Alliance for Water Stewardship (AWS)

Audit Number: AO-000261



SITE DETAILS

Site: Nestlé Waters Lebanon: Barouk Ain Zhalta

Address: Ain Zhalta, Barouk, LEBANON

Contact Person: Elie Sfeir

AWS Reference Number: AWS-000108

Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Core

Date of certification decision: 2023-Mar-30

Validity of certificate: 2026-Mar-30

AUDIT DETAILS

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

Audit Type(s): Re-Certification Audit

Audit Start Date: 2022-Apr-21 Lead Auditor: Tanya Christensen

Audit team participants:

Mia Antoni-Naidoo, Observer Natalia Karam, Local Auditor Tanya Christensen, Lead Auditor

Site Participants:

Maya Abou Diwan, Quality manager Elie Sfeir, Quality Controller Raji Chbat, Other Simon Abou Naoum, Water treatment



Alliance for Water Stewardship (AWS)

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ADDITIONAL INFO

Summary of Audit Findings: A total of 33 findings were raised during the certification audit, zero major non-conformities, 31 minor non-conformities, 2 observations. The major non-conformities were of sufficient concern to warrant the categorisation of the non-conformity as major and all major non-conformities must be sufficiently addressed and closed out in order for certification to be awarded.

The audit team recommends certification of Nestle Waters Lebanon - Ain Zhalta at Core level pending approval of the corrective actions plan and closure of the major non-conformities.

The Client is requested to define corrective actions for all non-conformities and submit these to WSAS via the online platform within 60 days of receipt of the audit report, by 13/11/2022

Minor non-conformities must be addressed and closed out by the time of the next annual surveillance audit.

CLOSURE OF FINDINGS AND CORRECTIVE ACTION PLAN:

The Client has successfully submitted the corrective action plan addressing all findings. Proof of implementation has been requested for the Minors and this will be evaluated during the Surveillance Audit.

Scope of Assessment: The scope of services covers the recertification audit for assessing conformity of Nestle Waters Lebanon: Barouk Ain Zhalta against the AWS International Water Stewardship Standard Version 2.

The Nestle Waters Ain Zhalta factory is a water bottling plant, which bottles mineral water obtained from the on-site and off-site wells, under the Nestle Pure Joy brand name. The audit team observed the 0.6l and 19l products being produced during the audit and the 19l containers are collected and brought back to be inspected, cleaned and reused at the bottling plant. The cleaning and refilling of the 19l bottles is a separate production line. All bottles can be recycled and melted into new pellets for bottle formations. The factory site is located about 30km south-east of Beirut, within the Ain Zhalta Municipality. The site is entirely self-sufficient and receives no municipal water, all water is received from the off-site well (RA2) as the on-site well (RA1) is currently decommissioned. The site is not connected to an electricity grid and all power is generated from on-site diesel generators.

The facility is located in the Ain Zhalta region, which contains two major aquifers: Bikfaya aquifer and Kesrouane aquifer. The Ain Zhalta site is within the Kesrouane Formation that is an important aquifer in the Jurassic sequence. It is a karstic aquifer characterised by a significant amount of groundwater flowing in channels, faults and fractures. The aquifer is characterised by its high secondary porosity causing groundwater to flow through fractures, joints and channels, which is a typical occurrence in karstic aquifers. The groundwater flow in this formation is mainly towards the west and south-west. The factory is located within the Shouf Mountain catchment, as is the Nestle Waters Falougha factory, and it is considered part of the Shouf Biosphere Reserve which is a UNESCO site.

The audit was conducted onsite on 25th (Catchment tour) and 28-29th at the Ain Zhalta factory site. The onsite visit included the assessment of water-related sites within the catchment, the on-site and off-site wells and the Ain Zhalta bottling factory.

FINDINGS

NUMBER OF FINDINGS PER LEVEL

Observation 2 Minor 31

WSAS



Alliance for Water Stewardship (AWS)

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FINDING DETAILS

Finding No: TNR-000962

Checklist Item No: 1.1.1

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2023-Apr-21

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 Google Maps provided do not adequately show the two parcels of land

leased by Nestle Waters, and although the factory discharge point has been 'pinned' on the map, it does not map the receiving water body for the treated

waste water, nor was the site able to demonstrate that they had an

understanding of the ultimate receiving water. In addition, they were unable to provide a site map that includes any piping networkFor the catchment boundaries, the study area was provided but it is not clear how the study area boundaries compare to the W.Barouk-Niha Jurrasic basin for which the water balance is provided. It is also not clear what is the relevant affected surface water catchment considering the ultimate receiving body of the site's wastewater and given the karstic area appears to be a source of surface

waters on the western slopes

Corrective action: The Map uploaded showing IWRA s in the catchment and the location of both

factories regarding the catchment area; the power point show the factory waste -water drain point after the treatment in waste water treatment plans which is discharge into the surrounding area after treatment and it will be

used for irrigation by the nearby garden's owner.

WSAS WATER STEWARDSHIP ASSURANCE SERVICES

Alliance for Water Stewardship (AWS)

Audit Number: AO-000261

Finding No: TNR-001507

Checklist Item No: 1.2.1

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2023-Apr-21

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: WSAS notes that although the site has identified numerous water-related

stakeholders in their stakeholder mapping process. There are stakeholders listed who have water-related issued listed in the 'concerns' columns, but have then been classified as 'no' in the AWS Stakeholder column. Examples of

this are: Mr Joumblat, 4 to 5 houses (Elhmeidy), 4 to 5 houses (Nahkle),

Joseph Moufarerej), Officicial Hogh School Ain Zhalta.

Corrective action: Updating the stakeholders list to met the requirements

Finding No: TNR-001040

Checklist Item No: 1.3.1

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2023-Apr-21

Checklist item: Existing water-related incident response plans shall be identified.

Findings: The site has not adequately outlined the actions they will take to recover from

a water-related incident, nor does the business continuity plan adequately

cover any incidents that could impact the wells.

Corrective action: Outline the actions that should be taken to recover from a water related

incident and to cover any accident that could impact the well.

WSAS STEWARDSHIP ASSURANCE SERVICES

Alliance for Water Stewardship (AWS)

Audit Number: AO-000261

Finding No: TNR-001062

Checklist Item No: 1.3.3

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2023-Apr-21

Checklist item: Site water balance, inflows, losses, storage, and outflows, including

indication of annual variance in water usage rates, shall be quantified. Where there is a water-related challenge that would be a threat to good water

balance for people or environment, an indication of annual high and low

variances shall be quantified.

Findings: The quantified water balance calculation is not balanced and there is a

discrepancy in the calculation, that the site was not able to explain. The

calculation is to be reviewed by the site and reissued.

Corrective action: Review the calculation for the water balance by the site, and balanced the

quantified water balance calculation.

Finding No: TNR-000614

Checklist Item No: 1.3.7

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2023-Apr-21

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: Site has not completed the Revenue section in the 'AZ AWS Cost breakdown'

spreadsheet, nor are they prepared to share the document with the audit team, due to its perceived sensitive nature. The audit team were unable to verify that the social, cultural, environmental or economic water related

value generated by the site had been identified.

Corrective action: Completing the revenue section in the Az AWS cost breakdown spreadsheet

which let the auditors able to verify that the social cultural, environmental or economic water related value generated by the site being identified through

the water stewardship attached plan (Budget section).

WSAS WATER STEWARDSHIP ASSURANCE SERVICES

Alliance for Water Stewardship (AWS)

Audit Number: AO-000261

Finding No: TNR-001073

Checklist Item No: 1.5.1

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2023-Apr-21

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 site has listed a number of water infrastructure projects that they have

implemented, rather than reflect on initiatives that are under way. The site has not provided a summary of water-related public policies nor catchment

plans.

