

# CDP Water Security Scoring Essential Criteria 2026

## Full Water Security Essential Criteria 2026: Version Control

Version Number	Release / Revision Date	Revision Summary
1.0	Released: April 30, 2026	Publication of CDP Water Security Scoring Essential Criteria 2026
1.1	Revised: June 08 2026	EC-W6 updated at A-list level to clarify that ROUTE B is applicable to organisations who do not have a board of directors or equivalent governing body.

## Introduction

CDP recognizes the importance of environmental transparency in incentivizing positive and effective actions to mitigate risks due to climate change, water security, and deforestation. Essential criteria for Water Security are applied across Leadership and A list levels. All essential criteria at one level must be met to progress a score to the next level to ensure that critical areas of disclosure are addressed.

All criteria at one level must be met to progress a score to the next level. This set a consistent baseline of reporting, ensuring that organizations include key data points that are critical to understanding how they are assessing and responding to environmental issues. It also ensures that high scoring organizations are disclosing in the most consistent and comprehensive way, and clarifies the critical datapoints that organizations must disclose on to earn leadership status.

In 2026, CDP has applied a broad restructuring to the wording of the essential criteria, with the intention of clarifying existing criteria and providing a higher level of detail on the exact criteria that must be met in order to fulfil the essential criterion. Where in 2025, the essential criteria outlined the actions that each level incentivised with the questions assessed, in 2026 the criteria now mirrors the structure of the Full Corporate Scoring Methodology by specifying the exact response options that must be selected within each question to meet the criteria.

### Example 1 – excerpt of 2025 wording

2.2.1: The organization has a process in place for identifying, assessing, and managing environmental risks and/or opportunities.

### Example 1 – excerpt of 2026 wording

'Yes' selected in column 'Process in place' in question 2.2.1

### Example 2 – excerpt of 2025 wording

5.11.6:  
- The organization reports at least one water-related environmental requirement that suppliers have to meet as part of their purchasing process (excluding option 'Other, please specify').

### Example 2 – excerpt of 2026 wording

Any option excluding 'Other, please specify' selected in column 'Environmental requirement' in row 'Water' in question 5.11.6

### Example 3 – excerpt of 2025 wording

The organization identifies the positions of individuals or committees on the board with accountability for water-related issues (excluding option 'Other, please specify') in question 4.1.2.

### Example 3 – excerpt of 2026 wording

For 'Water' row:  
Any option excluding 'Other, please specify' is selected in column 'Positions of individuals or committees with accountability...' in question 4.1.2

Alongside this, tags have been added in the 2026 Full corporate questionnaire to signpost which questions are included in essential criteria. For example, 4.6.1 is included in the essential criteria on environmental policies, therefore a tag has been added to the 2026 Full corporate questionnaire to signpost as such. The essential criteria tables in this document outline the critical data points that are assessed. Organizations should refer to questionnaire guidance for details of question dependencies as some questions assessed as part of the essential criteria are only triggered when specific options are selected in the parent question. For example, question 4.6.1 only appears when 'Yes' is selected in column 'Does your organization have any environmental policies?' of question 4.6.

Please note, essential criteria are applied to the organization's overall score in a particular environmental issue, and do not cap or limit category scores.

## **How to use this document**

This document aims to outline the essential criteria across levels below and including the A list. The Full Corporate Essential criteria apply to organizations responding to the Full corporate Questionnaire and this document outlines which sectors the criteria apply to and provides a description of each criteria. For each essential criteria there is a table that outlines the following:

**Essential criteria level** – Whether criteria is applied at a level will be outlined in the tables for each essential criteria area. For water security, essential criteria will be applied at Leadership or A list levels. If a criterion is applied to Leadership level and the check is not met, this will limit an organization's final score to a B. Similarly, if the A-list criteria are not met then the final score will be limited to an A-

**Question** – Each essential criterion will be linked to a question or multiple questions from the 2026 Full Corporate Questionnaire – Water Security. Where two or more question numbers are referenced, this indicates that a combination of questions are assessed to meet the overall essential criteria at that level. Question numbers that are combined with an 'OR' indicate that the essential criterion can be met through data points in either question.

**Scored data points** – Organizations must meet all criteria within a level to meet the overall essential criteria, unless stated otherwise. An 'AND' indicates where multiple criteria must be met for clarity. Some criteria may specifically link to criteria that are present within the CDP full corporate scoring methodology 2026 - Climate Change.

