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Client Name:	Nestlé Waters North America, Inc. – Sacramento, CA
AWS Registration Number:	AWS-000139
Client Representative:	Brandon Kienenberger, NWNA Sustainability Analyst
Audit Team:	Rae Mindock/Lead Auditor
	Shana Golden/Team Auditor
Audit Dates:	Remote Audit August 31, 2020
Stakeholder Notification:	July 24, 2020, SCS and AWS websites, Sacramento Bee Newspaper
Site Location:	8670 Younger Creek Drive, Sacramento, CA
Report Date:	November 1, 2020

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

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

Level of Certification	☒ Core	☐ Gold	☐ Platinum

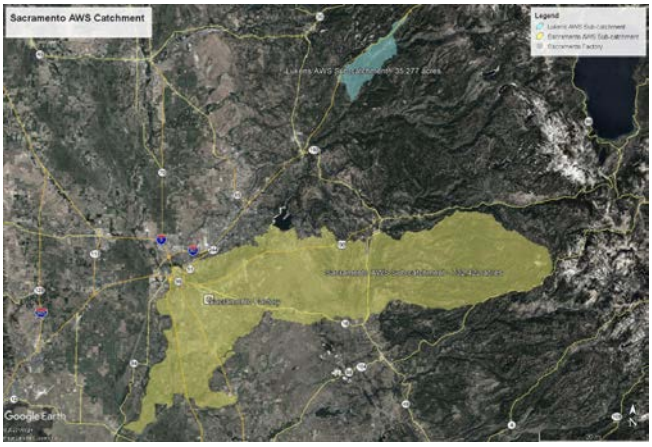
Site Information

Site Description

The NWNA Sacramento plant is a water bottling facility, producing bottled water products under the brand names of Arrowhead Mountain Spring Water and Nestlé Pure Life. The geographic scope of the site is limited to the property boundary of the facility. The facility itself is located in an industrial park in the City of Sacramento, California. Water for the bottling facility comes from several sources, including spring water delivered by truck from one of several regional springs, both inside and outside of the catchment, in order to produce bottled spring water. The site also receives water from the municipal water provider in order to produce bottled purified water.

Catchment Description

The Sacramento Factory is located in the South American River Groundwater Subbasin (HUC-8, 18020111) and the Lower Sacramento Watershed (HUC-8, 18020163). The AWS Sacramento Catchment is approximately 767,699 acres, which consists of two non-contiguous sub catchments. The Sacramento Factory sub-catchment is approximately 732,277 acres and includes the primary water sources (City of Sacramento Municipal (Sacramento River Water Treatment Plant and E.A. Fairburn Treatment Plants), Sacramento Regional Wastewater Treatment Plant, and Sopiago Springs), bottling operations (Sacramento Factory), and the discharge recipient (Sacramento Regional Wastewater Treatment Plant). Additional water sources are included within the non-contiguous sub-catchment: Lukens sub-catchment (approximately 35,277 acres) which contains Lukens Springs. Collectively, these two sub-catchments comprise the Sacramento AWS Catchment. The primary source of water for the catchment is surface water from the Sacramento and American Rivers, with the ultimate discharge of treated wastewater to the Pacific Ocean.



Sacramento AWS Catchment includes two non-contiguous sub-catchments: Sacramento Factory Catchment and Lukens

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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. Primary water-related risks to the site include public education surrounding water use; other shared water challenges include water scarcity (quantity), site water use efficiency and water quality concerns. A prioritized list of shared water challenges addressing the outcomes was provided.

To better understand catchment issues and opportunities, NWNA regularly meets with catchment authorities including Sacramento Municipal Utility District (SMUD). The Factory has previously conducted tours of operations, provided local presentations on water stewardship through AWS, and hosted World Water Day 2019 focusing on WASH. Most of the activities have been postponed due to COVID-19. Water efficiency projects in 2019 included RO CIP Optimization, Line 1 Fill Level Refinement, reduced wastewater volume and continuing refinement of the factory water map.