Corrective action: Providing a summary of water related public policies and catchment plans.

Finding No: TNR-001074

Checklist Item No: 1.5.2

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2023-Apr-21

Checklist item: Applicable water-related legal and regulatory requirements shall be

identified, including legally-defined and/or stakeholder-verified customary

water rights.

Findings: The audit team identified legal and regulatory requirements that the site did

not appear aware of. The site must review at least the following legislation to define how it applies to the site as well as review if there are any other

applicable legal or regulatory requirements:

- Code of Water 2018

- Law no. 77 (2018) Law of Water

- Decision of the Minister of Environment no. 8/1 dated 2001, related to waste

water discharge.

- Decision of the Minister of Environment no. 52/1 dated 1996, related to wate water discharge; the 8/1 2001 decision amended elements of it.

- Decree 1039 (1999) related to drinking water standards (bottled and

non-bottled drinking water)

- Screening application to establish whether a environmental assessment is

required in line with Decree 8633 (2012)

Corrective action: Review the legislation and compare it to Nestle requirements

screened all possible legal and regulatory requirements and determined which one apply to the site and how..

WSAS

WSAS STEWARDSHIP ASSURANCE SERVICES

Alliance for Water Stewardship (AWS)

Audit Number: AO-000261

Finding No: TNR-001508

Checklist Item No: 1.5.3

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2023-Apr-21

Checklist item: The catchment water-balance, and where applicable, scarcity, shall be

quantified, including indication of annual, and where appropriate, seasonal,

variance.

Findings: The site has not supplied any information on the seasonal variance of the

catchment water balance. The catchment water balance provided for the

W.Barouk-Niha Jurrasic basin does not include losses to other

basins/aquifers/sea, deep percolation, or gains from other basins. Nestle should consider improving the assessment by considering these losses and

gains.

Corrective action: Improving the assessment by considering the losses and gains in the

catchment and supplying information's on the seasonal variance of the

catchment water balance.

Finding No: TNR-000625

Checklist Item No: 1.5.5

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2023-Apr-21

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 AWS standard requires that the site lists IWRA within the catchment as

such, and provides a summary of their status and linking it to their

stakeholder engagement activities. The site already does this, but it has not

been adequately documented.

Corrective action: A documented list for IWRAs within the catchment will be created and

provide a summary of their status and linking it to their stakholders

engagement activities.

WSAS WATER STEWARDSHIP ASSURANCE SERVICES

Alliance for Water Stewardship (AWS)

Audit Number: AO-000261

Finding No: TNR-000630

Checklist Item No: 1.5.6

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2023-Apr-21

Checklist item: Existing and planned water-related infrastructure shall be identified,

including condition and potential exposure to extreme events.

Findings: Although the site has listed some of their infrastructure projects in the

'Publically Led Initiatives' document, it does not list any water-related infrastructure projects being delivered by other stakeholders in the catchment. Nor does it list the projects that are currently underway and planned. The document does not describe the condition of the infrastructure

nor their potential exposure to extreme events.

Corrective action: Describe the condition of the infrastructure and their potential exposure to

extreme events, list water related infrastructure projects being delivered by other stakholders in the catchment and list the projects that are currently

underway and planned.

Finding No: TNR-000621

Checklist Item No: 1.5.7

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2023-Apr-21

Checklist item: The adequacy of available WASH services within the catchment shall be

identified.

Findings: The data presented in the WASH Baseline Assessment document should be

clarified, referenced and explained.

Corrective action: Clarification and explanation for the WASH Baseline assessment.

Finding No: TNR-001090

Checklist Item No: 1.7.1

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2023-Apr-21

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 to Shared Water Challenges' spreadsheet does not cover all the

requirements of the indicator, as it has not assessed the severity of impact within a given timeframe, nor established the potential costs and business

impacts.

Corrective action: Updated the Risk shared water challenges spreadsheet to cover all the

requirements of the indicator, assess the severity of impact within a given

timeframe and establish the potential costs and business impacts.



Alliance for Water Stewardship (AWS)

Audit Number: AO-000261

Finding No: TNR-001091

Checklist Item No: 1.7.2

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2023-Apr-21

Checklist item: Water-related opportunities shall be identified, including how the site may

participate, assessment and prioritization of potential savings, and business

opportunities.

Findings: The site has not listed any current opportunities, nor their potential savings

and business opportunities.

Corrective action: List current opportunities and their potential savings and business

opportunities.

Finding No: TNR-001101

Checklist Item No: 1.8.1

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2023-Apr-21

Checklist item: Relevant catchment best practice for water governance shall be identified.

Findings: The site has not provided any evidence to demonstrate that they have

identified what catchment best practice for water governance is, which is

relevant to the operations of the site.

Corrective action: Identify what catchment best practice for water governance which is relevant

to the operation of the site.

Finding No: TNR-001103

Checklist Item No: 1.8.5

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2023-Apr-21

Checklist item: Relevant sector and/or catchment best practice for site provision of equitable

and adequate WASH services shall be identified.

Findings: The site has not identified relevant sector or catchment best practice for site

provision of WASH.

Corrective action: Identifying relevant sector or catchment best practice for the site provision of

WASH.

WSAS WATER STEWARDSHIP ASSURANCE SERVICES

Alliance for Water Stewardship (AWS)

Audit Number: AO-000261

Finding No: TNR-000632

Checklist Item No: 2.2.1

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2022-Apr-21

Checklist item: The system to maintain compliance obligations for water and wastewater

management shall be identified, including:

- Identification of responsible persons/positions within facility

organizational structure

- Process for submissions to regulatory agencies.

Findings: The site was not able to demonstrate that they have a system in place to track

and maintain compliance obligations.

Corrective action: Quality assurance and water resources water treatment organigram has been

created to demonstrate responsible persons.

Comparison tables are demonstrating the system in place to track and

maintain compliance obligations.

Finding No: TNR-000616

Checklist Item No: 2.3.1

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2023-Apr-21

Checklist item: 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.

Findings: The site were unable to produce a Water Stewardship Strategy that meets the

requirements of the indicator, defining the overarching mission, vision and

goals to achieve good water stewardship.

Corrective action: producing a WSP strategy that meets the requirements of the indicator,

defining the overarching mission, vision and goals to achieve good water

stewardship.

WSAS STEWARDSHIP ASSURANCE SERVICES

Alliance for Water Stewardship (AWS)

Audit Number: AO-000261

Finding No: TNR-000626

Checklist Item No: 2.3.2

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2023-Apr-21

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 itFinancial 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: The Water Stewardship Plan presented does not meet the requirements of the

indicator; it does not contain SMART targets or objectives nor budget allocations. The WSP should be linked to the water stewardship strategy (2.3.1) and consider the 5 AWS Outcomes and the identified shared water

challenges.

Corrective action: Update WSP to met the requirements including SMART targets, Objectives,

budget and linked to the water stewardship strategy.

adding a KPI to truck the measured targets for the water stewardship plan

Finding No: TNR-001104

Checklist Item No: 2.4.1

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2023-Apr-21

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 site has identified relevant water risks, but not developed a plan to

mitigate and adapt in response to those risks.

Corrective action: Developing a plan based on the risks identified by the site to mitigate and

adapt risk to those risks.