**Essential criteria identifier** – Each essential criteria in this document has an accompanying unique identifier. These are composed of 'EC' for 'essential criteria,' a dash followed by an 'W' for Water security, and a specific number e.g. EC-W1. Essential criteria may be referred to using their essential criteria identifiers in this document.

**Essential criteria description** – Positioned directly underneath the essential criteria identifier is a summary of the essential criteria. Where multiple levels apply, the description summarises all of the elements that must be met in order to pass the essential criteria.

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## 2026 Full Water Security Essential Criteria

### EC-W1: Public response [All sectors]

Submit a public response.

Essential criteria level	Scored data points
Awareness	No essential criteria applied.
Management	No essential criteria applied.
Leadership	The organization must submit a public response to the full corporate questionnaire.
A List	No essential criteria applied.

### EC-W2: Reporting of portfolio activity [Financial services only]

Financial services organizations must identify and disclose at least one activity they undertake that is relevant to disclosure.

Essential criteria level	Scored data points
Awareness	No essential criteria applied.
Management	No essential criteria applied.
Leadership	No essential criteria applied.
A List	'Yes' selected in at least one row in column 'Activity undertaken' in question 1.10

### EC-W3: Tailing dams [Coal only]

Organizations must demonstrate that they follow global standards, report on all hazardous dams, and have a wide range of effective management procedures in place for all their dams.

Essential criteria level	Scored data points
Awareness	No essential criteria applied.
Management	No essential criteria applied.
Leadership	No essential criteria applied.
A List	EC ROUTE A) Any option excluding 'Coal derived fuels and chemical feedstocks' and 'Grid electricity generation from coal' selected in column 'Aspect' selected in question 1.13 AND Figure greater than 0 in column 'Number of tailings dams in operation' OR 'Number of inactive tailings dams' in question 2.6 AND Full Management points awarded including the eligibility criteria in question 2.6.1

	<p>AND</p> <p>Full Awareness points awarded including the eligibility criteria in question 2.6.2</p> <p>AND</p> <p>Full Leadership points awarded including the eligibility criteria in question 2.6.3</p> <p>OR</p> <p>EC ROUTE B)</p> <p>Any option selected excluding 'Coal derived fuels and chemical feedstocks' AND 'Grid electricity generation from coal' selected in column 'Aspect' in question 1.13</p> <p>AND</p> <p>A figure of 0 in column 'Number of tailings dams in operation' AND 'Number of inactive tailings dams' in question 2.6</p> <p>OR</p> <p>EC ROUTE C)</p> <p>'Coal derived fuels and chemical feedstocks' and 'Grid electricity generation from coal' selected in column 'Aspect' elected in question 1.13</p>
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#### EC-W4: Tailing dams [Metals & Mining only]

Organizations must demonstrate that they follow global standards, report on all hazardous dams, and have a wide range of effective management procedures in place for all their dams.

Essential criteria level	Scored data points
Awareness	No essential criteria applied.
Management	No essential criteria applied.
Leadership	No essential criteria applied.
A List	<p>EC ROUTE A)</p> <p>Any mining option selected in question 1.17</p> <p>AND</p> <p>Figure greater than 0 in column 'Number of tailings dams in operation' OR 'Number of inactive tailings dams' in question 2.6</p> <p>AND</p> <p>Full Management points awarded including the eligibility criteria in question 2.6.1</p> <p>AND</p> <p>Full Awareness points awarded including the eligibility criteria in question 2.6.2</p> <p>AND</p> <p>Full Leadership points awarded including the eligibility criteria in question 2.6.3</p>

	<p>OR</p> <p>EC ROUTE B) Any mining option selected in question 1.17</p> <p>AND</p> <p>A figure of 0 in column 'Number of tailings dams in operation' AND 'Number of inactive tailings dams' in question 2.6</p> <p>OR</p> <p>EC ROUTE C) Any processing option selected in question 1.17</p>
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**EC-W5: Identification, assessment and management of risks [General and all sectors excl. Financial services]**

Organizations must have a process in place for identifying, assessing, and managing water-related risks across their direct operations and upstream value chain, and details on processes must be disclosed.

