality monitoring, has implemented stewardship projects (regeneration well upgrade, irrigation pond, Lahoud spring decontamination, MOUs with public bodies), and provides WASH facilities for staff; workforce size and built-up area were presented during the audit and are recorded in site records.



Picture4.png

Summary of Shared Water Challenges

Summary of Shared Water Challenges

The site and stakeholders have identified the following shared water challenges in the catchment: seasonal and long-term water shortages affecting irrigation and agriculture; reduced potable supply to surrounding villages due to low source flows; declining recharge of aquifers driven by reduced rainfall and snowpack; accumulation of solid waste at village level contributing to pollution; sewage systems that are not functioning adequately, leading to untreated effluent infiltration and groundwater contamination; insufficient wastewater infrastructure and household sewerage connections, exacerbating summer water scarcity and sanitation risks; limited community knowledge and awareness on water use and conservation; distribution losses from leaking networks and lack of preventive maintenance; population growth and refugee influx increasing demand on limited water resources; unreliable electricity supply that disrupts water distribution to households; degraded potable water quality in schools and public fountains; reduced water availability for livestock; and a lack of comprehensive catchment-scale studies to inform resource management.

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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: During the site tour the audit team visited on-site water resources (production wells F1 and F3 and regeneration well F2), inspected the neutralization unit and its discharge location, and observed associated water infrastructure and discharge routing.

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1 STEP 1: GATHER AND UNDERSTAND

1.1 *Gather information to define the site's physical scope for water stewardship purposes, including: its operational boundaries; the water sources from which the site draws; the locations to which the site returns its discharges; and the catchment(s) that the site affect(s) and upon which it is reliant.*

1.1.1 *The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including:*

- Site boundaries;
- Water-related infrastructure, including piping network, owned or managed by the site or its parent organization;
- Any water sources providing water to the site that are owned or managed by the site or its parent organization;
- Water service provider (if applicable) and its ultimate water source;
- Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies;
- Catchment(s) that the site affect(s) and is reliant upon for water.



closed

Comment The site provided a comprehensive physical-scope map showing site boundaries, surrounding context, and internal site sections. Water sources and infrastructure are shown and described: two production wells (F1, F3), a third well used for regeneration, and reliance on the Sohat spring for the Sohat production line. Internal water-related infrastructure mapped includes wastewater, sewage, firefighting, stormwater piping networks, and the internal water circuits for Sohat (simple filtration) and Nestlé (multi-stage filtration and CIP). Mechanical systems relevant to water use (chillers, compressors, cooling towers, boilers and blowers) are also mapped.

The effluent wastewater flow is documented: effluent connects to the Falougha sewage network with final discharge to the Beirut River; the sewage network route and final receiving water body are shown on the maps. The site presented the design for a new neutralization station (two mixing tanks plus an additional chemical-injection tank) and reported that neutralized water is reused for toilet flushing and irrigation subject to testing. Personnel assignments for regular cleaning of neutralization equipment were also described.

The site has identified "Jebel Al Knesseh catchment" (Shouf Mountain) as its catchment - it is identified according to hydrogeology only.

Finding No: TNR-021112

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.



Yes

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Comment The site has implemented a documented stakeholder identification and engagement process using its Community Relations Process (CRP 3.0) tool. CRP 3.0 includes steps for stakeholder identification, selection for interviews, influence assessment, mapping, and activity documentation. The site expanded the stakeholder list to include suppliers and relevant government bodies and presented the current CRP process, stakeholder maps, poll survey results, interview summaries, and the active action plan.

The site provided the Stakeholder_Mapping_2025-LB_-_FA spreadsheet which lists identified stakeholders, their influence, attitudes, AWS stakeholder classification, catchment-level influence, water-related interests, perceived challenges, and priority to the site. Evidence of consultation was presented: interview questionnaires (updated in 2024 to include additional water-related questions), poll/survey results, meeting invitations, photographs, and examples of interview outputs. The site demonstrated that questionnaire outputs informed identification of shared water challenges.

1.2.2 *Current and potential degree of influence between site and stakeholder shall be identified, within the catchment and considering the site's ultimate water source and ultimate receiving water body for wastewater.* 🔍
Obs.

Comment The site has identified the current and potential degrees of influence between the site and stakeholders, and has provided stakeholder mapping that considers the catchment and the site's ultimate water source and receiving water body. The Stakeholder_Mapping_2025-LB_-_FA spreadsheet contains influence ratings and rationale for many stakeholder groups. However, inconsistencies were observed between the CRP documentation and the stakeholder analysis spreadsheet: several stakeholders are marked as "Not Applicable" for influence in the CRP tool while the spreadsheet assigns a defined degree of influence to those same stakeholders.

