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Client Name: Primo Water North America – Diamond Spring, PA

AWS Registration Number: AWS-000278

Client Representatives: Lou Vittorio - Director Water Resources
Travis Thornton - VP Water Resources

Audit Team: Isabella Polenghi-Gross - Lead Auditor
Shana Golden - Team Auditor

Audit Date: October 15, 2020

Stakeholder Notification: 9/4/2020 - AWS, SCS, Local Stakeholder Clay Township

Site Location: Stevens, PA 17578

Report Date: November 20, 2020

Standard: AWS International Water Stewardship Standard - Version 2.0, March 22, 2019

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

Level of Certification	X Core	☐ Gold	☐ Platinum

Site Information

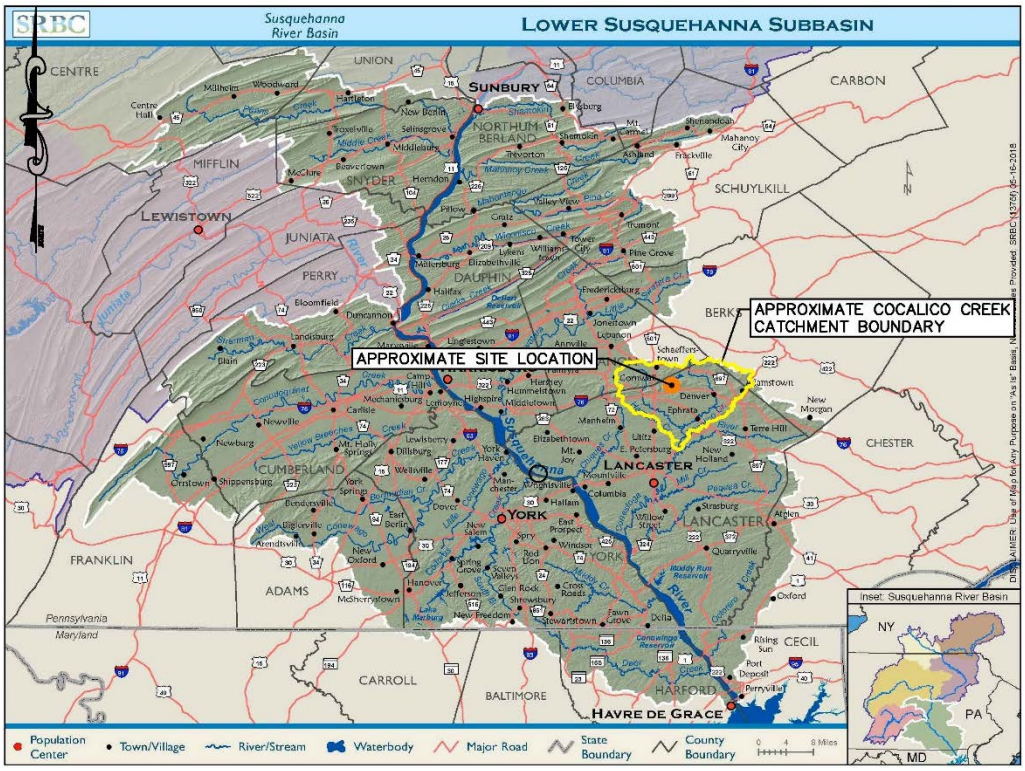
Site Description

The Diamond Spring site is a spring water resource site located north of the Village of Hopeland in Clay Township, Lancaster County, PA. The site is a 30-acre parcel that is accessed by private driveway and is surrounded by mostly undeveloped forestland with state conservation areas to the north, limited residential areas to the north and east, and low density agriculture to the west and south.

The site is owned and used exclusively by DS Services of America, Inc. doing business as (dba) Primo Water North America (Primo Water) for water bottling operations at their Crystal Springs Brownstown, PA manufacturing facility. Primo Water personnel from the Brownstown facility maintain and operate the Diamond Spring Site. Spring water from this site is transported by tanker to the Primo Water Crystal Springs® plant in Brownstown, PA. From there, water is delivered to home and office (HOD) customers via route trucks.

Catchment Description

The site is situated along an unnamed tributary to Middle Creek in the Cocalico Creek Watershed within the Susquehanna River Basin. The Cocalico Creek Catchment (Hydrologic Unit Code 0205030609) comprises 140 square miles, of which 110 square miles are in Lancaster County, where the site is situated. The site is located in the north central portion of the catchment while the Crystal Springs Bottling plant, that receives water from the site, is located in Brownstown, the southern portion of the catchment.



The Cocalico Creek Catchment is located within the Susquehanna River Basin

Shared Water Challenges

Shared water challenges are catchment water-related issues shared by the site and stakeholders. Stakeholder engagement was documented, and auditor interviews confirmed the topics of engagement. Primo Water North America has identified and prioritized a list of shared water challenges addressing the outcomes. Shared water challenges include sufficient water availability (over extraction and drought), water quality (human consumption), natural disaster/emergency, and public/stakeholder education. The Water Stewardship Plan includes details to address the identified challenges and outcomes including targets, actions, timelines, and metrics.