Essential criteria level	Scored data points
Awareness	No essential criteria applied.
Management	No essential criteria applied.
Leadership	No essential criteria applied.
A List	<p>The following must be met in any row where 'Water' is selected in column 'Environmental issue' AND 'Risks' is selected in column 'Indicate which of dependencies, impacts, risks, and opportunities are covered by the process for this environmental issue' in question 2.2.2:</p> <ul style="list-style-type: none"> <li>- 'Direct operations' AND 'Upstream value chain' selected in column 'Value chain stages covered'</li> <li>- Either 'Full' OR 'Partial' selected in column 'Coverage'</li> <li>- 'Short-term', 'Medium-term' AND 'Long-term' selected in column 'Time horizons covered'</li> </ul> <p>AND</p> <p>'Yes' selected in column 'Process in place' in question 2.2.1.</p>

**EC-W6: Board oversight [General and all sectors excl. Financial services]**

Organizations must demonstrate board-level (or management-level) oversight and competency on water-related issues.

Essential criteria level	Scored data points
Awareness	No essential criteria applied.
Management	No essential criteria applied.

Leadership	No essential criteria applied.
A List	<p>EC ROUTE A)          'Yes' is selected in column 'Board of directors or equivalent governing body' in question 4.1 AND          For 'Water' row:          Any option excluding 'Other, please specify' is selected in column 'Positions of individuals or committees with accountability...' in question 4.1.2          AND          For 'Water' row:          'Yes' selected in column 'Board-level competency on this environmental issue' in question 4.2</p> <p>OR</p> <p>EC ROUTE B)          'No' is selected in column 'Board of directors or equivalent governing body' in question 4.1 AND          For 'Water' row:          'Yes' is selected in column 'Management-level responsibility for this environmental issue' in question 4.3          AND          For at least one row where 'Water' is selected in column 'Environmental issue':          Any option excluding 'Other, please specify' OR 'Other committee, please specify' in column 'Position of individual or committee with responsibility' in question 4.3.1          AND          For 'Water' rows:          'Yes' selected in column 'Management-level competency on this environmental issue' in question 4.4</p>

**EC-W7: Environmental policies [General and all sectors excl. Financial services]**

Organizations must have a publicly available environmental policy that covers water-specific commitments.

Essential criteria level	Scored data points
Awareness	No essential criteria applied.
Management	No essential criteria applied.
Leadership	No essential criteria applied.
A List	<p>'Water' selected in column 'Environmental issues covered' in question 4.6.1          AND          'Publicly available' selected in column 'Public availability' in question 4.6.1          AND          At least 3 of the following options selected in column 'Environmental policy content' in question 4.6.1:          - 'Commitment to reduce or phase out hazardous substances.'</p>

	<ul style="list-style-type: none"> <li>- 'Commitment to control/reduce/eliminate water pollution'</li> <li>- 'Commitment to reduce water consumption volumes.'</li> <li>- 'Commitment to reduce water withdrawal volumes'</li> <li>- 'Commitment to safely managed WASH in local communities'</li> <li>- 'Commitment to the conservation of freshwater ecosystems'</li> <li>- 'Commitment to water stewardship and/or collective actions'</li> <li>- 'Commitment to stakeholder engagement and capacity building on environmental issue'</li> <li>- 'Recognition of environmental linkages and trade-offs'</li> <li>- 'Commitment to take environmental action beyond regulatory compliance.'</li> </ul>
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### EC-W8: CAPEX Breakdown [Coal only]

Coal companies must have zero CAPEX in the reporting year and planned over the next 5 years on expansion/development of existing or new coal mines.

Please note: This essential criterion references questions within the Environmental Performance – Climate change module. This criterion applies to scoring for this sector in all three environmental issue areas.

Essential criteria level	Scored data points
Awareness	No essential criteria applied.
Management	No essential criteria applied.
Leadership	No essential criteria applied.
A List	<p>All of the following are met in both rows 'Development of new coal mines' AND 'Expansion of existing coal mines' in question 5.6:</p> <p>Figure of 0 provided in column 'CAPEX in the reporting year for this expansion activity (unit currency as selected in 1.2)' AND            Figure of 0 provided in column 'CAPEX in the reporting year for this expansion activity as % of total CAPEX in the reporting year' AND            Figure of 0 provided in column 'CAPEX planned over the next 5 years for this expansion activity as % of total CAPEX planned over the next 5 years'.</p>

### EC-W9: CAPEX Breakdown [Oil & Gas only]

Oil and gas companies must have zero CAPEX in the reporting year and planned over the next 5 years on expansion of new oil or natural gas fields.