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

1.3.1 *Existing water-related incident response plans shall be identified.* ✅
Yes

Comment The site has identified and presented a comprehensive set of emergency preparedness and response plans relevant to water-related incidents. Documents reviewed include: SHE-ERP-001 Emergency Preparedness and Response Plan Rev.F (Apr 2023); SHE-ERP-002 Emergency Preparedness & Response Plan for Boiler House (FA); SHE-ERP-003 Emergency Preparedness Response Plan Rev.B; Chemical_Handling_2023_-Fit_to_win; chemical hazard handling; FA_SHE_team; Post_Evacuation_drill; and the updated evacuation plan. These documents collectively cover a wide range of scenarios relevant to water risks and impacts, including floods, storms, earthquakes, fires, steam/boiler leakages, tank ruptures, chemical spills, power failures, access block, and leaks.

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

Comment The site has prepared and presented water-balance mappings for the Sohat production line, the Nestlé Pure line, and general industrial uses for S10. The mappings identify and quantify inflows, storage points, outflows, and losses across the respective water circuits. Losses are accounted for and tracked at different stages of the water balance. No changes to the mapping were noted since the previous audit.

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

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Comment A water balance was presented for the Falougha factory in May 2024, showing losses of approximately 2.7% of the total inflow. It's important to note that the current loss percentages remain within Nestle Waters' acceptable internal standards (< 5%).

the site presented the monthly trend in water ratio for the year 2025 with all water ratio are below 2.

In addition, Nestlé's monitoring of Water Ratio tracking on a monthly basis in 2023, compared to the average water ratio for 2022, and tracking for 2024, compared to 2023. The site has also provided details of the annual variance in water usage rates. (they added annual water ratio still water use trends)

1.3.4 *Water quality of the site's water source(s), provided waters, effluent and receiving water bodies shall be quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be quantified.* 🚩 No

Comment The site demonstrates systematic water-quality monitoring across source waters, provided waters, effluents and relevant receiving water bodies. Daily internal laboratory testing is performed for product water during production (6L, BF, Glass, SF); microbiological monitoring data for 2024–2025 were presented, with CIP initiated when HPC deviations occur. Annual raw-water microbiological and chemical analyses are performed by a third-party laboratory (NQAC, France). BTd sampling and testing of the Sohat spring and wells F1 and F3 were presented and are within limits.

Chemical monitoring (temperature, pH, conductivity) for S7, F1, F3, BF, SF and finished product at Falougha from 2021–June 2024 was provided with no exceedances of regulatory requirements. Wastewater and neutralization monitoring continues: daily pH and COD for neutralization and industrial effluent; monthly TSS and color monitoring at Falougha with additional monitoring of nitrogen, phosphorus, oil & grease. Periodic comprehensive wastewater analyses (ammonia, nitrate, TDS, sulfate, temperature, TOC) have been conducted by third-party labs (historically IRI; alternative lab being sourced). BTd third-party testing of wastewater (BOD, COD, TSS, heavy metals) was provided and compared to discharge and irrigation limits. Deviations in acidity, COD, total nitrogen and color were identified and corrective actions implemented; these actions and their implementation were presented.

Finding No: TNR-021132

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

Comment The site has identified and mapped potential sources of pollution across the Falougha facility. Mapped sources include diesel storage/handling areas, chemical storage and handling locations, chillers, boilers, and the solid-waste segregation area. The site provided an inventory of chemicals present on site accompanied by the relevant Material Safety Data Sheets (MSDS). Mapping is consistent with identified hazards and shows locations of key equipment and storage that could give rise to chemical or hydrocarbon contamination.

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 has identified and mapped on-site Important Water-Related Areas as required. Mapped IWRAs comprise the Sohat spring and the F2 regeneration well. The site provided a description of the status and community/cultural values associated with these features: the Sohat spring is documented as a culturally and historically significant source (noted as the first bottled natural mineral water in the Middle East and a local landmark), and the F2 regeneration well is highlighted for its role in supporting downstream community water availability.

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

Comment The site provided an itemized summary of annual water-related costs for 2024 covering water treatment (filters), maintenance, laboratory testing, wash processes, municipal well expenses, stakeholder engagement activities, and investments under MOUs (noting MOU-related investments are presented for Ain Zhalta only and not for falougha). No water-related revenues were documented. No evidence was provided for 2025 water-related costs or revenues. The site did not provide an analysis quantifying the social, cultural, environmental or economic water-related value generated by the site, nor a cost-versus-value assessment to inform planning.