WSAS WATER STEWARDSHIP ASSURANCE SERVICES

Alliance for Water Stewardship (AWS)

Audit Number: AO-000261

Finding No: TNR-000622

Checklist Item No: 3.2.1

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2023-Apr-21

Checklist item: A process to verify full legal and regulatory compliance shall be

implemented.

Findings: The site does not have a process in place to demonstrate that they are able to

verify full legal and regulatory compliance. The auditors also identified legal requirements that the site was not able to demonstrate compliance with (see

indicator 1.5.2)

Corrective action: The process output is attached to demonstrate that we are able to verify full

legal and regulatory compliance.

Finding No: TNR-000629

Checklist Item No: 3.3.1

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2023-Apr-21

Checklist item: Status of progress towards meeting water balance targets set in the water

stewardship plan shall be identified.

Findings: The targets set out in the water stewardship plan must be SMART, in order to

meaningfully establish their status and progress. The site has identified water risks e,g, new Pepsi plant, which will have an impact on water balance

in the vicinity of the plant.

Corrective action: Set out a SMART targets in the WSP in order to meaningful establish their

status and progress.

Finding No: TNR-001509

Checklist Item No: 3.3.2

Status: In Progress - CA plan approved

Finding level: Minor

Checklist item: 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.

Findings: the site has not set any quantifiable targets for reducing the significant water

losses identified by the site, or to analyse the significant volume of

'unexplained losses' experienced by the site.

Corrective action: Follow up the water losses and set a quantifiable targets for reducing the

significant water losses and to analyse the significant losses experienced by

the site.



Alliance for Water Stewardship (AWS)

Audit Number: AO-000261

Finding No: TNR-000615

Checklist Item No: 3.4.1

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2023-Apr-21

Checklist item: Status of progress towards meeting water quality targets set in the water

stewardship plan shall be identified.

Findings: The targets set out in the water stewardship plan must be SMART, in order to

meaningfully establish their status and progress,

Corrective action: Set smart targets for the water stewardship plan and establish their status

and progress.

Finding No: TNR-001234

Checklist Item No: 3.4.2

Status: Response received

Finding level: Observation

Checklist item: 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.

Findings: The site is identifying and quantifying water quality activities that could be

classified as shared water challenges, particularly as all water effluent is discharged off-site. But the documentation is not currently supporting all the good work conducted by the site, in order to demonstrate full compliance.

Corrective action: Update the documents to support all the good work conducted by the site in

order to demonstrate full compliance.

Finding No: TNR-001235

Checklist Item No: 3.5.1

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2023-Apr-21

Checklist item: Practices set in the water stewardship plan to maintain and/or enhance the

site's Important Water-Related Areas shall be implemented.

Findings: The site has not adequately defined their IWRAs and it is therefore not

possible to link the targets that are set with relevant IWRAs and

implementation activities.

Corrective action: Identifying the site IWRAs and link the targets with the implemented

activities.



Alliance for Water Stewardship (AWS)

Audit Number: AO-000261

Finding No: TNR-001510

Checklist Item No: 3.9.1

Status: Response received

Finding level: Observation

Checklist item: Actions towards achieving best practice, related to water governance, as

applicable, shall be implemented.

Findings: The site is relying heavily on their MoU with the Shouf Biosphere to meet the

requirements related to water governance, when there might also be

examples from Municipalities or other Authorities available.

Corrective action: Implementation of actions towards achieving best practice related to water

governance as applicable, examples from municipality and other authorities

available.

Finding No: TNR-000620

Checklist Item No: 4.1.1

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2023-Apr-21

Checklist item: Performance against targets in the site's water stewardship plan and the

contribution to achieving water stewardship outcomes shall be evaluated.

Findings: The site has not set any meaningful SMART targets in their Water Stewardship

Plan and were not able to undertake an evaluation of their performance.

Corrective action: Set meaningful SMART targets are set in the water stewardship plan which

can undertake an evaluation of their performance.

Finding No: TNR-000624

Checklist Item No: 4.1.2

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2023-Apr-21

Checklist item: Value creation resulting from the water stewardship plan shall be evaluated.

Findings: The site has not established a process for evaluating any value creation

resulting from delivering the water stewardship plan.

Corrective action: Establish a process for evaluating any value creation resulting from

delivering the water stewardship plan.

WSAS STEWARDSHIP ASSURANCE SERVICES

Alliance for Water Stewardship (AWS)

Audit Number: AO-000261

Finding No: TNR-000619

Checklist Item No: 4.4.1

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2023-Apr-21

Checklist item: 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.

Findings: The Water Stewardship Plan for the site is out-of-date and does not contain

any SMART targets. The site was therefore unable to demonstrate that it

modified and adapted the plan based on lessons learnt.

Corrective action: Update the WSP date and put SMART targets and demonstrate that it was

modified on lessons learned.

Finding No: TNR-000627

Checklist Item No: 5.1.1

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2023-Apr-21

Checklist item: The site's water-related internal governance, including positions of those

accountable for compliance with water-related laws and regulations shall be

disclosed.

Findings: The site has not adequately documented the organisation structure, to

include the positions of those accountable for compliance with water-related

laws and regulations nor has it disclosed it.

Corrective action: Documentation for the organization structure, to include the positions of

those accountable for compliance with water related laws and regulations.

Attached picture showing the disclosed of the organogram.

Finding No: TNR-000628

Checklist Item No: 5.2.1

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2023-Apr-21

Checklist item: The water stewardship plan, including how the water stewardship plan

contributes to AWS Standard outcomes, shall be communicated to relevant

stakeholders.

Findings: The Site has not communicated their WSP to stakeholders, nor any progress

on how their activities contribute to AWS Standard outcomes.

Corrective action: Communicating the WSP to stakholders through emails and through

interviews and keep them updated.



Alliance for Water Stewardship (AWS)

Audit Number: AO-000261

Finding No: TNR-000617

Checklist Item No: 5.3.1

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2023-Apr-21

Checklist item: A summary of the site's water stewardship performance, including quantified

performance against targets, shall be disclosed annually at a minimum.

Findings: The site was unable to supply a Water Stewardship Summary that is current,

with evidence that it has been made available to the public.

Corrective action: Suppling a water stewardship summary that is current, with evidence that it

has been made available to the public.

Finding No: TNR-001249

Checklist Item No: 5.4.1

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2023-Apr-21

Checklist item: The site's shared water-related challenges and efforts made to address these

challenges shall be disclosed.

Findings: The site was unable to provide any evidence that they have documented the

current work undertaken to address shared water challenges, and it has

subsequently not been disclosed.

Corrective action: Disclose the current work undertaken to address shared water challenges.



Alliance for Water Stewardship (AWS)

Audit Number: AO-000261

Report Details	
Report	Value
Report prepared by	Tanya Christensen
Report approved by	Neringa Pumputyte
Report approved on (Date)	14 September 2022
Surveillance	

Proposed date for next audit

2023-Apr-24

Stakeholder Announcements

Date of publication	Location
17/03/2022	AWS Website
17/03/2022	WSAS Website
22/04/2022	Nestle Waters Lebanon Facebook page

Catchment Information

Catchment Information

The Ain Zhalta factory is located about 40 km eastwards of Beirut. Nestlé Waters is producing bottled water from the Ain Zhalta spring, which is located in the Shouf mountain catchment in the Shouf District of Mount Lebanon Governate, bordering the Shouf Biosphere Reserve. All water is received from the off-site spring, located about 500 meters outside the factory boundary, The on-site well is currently out of commission and has been disconnected. The Shouf Biosphere Reserve was declared a protected area by UNESCO in 2005 and includes the Shouf Cedar Reserve, located in the Chouf mountain chain of central Lebanon. The Chouf Mountains are famous for hosting the largest area of Lebanese Cedar (cedrus libani) in the country. The Chouf, together with the surrounding mountains, is one of the most important freshwater-generating hotspots in Lebanon and the Middle East. Precipitation and snow in the watershed represent the recharge of both surface streamflow and groundwater. A more detailed outline of the hydrogeology of the Ain Zhalta region is attached fpr information, extracted from the 'Groundwater Resources Assessment Study' (2016), which is uploded against indicator 1.5.3.