Audit Attendees

Participant/Title	Opening Meeting	Document Review	Site Inspection	Closing Meeting
Natural Resources Manager	X	X	X	X
Sustainability Analyst	X	X	X	X
Factory Manager	X	X	X	X
Field Safety, Health, and Environment Manager	X	X	X	X

The NWNA Sacramento Factory provided documentation using DropBox file share to support conformity with the AWS Standard v2.0 including: Stakeholder Outreach Log, Community Relations Program (CRP) Summary, Factory AWS Presentation 2020, NWNA Water Map, 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 included progress, performance evaluation and stakeholder feedback. Other supporting documentation were also provided as evidence.

Summary of Findings

Step	Major	Minor	Observations	Total Points
1. Gather & Understand	0	0	3	
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	3	

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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	1.5.4	NR	Water quality data was provided as excerpts from multiple sources. It would be beneficial to summarize the data to facilitate review and comparison.
				Root Cause Analysis and Corrective Action Not Required for Observation
Observation	OBS 2020.02	1.5.5	NR	**OBS 2020.02 was issued**. Locations of IWRAs were provided as excerpts from multiple sources. It would be beneficial to summarize the data on a single map, or catchment maps.
				Root Cause Analysis and Corrective Action Not Required for Observation
Observation	OBS 2020.03	1.8.	NR	Best practices have been identified. It would be of value to include Best Practice in the Water Stewardship Plan (WSP) in Step 2.
				Root Cause Analysis and Corrective Action Not Required for Observation

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 11, 2020
Technical Review by:		Nicole Munoz, December 11, 2020
Date of Decision:		
Surveillance Schedule:		Next audit is scheduled for: August 2021 to February 2022 (18 Month Surveillance to be Recommended)

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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

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 NWNA Sacramento factory is located in central California, east of San Francisco. The factory may receive spring water from Lukens Springs, Sopiago Springs, and Sugar Pine Springs. Water is also obtained from City of Sacramento Municipal. The water-related infrastructure at the factory was mapped including: layout of bottle lines, City of Sacramento Municipal Water, Sanitary Sewer Discharge, and Stormwater Discharge. The factory receives water from the City of Sacramento Municipal through a single metered pipeline connection. It is used for production of purified water and facility sanitary water supply. The primary source of the water for the City is the American and Sacramento Rivers. Sanitary discharge is sent to Sacramento Regional Water Treatment Plant (SRWTP). Treated sanitary and industrial wastewater may either be reused within SRWTP's service area or discharged to the Sacramento River. Sacramento Catchment (767,699 acres) includes two non-contiguous sub-catchments: the Sacramento Factory (732,422 acres) and Lukens (35,277 acres). The areas are defined and mapped. The catchments are located within the South American Groundwater Subbasin and the Lower Sacramento Watershed.	

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	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 stakeholder map created during the Nestlé Community Relations Process (CRP) was reviewed. This mapping effort was updated to include the addition of the new sub-catchment (Sopiago). The CRP includes identification of local population, authorities (municipalities), businesses (economic neighbors), and NGOs. Stakeholders identified include City of Sacramento Water Department, Gov Office of Tribal Relations, Amador Water District, El Dorado Irrigation District, PG&E, fire department, local suppliers, manufacturers, community outreach programs, and regional and state representatives. The Outreach log included individuals and organizations consulted with since 2016, including notes on conversations which provided information on water-related interests/challenges. The summary includes actions, follow-up and feedback. The CRP includes ranking of stakeholder influence and interest with levels of influence and interest defined.	