Please note: This essential criterion references questions within the Environmental Performance – Climate change module. This criterion applies to scoring for this sector in all three environmental issue areas.

Essential criteria level	Scored data points
Awareness	No essential criteria applied.

Management	No essential criteria applied.
Leadership	No essential criteria applied.
A List	<p>All of the following are met in both rows 'Exploration of new oil fields' AND 'Exploration of new natural gas fields' in question 5.6:</p> <p>Figure of 0 provided in column 'CAPEX in the reporting year for this expansion activity (unit currency as selected in 1.2)' AND            Figure of 0 provided in column 'CAPEX in the reporting year for this expansion activity as % of total CAPEX in the reporting year' AND            Figure of 0 provided in column 'CAPEX planned over the next 5 years for this expansion activity as % of total CAPEX planned over the next 5 years'.</p>

**EC-W10: Value chain engagement [General and all sectors excl. Financial services]**

Organizations must engage with their suppliers on water through either their purchasing process, capacity building, financial incentives, information collection, or innovation and collaboration.

Essential criteria level	Scored data points
Awareness	No essential criteria applied.
Management	No essential criteria applied.
Leadership	No essential criteria applied.
A List	<p>EC ROUTE A)</p> <p>'Yes, environmental requirements related to this environmental issue are included in our supplier contracts' OR 'Yes, suppliers have to meet environmental requirements related to this environmental issue, but they are not included in our supplier contracts' selected in column 'Suppliers have to meet specific environmental requirements related to this environmental issue as part of the purchasing process' in row 'Water' in question 5.11.5            AND            Any option excluding 'Other, please specify' selected in column 'Environmental requirement' in row 'Water' in question 5.11.6</p> <p>OR</p> <p>EC ROUTE B)</p> <p>For rows where 'Water' is selected in column 'Environmental issue covered':            Any option selected excluding the following in column 'Type and details of engagement' in question 5.11.7:</p> <ul style="list-style-type: none"> <li>- 'Other capacity building activity, please specify'</li> <li>- 'Other financial incentive, please specify'</li> <li>- 'Other information collection activity, please specify'</li> <li>- 'Other innovation and collaboration activity, please specify'</li> </ul>

### EC-W11: Emissions targets (near-term) [Coal only]

Organizations must make progress against emissions targets that reflect their full emissions inventory and are in line with the Science Based Targets initiative (SBTi) criteria.

Please note: This essential criterion references questions within the Environmental Performance – Climate change module. This criterion applies to scoring for this sector in all three environmental issue areas.

Essential criteria level	Scored data points
Awareness	No essential criteria applied.
Management	No essential criteria applied.
Leadership	No essential criteria applied.
A List	At least 2.75 Leadership points awarded in either question 7.53.1 OR 7.53.2.

### EC-W12: Emissions targets (near-term) [Oil & Gas only]

Organizations must make progress against emissions targets that reflect their full emissions inventory and are in line with the Science Based Targets initiative (SBTi) criteria.

Please note: This essential criterion references questions within the Environmental Performance – Climate change module. This criterion applies to scoring for this sector in all three environmental issue areas.

Essential criteria level	Scored data points
Awareness	No essential criteria applied.
Management	No essential criteria applied.
Leadership	No essential criteria applied.
A List	At least 2.75 Leadership points awarded in either question 7.53.1 OR 7.53.2.

### EC-W13: Exclusions from disclosure [General and all sectors excl. Financial services]

Organizations must not exclude any water volumes from their disclosure. Where organizations exclude partial volumes from disclosure, all excluded volumes are disclosed with an acceptable reason for exclusion.

Please note: The appendix (page 21) contains example responses to provide further guidance on exclusions considered significant by CDP.

Essential criteria level	Scored data points
Awareness	No essential criteria applied.
Management	No essential criteria applied.
Leadership	No essential criteria applied.