Alliance for Water Stewardship (AWS)

Audit Number: AO-000261

Client Description and Site Details

Client/Site Background

The Ain Zhalta Factory is a water bottling facility, producing bottled water products under the brand name of Nestlé Pure Joy. The final water products are sold in a variety of sizes, with different production areas in the factory. Ain Zhalta produces bottled water in 0.6, 1.5 and 19 litre bottles. The 19 litre bottle line mainly uses reused/recycled plastic PET bottles, which are assessed and cleaned on the production line, before being refilled.

Ain Zhalta does not have access to any municipal water, so all water used for industrial bottling as well as onsite WASH, comes from the off-site well (RA2), which is located about 500 meters from the factory. The on-site well (RA1) has been shut down and is not currently utilised. Any waste water is treated as effluent and treated on-site before being discharged to the nearest water course. The site and nearby villages do not have access to a municipal waster water treatment facility, The site does not have access to a municipal energy supplier and all electricity is generated onsite.

Summary of Shared Water Challenges

Summary of Shared Water Challenges

The Nestle Water Lebanon site have summarised their shared water challenges in the spreadsheet attached, based on their interactions with stakeholders. They are as follows:

- Water shortage risk
- Potential water contamination due to industrial and domestic activities.
- Waste disposal and sewage system (septic tanks)
- Expansion of the town and the refugees
- Agriculture and chemicals (pesticides, fertilizers) + cattle
- Capacity and institutional stability (limits of existing sources)
- No monitoring/follow up on water sources and catchment (industries and resorts ...) + lack of control from water offices
- Issues in terms of access to drinking water (quantity and quality)
- Hygiene and sanitation issues (awareness + hardware)
- Springs and Streams are not protected

0.1	General Requirements for Single Sites, Multi-Sites and Groups	
0.1.1	Eligibility Criteria	
0.1.1.1	The site(s) occupy one catchment OR an exception has been granted.	✓ Yes
Comment	The Site is within a singular catchment, located in the Shouf Mountain catchment area.	
0.1.1.2	The scope of the proposed certification shall be under the control of a single management system.	✓ Yes
Comment	The site operates under the control of a single management system.	
0.1.1.3	The scope of the proposed certification shall be homogeneous with respect to primary production system, water management, product or service range, and the main market structures.	✓ Yes
Comment	The Ain Zhalta site is a water bottling factory, with no other production taking place.	

WSAS



Alliance for Water Stewardship (AWS)

Audit Number: AO-000261

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.

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



in progress

- Site boundaries;

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

Comment

1

The physical scope of the site is currently captured in two simple Google Maps, showing the factory boundaries and the location of the wells. The site has access to two wells, one on-site (RA1), which is currently shut down, and one off-site (RA2). The Google Map does not clearly outline the land that is rented by the site, including the land around the off-site well, nor the sewage treatment area outside the factory fence. It would benefit from being mapped in line with the lease agreement, which states that the factory rents two plots. .WSAS had view of the lease between Mr Houssam Abou Ghayda and Nestle Waters dated 16th Sept 2013 (renewal) for two plots covering the two water wells and the factory. The site did not have access to a map that clearly outlines the piping network for the site, including the off-site well (RA2) and the off-site elements of the water treatment plant.

The site uploaded a Factory Drainage Map, which was verified during the factory tour. Post-audit WSAS received a Sewage Treatment Plan and Waste Water Treatment Plan to completed the factory water usage plans. It is noted that the map and plans do not identify the ultimate receiving water body for the treated waste water. A Process Water Circuit map was also observed during the factory tour and a photo captured as evidence. Two plain maps of the region were supplied, with both Nestle Water factories identified within the Shouf Mountain catchment. The water catchment is not delineated on the map, nor does it consider any regulatory or stakeholder issue zones.

Finding No: TNR-000962

- 1.2 Understand relevant stakeholders, their water related challenges, and the site's ability to influence beyond its boundaries.
- Stakeholders and their water-related challenges shall be identified. The process used for 1.2.1 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.

Alliance for Water Stewardship (AWS)

Audit Number: AO-000261

Comment

NW Lebanon utilise the Community Relations Process (CRP3) tool to identify and manage the sites relationship with their stakeholders. WSAS was supplied with a screenshot of the list of stakeholders that have been identified for the Ain Zhalta site. They have identified 18 stakeholders, which cover a cross-section of stakeholders relevant to the site, including the local Women's Association (please refer to the attached stakeholder list). Some examples of stakeholders that could be included going forward, are Lebanese suppliers (plastic bottle pellets and packaging). The site has conducted interviews with 8 of the stakeholders listed, in order to gain an understanding of shared water challenges and how the factory is viewed.

The site has mapped the degree of influence between the site and its stakeholders and the

allocated appear to be appropriate. Mr. Houssam Ghayda is the land owner, whom NWL leases the land which the factory and well sits on form, he is currently listed as having 'medium influence' (2) on site, which could be argues as too low. The stakeholder mapping can be identified in the 'CRP3 Steps' powerpoint presentation.

Finding No: TNR-001507

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.



Comment The degree of influence between the site and stakeholder is record in the 'CRP3 Steps'

presentation, which has been uploaded against indicator 1.2.1.

Gather water-related data for the site, including: water balance; water quality, Important 1.3 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.



in progress

Comment

NW Ain Zhalta shared a Business Continuity Plan during the audit, where the site has identified some water-related risks e.g. floods in the Contingency Plan in case of Floods and Dust Storms' section. The site does no receive any municipal water or electricity, so all power is generated onsite with a diesel generator, with energy stored through a large battery storage system. The site has a Diesel Filling SOP in place in Arabic and Local Auditor Nathalie Karram reviewed the content. In terms of a Diesel Spillage, the site has a containment basin that matches the volume of the diesel storage, preventing any possible spillage flowing into the water table. The plan does not cover any potential incidents that could pollute the wells, or if there is a drop in the available water levels.

The difference between a risk assessment and response plan was discussed, as the Business Continuity Plan mainly focusses on assessing risks rather than detailing any response plan.

Finding No: TNR-001040

1.3.2 Site water balance, including inflows, losses, storage, and outflows shall be identified and



Comment

1.3.3

The site has identified and mapped the site water balance, including inflow, losses, storage and outflows. WSAS was supplied with a water balance spreadsheet (date 04.01.2021) which quantifies the water balance'

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 in progress that would be a threat to good water balance for people or environment, an indication of annual high and low variances shall be quantified.



WSAS STEWARDSHIP ASSURANCE SERVICES

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Comment

The quantified water balance was reviewed with the NWL Team. The quantified water balance spreadsheet is dated 04.01.21 and the site has not conducted another water balance calculation for over a year, which would allow both the site and the audit team to compare and contrast different years. The 04.01.21 calculation had an Input of 18,760 m3/month and the Output totalled 25,880 m3/month, showing a clear discrepancy in the calculation and totalling more than the 5% discrepancy which is accepted in the AWS Guide. Inflows, storage and outflows have been quantified, but losses have not been quantified adequately.

