SCS Global Services
2000 Powell Street, Suite 600
Emeryville, CA 94608
www.SCScertified.com

Client Name:	Nalco Water, Garyville, LA
AWS Registration Number:	AWS 000051
Client Representative:	James Cartwright, SHE Manager
Auditor Team:	Rae Mindock, SCS Shana Golden, SCS
Audit Dates:	November 5 and 6, 2019
Stakeholder Notification	October 4, 2019 AWS Website, SCS Website, Landmark Classified
Site Location:	3628 Highway 44, Garyville, LA
Report Date:	December 15, 2019
Standard:	AWS International Water Stewardship Standard Version 2.0, March 22, 2019

Audit Type	☐ Gap Analysis ☐ Pre-assessment	☒ Initial Certification	☐ Surveillance ☐ Recertification

Site Information

Site Description	Ecolab's manufacturing facility located in Garyville, Louisiana, is a reaction plant that primarily produces water treatment chemical blends and polymers. The Garyville facility is located in the Lower Mississippi River Basin, which is part of the largest watershed in the United States, the Mississippi River Watershed. Process water is pulled directly from the Mississippi River and treated on site.
Catchment Description	The Site is located on the Mississippi River in between Baton Rouge and New Orleans in Garyville, Louisiana. It is located in the 08 Lower Mississippi Region, in HUC 08070204. The plant receives water from two sources, approximately 19,000 gallons per day of potable water from St. John Parish Lions water treatment plant (withdrawals water from the Mississippi River) and directly withdrawals approximately 700,000 gallons per day of Mississippi River water. The facility has one permitted discharge point directly to the Mississippi River which includes plant waste water, outfall 001; an on-site sanitary sewer treatment unit, outfall 101; and sand filter backwash and treated river water (TRW) clarifier blowdown sump, outfall 002. The total discharge of the site is approximately 400,000 gallons per day.
Shared Water Challenges	Shared water challenges are catchment related issues shared by the site and stakeholders. A prioritized list of shared water challenges was provided and included flooding, disruption to municipal water and Mississippi River Water Quality. The site engages with stakeholders to address challenges through participation with Mt Airy, Garyville, Reserve, Edgard, Wallace Community Advisory Panel. (CAP, established in 1996).

Audit Attendees

Participant/Title	Opening Meeting	Document Review	Site Inspection	Closing Meeting
James Cartwright/SHE	X	X	X	X
James Kulesa/Plant Manager	X		X	
Rodney Bourgeois/Sr SHE		X	X	
AJ St.Pierre/Water Treatment Operator			X	
Document review was achieved through examination of the Ecolab OneNote for the Site and additional documents.				

Summary of Findings

Step	Major	Minor	Observations	Total Points
1. Gather & Understand	0	0	3	NA
2. Commit & Plan	0	0	0	NA
3. Implement	0	0	0	NA
4. Evaluate	0	0	0	NA
5. Communicate & Disclose	0	0	0	NA
TOTAL	0	0	3	NA

Findings and Corrective Action

Citation	Finding	Description and Corrective Action
1.2.2	OBS 2019.01	The current and potential influence was identical for each stakeholder, review whether this is the case for the stakeholder's dependent on site or catchment situations. No Corrective Action is Required.
1.3.2	OBS 2019.02	The site-water balance could be presented similar to the description provided in the Guidance. No Corrective Action is Required.
1.5.4	OBS 2019.03	Water quality is a shared water challenge and additional descriptions of seasonal variation should be provided. No Corrective Action is Required.

Certification Decision

Auditor's recommendation for initial, continued or re-certification based on compliance with requirements:	X	Recommended
		Not Recommended
Level of Certification recommended	X	AWS Core
		AWS Gold
		AWS Platinum
SCS Certification Decision:	X	Approved
		Denied
Certification Decision by:		 Nicole Munoz, December 19, 2019
Technical Review by:		 Nicole Munoz, December 19, 2019
Date of Decision:		December 19, 2019
Surveillance Schedule:		Next audit is scheduled for: November to December 2020