A List	<p>The organization does not have any significant exclusions from its disclosure, as reported in question 9.1 and 9.1.1.</p> <p>Per row:</p> <p>EC ROUTE A) 'No' selected in question 9.1</p> <p>OR</p> <p>EC ROUTE B) 'Yes' selected in question 9.1 AND Option 'Water used for internal WASH services' is selected in column 'Reason for exclusion' in question 9.1.1</p> <p>OR</p> <p>EC ROUTE C) 'Yes' selected in question 9.1 AND 'Recent acquisition or merger' is selected in column 'Reason for exclusion' in question 9.1.1 AND The date provided in column 'Completion date of acquisition or merger' in question 9.1.1 is no earlier than one year before the date in column 'End date of reporting year' in question 1.4 AND 'Yes' is selected in column 'Data from the merger/acquisition will be incorporated in the next reporting year' in question 9.1.1</p> <p>OR</p> <p>EC ROUTE D) 'Yes' selected in question 9.1 AND 'Rainwater' selected in column 'Reason for exclusion' in question 9.1.1 AND a figure less than 5 provided in column 'Estimated % of total water' in question 9.1.1</p> <p>OR</p> <p>EC ROUTE E) 'Yes' selected in question 9.1 AND 'Water supply network' selected in column 'Reason for exclusion' in question 9.1.1</p> <p>OR</p> <p>EC ROUTE F) 'Yes' selected in question 9.1 AND 'Divestiture' selected in column 'Reason for exclusion' in question 9.1.1</p> <p>OR</p>
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EC ROUTE G)

'Yes' selected in question 9.1

AND

Either 'Other, please specify' OR 'Shared Premises' selected in column 'Reason for exclusion' in question 9.1.1

AND

Column 'Description of exclusion' is complete

AND

Any figure provided in column 'Estimated % of water'

AND

The organization does not have any significant exclusions from its disclosure, as reported in question 9.1 and 9.1.1.

Significance of an exclusion will depend on factors such as the size of the exclusion, pollution load associated with the exclusion, sector and related business activities of the company, the impact of the activities the excluded water is used for, geographical location if the exclusion represents operations in a specific place (and the watershed context of that location, such as if it is an area of limited water availability or poor water quality), and how much environmental impact the exclusion represents relative to the whole. The qualitative information provided should address the above points as much as possible.

The exclusion from the disclosure is not significant when the following factors are considered in column 'Please explain'

- The size of the exclusion
- Impact of the activity the excluded water is used for
- Pollution load associated with the exclusion
- Sector and related business activities of the company
- Geographical location if the exclusion represents operations in a specific place (and the watershed context of that location)
- Whether the water is withdrawn from water stressed areas or an area of low water quality

The following information must be provided:

- o A description and reason for each exclusion
- o The percentage of water volume that is excluded
- o The business activity the excluded water is used for and the

	<p>environmental impacts (including the pollution load) associated with these activities</p> <ul style="list-style-type: none"> <li>o The river basin the excluded water is withdrawn from and the availability and quality of water in the area</li> </ul> <p>CDP recommends that an organization includes all water-related data in its disclosure in line with best practice. Where an organization that is eligible for the A list does report an exclusion that CDP considers significant, the organization's final score will be capped at an A-</p> <p>Failure to provide sufficient information for CDP to determine the significance of an exclusion (i.e. size of exclusion and its pollution load, business activity the excluded water is used for, the river basin the excluded water is withdrawn from and watershed context of that area) is grounds for a score to be capped: any exclusion must be clearly justified.</p> <ul style="list-style-type: none"> <li>o CDP may use WRI Aqueduct or WWF Water Risk Filter as tools for determining if the location of water withdrawals is in areas of water stress.</li> <li>o CDP may use Water Watch (CDP Water Watch - CDP) as a tool for determining the water impact of business activities associated with the exclusion at different stages of the value-chain.</li> <li>o Please note, CDP has not set a percentage threshold for the size of exclusion that is considered significant as the volume of water excluded from the disclosure is considered by CDP in conjunction with the factors listed above.</li> </ul> <p>If the organization has multiple exclusions, each exclusion will be assessed against the above criteria.</p> <p>See appendix for examples of responses in column 'Please explain' of question 9.1.1 that would be considered as significant exclusions by CDP according to the essential criteria.</p>
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**EC-W14: Company-wide water accounting [General and all sectors excl. Financial services and Energy utilities & power generators]**

Organizations demonstrate comprehensive water accounting by indicating that total volumes of withdrawals and consumption, as well as the provision of WASH services, are regularly monitored at more than 75% of sites/facilities/operations. If the organization treats their own discharge, they also regularly monitor water discharge quality in more than 75% of sites/facilities/operations.