The site produced a monthly water withdrawal graph for the year, showing annual variances and comparing to the previous year. The site confirmed that there was raw data available to support the 'Water Ratio AZ 2022' spreadsheet, but this data was not shared by the site.

Finding No: TNR-001062

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.

Comment

The site has a robust programme in place for conducting water quality testing of their water source, production water and waste water. All water, whether from the well, production or waste water, is checked for pH and conductivity. Samples are also sent to an accredited external laboratory in France for chemical and microbiological tests, please reference the attached test reports and results It should be noted that the site also has an on-site non-accredited lab that can undertake a range of quality tests.

AZ Line Health Program (2021) spreadsheet, collating test data for the wells. Chemical, microbiology. Plus effluent data sheet for 2021 will be uploaded.

1.3.5 Potential sources of pollution shall be identified and if applicable, mapped, including

chemicals used or stored on site.

Yes

Yes

Comment The site supplied a list of Chemicals that are used at the factory and the site tour included a

visit to the chemical store, which was secured and under good housekeeping $% \left(1\right) =\left(1\right) \left(1\right)$

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 on-site IWRA consists of the on and off-site wells, which are both situated on land

leased by NW Lebanon. They have not been defined as on-site IWRAs by the site, nor mapped as such. The site does utilise a 'Well Maintenance - Assessment Tool' spreadsheet for each well, which has been developed by Nestle for use by all their sites. The Well Maintenance tool can be used to demonstrate that the site understand the condition of

their on-site 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.

in progress

Comment The site did show the auditors a 'AZ AWS Cost Breakdown' spreadsheet, which contains water-related costs for Ain Zhalta, but the site has not completed the Revenue section in the

'AZ AWS Cost breakdown' spreadsheet, no rare they prepared to share the document with the

audit team, due to its perceived sensitive nature.

Finding No: TNR-000614

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



Yes



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Comment The site provides toilet facilities and stations offering bottled water to all staff. There are

no shower facilities on-site, but this is not a requirement.

The site has completed a 'WASH implementation at the workplace' tool, which contains a self assessment, summary of outputs and an action plan. The action plan lists a number of WASH projects that have been completed and some that are still ongoing.

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

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 There are primary inputs that are produced in Lebanon, such as the water bottles (raw plastic plugs), cardboard and wrapping films, but they are manufactured outside the

catchment.

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

₹

Comment The site has compiled a document that lists the site's outsourced services. The following services have been identified:

- Gardening

- Cleaning/Washing of floors (non-production)
- Toilets
- Food Canteen (Personnel use)

All outsourced services utilise water from the site, rather than off-site.

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

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 in progress of possible opportunities for water stewardship collective action.

The site has identified some water governance initiatives, which are listed in the attached 'Publicly Led Initiatives' giving you a one page overview of water projects undertaken by the site. WSAS notes that the document does not do the work undertaken by the site justice, and would benefit immensely from listing the projects they are currently developing, with specific time-lines.

The document does not identify any catchment plans, nor does it summarise water related public policies. Preliminary groundwater resources studies have been conducted for Nestlé Waters in 2007 and 2015 at Ain Zhalta, but these are not contextualised under water governance.

Finding No: TNR-001073

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

in progress

1.5.1

Comment

WSAS STEWARDSHIP ASSURANCE SERVICES

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Comment

The Ain Zhalta Wells operate under a Decree from the Council of Minsters, which were recommended from the Ministry of Energy and Water. The Decree for RA1 (Decree no 13576, issued 21.11.98) the on-site well is for 91m3 per day. The RA2 off-site well is authorised to extract 950m3 per day (Decree no. 1899) and that is the extraction license (11.05.2012). RA2 was granted a temporary renewal for six months starting 10th October 2021, so it is now out of date, due to Covid and the economic crisis in Lebanon, A decision from the Ministry of Public Health to allow Nestle to bottle and sell drinking water was seen and translated during the audit.

The Quantity of water a site can extract is approved by the Ministry of Energy and Water, whereas the Quality of Water is determined by the Ministry of Public Health. The Lebanese standard for Bottled Water, produced by Libnore (Lebanese Standard Institute) was supplied during the audit. Any documents in Arabic were translated by the WSAS Local Auditor during the audit. The Local Auditor stated that the Code of Water (2018) is applicable to site and they need to follow it, but the site did not appear aware of it. The Local Auditor also stated that Waste Water regulations apply to the site and she would provide a list of regulations that the site must demonstrate that they comply with. The site will provide a list of applicable water related legal and regulatory requirements and conduct an internal audit against them.

Finding No: TNR-001074

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 'Water Balance in the Shouf Mountains' leaflet is supported by the 'Groundwater Assessment of the Shouf Biosphere - Lebanon' study. The study was prepared by the Antena Group and part funded by NW Lebanon. Data is available in the report for 2015/2016 and WSAS was supplied with a copy. WSAS notes that neither the Groundwater Study, nor the water catchment infographic contain any information about seasonal variance, especially as seasonal availability is a shared water challenge.

The site has been collecting water quantity data from the following catchment springs since 2016: Barouk, Safa and El Qaa.

Finding No: TNR-001508

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.



Comment

Water quality data is captured in the 'Groundwater Assessment of the Shouf Biosphere Reserve' report, which is uploaded against 1.5.3. NW Lebanon also conduct water quality testing of catchment samples at the Falougha factory. All of the catchment springs and wells get tested for conductivity and pH, although the document supplied does not indicate when the tests were taken. The testing conducted by the site confirms that water quality is not a shared water challenge in the catchment.

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.



Comment

The site understands that they have IWRAs within the catchment and are actively involved in projects to improve them, as demonstrated in the evidence uploaded against indicator 1.5.1, 1.5.3 and 1.5.4. The site is not adequality demonstrating this in their documented AWS system, as the potential IWRAs have not been listed as such, nor has their status been adequately described.

Finding No: TNR-000625

Finding No: TNR-000630

WSAS



Alliance for Water Stewardship (AWS)

Audit Number: AO-000261

1.5.6

	potential exposure to extreme events.	in progress
Comment	The 'Publicly led Initiatives' document, lists some of the existing water-related infrastructure projects that have been completed by the site, but it does not list any of the new planned projects, nor does it cover their condition or their exposure to extreme events. For example the Barouk Spring there has been a significant amount of work undertaken and current project is to install a new pump. The site is cooperating with other catchment stakeholders to deliver these projects, but the site has not identified any water-related infrastructure	

Existing and planned water-related infrastructure shall be identified, including condition and

to deliver these projects, but the site has not identified any water-related infrastructure

projects that are delivered by other stakeholders in the catchment.

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

in progress

Comment The 'AZ WASH Baseline Assessment' document is dated 17.03.2022 and is an attempt at benchmarking the status of WASH in the catchment. It is unclear what the data source for the baseline assessment was. The adequacy of WASH in the catchment is not a shared water challenge, but there are shared water challenges identified which are WASH related, such as: potential water contamination due to industrial and domestic activities and waste disposal and sewage system (Septic tanks).

Findina No: TNR-000621

- Understand current and future shared water challenges in the catchment, by linking the 1.6 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.

Comment The site has identified Shared Water Challenges for the Ain Zhalta site, which are

documented in a spreadsheet covering both sites. The challenges have been prioritised with a supporting statement for the classification. The list is comprehensive and covers the AWS standard outcomes.

1.6.2 Initiatives to address shared water challenges shall be identified.

Comment

The initiatives are listed in the CRP and link back to the shared water challenges identified, which have been prioritised in terms of significance and urgency. The actions were agreed at a management team meeting (QM, technical manager, water resource/water treatment manager, water manager MENA) when reviewing the CRP. The team conducts quarterly CRP meetings.