Audit Attendees

Participant/Title	Opening Meeting	Document Review	Site Inspection	Closing Meeting
Director Water Resources - Lou Vittorio	X	X	X	X
VP Water Resources - Travis Thornton	X	X	X	X
QC Manager- Justin Newcomer	X	X	X	X
VP Gov. Affairs and ESG Programs - Shayron Barnes-Selby	X	X	X	X
Earthres Consultant Hydrogeologist – Matt Weikel	X		X	X
Earthres Consultant Project Manager – Shae Porter	X		X	X
Earthres Consultant Sr. Project Manager – Scott Campbell	X		X	X
SCS Lead Auditor - Isabella Polenghi-Gross	X	X	X	X
SCS Team Auditor - Shana Golden	X	X	X	X

Supporting Documentation:
The Diamond Spring site provided documentation using OneNote to support conformity with the AWS Standard v2.0 including: Stakeholder Communication Summary, Stakeholder Outreach Presentation, Catchment Water Balance, and Water Stewardship Plan. The Water Stewardship Plan is a working document which is continually updated with information regarding how shared water challenges are being addressed including progress, performance evaluation, and stakeholder feedback. Other supporting documentation were also provided as evidence.

Note: *This project is a certification pilot project for a spring water site.*

Summary of Findings

Step	Major	Minor	Observations	Advanced Criteria Total Points
1. Gather & Understand	0	0	8	
2. Commit & Plan	0	0	0	
3. Implement	0	0	0	
4. Evaluate	0	0	0	
5. Communicate & Disclose	0	0	0	
TOTAL	0	0	8	n/a

Audit Non-conformities and Observations

Non-Conformity (Major or Minor) or Observation	Citation	Criteria/ Indicator	Due Date	Detail and Corrective Action
Observation	OBS 2020.01	1.3.3	NR	It would be of value to include a specific water efficiency parameter (e.g. water usage ratio), to establish a baseline and/or future goal against which to measure improvements or changes going forward.
				Response: A water efficiency parameter was added that accounts for total water removed from the site vs. total pumped at the site.
Observation	OBS 2020.02	1.3.3	NR	Monthly site water balance data are only available for the last six months. In order to provide an indication of seasonal variations in water usage rates going forward, the site acknowledges that they should continue to update the site water balance with monthly values going forward.
				Response: It is noted that the water balance data will be available going forward for continued assessment of site inflows, losses, storage and outflow via the provided spreadsheet.
Observation	OBS 2020.03	1.3.4	NR	It would be beneficial to include a comparison of the spring water sampling data with the appropriate screening criteria.
				Response: The tables and provided data have been updated to provide a comparison to the appropriate standards of quality (SOQ).
Observation	OBS 2020.08	1.3.7	NR	A description of the economic value generated by the site would be beneficial in explaining the site water related revenues, even if indirect. References to publicly available reports about Primo Water annual revenues could be helpful too.
				Response: As the Diamond Spring site is owned, there is no revenue associated with the site, only costs for operation. However, if the site was unusable, Primo Water would need to purchase water from a nearby non-owned source. Indirect revenue from the site could be considered as money saved by not purchasing spring water. Average site water use indicates that annual indirect revenue or savings are realized by using the Diamond Spring site.

				The International Bottled Water Association tabulates the economic value generated by the bottled water industry for each congressional district across the United States (using data current to 2019). Based upon this data, the economic value generated in the area of the Diamond Spring is publicly provided and readily available online.
Observation	OBS 2020.04	1.5.3	NR	Groundwater discharge to Cocalico Creek and tributaries was calculated using the rearranged water balance equation. It would be more accurate to estimate the groundwater discharge to Cocalico Creek using available actual stream flow values.
				Response: The provided water budget (specifically groundwater recharge) was verified using the USGS StreamStats tool for the Cocalico Creek Catchment.
Observation	OBS 2020.05	1.5.3	NR	In order to provide an indication of seasonal variations of the water usage rates in the catchment, publicly available monthly or seasonal data would be more appropriate.
				Response: Seasonal data was assessed to determine annual rates for the years provided. The annual data included drought (2016 and 2017), excessive rainfall conditions (2018), and average conditions (2019). Publicly available seasonal catchment data will be assessed and incorporated in an ongoing manner.
Observation	OBS 2020.06	1.5.5	NR	It would be useful to add the water related risks associated with each IWRA to the existing table provided.
				Response: Water-related risks were added to the IWRA Table in Indicator 1.5.5.
Observation	OBS 2020.07	1.5.6	NR	It would be useful to include the infrastructure age, condition, and percentage of catchment population served in the summary provided for all infrastructure listed.
				Response: The age, condition, and percentage of catchment population served was researched and added to the Indicator.

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, November 20, 2020
Technical Review by:		 Nicole Munoz, November 20, 2020
Date of Decision:		
Surveillance Schedule:		Next audit is scheduled for: October/November, 2021

AWS International Water Stewardship Standard, Version 2.0, March 22, 2019

Surveillance audits shall cover at a minimum those requirements highlighted in light green.