Essential criteria level	Scored data points
Awareness	No essential criteria applied.
Management	No essential criteria applied.
Leadership	No essential criteria applied.
A List	Part 1: Any option except 'Unknown' in column 'Frequency of measurement' in row 'Water withdrawals - total volume' in question 9.2 AND '76-99' OR '100%'

	<p>selected in column '% of sites/facilities/operations' in row 'Water withdrawals - total volume' in question 9.2</p> <p>AND</p> <p>Any option except 'Unknown' in column 'Frequency of measurement' in row 'Water discharges - total volume' in question 9.2 AND '76-99' OR '100%' selected in column '% of sites/facilities/operations' in row 'Water discharges - total volume' in question 9.2</p> <p>AND</p> <p>Any option except 'Unknown' in column 'Frequency of measurement' in row 'The provision of fully -functioning, safely managed WASH services to all workers.' in question 9.2 AND '76-99' OR '100%' selected in column '% of sites/facilities/operations' in row 'The provision of fully -functioning, safely managed WASH services to all workers.' in question 9.2</p> <p>AND</p> <p>Part 2:</p> <p>Any option except 'Unknown' in column 'Frequency of measurement' in row 'Water discharge quality - by standard effluent parameters' in question 9.2 AND '76-99' OR '100%' selected in column '% of sites/facilities/operations' in row 'Water discharge quality - by standard effluent parameters' in question 9.2</p> <p>OR</p> <p>'Not relevant' selected in column '% of sites/facilities/operations' in row 'Water discharge quality - by standard effluent parameters' in question 9.2 AND the figure provided in column 'Volume (megaliters/year)' in row 'Third party destination' in question 9.2.8 is equal to the figure provided in column 'Volume (megaliters/year)' in row 'Total discharges' in question 9.2.2 (+/- 5%)</p> <p>OR</p> <p>'Not relevant' selected in column '% of sites/facilities/operations' in row 'Water discharge quality – by standard effluent parameters' AND '100%' selected in column '% of sites/facilities/operations' in row 'Water discharges – total volume' AND figure of 0 provided in column 'Volume (megaliters)' in row 'Total discharges' in question 9.2.2</p> <p>OR</p> <p>'Not relevant' selected in column '% of sites/facilities/operations' in row 'Water discharge quality – by standard effluent parameters' AND figure of 0 provided in column 'Volume (megalitres)' in the row 'Total discharges' AND 'Total withdrawals' in question 9.2.2</p>
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**EC-W15: Company-wide water accounting [Energy utilities & power generators only]**

Organizations demonstrate comprehensive water accounting by indicating that total volumes of water withdrawals and water consumption, as well as the provision of WASH services, are regularly monitored at more than 75% of sites/facilities/operations. If the organization treats their own discharge, they also regularly monitor water discharge quality in more than 75% of sites/facilities/operations.

Essential criteria level	Scored data points
Awareness	No essential criteria applied.
Management	No essential criteria applied.
Leadership	No essential criteria applied.
A List	<p>Part 1:</p> <p>Any option except 'Unknown' in column 'Frequency of measurement' in row 'Water withdrawals - total volume' in question 9.2 AND '76-99' OR '100%' selected in column '% of sites/facilities/operations' in row 'Water withdrawals - total volume' in question 9.2</p> <p>AND</p> <p>Any option except 'Unknown' in column 'Frequency of measurement' in row 'Water discharges - total volume' in question 9.2 AND '76-99' OR '100%' selected in column '% of sites/facilities/operations' in row 'Water discharges - total volume' in question 9.2</p> <p>AND</p> <p>Any option except 'Unknown' in column 'Frequency of measurement' in row 'The provision of fully-functioning, safely managed WASH services to all workers.' in question 9.2 AND '76-99' OR '100%' selected in column '% of sites/facilities/operations' in row 'The provision of fully-functioning, safely managed WASH services to all workers.' in question 9.2</p> <p>AND</p> <p>Part 2:</p> <p>Any option except 'Unknown' in column 'Frequency of measurement' in row 'Water discharge quality - by standard effluent parameters' in question 9.2 AND '76-99' OR '100%' selected in column '% of sites/facilities/operations' in row 'Water discharge quality - by standard effluent parameters' in question 9.2</p> <p>OR</p> <p>'Not relevant' selected in column '% of sites/facilities/operations' in row 'Water discharge quality - by standard effluent parameters' in question 9.2 AND the figure provided in column 'Volume (megaliters/year)' in row 'Third party destination' in question 9.2.8 is equal to the figure provided in column 'Volume (megaliters/year)' in row 'Total discharges' in question 9.2.2 (+/- 5%)</p> <p>OR</p> <p>'Not relevant' selected in column '% of sites/facilities/operations' in row 'Water discharge quality – by standard effluent parameters' AND '100%' selected in column '% of sites/facilities/operations' in row 'Water discharges – total volume' AND figure of 0 provided in column 'Volume (megaliters)' in row 'Total discharges' in question 9.2.2</p> <p>OR</p> <p>Not relevant' selected in column '% of sites/facilities/operations' in row 'Water discharge quality – by standard effluent parameters' AND figure of 0 provided in column 'Volume (megalitres)' in the row 'Total discharges' AND 'Total withdrawals' in question 9.2.2</p> <p>OR</p>