STEP 1: Gather and Understand							
Level	**Criteria**	**Indicator**	**Yes**	**No**	**NA**	**Objective Evidence/Finding**	**Points**
Core	1.1 Gather information to define the site's physical scope for water stewardship purposes, including: its operational boundaries; the water sources from which the site draws; the locations to which the site returns its discharges; and the catchment(s) that the site affect(s) and upon which it is reliant	1.1.1 The physical scope of the site shall be ***mapped***, considering the regulatory landscape and zone of stakeholder interests, including: - Site boundaries; - Water-related infrastructure, including piping network, owned or managed by the site or its parent organization; - Any water sources providing water to the site that are owned or managed by the site or its parent organization; - Water service provider (if applicable) and its ultimate water source; - Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies; - Catchment(s) that the site affect(s) and is reliant upon for water.	Yes			The physical scope of the site was mapped on multiple figures providing information required by Indicator.	
	1.2 Understand relevant stakeholders, their water related challenges, and the site's ability to influence beyond its boundaries.	1.2.1 Stakeholders and their water-related challenges shall be ***identified***. The process used for stakeholder identification shall be ***identified***. This process shall: - Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people; - Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies; - Provide evidence of stakeholder consultation on water-related interests and challenges; - Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups; - Identify the degree of stakeholder engagement based on their level of interest and influence.	Yes			The stakeholders and water-related challenges were identified. The AWS Stakeholder Guidance was referenced, and the stakeholder identified process was identified. The information provided was consistent with indicator requirements.	

		1.2.2 Current and potential degree of influence between site and stakeholder shall be ***identified***, within the catchment and considering the site's ultimate water source and ultimate receiving water body for wastewater.	Yes			The current and potential influence was provided consistent with indicator requirements. **OBS 2019.01 was issued**. The current and potential influence was identical for each stakeholder, review whether this is the case for the stakeholder's dependent on site or catchment situations.	
	1.3 Gather water-related data for the site, including: water balance; water quality, Important Water-Related Areas, water governance, WASH; water-related costs, revenues, and shared value creation.	1.3.1 Existing water-related incident response plans shall be ***identified***.	Yes			Multiple plans were provided for review consist with indicator requirement.	
		1.3.2 Site water balance, including inflows, losses, storage, and outflows shall be ***identified*** and ***mapped***.	Yes			The site-water balance was identified and mapped with multiple flow diagrams and supported with real time flow data. **OBS 2019.02 was issued**. The site-water balance could be more in line with the description provided in the Guidance..	
		1.3.3 Site water balance, inflows, losses, storage, and outflows, including indication of annual variance in water usage rates, shall be ***quantified***. Where there is a water-related challenge that would be a threat to good water balance for people or environment, an indication of annual high and low variances shall be ***quantified***.	Yes			The site water balance was quantified and shown in several diagrams. The site installed over 30 flow meters to provide real-time measurement of the water balance.	

						Water quantity was not identified as a water-related challenge.	
		1.3.4 Water quality of the site's water source(s), provided waters, effluent and receiving water bodies shall be ***quantified***. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be ***quantified***.	Yes			Water quality information was provided for City Water, Mississippi River water and water quality for the facility. Water quality was not identified as a water-related challenge.	
		1.3.5 Potential sources of pollution shall be ***identified*** and if applicable, ***mapped***, including chemicals used or stored on site.	Yes			The chemicals used and stored on-site are tracked with locations are provided on a diagram.	
		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			There were no on-site IWRAs. Wetlands are present on site and categorized description provided as not natural/protected.	
		1.3.7 Annual water-related costs, revenues, and a description or quantification of the social, cultural, environmental, or economic water-related value generated by the site shall be ***identified*** and used to inform the evaluation of the plan in 4.1.2.	Yes			Costs, revenues and value (Restore the Earth Ecometrics) were identified.	
		1.3.8 Levels of access and adequacy of WASH at the site shall be ***identified.***	Yes			Laboratories, water fountains, sinks, eyewash stations and showers were identified and observed at the site.	
	1.4 Gather data on the site's indirect water use, including: its primary inputs; the water use embedded in the production of those primary inputs the status of the waters at the origin of the inputs (where they can be ***identified***); and water used in out-sourced water-related services.	1.4.1 The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be ***identified.***	Yes			Information on primary inputs was identified using raw material files and procurement information.	