Finding No: TNR-019790

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

Comment The site provided a WASH assessment and evidence of implemented WASH facilities and measures. Documented facilities include drinking-water stands and dispensers, distribution of toilets and hand-washing sinks, and an on-site quarantine area. The WASH assessment addressed drinking-water availability and quality, access to hygiene facilities, treatment prior to discharge, maintenance requirements for toilets, and workplace sanitation.

Implemented actions include increased cleaning frequency for water dispensers (completed). Ongoing actions documented include installation of emergency lighting in toilet facilities. Records and photographic evidence of facility locations and the assessment were presented.

1.4 *Gather data on the site's indirect water use, including: its primary inputs; the water use embedded in the production of those primary inputs the status of the waters at the origin of the inputs (where they can be identified); and water used in out-sourced water-related services.*

1.4.1 *The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be identified.* ✔ Yes

Comment The site identified primary input suppliers for packaging materials and provided a supplier list. All listed packaging suppliers are located outside the site's catchment.

1.4.2 *The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.* ✔ Yes

Comment The site provided a list of outsourced service providers (gardening, laundry, cleaning, etc.) and confirmed that these services source water from the site. Consequently, the water consumption of these outsourced services is incorporated into the site's water balance.

1.5 *Gather water-related data for the catchment, including water governance, water balance, water quality, Important Water-Related Areas, infrastructure, and WASH*

1.5.1 *Water governance initiatives shall be identified, including catchment plan(s), water-related public policies, major publicly-led initiatives under way, and relevant goals to help inform site of possible opportunities for water stewardship collective action.* 🔍 Obs.

Comment The site has identified relevant high-level water governance initiatives and opportunities for collective action. Evidence presented includes recognition of national strategies (Lebanon Water Strategy 2024–2035) and specific ministry targets (e.g., Ministry of Agriculture tree-planting target of 40,000 trees) and how the site's activities could contribute. These items demonstrate awareness of governance context and potential alignment opportunities.

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1.5.2 *Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.* ✔ Yes

Comment The site has identified and compiled a comprehensive list of water-related legal and regulatory texts relevant to its operations, covering industrial, water-use and pollution control legislation. For each referenced law or regulation the site has assessed applicability to the Falougha facility and documented the specific compliance requirements where relevant. This assessment identifies what is required for compliance under each legal instrument.

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

Comment The site provided a catchment-scale hydrological assessment prepared by BTD and an independent consultant. The study presents inflows, outflows and changes in storage comparing September 2023 to August 2024 and includes a climate-change simulation (2025–2100) indicating increased precipitation variability and potential deficits in dry years. The site also presented cooperation with SBR on flow testing of catchment sources, with seasonal and annual flow-change data.

However, the submitted water-balance materials focus on the Sohat spring catchment rather than the full catchment area referenced in Indicator 1.5.3. The report does not clearly interpret whether the catchment water balance (as presented) is net positive or negative, nor does it provide a clear, consolidated statement of annual and seasonal variance or quantified scarcity indicators for the full catchment.

Finding No: TNR-020008

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

Comment The site has presented catchment water-quality monitoring comprising internal and planned external testing. Internal sampling covers 11 catchment sources with varying frequencies (four sources tested bimonthly) for microbiological and chemical parameters; results are benchmarked against national drinking-water standards. Chemical parameters reported are within acceptable limits. Microbiological exceedances were recorded for one spring (Lahoud), and the site implemented disinfection measures; trend data show a clear improvement in coliform levels following intervention. The site also presented planned external (third-party) testing for 2025; those tests have not yet been completed.

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.* 🔍 Obs.

Comment The site engaged an independent third party (BTD) in coordination with the site AWS team to identify and assess IWRAs within the catchment. Sixteen IWRAs were identified and mapped, including springs, one government well, Qaysamani Dam and Kfarselwan Lakes. For each IWRA the site provided descriptive information covering location, importance, identified threats and stakeholder relevance. The assessment demonstrates application of scientific input and stakeholder engagement in the identification process.

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

Comment The site identified six water-related infrastructure assets within the catchment, including Qaysamani Dam and Kfarselwan Lakes (also listed as IWRAs for their environmental and cultural value). Ownership/management was recorded: most infrastructure is publicly managed, while Kfarselwan Lakes are on privately owned land and used for local irrigation. The site provided an assessment of the status, current use and condition of each asset and noted potential exposure to extreme events.