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		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 and identifies the stakeholders' ability to influence or be influenced. Influence/Interest is characterized (low to critical) and further describe opinions towards NWNA.	
	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, Spill Prevention Control Countermeasure Plan (SPCC) and Storm Water Pollution Prevention Plan (SWPPP) were reviewed. Incident response was addressed in the plans.	
		1.3.2 Site water balance, including inflows, losses, storage, and outflows shall be ***identified*** and ***mapped***.	Yes			NWNA provided water maps containing inputs and outputs of water at this facility. Data showing monthly water inflows, outflows, storage and losses for each bottling line at the Factory reviewed. The map indicates water sources, water treatment, process units, wastewater treatment and production.	
		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			NWNA provided water maps containing inputs and outputs of water at this facility. NWNA utilizes a Water Withdrawal Ratio (WWR) to evaluate efficiency, measuring Liters of water used to produce a Liter of product. The goal for 2019 was 1.430 l/l with an actual 1.374 l/l. NWNA provided WWR on a monthly basis for 2019 with high and low variance, compared to 2018 values. The comparison shows consistent water efficiency from 2018 to 2019.	
		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	Yes			A summary of water quality tests conducted at the site on incoming source water and finished product was provided. To verify the internal water quality results, samples get sent once a year to an external accredited laboratory. Monthly or higher frequency data were provided for water quality of spring sources and effluent. NWNA water quality testing protocol includes pH, T, DO, TDS and other constituents. Water quality data is regularly compared to NWNA and available MCL screening criteria. The records reviewed showed that no parameters exceeded any regulatory standards. Effluent and receiving water quality data were also provided. The effluent system is automated so that if a value is out of limits, the system shuts down. NWNA	

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		where appropriate, seasonal, high and low variances shall be ***quantified***.				is notified and must respond if the effluent quality is out of required limits (e.g. if pH exceeds certain amount).	
		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 all chemicals stored at the site was provided with the CERS Submission. The chemicals located within the Factory were mapped on the Facility Layout.	
		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			No on-site IWRAs were identified.	
		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 were presented including costs to implement water stewardship actions and factory-related costs were provided and reviewed. Finances are prepared by NWNA corporate headquarters with revenues complied at a company level. Annual revenue for NWNA is publicly available on the NWNA website. **Minor NC 2019.01 was closed with AWS Standard v2.0.**	
		1.3.8 Levels of access and adequacy of WASH at the site shall be ***identified.***	Yes			WASH is available on-site with potable water and toilets for employees and visitors. The Factory utilized "Self-Assessment Tool for Evaluating Access to Water, Sanitation and Hygiene (WASH) at the Workplace".	
	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	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			A list of primary inputs for outsourced services was provided with designation of location. Information on water source with annual water consumption values, and origin for each input was provided by the Factory. Analysis includes water use associated with packaging, transportation, cooling, end of life, and level of water stress.	
		1.4.2 The embedded water use of outsourced services shall be *identified*, and where those services originate	Yes			Documentation on embedded water use indicates values of water consumptions and availability. Calculations conducted indicate the Blue Water Scarcity Value and provides the score of the water stress. The Factory worked to obtain updated quantified water use information from services in the catchment.	

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	in out-sourced water-related services.	within the site's catchment, *quantified*.					
	Advanced Indicator	1.4.3 **Advanced Indicator** The embedded water use of primary inputs in catchment(s) of origin shall be ***quantified***.				Advanced criteria were 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 for the catchment was provided at the state, regional, county, city, and district 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 federal, state, local permits and regulatory requirements was provided, including permits issued by the CA Department of Public Health – Food and Drug Branch. List of relevant and applicable legal and other requirements were also provided and reviewed.	
		1.5.3 The catchment water-balance, and where applicable, scarcity, shall be ***quantified***, including indication of annual, and where appropriate, seasonal, variance.	Yes			The catchment water balance with precipitation, point source flows, subsurface flow, runoff, and ET data were provided for the Sacramento Factory sub-catchment and Lukens sub-catchment(from Model My Watershed Multi-Year Model). Data is presented as an average from a 30-year period and indicates seasonal fluctuation.	
		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	Yes			Spring water undergoes the standard State required annual water quality testing performed by third party, accredited laboratories. Additionally, NWNA performs quarterly, monthly, and weekly water quality testing on additional constituents and parameters. City of Sacramento water is treated according to federal and state standards to remove any possible harmful contaminants. Trending of both water quality sources is evaluated annually and compared to historical data and water	