		1.4.2 The embedded water use of outsourced services shall be *identified*, and where those services originate within the site's catchment, *quantified*.	Yes			Outsourced indirect water use was identified. There was not outsourced water use identified in the catchment.	
	Advanced Indicator	1.4.3 **Advanced Indicator** The embedded water use of primary inputs in catchment(s) of origin shall be ***quantified***.					NA
	1.5 Gather water-related data for the catchment, including: water governance, water balance, water quality, Important Water-Related Areas, infrastructure, and WASH	1.5.1 Water governance initiatives shall be ***identified***, including catchment plan(s), water-related public policies, major publicly-led initiatives under way, and relevant goals to help inform site of possible opportunities for water stewardship collective action.	Yes			Multiple permits, Louisiana Department of Environmental Quality program requirements and stormwater management plans were provided.	
		1.5.2 Applicable water-related legal and regulatory requirements shall be ***identified***, including legally-defined and/or stakeholder-verified customary water rights.	Yes			Multiple wastewater permits and discharge criteria were provided.	
		1.5.3 The catchment water-balance, and where applicable, scarcity, shall be ***quantified***, including indication of annual, and where appropriate, seasonal, variance.	Yes			Water balance was quantified with information with Mississippi River upstream and downstream flow information, and precipitation.	
		1.5.4 Water quality, including physical, chemical, and biological status, of the catchment shall be ***identified***, and where possible, ***quantified***. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be ***identified***.	Yes			Water quality data included EPA water designation and status, and Lower Mississippi River, St. John Parish data was provided. **OBS 2019.03 was issued.** Water quality is a shared water challenge and additional descriptions of seasonal variation should be provided.	
		1.5.5 Important Water-Related Areas shall be identified, and where appropriate, ***mapped***, and their status assessed including any threats to people or the natural environment, using scientific information and through stakeholder engagement.	Yes			IWRA's mostly consisting of wetlands, swamps and canals (agriculture) were identified, mapped, and described.	

		1.5.6 Existing and planned water-related infrastructure shall be ***identified***, including condition and potential exposure to extreme events.	Yes			Infrastructure reports from St. John Parish and State Louisiana were provided with description.	
		1.5.7 The adequacy of available WASH services within the catchment shall be ***identified***.	Yes			Data on WASH availability in St. John Parish was provided.	
	Advanced Indicator	**1.5.8 Advanced Indicator** Efforts by the site to support and undertake catchment level water-related data collection shall be identified.					NA
	Advanced Indicator	**1.5.9 Advanced Indicator** The adequacy of WASH provision within the catchments of origin of primary inputs shall be identified.					NA
	1.6 Understand current and future shared water challenges in the catchment, by linking the water challenges ***identified*** by stakeholders with the site's water challenges.	1.6.1 Shared water challenges shall be *identified* and prioritized from the information gathered.	Yes			Risk mapping, engagement and planning lead to shared water challenges including water quality, water infrastructure, and ecosystem health. .	
		1.6.2 Initiatives to address shared water challenges shall be ***identified***.	Yes			Both public and private lead initiatives were described including Site and Stakeholder Relevance.	
	Advanced Indicator	**1.6.3 Advanced Indicator** Future water issues shall be identified, including anticipated impacts and trends					NA
	Advanced Indicator	**1.6.4 Advanced Indicator** Potential water-related social impacts from the site shall be identified, resulting in a social impact assessment with a particular focus on water.					NA
	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	1.7.1 Water risks faced by the site shall be ***identified***, and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.	Yes			Water risks/challenges including flooding, disruption to municipal water and Mississippi River Water Quality was identified, ranked with site with and business impacts and costs identified.	

	management plans and/or the issues and future risk trends ***identified*** in 1.6.						
		1.7.2 Water-related opportunities shall be ***identified***, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.	Yes			Water-related opportunities were identified, described and monetizes for savings.	
	1.8 Understand best practice towards achieving AWS outcomes: Determining sectoral best practices having a local/catchment, regional, or national relevance.	1.8.1 Relevant catchment best practice for water governance shall be *identified*.	Yes			Permit compliance and stakeholder consultation were described.	
		1.8.2 Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be ***identified***.	Yes			Consultation with relevant neighbors through CAP (industrial), trade groups and site feasibility studies were described.	
		1.8.3 Relevant sector and/or catchment best practice for water quality shall be ***identified***, including rationale for data source.	Yes			Permit compliance was described in addition, the Site discharges water with lower levels of several contaminants than in-coming river water. .	
		1.8.4 Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be ***identified***.	Yes			There are no on-site IWRAs identified. Catchment best practice was described.	
		1.8.5 Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be ***identified***.	Yes			There is adequate WASH in the catchment.	
STEP 2: Commit and Plan							
Level	**Criteria**	**Indicator**	**Yes**	**No**	**NA**	**Objective Evidence**	**Points**
	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	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	Yes			A signed statement was provided containing indicator requirements.	