The audit team also had view of two recent proposals to conduct Environmental Impact Assessments of project within the catchment. Proposed projects for the Ain Zhalta site include: rehabilitation of the Quaa spring, construction of micro dams in the valley to improve filtration and construction of pipeline infrastructure to connect households ro the municipal network.

- 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.
- Water risks faced by the site shall be identified, and prioritized, including likelihood and 1.7.1 severity of impact within a given timeframe, potential costs and business impact.





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Comment

The site has a developed a 'Risks to Shared Water Challenges' spreadsheet, which identifies and prioritises water risks to the site. The risks identified are comprehensive, but they do not address the impact within a given timeframe or potential costs of business impacts. Therefore, the document does not fully meet the requirements of the standard. The 'water shortage and water depletion in the summer' issues identifies a risk to the site's license in case of new well drilling. The site did not reference the possibility of having to drill a new well during the audit and this would benefit from being explained further.

WSAS notes that under the 'Follow up on new water project by Pepsi in the Barouk area' that NW have recorded that they will 'keep this project under their radar', which could be read as keeping it secret, rather than being aware of it.

Finding No: TNR-001090

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

A

in progress

Comment

The site's water related opportunities are identified in the CRP Tool and presented as the 'CRP Action Plan, in response to shared water challenges. The site provided screenshots of the Actions currently listed in the CRP; it lists 15 actions, 13 of which have been completed and the remaining two have been launched. The list therefore no longer presents current opportunities and although some actions have had a budget allocated, it has not identified potential savings from improving the water ratio of water abstracted to water in the bottles, nor business opportunities.

Finding No: TNR-001091

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.

in progress

Comment

Nestle Waters Lebanon have an MoU in place with the Shouf Biosphere, which covers both NW sites. It should be noted that this is a great example of an action demonstrating best practice, but it does not identify relevant best practice for water governance. There could be examples from the municipality or other relevant Authorities. The AWS Standard Guidance offers some useful examples for the site to consider.

Finding No: TNR-001101

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.



Comment

The site has identified water replenishment projects for the catchment, including a project to recharge the aquafer at the Falougha site, which will contribute towards replenishing the catchment. The following projects have been identified in the Ain Zhalta area:

- The rehabilitation of the Quaa spring in the Quaa village, to increase flow to around 50 m3/hr on average
- Construction of micro dams in the valleys around Ain Zhalta, installing small retaining walls (less than 2 m heights) to improve infiltration during rainy season and increase absorption into the catchment.

The site has also demonstrably improved their water ratio for the site and supplied supporting evidence for this.

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



yes



Alliance for Water Stewardship (AWS)

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Comment The site has identified water testing as best practice, due to the lack of water quality data in

the catchment. As such, the site undertakes water testing for the Biosphere free of charge, as well as a flow velocity measurement project, contributing towards catchment best practice.

The site also conducts water testing at a number of schools in the catchment.

1.8.4 Relevant catchment best practice for site maintenance of Important Water-Related Areas

shall be identified.

Comment Although the site has not adequately identified their IWRAs, they have identified best

practice projects that would contribute towards the maintenance of IWRAs. The Well Assessment Tool contributes towards the maintenance of the operational factory well (RA2). The last assessment was conducted in 2019 and there will be a new assessment done in

2022. The site intends to apply the tool every three years.

The site has also identified a number of projects that would contribute towards improving the IWRA (water sources) in the catchment and are also looking at developing a waste water project, to connect surrounding houses around the factory to the municipal waste water

treatment plant.

1.8.5 Relevant sector and/or catchment best practice for site provision of equitable and adequate

WASH services shall be identified.

in progress

Yes

Comment The site has demonstrated the provision of adequate WASH provisions on-site, but were not able to demonstrate any relevant sector or catchment best practice for site provision of WASH services. For example, the site has introduced obleving into the water source that is

WASH services. For example, the site has introduced chlorine into the water source that is being used for hand washing, But without having identified potential best practices, it is not

possible to benchmark the actions that the site have undertaken.

Finding No: TNR-001103



Alliance for Water Stewardship (AWS)

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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	A signed site statement in Arabic has been provided and is publicly displayed on the site's communication board.	
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.	₹ gress
Comment	The site supplied an organogram covering both sites at a high level, which identifies the people responsible for maintaining compliance obligations. Nestle Waters Lebanon have a Head Office in Beirut where Menhem is located and he is the main person responsible for submitting data to regulatory agencies. The MPCS 'Maintenance, Planning Control System' tasks spreadsheet lists regular operational tasks and there are some Waste Water testing activities that would be undertaken to demonstrate compliance. The person responsible for this, obtains all input details from the quality team and manages the compliance process. The site where not able to supply a documented process for how compliance obligations are maintained and submissions made to regulatory agencies. Finding No: TNR-000632	
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 in prog	₹ gress
Comment	The commitment letter signed by Raji Chabt (Technical Manager) does not quite constitute a strategy, but contains some relevant content for a Water Stewardship Strategy. *Finding No: TNR-000616*	
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	;ress

WSAS

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- Where available, note the link between each target and the achievement of best practice to

help address shared water challenges and the AWS outcomes.

WSAS STEWARDSHIP ASSURANCE SERVICES

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Comment

NW Lebanon have prepared a Water Stewardship Plan (WSP) for the Ain Zhalta site, which has been extracted from CRP3. The site showed the audit team a 'Quality QCR 2022' presentation, which reports back on actions listed in CRP3 as well as the WSP, but this was not supplied by the site. WSAS notes that the CRP Tool is not aligned with the AWS requirements for a Water Stewardship Plan and the two are not interchangeable. The CRP Tool does not meet the requirements of the indicator and the actions listed are out of date and do not reflect the current water stewardship projects that the site is delivering. The AWS Guidance clearly states that the actions should be linked to targets or objectives that are SMART; and at the moment the actions are not specific, measurable nor time-based.

Finding No: TNR-000626

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.

in progress

Comment

The 'Risks related to Shared Water Challenges' spreadsheet (Indicator 1.7) has identified risks relevant to Ain Zhalta, and has also developed a 'Hazard and Vulnerability Assessment Tool covering: Technological, Human, Hazardous risks'. The site has identified relevant risks, but there is currently no plan in place to mitigate and adapt to. WSAS notes that there aren't any national response plans in Lebanon, apart from a response plan to oil spills.