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1.5.7	<i>The adequacy of available WASH services within the catchment shall be identified.</i>	 closed
Comment	<p>The site identified potable water sources used by the public within the catchment and reported their status. The hydrogeological study includes WASH-relevant information such as freshwater availability relative to population and service demand (hotels, hospitals, churches, restaurants). This provides useful context on water supply capacity and competing uses within the catchment.</p> <p style="text-align: right;">Finding No: TNR-019811</p>	
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	<p>The site has identified shared water challenges using inputs from stakeholder engagement, the BTM hydrogeological study, and internal factory assessments. Identified challenges were prioritized based on stakeholder outreach and internal evaluation, and are under discussion in management meetings to determine applicable action plans. During an open-day awareness session (with an MoA/biosphere expert) three additional shared challenges were identified and added to the list.</p>	
1.6.2	<i>Initiatives to address shared water challenges shall be identified.</i>	 Yes
Comment	<p>Following the prioritization exercises with the management team, a comprehensive list of activities has been identified to address the site's water-related challenges. The site has linked each activity to its respective challenge and provided the current status, indicating whether the initiatives have been completed or are still in progress.</p> <p>Several key initiatives have already been put in action by the site in cooperation with their main identified stakeholders (biosphere and municipality), with supporting evidence presented. These include:</p> <ul style="list-style-type: none"> - Irrigation pond - initiation of the planning to implement another irrigation pond - Installation of the batloun chlorination staion - awareness sessions 	
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>	
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>	 Obs.
Comment	<p>The site has documented a water-risk assessment and prioritization process. The submitted risk register and supporting documentation identify key water risks, evaluate likelihood and severity within defined timeframes, and include estimated potential costs and projected business impacts. Time horizons for each risk are recorded and mitigation/responsibility assignments are noted.</p>	
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>	 Obs.

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Comment	The site has identified and documented water-related opportunities, linking them to the risk register (Indicator 1.7.1) and providing evidence of implementation for several opportunity actions. Opportunities include operational efficiency measures and projects that generate water savings and cost reductions; these are prioritized based on feasibility and expected benefits and are tracked in the CRP/management documents.	
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>	Q Obs.
Comment	The site has identified several relevant catchment best-practice actions for water governance that demonstrate proactive engagement and information sharing. Documented examples include: an MoU with SBR to support catchment water and environmental management; sharing hydrogeological study data with public authorities; and supporting the Ministry of Environment (MoE) and SBR in assessment and establishment of an OECM.	
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>	Q Obs.
Comment	The site has identified and implemented several relevant best-practice measures to improve water balance through efficiency and reduced total use. Documented practices include: a catchment water-regeneration project; reuse of neutralized water for toilet flushing; and installation of a water-collection system to reduce overspill and flushing losses from the BF production line. Evidence of implementation and linkage to water-balance tracking was presented.	
1.8.3	<i>Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.</i>	Q Obs.
Comment	The site has identified and implemented several relevant best-practice measures to protect and improve catchment water quality. Documented practices include: periodic water testing across the catchment (schools, springs, public fountains) with results benchmarked against national standards (data-source rationale: internal sampling program and third-party laboratory analyses); targeted disinfection intervention at Lahoud spring following microbiological exceedances, with demonstrated improvement in coliform trends; support for OECM recognition to strengthen protection and reduce pollution pressures on key water bodies; and incorporation of water-quality assessment outputs from the commissioned hydrogeological study into management actions.	
1.8.4	<i>Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.</i>	✔ Yes
Comment	The site has identified relevant best practices for maintenance of IWRA, including upgrade works on the F2 regeneration well, routine IWRA testing (water quality and flow monitoring), and scheduled IWRA maintenance activities. The presented measures include both implemented site actions (F2 upgrade) and proposed future activities to support catchment IWRA health. Mapping of responsibilities and some implementation evidence was provided.	
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	The site has identified and implemented several relevant best-practice actions to support equitable and adequate WASH services within the catchment. Documented measures include: assistance to the municipality in water-supply activities, drinking-water testing of public sources, decontamination/intervention at contaminated sources, distribution of public waste bins, and ad hoc water donations to communities. The presented best practices include both completed site-led actions and proposed future activities for wider catchment application.	

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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	<p><i>A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:</i></p> <ul style="list-style-type: none"> - <i>That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes</i> - <i>That the site implementation will be aligned to and in support of existing catchment sustainability plans</i> - <i>That the site's stakeholders will be engaged in an open and transparent way</i> - <i>That the site will allocate resources to implement the Standard.</i>
Comment	The site presented a formally signed water stewardship commitment document, endorsed by the Factory Manager. The statement affirms the site's intent to implement and disclose progress on water stewardship programs, align implementation with existing catchment sustainability plans, engage stakeholders openly and transparently, and allocate resources to implement the Standard. The signed commitment is publicly displayed on information boards.
2.2	<i>Develop and document a process to achieve and maintain legal and regulatory compliance.</i>
2.2.1	<p><i>The system to maintain compliance obligations for water and wastewater management shall be identified, including:</i></p> <ul style="list-style-type: none"> - <i>Identification of responsible persons/positions within facility organizational structure</i> - <i>Process for submissions to regulatory agencies.</i>
Comment	<p>The site presented a compliance responsibilities scheme, outlining the roles and duties of the quality management team, safety team, regulatory team, and the Factory Manager. In addition, the site shared a comparison of product quality requirements for chemical testing, referencing various authorities and standards. They also provided an example of an action plan implemented in case of non-compliance, following the established responsibilities scheme.</p> <p>A minutes of meeting was presented, clearly allocating compliance responsibilities for each requirement. The Quality Management System (QMS) was also outlined, identifying the person responsible for conducting necessary tests. The quality department is responsible for follow-up actions and ensuring compliance.</p> <p>The site has also shared a comprehensive list of applicable regulations with assigned responsibilities.</p>
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>
Comment	The site has developed their water stewardship strategy including their overarching mission, vision, and goals of the organization towards good water stewardship.