	a commitment to water stewardship, the implementation of the AWS Standard and achieving its five outcomes, and the allocation of required resources.	- 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.					
	Advanced Indicator	**2.1.2 Advanced Indicator** A statement that explicitly covers all requirements set out in Indicator 2.1.1 and is signed by the organization's senior-most executive or governance body and publicly disclosed shall be identified.					NA
	2.2 Develop and document a process to achieve and maintain legal and regulatory compliance.	2.2.1 The system to maintain compliance obligations for water and wastewater management shall be ***identified***, including: - Identification of responsible persons/positions within facility organizational structure - Process for submissions to regulatory agencies.	Yes			The site maintains management plans and describes responsibilities.	
	2.3 Create a water stewardship strategy and plan including addressing risks (to and from the site), shared catchment water challenges, and opportunities.	2.3.1 A water stewardship strategy shall be identified that defines the overarching mission, vision, and goals of the organization towards good water stewardship in line with this AWS Standard.	Yes			The site water stewardship strategy including goals was provided for review.	
		2.3.2 A water stewardship plan shall be *identified*, including for each target: - How it will be measured and monitored - Actions to achieve and maintain (or exceed) it - Planned timeframes to achieve it - Financial budgets allocated for actions - Positions of persons responsible for actions and achieving targets - Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.	Yes			A water stewardship plan was provided containing indicator requirements.	
	Advanced Indicator	**2.3.3 Advanced Indicator** The site's partnership/water stewardship activities with other sites within the same catchment (which may or					NA

		may not be under the same organizational ownership) shall be *identified* and described.					
	Advanced Indicator	**2.3.4 Advanced Indicator** The site's partnership/water stewardship activities with other sites in another catchment(s) (either under same corporate structure or with another corporate site) shall be ***identified***.					NA
	Advanced Indicator	**2.3.5 Advanced Indicator** Stakeholder consensus shall be sought on the site's water stewardship plan. Consensus should be achieved on at least one target. A list of targets that have consensus and in which stakeholders are involved shall be ***identified***.					NA
	2.4 Demonstrate the site's responsiveness and resilience to respond to water risks	2.4.1 A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be ***identified***.	Yes			A plan for risk mitigation was provided containing indicator requirements.	NA
	Advanced Indicator	**2.4.2 Advanced Indicator** A plan to mitigate or adapt to water risks associated with climate change projections developed in co-ordination with relevant public-sector and infrastructure agencies shall be ***identified***.					NA
STEP 3: Implement							
Level	**Criteria**	**Indicator**	**Yes**	**No**	**NA**	**Objective Evidence**	**Points**
	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			Good catchment governance is supported through community and stakeholder engagement, membership with catchment-based organization and engagement with NGOs.	
		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			Site water use, quality, Parish water sources and near-by indigenous populations were described as measures.	
	Advanced Indicator	**3.1.3 Advanced Indicator** Evidence of improvements in water governance capacity from a site-selected baseline date shall be *identified*.					NA
	Advanced Indicator	**3.1.4 Advanced Indicator**					NA

		Evidence from a representative range of stakeholders showing consensus that the site is seen as positively contributing to the good water governance of the catchment shall be *identified*.					
	3.2 Implement system to comply with water-related legal and regulatory requirements and respect water rights.	3.2.1 A process to verify full legal and regulatory compliance shall be ***implemented***.	Yes			Documentation, permitting requirements and data, with responsibilities was provided.	
		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			Water rights are not a legal requirement for the plant. Intake water from the Mississippi River in not required to be permitted.	
	3.3 Implement plan to achieve site water balance targets.	3.3.1 Status of progress towards meeting water balance targets set in the water stewardship plan shall be ***identified***.	Yes			The site has established a reduction goal and reports monthly on the status.	
		3.3.2 Where water scarcity is a shared water challenge, annual targets to improve the site's water use efficiency, or if practical and applicable, reduce volumetric total use shall be ***implemented***.	Yes			Water scarcity is not a shared water-challenge.	
		3.3.3 Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be ***identified***.	Yes			There is no re-allocation required in the catchment.	
	Advanced Indicator	**3.3.4 Advanced Indicator** The total volume of water voluntarily re-allocated (from site water savings) for social, cultural and environmental needs shall be ***quantified***.					NA
	3.4 Implement plan to achieve site water quality targets.	3.4.1 Status of progress towards meeting water quality targets set in the water stewardship plan shall be ***identified***.	Yes			Status is measured through permit compliance and monitoring with no permit exceedances in 2019.	
		3.4.2 Where water quality is a shared water challenge, continual improvement to achieve best practice for the site's effluent shall be identified and where applicable, ***quantified***.	Yes			Water quality is a shared water challenge with eutrophication observed int eh Gulf of Mexico, monitored BOD levels have been below discharge limitation in 2018/2019.	