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		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***.				quality goals. Publicly-available water quality information were provided for the sub-catchments. **OBS 2020.01 was issued**. Water quality data was provided as excerpts from multiple sources. It would be beneficial to summarize the data to facilitate review and comparison.	
		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			IWRAs have been identified by NWNA, along with a description of their water-related issues. IWRAs are shown on multiple maps. Lukens Sub-catchment IWRAs: - Lukens Springs Sources - Lukens Springs Recharge Area - Drum Forebay and Canal - North Fork American River Sacramento Catchment: - Alder Creek - Laguna Creek - Lake Natoma - Sopiago Springs Sources - Sopiago Springs Recharge Area - Lower American River - Sacramento River - Lower Cosumnes River **OBS 2020.02 was issued**. Locations of IWRAs were provided as excerpts from multiple sources. It would be beneficial to summarize the data on a single map, or catchment maps.	
		1.5.6 Existing and planned water-related infrastructure shall be ***identified***, including condition and potential exposure to extreme events.	Yes			A list of publicly available reports/data of water-related infrastructure with a description, exposure scenarios and opportunities. Infrastructure includes imported water infrastructure, municipal wells and ponds/dams.	
		1.5.7 The adequacy of available WASH services	Yes			California State Water Resources Control Board map providing Exceedance/Compliance Status of Public Water Systems was reviewed. WASH for the	

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		within the catchment shall be ***identified***.				catchment is adequate based on demographic information. NWNA Sacramento supports local food banks and disaster relief organizations. Local agencies work to meet the needs of populations who do not have access to WASH.	
	Advanced Indicator	**1.5.8 Advanced Indicator** Efforts by the site to support and undertake catchment level water-related data collection shall be identified.				Advanced Indicators were not considered for this site.	
	Advanced Indicator	**1.5.9 Advanced Indicator** The adequacy of WASH provision within the catchments of origin of primary inputs shall be identified.				Advanced Indicators were not considered for this 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. Drivers and public-sector agency efforts are noted as well. Education is prioritized as first, on a scale of 1-4. NWNA Sacramento challenges were prioritized based on stakeholder feedback and corporate initiatives.	
		1.6.2 Initiatives to address shared water challenges shall be ***identified***.	Yes			A list of existing initiatives was provided in the water stewardship plan.	
	Advanced Indicator	**1.6.3 Advanced Indicator** Future water issues shall be identified, including anticipated impacts and trends				Advanced Indicators were not considered for this site.	
	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.				Advanced Indicators were not considered for this site.	
	1.7 Understand the site's water risks and opportunities: Assess and prioritize the water risks and opportunities affecting the	1.7.1 Water risks faced by the site shall be ***identified***, and prioritized, including likelihood and severity of impact within a given	Yes			A prioritized list of water risks was provided and reviewed. Water risks matched shared water challenges. Education is prioritized first, on a scale of 1-4.	

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	site based upon the status of the site, existing risk management plans and/or the issues and future risk trends ***identified*** in 1.6.	timeframe, potential costs and business impact.					
		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 education and the idea that increased stakeholder education may lead to more available high quality water and well-educated water stewards. A prioritized list of projects, savings and value creation was submitted and reviewed. Value creation was quantified, as applicable.	
	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			NWNA has identified multiple best practices toward achieving AWS outcomes at the site and in the catchment. The following best practices are examples for Indicators 1.8.1 - 1.8.5 **OBS 2020.03 was issued for 1.8**. Best practices have been identified for each indicator. It would be of value to include Best Practice in the Water Stewardship Plan in Step 2. NWNA engages with catchment authorities and other stakeholders to share information, practices and drive water stewardship practices.	
		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			NWNA identified The Beverage Industry Continues to Drive Improvement in Water, Energy, and Emissions Efficiency, 2108 Benchmarking Study. NWNA uses the sector specific efficiency metric of water use ratio (liters of water used in the process/liter of bottles water) to track onsite efficiency and established a target to monitor continual improvement.	
		1.8.3 Relevant sector and/or catchment best practice for water quality shall be ***identified***, including rationale for data source.	Yes			NWNA identified Sector best practice for Processing and Bottling of Bottled Drinking Water is established in CFR Title 21, Part 129. NWNA exceeds requirements outlined with sampling frequency, parameters analyzed and consistency across the business unit.	
		1.8.4 Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be ***identified***.	Yes			NWNA identified 1) Assessment, management and monitoring of High Conservation Value Forest (HCVF) A practical guide for forest managers and 2) Good practice guidelines for High Conservation Value assessments, A practical guide for practitioners and auditors, both by ProForest. NWNA follows practices described by ProForest by assigning Natural Resource Manager for each site who focuses on maintenance of springs and other IWRAs.	