Finding No: TNR-001104



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3	STEP 3: IMPLEMENT - Implement the site's stewardship plan and improve impacts	
3.1	Implement plan to participate positively in catchment governance.	
3.1.1	Evidence that the site has supported good catchment governance shall be identified.	⊘ Yes
Comment	Nestle Water Lebanon have a longstanding MoU in place with the Shouf Biosphere, which has resulted in water-related studies being undertaken in the catchment. The MoU continues to date, but activities have been limited due to the pandemic and the economic crisis in Lebanon. Despite having access to limited resources, the NW Lebanon team continues to explore new catchment projects, demonstrating interactions with stakeholders. Planned projects are outlined in the CRP3 Action Plan and WSAS had view of quotes for new feasibility studies, which are uploaded against indicator 1.6.2.	
3.1.2	Measures identified to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be implemented.	✓ Yes
Comment	The site conducts water testing (for free) of numerous water sources in the catchment and have proactively instigated projects to improve water access to the public, particularly at the Barouk spring. The Barouk site offers access to clean and managed water for the public, which the WSAS team observed being utilised by the public.	
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.	n progress
Comment	The site was not able to demonstrate that they have a process in place that will effectively verify that full compliance with legal and regulatory requirements have been met. WSAS observed some regulatory compliance activities that were effective, such as water testing, but this was conducted outside of a formal process being in place.	
	Finding No: TNR-000	622
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	This indicator has been met as the site proactively respects the water rights of others, regardless of whether it is a legal requirement or not. Please refer to the comments against indicator 3.1.2 as well as the documents uploaded against the indicator.	
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.	n progress

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Comment

The site has set three water balance targets in the Ain Zhalta Water Stewardship Plan (WSP), these are:

- Follow up with Shouf reserve biosphere team and Monitoring of surrounding public Sources and Well and Share Meteo Data
- Get quotation to do the Environmental Impact Assessment to support micro-dams projects with SBR
- Regular meeting and coordination with Shouf biosphere reserve through Teams or Zoom

The WSP does contain a progress status column against the targets, but the targets themselves are not measurable and the timeline is not specified. The targets should be SMART, so that they are Specific, Measurable, Accepted, Realistic and Time bound. In addition, the site has identified the new Pepsi bottling plant as a potential water risk, which will have an impact on the water balance in the catchment,

Finding No: TNR-000629

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.

in progress

Comment

The site has installed an Aquassey control system, to improve water control and decrease water losses at site. WSAS noted that the water balance for the site was off and that water losses were unaccounted for, which has been acknowledged by the site. The site supplied the '3Y Plan for Environmental Performance' evaluation tool for the Aquassey project and justified the project on the basis that 'The water losses of 2021 due to the tanks overflow is 398 m3 and the unexplained losses is 4662 m3'. However, the site has not set any quantifiable targets on reducing the water losses, or identifying the root cause of the unexplained losses, despite them being so significant and constituting a significant volume of the the water withdrawn by the site.

Finding No: TNR-001509

3.3.3

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



Comment

The site does not reallocate clean drinking water, but they do manage the Barouk Well making safe drinking water available in the catchment. This does not require any legally binding documentation.

- **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.



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Comment

The site has identified two water quality targets in the Water Stewardship Plan and these are:

- Get quotation to Do the EIA to support the rehabilitation of Quaa municipal source
- Maintenance and Improvement of WASH on site

The first target of rehabilitating/recharging the Quaa municipal source, could be categorised as a 'Sustainable Water Balance' shared water challenge, rather than a water quality target. Particularly as the site is exploring the option of extending the municipal waste water treatment connections to households near the Ain Zhalta factory.

As with indicator 3.3.1, although the WSP contains a progress status column the targets are not measurable and the timeline is not specified. The site should avoid using words such as ongoing and done, without providing some more information to contextualise the progress status. The targets should be SMART, so that they are Specific, Measurable, Accepted, Realistic and Time bound. The target would also benefit from being more specific to the AWS Outcome that is trying to address

Finding No: TNR-000615

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.

in progress

Comment

The site must demonstrate how it continuously improves and achieves best practice for the site's effluent, through water quality measurements. NW Lebanon does undertake daily checks of al water effluent and the team observed a 'Water effluent Falougha factory' graph, showing the pH levels over 110 batches (no dates recorded). The WSAS team also reviewed a graph during the audit, showing the monthly Chemical Oxygen Demand (COD) levels of water discharge. The site are measuring COD and COD Load and comparing it against the Nestle threshold, which is meant to be stricter than the National regulatory limits. The Local Auditor observed that it would be meaningful to add the national regulations to the graph, as it would demonstrate that the site is meeting both national and organisational limits. Please reference the evidence uploaded against indicator 1.3.4. for some example test data of effluent water.

The site is working with stakeholders on the feasibility of a new waste water treatment plant and connecting local households to it. This is a shared water challenge but it has not been included yet in the Water Stewardship Plan.

Finding No: TNR-001234

- 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.

in progress

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Comment

Comment

The site has identified three IWRAs actions to maintain or enhance in the WSP and these are:

- Study to connect all neighbour sewage units to Barouk waste water treatment plant, clarify the situation on how to connect the waste water (ongoing) Safa.

Two municipal waste water plants at Barouk and Safa, that are currently working at 10 percent capacity and NWL are looking at securing US Aid funding to link up households with the plants. US Aid will possibly fund the scoping study.

- Periodically assessment (quarterly check nuisance around the factory) (ongoing) WSAS is of the opinion that this should not be included.
- Engagement with stakeholders on waste water treatment management (done)

The targets are good examples of actions to address shared water challenges, but they are not related to the on-site IWRAs, namely the two wells (RA1 & RA2). There is currently not a plan in place to enhance the area around the off-site well, despite this being leased land. A finding has been raised, due to the site not adequately defining their catchment IWRA's and it s therefore difficult to link the actions back to IWRAs within the catchment.

Finding No: TNR-001235

Ves

- 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.
 - The WSAS Team observed that clean toilets, with soap and hand sanitation was provided to all staff at the factory. The water supplied to the bathroom sinks has been chlorinated and drinking water is provided to all staff free of charge at points throughout the factory. The site had also conducted a WASH self-assessment, please reference the document uploaded against indicator 1.3.8.
- **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.
- Comment The site have provided ample evidence of providing safe drinking water in the local community; particularly at the Barouk springs. The site also conducts water quality tests for local springs and water supplied to local schools.
- **3.7** *Implement plan to maintain or improve indirect water use within the catchment:*
- Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.
 The site has not identified any indirect water use targets, due to not having any suppliers.

The site has not identified any indirect water use targets, due to not having any suppliers based within the catchment. The WSAS team reviewed all chemical suppliers and verified that none of them are based within the catchment.

- **3.7.2** Evidence of engagement with suppliers and service providers, as well as, when applicable, actions they have taken in the catchment as a result of the site's engagement related to indirect water use, shall be identified.
- Comment Service providers that are based within the catchment, such as cleaners and gardeners, use the site's water. It was also confirmed that there are no suppliers operating within the catchment.
- **3.8** Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have.

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



Comment The MoU with the Shouf Biosphere is a good example of engagement with the owner of a

shared water-related infrastructure, which has generated studies that have improved the water-related knowledge base within the catchment. The waste water treatment project for the community surrounding the Ain Zhalta site continues to develop and evidence of

meetings taking place have been submitted against the indicator.

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.



in progress

Comment The site has a longstanding Mol Lin place with the UNESCO designated Shouf Biosphere.

The site has a longstanding MoU in place with the UNESCO designated Shouf Biosphere, which has led to a number of joint activities and continues to deliver a pipeline of new projects. This is a good example of best practice in water governance, please refer to evidence uploaded against previous indicators. However, the site has not identified any potential best practice on water governance from municipalities or other authorities.

Finding No: TNR-001510

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



implemented.



Comment The site is actively delivering actions to improve the water balance of the site, as well as the catchment. The site has obtained proposals for conducting an environmental impact

assessment to construct mini-dams in the Ain Zhalta area, by installing small retaining walls (less than 2m height) to improve infiltration during rainy season. This is being planned and not yet implemented, please reference evidence uploaded against indicator

1.6.2.

The site will be utilising Aquassay for tracking water losses on the factory site. The Ain Zhalta site have installed meters for collating data, but it has not been put on the dashboard and therefore not live. Please refence the evidence uploaded against indicator 3.3.2. Installation of sensor taps and push taps at sinks to improve water quality, has also been actioned at the site.

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



Comment The site has conducted free water testing in the catchment of the spring sources and of the

municipality tap water.