	<p>'Electricity generation' selected in column 'Aspect' in question 1.16 AND 'Not relevant' selected in column '% of sites/facilities/operations' in row 'Water discharge quality - by standard effluent parameters' in question 9.2 AND sum of figures in column 'Gross electricity generation (GWh)' in the following rows is greater than 70% of the figure in row 'Total' in question 1.16.1: - 'Offshore Wind' - 'Onshore wind' - 'Solar' - 'Hydropower'</p>
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**EC-W16: Withdrawals from water stressed areas [General and all sectors excl. Financial services]**

Organizations with withdrawals from water-stressed areas must demonstrate lower or stable withdrawals from water-stressed areas compared to the previous reporting year, or indicate that a Merger or Acquisition has meant that their withdrawals from water-stressed areas are higher.

Essential criteria level	Scored data points
Awareness	No essential criteria applied.
Management	No essential criteria applied.
Leadership	No essential criteria applied.
A List	<p>EC ROUTE A) 'No' selected in column 'Withdrawals are from areas with water stress' in question 9.2.4 AND Any option excluding 'No identification tool used' selected in column 'Identification tool' in question 9.2.4</p> <p>OR</p> <p>EC ROUTE B) 'Yes' selected in column 'Withdrawals are from areas with water stress' in question 9.2.4 AND Any option excluding 'Higher' OR 'Much higher' selected in column 'Comparison with previous reporting year' in question 9.2.4</p> <p>OR</p> <p>EC ROUTE C) 'Yes' selected in column 'Withdrawals are from areas with water stress' in question 9.2.4 AND</p>

	'Higher' OR 'Much higher' selected in column 'Comparison with previous reporting year' in question 9.2.4 AND 'Mergers and acquisitions' selected in column 'Primary reason for comparison with previous reporting year' in question 9.2.4
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**EC-W17: Targets [General and all sectors excl. Financial services]**

Organizations must demonstrate action towards achieving water security by setting targets in at least two categories related to water pollution, water withdrawals and/or WASH services.

Essential criteria level	Scored data points
Awareness	No essential criteria applied.
Management	No essential criteria applied.
Leadership	No essential criteria applied.
A List	EC ROUTE A) 'Yes' selected in column 'Target set in this category' in row 'Water pollution' AND 'Water withdrawals' in question 9.15  OR  EC ROUTE B) 'Yes' selected in column 'Target set in this category' in rows 'Water Pollution' AND 'Water, Sanitation, and Hygiene (WASH) services' in question 9.15  OR  EC ROUTE C) 'Yes' selected in column 'Target set in this category' in rows 'Water withdrawals' AND 'Water, Sanitation, and Hygiene (WASH) services' in question 9.15

## Appendix

Examples of responses in column 'Please explain' of question 9.1.1 that would be considered as significant exclusions by CDP according to the essential criteria. The responses below are for exemplar purposes only and do not represent a singular organizations' disclosure to CDP.