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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.

🔍
Obs.

Comment The site has a documented Water Stewardship Plan that has been updated to reflect findings and recommendations from recent hydrogeological studies. The WSP links AWS outcomes to site objectives, identified risks and shared water challenges, and groups actions by outcome (water governance, water quality, water balance, IWRA, WASH). For each listed action the WSP records the responsible person, planned timeline, budget, status and KPI.

Examples of actions and status:

- Water governance: share hydrological data with local authorities (planned); open day for stakeholder communication and awareness (implemented); MoU with SBR (in progress).
- Water quality: school water testing and fountain monitoring (planned); internal testing (completed — to be reflected in WSP); neutralization station upgrade (completed); effluent quality improvements (ongoing).
- Water balance: source level monitoring (implemented); catchment regeneration supply project (implemented/ongoing); groundwater monitoring and water use restrictions, rainwater harvesting, wastewater network expansion (planned; to be tailored to site scope).
- IWRA: IWRA assessment (completed); maintenance of Falougha main fountain (planned); waste bin provision in IWRA areas (partially implemented); Lahoud spring decontamination (to be added).
- WASH: school awareness sessions (planned); pipe replacement for drinking supply (completed); electricity supply to community well (completed/ongoing).

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

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

✅
closed

Comment The site presented an updated Business Continuity Plan (BCP) and Business Impact Assessment (BIA) that incorporate mitigation and adaptation measures addressing the water risks identified in Indicator 1.7.1. The documents detail internal actions, responsibilities, and business-impact considerations for key water-risk scenarios.

Finding No: TNR-019816

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3	STEP 3: IMPLEMENT - Implement the site's stewardship plan and improve impacts	
3.1	<i>Implement plan to participate positively in catchment governance.</i>	
3.1.1	<i>Evidence that the site has supported good catchment governance shall be identified.</i>	 Yes
Comment	<p>The site provided evidence of sustained support for catchment governance. Key evidence includes a long-standing MOU with SBR and a renewed MOU (3-year term to 2027) that expands commitments, hydrological study, construction of an irrigation pond (implemented), and additional planned actions. The site presented minutes of meetings (MoMs) and documentation demonstrating coordination with SBR, local municipalities and the water establishment. An open-house event conducted in collaboration with the Ministry of Agriculture (MoA) and SBR, aimed at raising awareness on water and agricultural issues, was also evidenced. These activities demonstrate proactive, ongoing engagement and contributions to governance, capacity building and shared catchment actions.</p>	
3.1.2	<i>Measures identified to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be implemented.</i>	 Yes
Comment	<p>The site has implemented multiple measures demonstrating respect for the water rights of other water users in the catchment. Actions include annual testing of public wells with provision of recommendations, routine inspections of catchment water sources, regeneration projects that enhance downstream water availability, and support for water infrastructure management to help maintain water quality standards. The site also provides targeted community support such as emergency water donations and decontamination/intervention at Lahoud spring.</p>	
3.2	<i>Implement system to comply with water-related legal and regulatory requirements and respect water rights.</i>	
3.2.1	<i>A process to verify full legal and regulatory compliance shall be implemented.</i>	 Yes
Comment	<p>The site has implemented a functioning compliance verification process integrating operational testing, management oversight and an electronic tracking system. Wastewater and other water-related testing are performed and benchmarked against Nestlé Environmental Requirements (NER) and Ministry of Environment (MoE) standards. Responsibility assignments and evidence of implementation were demonstrated via meeting minutes and the internal audit plan. A monthly compliance review meeting is held with site, national and MENA HQ representatives; deviations are reported to management and tracked until closed.</p> <p>The site uses an online verification system with automatic reminders for responsible persons to upload compliance evidence and to submit corrective action plans when deviations are identified. The system reports an overall compliance rate of 91% for 2025. Annual closure of the verification cycle is performed.</p>	
3.2.2	<i>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.</i>	 Yes
Comment	<p>The site has implemented multiple measures to respect legally defined water rights and support community water access. Actions evidenced include improving catchment water quality and quantity, rehabilitation/upgrading of village wells, interventions to enhance rivers and springs, and support for a comprehensive hydrological study in the Shouf Biosphere. The site has formalized collaboration with SBR via a renewed MOU that supports these initiatives. The site also presented its water extraction permit demonstrating that abstraction volumes are within legally allowable limits.</p>	