STEP 1: Gather and Understand

Criteria	Indicator	Yes	No	NA	Objective Evidence/Finding	Points
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 Diamond Spring site is located north of the Village of Hopeland, in Clay Township, Lancaster County, Pennsylvania. It includes two springs, three associated boreholes, a small building, and an unnamed tributary eventually discharging to Cocalico Creek. The site occupies a 30-acre parcel and is surrounded by mostly undeveloped forestland with state conservation areas to the north, limited residential areas to the north and east, and low-density agriculture to the west and south. Water at the Site is extracted from three boreholes and is transported via underground pipelines to the treatment building and silo and from there to the tanker loading port and/or surface discharge area. Spring water from this Site is transported by tankers to the Primo Water's Crystal Springs® plant in Brownstown, PA, approximately 11 miles away. The site boundaries and water-related infrastructure were mapped including: the two water springs, the three boreholes, the underground piping network, the water treatment building, the water storage silo, the tanker loading port, the swales from the Silo discharge, the surface discharge area, and the rain gauge. Maps also show the Spring Recharge Boundary. There are no water utilities (water or waste water service providers) that serve the site or immediately surrounding areas. Surrounding farms and residences use individual wells for supply. The site is serviced by a portable toilet. Surface water runoff at the site generally flows downslope from the North and West to the Southeast, draining into the unnamed tributary on the east side of the site. Water from Spring 1 flows to the Unnamed Tributary to the east. Water from the Spring 2 flows through a culvert under the driveway, then runs through a swale running parallel to the eastern site border. The Diamond Spring site, situated along an unnamed tributary to Middle Creek, is located in the north central portion of Cocalico Creek Watershed within the Susquehanna River Basin. The areas are well defined and mapped.	
1.2 Understand relevant stakeholders, their water related challenges, and the	1.2.1 Stakeholders and their water-related challenges shall be ***identified***. The process	Yes			A list of stakeholders and their water-related challenges was provided and reviewed. The list includes identification of local population, government organizations, non-governmental organizations, regulatory agencies,	

site's ability to influence beyond its boundaries.	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.				residential neighbors, and owners, employees, and shareholders. Stakeholders identified include Clay Township, PA Dept. of Environmental Protection, Susquehanna River Basin Commission, Lancaster County Watershed Association, local residents, and other agencies. The communication log included individuals and organizations consulted with since the early 2000s, and AWS-specific engagement within the last year, notes on conversations about water-related interests/challenges, follow-up and feedback. A brief description of the process for stakeholder identification, ranking and degree of interest and influence, was provided during the audit, based on level of their involvement, response and sphere of influence.	
	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			Stakeholders are related to the site's catchment. Stakeholders' ability to influence or be influenced was discussed. Both the degrees of interest and influence for each stakeholder were determined (low, medium, or high) based on the type of stakeholder and level of engagement (both historical and current).	
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			The Water Stewardship Plan, Water-Related Incident Response Plan, Drought Contingency Plan, Middle Creek Dam Emergency Action Plan, and Site Spill Plans were reviewed.	
	1.3.2 Site water balance, including inflows, losses, storage, and outflows shall be ***identified*** and ***mapped***.	Yes			Water at the Site is extracted from three boreholes DW-4, DW-5 and DW-6 and is transported via underground pipelines to the on-site bulk water loading station for treatment and storage in a 30,000-gallon water storage silo. The pumping rate and water level in each borehole is monitored continuously with separate level sensors and flow meters, respectively. Water levels in the silo are monitored with sensors. The PLC/Computer system also controls tanker truck loading. All water loaded to the tankers is metered and the data is stored on the onsite computer. Once loaded the water is transported to the Crystal Springs bottling plant for further processing and packaging. The main on-site water balance components were identified and listed in schematic representations.	

	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***.	OBS			The site water balance was summarized in two ways: 1) hydrogeologically as it relates to the spring basin and 2) as it relates to site water operations. The spring basin hydrogeological water balance table shows the annual values of inputs and outputs of water at the site (including precip, ET, runoff, site operations, domestic well use). The hydrogeological spring basin water balance indicates that the site maintains a sustainable water balance (i.e.: there is sufficient water available for site use). The site water balance, is provided in a table which accounts for water pumped from the boreholes (inflows), used at the site (storage and losses), and transported offsite (outflows). The data, collected from site meters installed as part of the water stewardship plan, were quantified on a monthly basis and are only available for the most recent 6 months (previous records can be extracted from publicly available reports submitted quarterly to SRBC). The site plans to update the table going forward to provide variance and seasonal variations in water usage rates going forward. **OBS 2020.1 was issued**: No site-specific water efficiency parameter (e.g. water usage ratio) was provided to establish a baseline or future goals against which to measure future improvements or changes. **OBS 2020.2 was issued:** Monthly Site water balance data are only available for the last 6 months. To provide an indication of seasonal variations in water usage rates going forward, the site should continue to update the site water balance with monthly values.	
	1.3.4 Water quality of the site's water source(s), provided waters, effluent and receiving water bodies shall be ***quantified***. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be ***quantified***.	OBS			Annual, and quarterly sampling data were summarized and provided for water quality of spring sources. Tests were performed by accredited laboratories on a regular basis and include pH, T, DO, TDS and other constituents (inorganics, organics, nutrients, disinfection byproducts, and radiological). **OBS 2020.3 was issued**: No evidence was provided of the comparison and compliance with the required screening criteria.	
	1.3.5 Potential sources of pollution shall be ***identified*** and if applicable, ***mapped***, including chemicals used or stored on site.	Yes			A list of chemicals used at the site was provided. The cleaning compounds are brought onsite to complete the cleaning process but are not permanently stored onsite. In addition, a vulnerability assessment was conducted of the Diamond Spring site and surrounding areas and nothing	