### Example 1

Q1.4

End date of reporting year

30/12/2025

Q9.1.1

Our disclosure includes water data from all our entities except company x. We acquired company x, a paper packaging company, in 2020 to improve the efficiency of our production process. However, the integration into our organization has been more challenging than anticipated. We are still in the process of integrating the water data into our accounting systems, which means we are not able to include the data in our disclosure this cycle.

Explanation for fail decision - The company has excluded an acquisition; therefore, CDP will not consider the exclusion significant if:

The date provided in column 'Completion date of acquisition or merger' in question 9.1.1 is no earlier than one year before the date in column 'End date of reporting year' in question 1.4

AND

'Yes' is selected in column 'Data from the merger/acquisition will be incorporated in the next reporting year' in question 9.1.1

Both elements of the criteria need to be met for the exclusion to not be considered significant.

The company's response states that the acquisition occurred in 2020, but their reporting year ended in 12/2025. Therefore, the acquisition did not occur within the reporting year, and the first element of the criteria is not met.

The response doesn't state that the data will be included in their disclosure next year, so neither of the two criteria are met. As a result, the response does not satisfy the criteria check.

### Example 2

Our production facilities located in Georgia, USA, Central France and Portugal are the focus of our disclosure as they account for 95% of the company's withdrawals and 94% of our discharges. Water is a vital resource used for multiple steps of the chemical production process in these facilities. The resulting water discharge from these facilities has a high pollution load which requires a high level of specialised treatment and, if not treated correctly, has the potential to have a sizable impact on our local communities and environment.

Five facilities, located in Türkiye and India, use water to heat and cool equipment during the production of chemicals. They represent 5% of the company's total withdrawals and 6% of the total discharges. These facilities have not been included in the disclosure whilst we prioritise managing the risk of the high impact facilities.

Explanation for fail decision - Whilst the company has excluded a smaller element of their water usage at 5% of the total withdrawals and 6% of the total discharges, the excluded water is used in the production of chemicals, a heavily water intensive process ranked as 'Critical' on Water Watch. Furthermore, the excluded facilities are located in regions with high and extremely high water stress (WRI Aqueduct). When we consider the impact of the business activity with the degree of water stress, the exclusion is impactful, with a high risk factor for the local community, water basin and company.

### Example 3

The water accounting data from our one overseas metal refinement operation in Paraguay is not included. Water is used for cleaning at the facility. This is a subsidiary of an acquisition that is not our main business activity and thus is not considered a priority. The data systems in our Paraguayan facility are not aligned with the systems we use throughout the rest of our organization to process our data for our disclosure, and as a result has not been verified by a third party. However, we estimate the water volume withdrawn is roughly 15% of our total water withdrawals. We have focused our disclosure on the larger part of our operations which are expected to have a larger impact.

Explanation for fail decision - The operation is located in a region with low water stress according to WRI aqueduct. However, the criteria states that the significance of an exclusion depends on multiple factors, not only on the location of the operations. Other factors include 'the size of the exclusion, pollution load associated with the exclusion, sector and related business activities of the company, the impact of the activities the excluded water is used for...'. The response states that the water is used for cleaning in metal refinement operations which has a high water impact due to the pollution load of the discharge. Water Watch ranks the Metal smelting, refining & forming activity group as 'Critical' for its impact on Water.

### Example 4

We have reported on our granola cereals production operations which covers 17 wheats, 10 corn, 5 barley and oat crops farms, milling processing and cooking production sites. Additions to our final products such as flavourings, fruits and nuts are predominately purchased from suppliers and our associated water risks, opportunities and engagement activities have been disclosed accordingly. However, we have recently begun producing our own pistachios for our products in Arizona, USA, and the water used for our farm and production processes has been excluded from our disclosure. We are still experimenting and refining our processes for producing pistachios, so the volumes are irregular and not what we forecast them to be in the future. Nonetheless, we can state that in 2023 the withdrawals for our pistachio farm were 9% of our total withdrawals. Once the trees and our processes are established and we feel the water data is an accurate representation of the long-term water impact, we will include it in our disclosure.

Explanation for fail decision - Crop farming ranks as critical on Water Watch. Furthermore tree nuts, including Pistachios, are one of the most water intensive crops to produce, which means they can have a large water impact. The company states their pistachio production site is located in Arizona, an area of water stress, where water consumption can have a large

impact on the water availability to local communities and downstream users. This indicates a large volume of water in a vulnerable area with a potentially large water impact has been excluded.