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3.3	<i>Implement plan to achieve site water balance targets.</i>	
3.3.1	<i>Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.</i>	 Yes
Comment	<p>The site has demonstrated progress toward water balance targets in the Water Stewardship Plan. Evidence presented includes implementation of the Falougha regeneration project with documented water quantities; provision of electricity to the municipality water well to improve local supply; upgrade of the neutralization station and documented reuse of neutralized water for irrigation and toilet flushing to reduce discharge volumes; and ongoing water level monitoring of catchment sources. A water saving project in the CIP room has been initiated and is in progress, implementation evidence to be provided at the next surveillance audit.</p>	
3.3.2	<i>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.</i>	 Yes
Comment	<p>The site has established multi-year projects and annual targets to improve water use efficiency and reduce total volumetric use where practical. Documented measures include reuse of neutralization water for on-site uses, implementation of the Aquassay data logging program (flow/pressure metering) to detect leaks and optimize use, and specific savings targets for the big-format (BF) production line. Planned 2024 BF savings were 13,369 m3 (planned) with year-to-date actuals of 1,160 m3; 2025 target of 680 m3 was exceeded with 797 m3 achieved. Other BF retention targets (e.g., 840 m3) are still under implementation and annual targets for some measures have not yet been realized.</p>	
3.3.3	<i>Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.</i>	 Yes
Comment	<p>The site presented its water extraction permit which explicitly prohibits re-allocation of extracted well water to third parties or external uses. No legally binding documentation was provided that permits formal re-allocation of site-extracted water for social, cultural or environmental purposes. The site reported that, seasonally (spring months), Sohat Spring yields surplus water beyond factory needs and that excess is returned to groundwater recharge (operational practice rather than a legal re-allocation).</p>	
3.4	<i>Implement plan to achieve site water quality targets</i>	
3.4.1	<i>Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.</i>	 Yes
Comment	<p>The site provided evidence of measurable progress toward water quality targets defined in the Water Stewardship Plan. Key evidence includes:</p> <ul style="list-style-type: none"> - Lahoud spring decontamination: photographic records of intervention activities and pre/post-intervention laboratory results demonstrating reduced coliform levels following the remediation. - Catchment source testing: monitoring data and laboratory reports for multiple catchment sources were presented, showing parameter results and trend information. - Neutralization station upgrade: documentation of the upgrade works and analytical results for neutralized effluent supporting its reuse for irrigation (and toilet flushing) where parameters meet reuse criteria. 	
3.4.2	<i>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.</i>	 Yes

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Comment	The site operates a comprehensive effluent monitoring program with daily, monthly, quarterly and annual testing covering rejected process water and bottle washing/cleaning effluent. Monitoring parameters and frequencies are in place and results are benchmarked against applicable standards. The site has implemented improvement measures (neutralization station upgrade and reuse trials, operational controls, and corrective actions when deviations occur) aimed at reducing pollutant loads and improving effluent quality.	
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>	 Yes
Comment	The site has implemented multiple Water Stewardship Plan actions to maintain and enhance identified IWRAs. Evidence observed and presented during the audit includes: improvement works at the F2 regeneration well (installation of well head and construction of well room); decontamination/intervention activities at Lahoud spring with supporting before/after evidence; and partial implementation of waste bin supply in IWRA areas (photographic evidence).	
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	<p>The site provided evidence demonstrating provision of adequate access to safe drinking water, effective sanitation and protective hygiene for workers. Key evidence and observations include:</p> <ul style="list-style-type: none"> - Onsite WASH facilities observed during the site tour: drinking-water dispensers/stands, toilets, hand washing sinks and quarantine facilities; facilities were maintained to a high standard. - Sewage-line assessment: documented inspection/assessment conducted with BTD addressing sewage infrastructure condition and risks. - Operational measures supporting community water access that also benefit workers: provision of electricity to a municipal well to secure local supply; decontamination intervention at Lahoud spring improving source water quality. - Records of WASH assessment and implemented actions (cleaning frequency increases, maintenance arrangements and other corrective measures) were presented. 	
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	The site has implemented multiple measures that support community access to safe water and sanitation and demonstrate consideration for local water rights. Evidence provided includes regular testing of public village wells with recommendations supplied to local authorities, interventions to improve source quality (e.g., Lahoud spring decontamination), provision of electricity to a municipal well to secure supply, and targeted community support such as water donations during events.	
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