					was found onsite or nearby that could negatively impacted groundwater quality in the immediate vicinity of the production boreholes.	
	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			Site IWRAs include: the unnamed tributary to Middle Creek, Springs 1 and 2, and the supply boreholes DW-4, DW-5, and DW-6. These site IWRAs were mapped and their status described.	
	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			Site level costs including costs to implement water stewardship actions and site-related costs were provided and reviewed. Reportedly, due to site operation the Diamond Spring site does not directly generate revenue. The shared value generated include: maintaining the site water quality through monitoring and maintenance (the site will continue to be used only as a water resource site), collection of site water quantity data and development of the Water Stewardship Plan. Site level costs including costs to implement water stewardship actions and site-related costs were provided and reviewed. Reportedly, due to site operation, the Diamond Spring site does not directly generate revenue. The shared value generated includes: maintaining the site water quality through monitoring and maintenance (the site will continue to be used only as a water resource site), collection of site water quantity data, and development of the Water Stewardship Plan. **OBS 2020.08 was issued:** A description of the economic value generated by the site, would be beneficial in explaining the site water related revenues, even if indirect. References to publicly available reports about Primo Water annual revenues could be helpful too.	
	1.3.8 Levels of access and adequacy of WASH at the site shall be ***identified.***	Yes			A self-contained portable toilet with built-in sanitizer dispenser is available for use by the water tanker drivers, maintenance staff, and any supervised site visitors. There is no sewer system at the site; the portable toilet is serviced monthly. The site has no potable water but one-gallon HDPE or single serve PET water bottles are stored and available at the site in the load-out building.	
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	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			The Diamond Spring site is a water source site and does not have a typical supply chain associated with its water withdrawal. The only procured goods or services used at the site (cleaning in place products and onsite portable toilet) were estimated to account for less than 5 % of the total weight or cost of the goods generated at the site	
	1.4.2 The embedded water use of outsourced services shall be ***identified***,	Yes			The Diamond Spring site is a water source site and does not have a typical supply chain associated with its water withdrawal. The primary service used by the spring was identified as the tanker trucking. Calculations were	

the inputs (where they can be ***identified***); and water used in out-sourced water-related services.	and where those services originate within the site's catchment, ***quantified***.				provided to show that the diesel fuel capacity used by the tankers for transportation is less than 5% of the total weight of the goods generated.	
	1.4.3 **Advanced Indicator** The embedded water use of primary inputs in catchment(s) of origin shall be ***quantified***.				Advanced criteria not considered for the Site.	
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			A list of significant publicly led initiatives and water-related public policy goals and plans for the catchment were provided at the Federal, State and regional level.	
	1.5.2 Applicable water-related legal and regulatory requirements shall be ***identified***, including legally-defined and/or stakeholder-verified customary water rights.	Yes			A list of current state, local, and regional permits and regulatory requirements was provided, including permits issued by Pennsylvania Department of Environmental Protection (PADEP), Susquehanna River Basin Commission (SRBC), and Clay Township.	
	1.5.3 The catchment water-balance, and where applicable, scarcity, shall be ***quantified***, including indication of annual, and where appropriate, seasonal, variance.	OBS			The catchment water balance with precipitation, groundwater discharge and consumptive use, runoff, evapotranspiration, Diamond Springs withdrawal, and groundwater storage changes annual data were provided for the Cocalico Creek catchment. Primo Water withdrawals are estimated to be less than 2% the groundwater consumptive use. Water quantity information of the Cocalico Creek Catchment was made available through links to the Lancaster County Watershed volunteer monitoring program, which includes monthly data (stream flow, surface velocity, stream width and depth). **OBS 2020.4 was issued:** Groundwater discharge to Cocalico Creek and tributaries was calculated using the rearranged water balance equation. It would be appropriate to estimate the groundwater discharge to Cocalico Creek using available actual stream flow values. **OBS 2020.5 was issued**: In order to provide an indication of seasonal variations of the water usage rates in the catchment, monthly or seasonal data should be used.	
	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	Yes			Water quality information of the Cocalico Creek Catchment was summarized and made available through links to the Lancaster County Watershed volunteer monitoring program, which includes monthly chemical, physical, and biological data that get entered into county-wide and statewide database accessible to the public.	