	3.5 Implement plan to maintain or improve the site's and/or catchment's Important Water-Related Areas.	3.5.1 Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be ***implemented***.	Yes			There are no on-site IWRAs. The site protects and enhances catchment IWRAs.	
	Advanced Indicator	**3.5.2 Advanced Indicator** Evidence of completed restoration of non-functioning or severely degraded Important Water-Related Areas including where appropriate cultural values from a site-selected baseline date shall be ***identified***. Restored areas may be outside of the site, but within the catchment.					NA
	Advanced Indicator	**3.5.3 Advanced Indicator** Evidence from a representative range of stakeholders showing consensus that the site is seen as positively contributing to the healthy status of Important Water-Related Areas in the catchment shall be ***identified***.					NA
	3.6 Implement plan to provide access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers at all premises under the site's control.	3.6.1 Evidence of the site's provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers onsite shall be ***identified*** and where applicable, ***quantified***.	Yes			Evidence for on-site WASH containing indicator requirements was described.	
		3.6.2 Evidence that the site is not impinging on the human right to safe water and sanitation of communities through their operations, and that traditional access rights for Indigenous and local communities are being respected, and that remedial actions are in place where this is not the case, and that these are effective.	Yes			Evidence for on-site WASH containing indicator requirements was described.	
	Advanced Indicator	**3.6.3 Advanced Indicator** A list of actions taken to support the provision to stakeholders in the catchment of access to safe drinking water, adequate sanitation and hygiene awareness shall be ***identified***.					NA
		3.6.4 Advanced Indicator In catchments where WASH has been ***identified*** as a shared water challenge, evidence of efforts taken with relevant public-sector agencies to share information and to advocate for change to address access to safe drinking water and sanitation shall be ***identified***.					NA

	3.7 Implement plan to maintain or improve indirect water use within the catchment.	3.7.1 Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be ***quantified***.	Yes			The site has no indirect water use within the catchment. The site is working with vendors to reduce indirect water use outside of 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.***	Yes			The site has no indirect water use within the catchment. The site is working with vendors to reduce indirect water use outside of the catchment.	
	Advanced Indicator	**3.7.3 Advanced Indicator** Actions taken to address water related risks and challenges related to indirect water use outside the catchment shall be documented and evaluated.					NA
	3.8 Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have.	3.8.1 Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be ***identified.***	Yes			Engagement with local Parish was provided with information on levee system and potable water infrastructure.	
	3.9 Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.	3.9.1 Actions towards achieving best practice, related to water governance, as applicable, shall be ***implemented***.	Yes			Best practice actions implemented toward water governance was described.	
		3.9.2 Actions towards achieving best practice, related to targets in terms of water balance shall be ***implemented***.	Yes			Best practice actions implemented toward water balance was described.	
		3.9.3 Actions towards achieving best practice, related to targets in terms of water quality shall be ***implemented***.	Yes			Best practice actions implemented toward water quality was described.	
		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			Best practice actions implemented toward IWRAs was described.	

		3.9.5 Actions towards achieving best practice related to targets in terms of WASH shall be ***implemented***.	Yes			Best practice actions implemented toward WASH was described.	
	Advanced Indicator	**3.9.6 Advanced Indicator** Achievement of identified best practice related to targets in terms of good water governance shall be ***quantified***.					NA
	Advanced Indicator	**3.9.7 Advanced Indicator** Achievement of identified best practice related to targets in terms of sustainable water balance shall be ***quantified***.					NA
	Advanced Indicator	**3.9.8 Advanced Indicator** Achievement of identified best practices related to targets in terms of water quality shall be ***quantified***.					NA
	Advanced Indicator	**3.9.9 Advanced Indicator** Achievement of identified best practices related to targets in terms of the site's maintenance of Important Water-Related Areas have been ***implemented***.					NA
	Advanced Indicator	**3.9.10 Advanced Indicator** Achievement of identified best practice related to targets in terms of WASH shall be ***quantified***.					NA
	Advanced Indicator	**3.9.11 Advanced Indicator** A list of efforts to spread best practices shall be ***identified***.					NA
	Advanced Indicator	**3.9.12 Advanced Indicator** A list of collective action efforts, including the organizations involved, positions of responsible persons of other entities involved, and a description of the role played by the site shall be ***identified***.					NA
	Advanced Indicator	**3.9.13 Advanced Indicator** Evidence of the ***quantified*** improvement that has resulted from the collective action relative to a site-selected baseline date shall be ***identified*** and evidence from an appropriate range of stakeholders linked to the collective action (including both those implementing the action and those affected by the action) that the site is materially and positively contributing to the achievement of the collective action shall be ***identified***.					NA