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Comment	The site has no indirect water use targets in the Water Stewardship Plan because identified suppliers and service providers are not located within the site's catchment. Consequently, no indirect water use target data or progress reports were presented.	
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	The site confirmed that outsourced service providers (e.g., gardening, laundry, cleaning) use site-supplied water on premises; therefore, these are accounted for within the site water balance and are not treated as indirect water use. No suppliers or service providers were identified as sourcing water within the catchment independent of the site; consequently, there is no evidence of supplier engagement or resulting actions in the catchment related to indirect water use.	
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	The site provided documented evidence of engagement and two-way communication with the regional water office. Records include meeting minutes, emails and shared documents confirming receipt of key messages. Outcomes of this engagement: - Sharing of catchment water testing results with the water office (records of transmission and acknowledgement presented). - Coordination meetings to relaunch flow testing of multiple catchment water sources (meeting minutes and action lists provided). - Initiation of the OECM assessment with email correspondence confirming water office involvement and agreement to proceed.	
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	The site has implemented multiple best-practice actions to support catchment water governance, consistent with those documented under Indicator 1.8.1. Evidence includes a long-standing and renewed MOU with SBR (three-year term through 2027) that expands joint commitments (hydrological study, irrigation pond implementation and other planned actions); sharing of hydrogeological study data with public authorities; and support to MoE and SBR in the OECM assessment process. The site also conducted an open-house event with MoA and SBR to raise awareness and share findings.	
3.9.2	<i>Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.</i>	 Yes
Comment	The site has implemented multiple best-practice actions to improve water balance, consistent with those documented under Indicator 1.8.2. Evidence presented includes: a catchment water regeneration project; reuse of neutralized water for toilet flushing and other non-potable uses; and installation of a water collection system to reduce overspill and flushing losses from the BF production line. Implementation evidence and linkage to water balance monitoring were provided.	
3.9.3	<i>Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.</i>	 Yes

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Comment The site has implemented multiple best practice measures to improve catchment and site water quality consistent with the items documented under Indicator 1.8.3. Evidence presented includes: periodic catchment water testing (schools, springs, public fountains) with results benchmarked to national standards (internal sampling and third party laboratory analyses); targeted disinfection and decontamination at Lahoud spring with demonstrated post-intervention coliform reductions; support for OECM recognition to strengthen protection and reduce pollution pressures; and incorporation of hydrogeological study outputs into water quality management actions.

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 The site has implemented IWRA maintenance actions consistent with those documented under Indicator 1.8.4. Evidence presented includes upgrade works on the F2 regeneration well (well head installation and well room construction), routine IWRA testing (water quality and flow monitoring), and scheduled IWRA maintenance activities. Photographic and on-site verification evidence was observed during the audit, and some activities are partially implemented (waste bin provision near IWRA).

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

Comment The site has implemented multiple WASH best practice actions consistent with those documented under Indicator 1.8.5. Evidence presented includes assistance to the municipality in water supply activities, periodic drinking water testing of public sources, targeted decontamination/intervention at contaminated sources (e.g., Lahoud spring), distribution of public waste bins, and ad hoc water donations to communities.

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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	The WSP documents action status (columns indicating Done, Ongoing, Planned, Not launched) for each activity. However, the site has not presented a consolidated evaluation of achievement against individual targets (baseline, target, current values, % complete) nor an analysis demonstrating how implemented actions contribute to AWS water stewardship outcomes.
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4.1.2	<i>Value creation resulting from the water stewardship plan shall be evaluated.</i>
Comment	The site assessed the financial cost-benefit analysis of their actions in the WSP. the site assessed the direct cost benefit in saving water and the associated cost of water saved by the community due to the site intervention in the catchment Additionally, the cost-benefit analysis for their projects within the catchment was presented.
4.1.3	<i>The shared value benefits in the catchment shall be identified and where applicable, quantified.</i>
Comment	The site has conducted a value creation assessment for actions in the Water Stewardship Plan. Evidence presented includes financial cost-benefit analyses for WSP projects, quantifying direct cost savings from reduced on-site water use and estimating associated community water cost benefits resulting from catchment interventions. Project-level cost-benefit summaries for implemented and planned catchment activities were provided.
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	The site maintains a documented incident review process: the SHE department presents monthly incident reviews to management covering 2023-2025. Evidence of these reviews (meeting minutes/reports) was shown. However, the incidents reviewed to date are not water-related and no written annual review or root-cause analysis specific to water-related emergency incidents was provided.
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>

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Comment The site demonstrated stakeholder consultation on its water stewardship performance. Evidence includes circulation emails to stakeholders (sharing the Water Stewardship Plan and performance information), follow-up phone calls, and a stakeholder meeting. Three stakeholders provided documented feedback (positive/appreciative), and these responses were recorded and verified during the stakeholder meeting.