	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***.					
	1.5.5 Important Water-Related Areas shall be ***identified,*** and where appropriate, ***mapped***, and their status assessed including any threats to people or the natural environment, using scientific information and through stakeholder engagement.	OBS			IWRAs have been identified and mapped, along with a description of their water-related issues. IWRAs include: Middle Creek Wildlife Area, Blue Lake, Speedwell Forge Lake, and Blainsport Swamp. The status and conditions of these IWRA is based on publicly available documentation. **OBS 2020.6 was issued:** The water related risks associated to each IWRA are not included in the table provided	
	1.5.6 Existing and planned water-related infrastructure shall be ***identified***, including condition and potential exposure to extreme events.	OBS			A list of publicly available reports/data of existing and planned water-related infrastructure in the catchment was provided with a description, exposure scenarios and opportunities. Infrastructure includes drinking water, stormwater, and green infrastructure. **OBS 2020.7 was issued:** The infrastructure age, condition, and the percentage of catchment population served is not included in the summary provided for all the infrastructure listed.	
	1.5.7 The adequacy of available WASH services within the catchment shall be ***identified***.	Yes			The site reported that WASH for the catchment is adequate based on demographic information. Lancaster County census information was provided and reviewed. Primo Water provides water donations during community crisis where access to potable water is diminished or need is high. A donation summary was provided which includes a local orphanage.	
	1.5.8 **Advanced Indicator** Efforts by the site to support and undertake catchment level water-related data collection shall be ***identified***.				Advanced criteria not considered for the Site.	
	1.5.9 **Advanced Indicator** The adequacy of WASH provision within the catchments of origin of primary inputs shall be ***identified***.				Advanced criteria not considered for the Site.	
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			A prioritized list with rationale of shared water challenges was provided and reviewed. rivers and public-sector agency efforts are noted as well. Sufficient Water Availability is prioritized as first, on a scale of 1-4. The site's challenges were prioritized based on stakeholders and corporate and plant operations.	
	1.6.2 Initiatives to address shared water challenges shall be ***identified***.	Yes			A list of initiatives was provided and reviewed including collecting site specific data on water levels, water use and rainfall, collection of water	

					quality data, involvement with local watershed associations, engagement with local agencies, and education outreach.	
	1.6.3 **Advanced Indicator** Future water issues shall be ***identified***, including anticipated impacts and trends				Advanced criteria not considered for the Site.	
	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.				Advanced criteria not considered for the Site.	
1.7 Understand the site's water risks and opportunities: Assess and prioritize the water risks and opportunities affecting the site based upon the status of the site, existing risk management plans and/or the issues and future risk trends ***identified*** in 1.6.	1.7.1 Water risks faced by the site shall be ***identified***, and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.	Yes			A prioritized list of water risks was provided and reviewed. The Aqueduct Web Tool (link provided) was used to assess water risks for the site. Water risks matched shared water challenges. Sufficient Water Availability is prioritized first, on a scale of 1-4.	
	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			A prioritized list of water-related opportunities was provided for the site and match the shared water challenges and water risks lists. First priority is based on water availability and the risk of over extraction and drought. A prioritized list of site engagement opportunities with associated ranking for potential savings and business values was provided and reviewed.	
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			The Diamond Spring site is operated and maintained in accordance with the regulatory requirements of the permits. Multiple best practices toward achieving AWS outcomes at the site and in the catchment have been identified. The following best practices are examples for Indicators 1.8.1 - 1.8.5 Primo Water has identified local plans including Comprehensive Plan for the Water Resources of the Susquehanna River Basin and Cocalico Creek Watershed Restoration Plan as catchment best practice for water governance. Primo Water engages with regulatory agencies to share information, practices and drive water stewardship practices. Primo Water stated they plan to engage with relevant stakeholders to promote improved water stewardship within the catchment.	
	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			Primo Water identified the IBWA Water and Energy Use Benchmarking Study, Nov. 2018. The site plans to track its water use efficiency to monitor potential improvement in the future.	

	1.8.3 Relevant sector and/or catchment best practice for water quality shall be ***identified***, including rationale for data source.	Yes			Primo Water identified sector best practice for water quality is established in the Comprehensive Plan for the Water Resources of the Susquehanna River Basin and in: 25 Pa. Code Chapter §109, 40 CFR Part §141.403, 18 CFR Parts §800 et. al., 21 CFR Part §165.110. The Site's water quality meets all applicable standards for the intended purpose as a spring water source, per SRBC, PADEP and FDA requirements.	
	1.8.4 Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be ***identified***.	Yes			Primo Water identified Comprehensive Plan for the Water Resources of the Susquehanna River Basin and Cocalico Creek Watershed Restoration Plan as catchment best practice for site maintenance of IWRAs. The Diamond Spring site follows practices which focus on maintenance of springs and other IWRAs.	
	1.8.5 Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be ***identified***.	Yes			Primo Water identified the Water Aid Corporate engagement on water supply, sanitation and hygiene: Driving progress on Sustainable Development Goal 6 (SDG6) through supply-chains and voluntary standards. The Site has no full-time employees; therefore, there is no on-site potable water or sewer system. A self-contained portable toilet with hand sanitizer is provided for site visitors, tanker drivers and maintenance staff. Bottled drinking water is available onsite for use when needed. Public areas within the catchment provide potable water and/or sewer systems, where necessary.	
					Advanced Points Step 1	

STEP 2: Commit and Plan

Criteria	Indicator	Yes	No	NA	Objective Evidence/Findings	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 a commitment to water stewardship, the implementation of the AWS Standard and achieving its five outcomes,	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	Yes			A pledge, signed by the Vice-President, Government Affairs and ESG Programs, was reviewed and contains all elements described in this indicator.	