The Ministry of Education issued Circular 121 that its mandatory for schools to undertake water testing, and NWL became a delivery partner in their catchments. The Ministry of Education sent a letter to the schools requesting that they undertake water testing (dated 2015) and site supplied a number of letter from local schools, requesting that Nestle Waters do the water testing on their behalf. Letters were seen and transstaed by the Local Auditor form the Ain Zhalta Highschool, the Lebanese Evangelical School at Ain Zhalta (2015) the school is now closed but testing was completed. And a Ain Zhalta School request from 2015.

The CRP lists this activity and the site confirmed that the Industrial Research Institute conducts the analysis, NWL takes the sampled and drives them to Beirut delivering them to the institute for testing.

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



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Comment The site has undertaken a number of actions to improve the maintenance of water sources

in the catchment and examples of evidence have been uploaded against this indicator. The site has been actively involved in rehabilitating the Barouk spring and continues to test springs within the catchment. The site is still to define both the on-site and catchment

IWRAs, under previous indicators.

3.9.5 Actions towards achieving best practice related to targets in terms of WASH shall be

implemented.

Comment All the water used onsite, including for WASH purposes, is obtained from the RA2 well.

Chlorine is added to the water at AZ to improve hygiene for hand washing and the audit team saw where the chlorine was stored during the site tour. The site is actively working with stakeholders to build a new water treatment plan for the community surrounding the

factory.





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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.	in progress
Comment	The site has not set any SMART targets in the Water Stewardship Plan for Ain Zhalta and it was therefore not possible to evaluated their performance against any targets set for the 2021 period. This does the site a disservice as they are currently delivering a host of projects that would support an up-to-date WSP.	
	Finding No: TNR-00	10620
4.1.2	Value creation resulting from the water stewardship plan shall be evaluated.	A
Comment	The site was unable to evaluate value creation from the WSP as no meaningful targets have been set and no evidence was supplied post-audit, to address this indicator. The site still has some work to do on establishing a value creation assessment process.	in progress
	Finding No: TNR-00	0624
4.1.3	The shared value benefits in the catchment shall be identified and where applicable, quantified.	✓ Yes
Comment	Numerous examples of shared value benefits have been demonstrated for the catchment through the actions recorded in Step 3. The site has also completed an AWS information on evidence document, which identifies the shared value benefits. The document applies to both sites as they are based within the same water catchment.	
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 site supplied a SHE (Safety, Health & Environment) Pyramid and uploaded evidence to support that there had not been an environmental emergency at either factory since the last AWS audit. WSAS was supplied with a screenshot of the incident reporting register, as well as an example of a specific entry. The 'Diesel Storage and Engine Facility' checklist was made available, to describe the safety measures in place.	:
4.3	Evaluate stakeholders' consultation feedback regarding the site's water stewardship performance, including the effectiveness of the site's engagement process.	
4.3.1	Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.	✓ Yes
Comment	The site has conducted 8 interviews with Ain Zhalta stakeholders, via self-assessment forms, capturing the stakeholders views on how the site delivers their water stewardship activities. The site has collated all the relevant screenshots from the CRP Database, including an analysis of their responses, in a powerpoint presentation, which has been uploaded for reference.	



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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 in progress identified.

The site was unable to demonstrate that they have modified and adapted any lessons Comment

learnt into their Water Stewardship Plan. The WSP was out of date and does not contain any

SMART targets, which is the basis for any meaningful evaluation activities.

Finding No: TNR-000619



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5	STEP 5: COMMUNICATE & DISCLOSE - Communicate about water stewardship and disclose the site's stewardship efforts
5.1	Disclose water-related internal governance of the site's management, including the positions of those accountable for legal compliance with water-related local laws and regulations.
5.1.1	The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.
Comment	The site has produced a 'Factory hierarchy' organogram, but it does not list Melhem Hachem (Regulatory Affairs Officer) who is accountable for compliance with water related laws and regulations on behalf of Nestle Waters Lebanon. WSAS was supplied with a 'Quality Organogram' post-audit, but this does not include Melhem Hachem. The sire should also note that the organigram must be disclosed to meet the requirement of the indicator. Finding No: TNR-000627
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. No
Comment	The site continuously referred to the CRP Tool as the plan that they report back to stakeholders on, rather than the actual Water Stewardship Plan. The site also stated that they would mainly communicate with stakeholders on projects that they are associated with, rather than how the AWS Standard outcomes are being met through the WSP. WSAS notes that the site is delivering projects with stakeholders to address shared water challenges, but this is not documented in line with the requirements of the standard, nor are they captured in the current version of the WSP.
	Shouf Biosphere is a key partner, Finding No: TNR-000628
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.
Comment	The site supplied a 'Summary of water stewardship performance' document, but it is not dated and WSAS was therefore unable to verify the year it summarises. No evidence was available on how the document viewed during the audit had been disclosed. Finding No: TNR-000617
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.
Comment	As noted throughout the report, the site is proactively delivering a number of projects to address shared water challenges, but it is not adequately documented and no formal disclosure has been made. This does the site a disservice, as they have some great projects to report back on.
	Finding No: TNR-001249



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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 is actively engaging with stakeholders and public-sector agencies, these have been identified throughout the report. Whether it is developing plans for linking households in Ain Zhalta to a new waste water treatment plant, or funding environmental impact assessments for water projects within the catchment.	
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	NWL made a 'Certification of compliance for BCP' document available, stating that no violations had occurred from January 2016 to April 2022. This a Statement form the site's Technical Manager.	
5.5.2	Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.	⊘ Yes
Comment	The site has not had to take any corrective actions, as no water-related compliance violations have occurred at the factory.	
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	There have been no water-related violations in the period 2016-2022	



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Photographic Evidence from Audit



AZ 19I bottle cleaning.jpg



2.1.1 AWS commitment in Arabic.jpg



AZ Production water drainage.jpg

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AZ waste water factory exit.jpg



AZ Chemical storage.jpg



AZ AWS Certificate.jpg

WSAS

WSAS STEWARDSHIP ASSURANCE SERVICES

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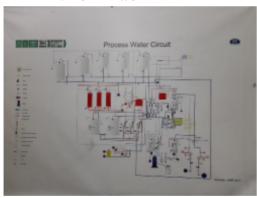
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AZ off-ste water treatment chamber.jpg



AZ Barouk spring house.jpg



AZ Process water circuit.jpg



WSAS
2 Quality StreetNorth Berwick, EH39 4HW, UNITED KINGDOM



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AZ Off-site well.jpg



AZ water bottling.jpg



Comment Please find a range of pictures attached, that were taken during the audit.



AZ water treament room.jpg



Shouf Catchment water balance.jpg

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AZ Barouk source.jpg



AZ Al Shouf CedAR Nature Reserve.jpg



AZ water treament room 2.jpg

WSAS

WSAS STEWARDSHIP ASSURANCE SERVICES

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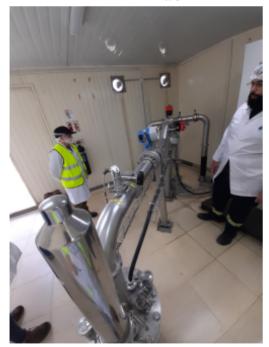
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AZ off-ste water treatment chamber.jpg



AX decommisioned on-site well.jpg



AZ Off-site well inside.jpg

WSAS



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AZ river measurements.jpg

Previous Findings

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



Comment

This was the first audit undertaken by WSAS and although previous reports were reviewed in preparation for the audit, then findings raised by their previous CAB rests solely with them. From next year onwards, WSAS will be able to closed any minor non-conformities, raised at this years audit.