4.4 *Evaluate and update the site's water stewardship plan, incorporating the information obtained from the evaluation process in the context of continual improvement.*

4.4.1 *The site's water stewardship plan shall be modified and adapted to incorporate any relevant information and lessons learned from the evaluations in this step and these changes shall be identified.*



Yes

Comment The site provided multiple WSP versions showing documented changes in structure, target identification and action lists. The WSP has evolved since SU2 through to recertification, incorporating lessons learned and new actions arising from the hydrogeological assessment and independent third-party recommendations. Changes are identifiable across versions and reflect adaptive management of the WSP.

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5 STEP 5: COMMUNICATE & DISCLOSE - Communicate about water stewardship and disclose the site's stewardship efforts	
5.1	<i>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.</i>
5.1.1	<i>The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.</i>
Comment	The site has disclosed its internal water-related governance structure and accountability assignments. Responsibilities and positions accountable for compliance with water-related laws and regulations are publicly posted on the Falougha site information board. Additional disclosure evidence was presented (email circulation to stakeholders) during the audit.
5.2	<i>Communicate the water stewardship plan with relevant stakeholders.</i>
5.2.1	<i>The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.</i>
Comment	The site has communicated the Water Stewardship Plan to relevant stakeholders. Evidence provided includes emails distributing the WSP and accompanying materials that describe how WSP actions link to AWS outcomes (governance, water balance, water quality, IWRA, WASH). Follow-up engagement (phone calls, stakeholder meeting) to solicit feedback was also demonstrated.
5.3	<i>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.</i>
5.3.1	<i>A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.</i>
Comment	The site has publicly disclosed water stewardship information through the WSP distribution to stakeholders. However, Even though the disclosure includes high level performance it does not include a consolidated annual summary reporting quantified performance against WSP targets (baseline, target, current value, units, and % achievement) as required.
5.4	<i>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.</i>
5.4.1	<i>The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.</i>
Comment	The site has disclosed its shared catchment water-related challenges and the actions taken to address them to stakeholders. Evidence presented includes email circulation of the Water Stewardship Plan and accompanying materials that describe identified shared challenges and linked initiatives (e.g., regeneration projects, Lahoud spring decontamination, irrigation pond, chlorination station, awareness sessions).
5.4.2	<i>Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.</i>

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Comment The site has demonstrated substantive engagement and coordination with public sector agencies and stakeholders. Key evidence includes a formal MOU with the SBR outlining joint commitments to water management, conservation and monitoring (including provision of expertise and instruments for catchment flow monitoring). Additional documented support to public bodies includes: provision of electricity to Falougha municipality to secure community water access; joint water testing activities with Falougha and Hammana municipalities; and coordination with the regional water office to support chlorination at the Batloun station. Meeting minutes, MoMs, emails and the signed MOU were presented as evidence.

5.5 *Communicate transparency in water-related compliance: make any site water-related compliance violations available upon request as well as any corrective actions the site has taken to prevent future occurrences.*

5.5.1 *Any site water-related compliance violations and associated corrections shall be disclosed.*



closed

Comment The site provided a formal statement asserting that no water-related regulatory compliance violations requiring activation of the Business Continuity Plan have occurred at the factory. However, the site has recorded deviations in three parameters during the neutralization process which prompted the upgrade of the neutralization station. These deviations were not publicly disclosed, and no record was presented that confirms a disclosure was made to stakeholders or regulators. The site indicated corrective actions were implemented (neutralization station upgrade) and that disclosure of incidents and corrective records can be provided upon request, but this was not evidenced as publicly available or included in the company statement.

Finding No: TNR-019869

5.5.2 *Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.*



closed

Comment As per Indicator 5.5.1, the site implemented corrective actions following deviations in three neutralization process parameters, notably by upgrading the neutralization station. However, no public disclosure of these corrective actions or confirmation of stakeholder/regulator notification was presented. The site indicated such records can be provided on request but has not published them.

Finding No: TNR-019870

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 The site has issued a formal statement indicating that no water-related regulatory compliance violations have occurred that would require activation of the Business Continuity Plan (BCP). Recorded deviations in three neutralization process parameters were addressed via an upgrade to the neutralization station. The site asserts these deviations do not pose a significant risk or threat to human health or the environment

Previous Findings

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



Yes