and the allocation of required resources.	- That the site will allocate resources to implement the Standard.					
	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***.				Advanced criteria not considered for the Site.	
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			A list of compliance reporting for water use was provided and reviewed. The list includes reporting process details and responsible staff to ensure maintenance of compliance. There are no wastewater management responsibilities or permits for the site.	
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			A water stewardship strategy statement signed by Vice President, Government Affairs and ESG Programs of the company was provided and reviewed. Primo Water's stated strategy And commitment is aligned with the AWS Standard.	
	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 detailed water stewardship plan was created as part of the AWS process. The plan is broken into objectives, targets, metrics, actions, and outcomes. There are different actions corresponding to different targets, each with their own metrics, costs, responsible person, and criteria. Public Consumer/Education, Water Availability, and Water Quality, are water topics identified in this plan.	
	2.3.3 **Advanced Indicator** The site's partnership/water stewardship activities with other sites within the same catchment (which may or may not be				Advanced criteria not considered for the Site.	

	under the same organizational ownership) shall be ***identified*** and described.					
	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***.				Advanced criteria not considered for the Site.	
	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***.				Advanced criteria not considered for the Site.	
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			In their Water Stewardship Plan, Primo Water identified and described responses and resilience operations to mitigate and adapt to water-related issues and risks identified in the plan. The water stewardship plan actions include annual meetings to disclose site operations and discuss potential water risks identified. These will be assessed and re-evaluated based upon additional stakeholder consultation and feedback.	
	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***.				Advanced criteria not considered for the Site.	
					Advanced Points Step 2	

STEP 3: Implement

Criteria	Indicator	Yes	No	NA	Objective Evidence/Findings	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			The site provided documentation of their efforts to support good catchment governance through participation with regulatory agencies, surrounding land users and watershed groups, and through continuing education on AWS and outcomes toward good water governance.	
	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			Water rights at the site are part of the legal and regulatory requirements of the site permits provided by Susquehanna River Basin Commission, Department of Environmental Protection, and Clay Township. Indigenous people, other than the long-term county residents, have not been identified in the site area. The water rights of all surrounding stakeholders	

					are guaranteed by the site water levels and water usage monitoring frequency which is at a frequency greater than regulatory requirements.	
	3.1.3 **Advanced Indicator** Evidence of improvements in water governance capacity from a site-selected baseline date shall be ***identified*****.**				Advanced criteria not considered for the Site.	
	3.1.4 **Advanced Indicator** 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*****.**				Advanced criteria not considered for the Site.	
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			A list of monitoring and reporting was provided and reviewed. The list includes responsible staff to ensure maintenance of compliance. Permits were provided and reviewed.	
	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 at the site are part of the legal and regulatory requirements of the site permits provided by Susquehanna River Basin Commission, Department of Environmental Protection, and Clay Township. Indigenous people, other than the long-term county residents, have not been identified in the site area. The water rights of all surrounding stakeholders are guaranteed by the site water levels and water usage monitoring frequency (per minute) which is higher than what is specified in the regulatory requirements (daily data collection).	
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 plans to track its water use efficiency to monitor potential improvement in the future. The site also plans to meet its water use reduction targets related to drought stages and emergencies as they relate to potential impacts to surrounding stakeholders. Progress and actions required will be detailed in ongoing communication with the stakeholders as described in the Water Stewardship Plan.	
	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 indicated as a shared water challenge except in times of drought, which is considered to be a low – medium risk. In time of droughts, the site plans to reduce the volumetric total use according to corresponding mandated State conservation restrictions.	
	3.3.3 Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be ***identified***.	Yes			Legal documentation is provided in the SRBC permit for the site, wherein a water use mitigation fee is paid by Primo Water on a quarterly basis. The fees are used by the SRBC to achieve best practice in water governance. The site is otherwise not re-allocating water savings.	

	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***.				Advanced criteria not considered for the Site.	
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			Water quality targets have been defined as maintaining the site as a high-quality potable spring water site. Primo Water plans to keep the site in its current undeveloped state as forest land to ensure water quality. Regular water quality sampling will measure the status of the progress towards meeting this water quality target.	
	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 identified as a shared water challenge in the catchment but not the site, as the site does not discharge effluent. Good Water quality will be continually measured through monitoring and management.	
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			Continual improvement of IWRAs status at the site or in the catchment is identified in the Water Stewardship Plan to be implemented through monitoring, regulatory compliance, community support in water stewardship efforts, such as participating in stream and litter clean-up days with the Cocalico Creek Watershed Association. Additional best practice in the basin are supported by payment of the site's water use mitigation fees to the SRBC, which goes towards catchment improvement projects for IWRAs.	
	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.				Advanced criteria not considered for the Site.	
	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***.				Advanced criteria not considered for the Site.	
3.6 Implement plan to provide access to safe	3.6.1 Evidence of the site's provision of adequate access to safe drinking water,	Yes			A self-contained portable toilet with built-in sanitizer dispenser is available for use by the water tanker drivers, maintenance staff, and any supervised	