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		1.8.5 Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be ***identified***.	Yes			NWNA 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. NWNA established the Nestlé Guidelines on Respecting the Human Rights to Water and Sanitation, which is extended to suppliers.	

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 a commitment to water stewardship, the implementation of the AWS Standard and achieving its five outcomes, and the allocation of required resources.	2.1.1 A signed and publicly disclosed site statement OR organizational document shall be ***identified***. The statement or document shall include the following commitments: - That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes - That the site implementation will be aligned to and in support of existing catchment sustainability plans - That the site's stakeholders will be engaged in an open and transparent way - That the site will allocate resources to implement the Standard.	Yes			A pledge, signed by the site factory manager, was reviewed containing all elements described in this indicator.	
	Advanced Indicator	**2.1.2 Advanced Indicator** A statement that explicitly covers all requirements set				Advanced Indicators were not considered for this site.	

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		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.					
	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 NWNA Compliance Matrix was provided and reviewed. Included in the matrix are the listed permits and responsible staff to ensure maintenance of compliance. A third-party is contracted to confirm compliance is maintained. In addition, the facility is ISO 14001 Certified (documentation for this certification were reviewed).	
	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 the factory manager was provided and reviewed. NWNA Sacramento strategy is a high-level document stating the overall strategy is in alignment with the AWS requirements.	
		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	Yes			A detailed water stewardship plan was created as part of the AWS process. The plan is broken into objectives, targets, and actions. There are different actions corresponding to different targets, each with their own metrics, budget, responsible person, status, and other criteria. Public Consumer/Education, Water Efficiency, Water Quality, and Water Quantity are the water topics identified in this plan.	

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		- Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.					
	Advanced Indicator	**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 under the same organizational ownership) shall be *identified* and described.				Advanced Indicators were not considered for this site.	
	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***.				Advanced Indicators were not considered for this site.	
	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***.				Advanced Indicators were not considered for this 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	Yes			NWNA Sacramento provided their current SWPPP/SPCC documents which included a description of their required responses and resilience operations to water-related issues and risks. Modifications to the plans are captured through revision/amendment comments and an annual review is part of standard procedures to evaluate the plan's effectiveness.	

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		infrastructure agencies shall be ***identified***.				In addition, the Water Stewardship Plan is a working document which documents identification of water risks through performance, evaluation, and stakeholder consultation. Stakeholders include the relevant public-sector agencies responsible for infrastructure.	
	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***.				Advanced Indicators were not considered for this site.	
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			The Factory provided documentation of their efforts to support good catchment governance through participation with the local governing agencies, sharing information with agencies and through continuing to expand 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			The Factory's water use is within the water rights identified by Sacramento Municipal Utilities Company. Permits for the Lukens, Sopiago, and Sugar Pine ~~spring~~ Springs sites are obtained from the State of California. Excluded water rights have not been identified.	
	Advanced Indicator	**3.1.3 Advanced Indicator** Evidence of improvements in water governance capacity from a site-selected baseline date shall be *identified*.				Advanced Indicators were not considered for this site.	
	Advanced Indicator	**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				Advanced Indicators were not considered for this site.	