STEP 4: Evaluate							
Level	**Criteria**	**Indicator**	**Yes**	**No**	**NA**	**Objective Evidence/Findings**	**Points**
	4.1 Evaluate the site's performance in light of its actions and targets from its water stewardship plan and demonstrate its contribution to achieving water stewardship outcomes.	4.1.1 Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be ***evaluated***	Yes			Performance was evaluated siting permitting and water reduction goals.	
		4.1.2 Value creation resulting from the water stewardship plan shall be ***evaluated.***	Yes			Value creation was achieved through the EcoMetrics program.	
		4.1.3 The shared value benefits in the catchment shall be identified and where applicable, ***quantified.***	Yes			EcoMetrics accounting predictions are provided for the site and Lower Mississippi River Basin.	
		4.1.4 Advanced Indicator A governance or executive-level review, including discussion of shared water challenges, water risks, and opportunities, and any water-related cost savings or benefits realized, and any relevant incidents shall be ***identified***.					NA
	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			Spill plans reporting procedures, monitoring and reporting requirements are provided. The Zn permit exceedance reported in 2018 was reported to the state with remedial actions.	
	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			Documentation on stakeholder engagement was provided.	

	Advanced Indicator	**4.3.2 Advanced Indicator** The site's efforts to address shared water challenges shall be ***evaluated*** by stakeholders. This shall include stakeholder reviewing of the site's efforts across all five outcome areas, and their suggestions for continual improvement.					NA
	4.4 Evaluate and update the site's water stewardship plan, incorporating the information obtained from the evaluation process in the context of continual improvement.	4.4.1 The site's water stewardship plan shall be modified and adapted to incorporate any relevant information and lessons learned from the evaluations in this step and these changes shall be ***identified.***	Yes			The site has described the plan as a "working document" which continues to be amended during the process.	
STEP 5: Communicate and Disclose							
Level	**Criteria**	**Indicator**	**Yes**	**No**	**NA**	**Objective Evidence/Findings**	**Points**
	5.1 Disclose water-related internal governance of the site's management, including the positions of those accountable for legal compliance with water-related local laws and regulations.	5.1.1 The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be ***disclosed***.	Yes			The site case study is posted on the Ecolab website.	
	5.2 Communicate the water stewardship plan with relevant stakeholders.	5.2.1 The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.	Yes			The site case study is posted on the Ecolab website.	
	5.3 Disclose annual site water stewardship summary, including the relevant information about the site's annual water stewardship performance and results against the site's targets.	5.3.1 A summary of the site's water stewardship performance, including quantified performance against targets, shall be ***disclosed*** annually at a minimum.	Yes			The site case study is posted on the Ecolab website.	
	Advanced Indicator	**5.3.2 Advanced Indicator** The site's efforts to implement the AWS Standard shall be disclosed in the organization's annual report.					NA
	Advanced Indicator	**5.3.3 Advanced Indicator**					NA

		Benefits to the site and stakeholders from implementation of the AWS Standard shall be ***quantified*** in the organization's annual report.					
	5.4 Disclose efforts to collectively address shared water challenges, including: associated efforts to address the challenges; engagement with stakeholders; and co-ordination with public-sector agencies.	5.4.1 The site's shared water-related challenges and efforts made to address these challenges shall be ***disclosed***.	Yes			The site case study is posted on the Ecolab website. Stakeholder engagement, public sector initiatives and programs with NGOs were described for previous indicators.	
		5.4.2 Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be ***identified.***	Yes			The site case study is posted on the Ecolab website. Stakeholder engagement, public sector initiatives and programs with NGOs were described for previous indicators.	
	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			Site water-related compliance was reviewed with information provided. The ECHO EPA Site confirmed a CWA Violation for Zinc in 2018. As zinc in not used at the facility, the source was off-spec material from a supplier.	
		5.5.2 Necessary corrective actions taken by the site to prevent future occurrences shall be ***disclosed*** if applicable.	Yes			The site case study is posted on the Ecolab website providing indicator requirements.	
		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			The site case study is posted on the Ecolab website providing indicator requirements.	