drinking water, effective sanitation, and protective hygiene (WASH) for all workers at all premises under the site's control.	effective sanitation, and protective hygiene (WASH) for all workers onsite shall be ***identified*** and where applicable, ***quantified***.				site visitors. There is no sewer system at the site; the portable toilet is serviced monthly. The site has no potable water but one-gallon HDPE or single serve PET water bottles are stored and available at the site in the load-out building.	
	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			Site operations are self-contained on private property and operations are not impacting WASH of the community. Discussions with stakeholders did not indicate a concern that the site was impinging of the human right to WASH in the catchment. The site operates under the permits and in accordance with the water stewardship plan, resulting in no negative impacts on community water supplies from pollution or excessive extraction. Evidence of no impacts is provided in the quarterly and annual site reports as wells as the disclosures provided with stakeholders per the water stewardship plans at annual meetings.	
	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***.				Advanced criteria not considered for the Site.	
	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***.				Advanced criteria not considered for the Site.	
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			Indirect water use at the site is insignificant and therefore no targets have been set.	
	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			Indirect water use at the site is insignificant and therefore no targets have been set.	
	3.7.3 **Advanced Indicator** Actions taken to address water related risks and challenges related to indirect				Advanced criteria not considered for the Site.	

	water use outside the catchment shall be documented and ***evaluated***.					
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			There is no shared water-related infrastructure between the site and local water supplier, the Ephrata Borough Authority. The site engages with the supplier and Clay Township to discuss water stewardship efforts. As part of the water stewardship plan Primo Water will share site data with stakeholders.	
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			The site engages with catchment authorities and other stakeholders to share information, best practices, and drive water stewardship efforts, one example is the Cocalico Creek Watershed Restoration Plan.	
	3.9.2 Actions towards achieving best practice, related to targets in terms of water balance shall be ***implemented***.	Yes			The Diamond Site is a spring site only, bottling activity does not occur at the site. Water loss (as it may affect the water balance) was reportedly insignificant. Best practices identified to maintain good water balance include: comprehensive Plan for the Water Resources of the Susquehanna River Basin; Sustainability of water supply for various uses in the basin; Equitable allocations of water for various uses, including protecting instream flows and the receiving waters of the Chesapeake Bay; Mitigation of drought impacts; Management of water diversions to avoid resource impacts Management of consumptive water use to avoid resource impacts, and, Effective regulatory compliance measures.	
	3.9.3 Actions towards achieving best practice, related to targets in terms of water quality shall be ***implemented***.	Yes			The site exceeds requirements outlined with sampling frequency, and parameters analyzed. Water quality data provided meets and exceeds regulatory requirements. Actions toward best practice will be further implemented through engagement and disclosure to the stakeholders as detailed in the water stewardship plan.	
	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			Relevant sector best practices for maintenance of IWRAs have been identified. These practices are implemented at the site through continued monitoring as outlined in the water stewardship plan. Actions toward best practice in the maintenance of IWRAs will be further implemented through engagement and disclosure to the stakeholders as provided in the water stewardship plan.	
	3.9.5 Actions towards achieving best practice related to targets in terms of WASH shall be ***implemented***.				There is adequate WASH in the catchment.	
	3.9.6 **Advanced Indicator**				Advanced criteria not considered for the Site.	

	Achievement of ***identified*** best practice related to targets in terms of good water governance shall be ***quantified***.					
	3.9.7 **Advanced Indicator** Achievement of ***identified*** best practice related to targets in terms of sustainable water balance shall be ***quantified***.				Advanced criteria not considered for the Site.	
	3.9.8 **Advanced Indicator** Achievement of ***identified*** best practices related to targets in terms of water quality shall be ***quantified***.				Advanced criteria not considered for the Site.	
	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***.				Advanced criteria not considered for the Site.	
	3.9.10 **Advanced Indicator** Achievement of ***identified*** best practice related to targets in terms of WASH shall be ***quantified***.				Advanced criteria not considered for the Site.	
	3.9.11 **Advanced Indicator** A list of efforts to spread best practices shall be ***identified***.				Advanced criteria not considered for the Site.	
	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***.				Advanced criteria not considered for the Site.	
	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				Advanced criteria not considered for the Site.	

	the achievement of the collective action shall be ***identified***.					
					Advanced Points Step 3	
STEP 4: Evaluate						
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			Primo Water has evaluated performance of the Stewardship Plan which is aligned with realizing the AWS Outcomes. Targets established in the Plan are tracked based on multiple actions with measurable metrics, documentation of stakeholder engagement, and evaluation of changes in water risk for each target. The evaluation also includes a cost/benefits review and describes shared value benefits for each target. Further evaluation will be conducted during the surveillance and renewal audits.	
	4.1.2 Value creation resulting from the water stewardship plan shall be ***evaluated.***	Yes			Primo Water has created value related to efforts including site operations which exceed regulatory requirements, disclosing site operations to stakeholders, assisting regulatory agencies and NGOs in water stewardship efforts through direct action, review, and encouragement of water stewardship efforts and education.	
	4.1.3 The shared value benefits in the catchment shall be ***identified*** and where applicable, ***quantified.***	Yes			Value benefits are found in having site operations exceed regulatory requirements, disclosing site operations to the stakeholders, assisting in the regulatory agencies and NGOs in water stewardship effort through direct action, review and encouragement of water stewardship efforts and education. Due to site operations, quantification of these efforts are not currently available.	
	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***.				Advanced criteria not considered for the Site.	
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			A water related emergency for the watershed was identified from Tropical Storm Isaias, when over 7" of rain occurred in the catchment during the week of August 4, 2020 (rainfall is typically 4" per month). The incident did not warrant preventative corrective actions and mitigations at the site and surrounding areas. No site shutdowns occurred that were water related over the course of 2020. Documentation of future emergency events, corrective actions, and mitigations will be provided during surveillance and renewal audits.	