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		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			The NWNA Compliance Matrix was provided and reviewed. Included in the matrix are the listed permits and responsible staff to ensure maintenance of compliance. A third-party is contracted to confirm compliance is maintained. In addition, the facility is ISO 14001 Certified (documentation for this certification were 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			The State of California Private Water Source Operator License (PWSOL) have been issued for the Lukens, Sopiago, and Sugar Pine Springs sites. Excluded water rights have not been identified.	
	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			Water withdrawal, water withdrawal rates, energy consumption and production volume are tracked monthly and compared to previous years monthly values. The site has worked to improve its water efficiency as per its targets, by implementing the following measures: RO CIP Optimization, Production Schedule Change, Line 1 Fill Level Refinement, Reduce RO Silo CIP Frequency, and Update water mapping. The site achieved a WWR of 1.374 versus target of 1.430 for 2019.	
		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			NWNA establishes site targets annually to improve water balance towards improving efficiency and strives to reduce volumetric total.	
		3.3.3 Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be ***identified***.	Yes			The site is not re-allocating water savings.	
	Advanced Indicator	**3.3.4 Advanced Indicator** The total volume of water voluntarily re-allocated (from site water savings) for social,				Advanced Indicators were not considered for this site.	

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		cultural and environmental needs shall be ***quantified***.					
	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			Measurement system is in place for water quality targets throughout the site, data from previous monitoring reports were reviewed. Annual review of data was found to be within historic values and regulatory limits. Wastewater results are within permitted values.	
		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 and an AWS Outcome. Improvements to water quality are achieved 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			No IWRAs are present at the Sacramento site.	
	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.				Advanced Indicators were not considered for this site.	
	Advanced Indicator	**3.5.3 Advanced Indicator** Evidence from a representative range of stakeholders showing consensus that the site is				Advanced Indicators were not considered for this site.	

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		seen as positively contributing to the healthy status of Important Water-Related Areas in the catchment shall be ***identified***.					
	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			NWNA uses a self-assessment tool at each site to review access to drinking water, sanitation and hygiene awareness (WASH). The nature of the product made at the facility requires strict adherence to these principals. Pledged compliance was achieved within the Sacramento facility.	
		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			NWNA uses a self-assessment tool at each site to review access to drinking water, sanitation and hygiene awareness (WASH). The Factory is not impacting WASH of communities. NWNA discussions with stakeholders did not indicate actual or perceived concern that site was impinging on human right to safe water and sanitation in catchment.	

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	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***.				Advanced Indicators were not considered for this 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 Indicators were not considered for this 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 targets in the Water Stewardship Plan include engaging with vendors in catchment. NWNA has reached out to the two suppliers located in the catchment to provide information on AWS and request water use data.	
		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			Communication requesting details from vendors were provided. Water usage data have been compiled for the majority of the Primary Input Providers and the top Outsourced Services based on Blue Water Scarcity.	
	Advanced Indicator	**3.7.3 Advanced Indicator** Actions taken to address water related risks and challenges related to indirect				Advanced Indicators were not considered for this site.	

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		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			Evidence indicated there are no concerns with any shared water-related infrastructure. NWNA regularly shares 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			NWNA team engages with catchment authorities and other stakeholders to share information, best practices and drive water stewardship efforts, one example is the data sharing and collaborative efforts of CWAC.	
		3.9.2 Actions towards achieving best practice, related to targets in terms of water balance shall be ***implemented***.	Yes			Sector specific efficiency metric of water use ratio (liters of water used in the process/liter of bottles water) are used to track onsite efficiency and established a target to monitor continual improvement. The 2019 Site WWR of 1.374 l/l was below the Site Goal of 1.430.	
		3.9.3 Actions towards achieving best practice, related to targets in terms of water quality shall be ***implemented***.	Yes			NWNA exceeds requirements outlined with sampling frequency, parameters analyzed and consistency across the business unit. Water quality data provided meets and exceeds regulatory requirements. Effluent is managed appropriately and in accordance with permit limits.	
		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			NWNA follows practices described by ProForest by assigning Natural Resource Manager for each site who focuses on maintenance of springs and other IWRAs. NWNA follows good practice guidelines for High Conservation Value assessments *A practical guide for practitioners and auditors* and Assessment, management and monitoring of High Conservation Value Forest *A practical guide for forest managers*, as set by ProForest.	
		3.9.5 Actions towards achieving best practice related to targets in terms of WASH shall be ***implemented***.	Yes			There is adequate WASH in the catchment. NWNA may provide bottled water donations to the community, as needed.	
	Advanced Indicator	**3.9.6 Advanced Indicator** Achievement of identified best practice related to targets in terms of good				Advanced Indicators were not considered for this site.	