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			Internal and external stakeholder outreach conducted and documented in the communications log. The water stewardship plan and its implementation was communicated and disclosed to stakeholders. The site plans to keep the Stakeholder consultation on the water stewardship performance an ongoing continuous effort.	
	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.				Advanced criteria not considered for the Site.	
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 Water Stewardship Plan is a working document updated annually to reflect on-going actions and completed projects. The Plan tracks targets and actions tied to best practice and AWS outcomes addressed. Performance and stakeholder consultation with respect to the projects are included. Stakeholder consultation has led to sharing projects and adapting to stakeholder projects as requested.	
					Advanced Points Step 4	

STEP 5: Communicate and Disclose

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			Disclosure of the site's water-related internal governance, including positions of those accountable for compliance with water-related laws was provided at a stakeholder presentation. Changes in accountable positions/and personnel will be updated as appropriate in the water stewardship plan.	
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			A communication log and email communication with catchment authorities about the AWS process was provided. The AWS Presentation summarizes the water stewardship plan and outcomes. The Presentation was shared during stakeholder presentations. Communication and outreach confirmed through stakeholder interviews.	
5.3 Disclose annual site water stewardship summary, including the	5.3.1 A summary of the site's water stewardship performance, including	Yes			The stakeholder presentation was reviewed, which included the site's shared water challenges, targets, planned actions, and correspondent AWS outcomes. The AWS Presentation was distributed to stakeholders as	

relevant information about the site's annual water stewardship performance and results against the site's targets.	***quantified*** performance against targets, shall be ***disclosed*** annually at a minimum.				documented in the Outreach Log. As the water stewardship plan implementation continues, the performance and quantification of the plan will be disclosed annually to stakeholders as provided in the plan.	
	5.3.2 Advanced Indicator The site's efforts to ***implement*** the AWS Standard shall be ***disclosed*** in the organization's annual report.				Advanced criteria not considered for the Site.	
	5.3.3 Advanced Indicator Benefits to the site and stakeholders from implementation of the AWS Standard shall be ***quantified*** in the organization's annual report.				Advanced criteria not considered for the Site.	
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 stakeholder presentation was reviewed, which included the site's shared water challenges, targets, planned actions, and correspondent AWS outcomes. The AWS Presentation was distributed to stakeholders as documented in the Outreach Log. As the water stewardship plan implementation continues, the performance and quantification of the plan will be disclosed annually to stakeholders as provided in the plan.	
	5.4.2 Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be ***identified.***	Yes			See 5.3.1, 5.4.1.	
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			No violations occurred at the site and there are no corrective actions to disclose. In the event of such an occurrence, they will be publicly available through state and federal reporting (ECHO/US EPA) and will be disclosed annually to stakeholders.	
	5.5.2 Necessary corrective actions taken by the site to prevent future occurrences shall be ***disclosed*** if applicable.	Yes			See 5.5.1	
	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			Violations are publicly available through state and federal reporting (ECHO/US EPA). There were no violations reported via ECHO. The ECHO reporting system would include violations that pose a significant risk and threat to human or ecosystem health.	
					Advanced Points Step 5	

INFORMATION FOR CLIENT/AWS/ SCS CERTIFIER REPORT REVIEW – DO NOT INCLUDE IN FINAL REPORT

Stakeholders Response from PN: None

Stakeholders Identification: Documented in Stakeholder Communication Table

Stakeholders Contacted: Bruce Leisey, Clay Township Manager, 717-733-9675 | Jay Snyder, Ephrata Area Joint Authority, 717-738-9282 | Matt Kofroth, Lancaster County Conservation District, (717) 299-5361 ext. 2523

Stakeholder Matrix (page 1 of 1)			
Questions for conversation:	Bruce Leisey	Jay Snyder	Matt Kofroth
• Stakeholder Info: Relationship, years working together, financial relationship? • Affected by water use and operations? Contribute to increase of your risks? • Engagement on water Issues? Positive or negative? • Shared Water Challenges: Main water related challenge? Adequately addressed? • Communication with other stakeholders? • Reach out to any others? • Responses confidential?	Has been working with Primo for roughly six months, no financial relationship. Stated Primo has educated Clay Twp. on operations, environmental and educational efforts. Received general overview of water challenges, discussed site IWRAs. Shares concerns about drought, overuse, water quality. Feels Primo is beneficial to town/region.	Has been working with Primo for a long time, no financial relationship. Has discussed shared water challenges such as educational outreach and IWRAs with Primo. Has engaged on stream restoration in area. Feels there are good neighbor relations with Primo, appreciates their resources and proactivity.	Has been working with Primo for roughly a year via discussions and presentations, no financial relationship. Has discussed shared water challenges with Primo such as agriculture issues, farms that could impact water quality and noted Primo has expressed interest in helping make improvements. Positive relationship, notes Primo could have reached out earlier.