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

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	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***.				Advanced Indicators were not considered for this site.	

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			NWNA 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			NWNA has created value related to multiple efforts. Knowledge gained through implementation is being shared with other water agencies in and out of the catchment.	
		4.1.3 The shared value benefits in the catchment shall be identified and where applicable, ***quantified.***	Yes			NWNA has demonstrated continued improvements to reduce demands on potable water, which is noted by catchment stakeholders.	
		4.1.4 Advanced Indicator				Advanced Indicators were not considered for this site.	

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		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***.					
	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			No water-related emergency events occurred since the last Surveillance Audit. No shutdown occurred that was water related. The annual environmental reviews would document these emergency events, if any. The facility has a current SWPPP and SPCC.	
	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 Stakeholder Outreach Log. Responses covered the main topics of catchment areas, WASH, IWRAs, water efficiency, water savings projects.	
	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.				Advanced Indicators were not considered for this site.	

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	4.4 Evaluate and update the site's water stewardship plan, incorporating the information obtained from the evaluation process in the context of continual improvement.	4.4.1 The site's water stewardship plan shall be modified and adapted to incorporate any relevant information and lessons learned from the evaluations in this step and these changes shall be ***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.	

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			NWNA Sacramento facility posts the factory organization chart in the entry of the factory floor where it will be observed the most by staff and during factory open houses with operational tours. The organization chart includes the staff and relevant responsible personnel for water-related laws and regulations. Factory tours also include presentations on the site's water stewardship projects and implementation of the AWS International Water Stewardship Standard.	
	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			NWNA Sacramento provided the outreach log and communication with catchment authorities about the AWS process. The AWS Presentation summarizes the water stewardship plan and outcomes. The Presentation was shared with visitors of the Factory tours and other stakeholders. Communication and outreach confirmed through stakeholder interviews.	
	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 stakeholder presentation was reviewed, the presentation includes the site's water stewardship performance results. NWNA Sacramento conducted public/consumer education outreach through tours; distribution of stakeholder presentations and providing stakeholders presentations that reviewed the sites water challenges, stakeholder feedback, targets, with implementation outcomes. The AWS Presentation was distributed to stakeholders as documented in the Outreach Log.	
	Advanced Indicator	**5.3.2 Advanced Indicator** The site's efforts to implement the AWS Standard				Advanced Indicators were not considered for this site.	

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		shall be disclosed in the organization's annual report.					
	Advanced Indicator	**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 Indicators were not considered for this 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 and includes the site's water stewardship performance results. The presentation was provided to stakeholders prior to the onsite audit. List of attendees reviewed at the facility. NWNA Sacramento conducted public/consumer education outreach through tours and providing stakeholders presentations that reviewed the sites water challenges, stakeholder feedback, targets, with implementation outcomes.	
		5.4.2 Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be ***identified.***	Yes			See 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			Violations are publicly available through state and federal reporting (ECHO/US EPA). There were no violations reported via ECHO. The EPA issued an Effluent Limit Exceedances Report. Upper Morrison Creek is impaired by a pollutant and in need of a TMDL. The site remains in compliance with the permit.	
		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.	

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

Stakeholders Response from PN: None

Stakeholders Identification: Documented in Stakeholder Engagement Log or NWNA Contacts

Stakeholders Contacted: Damien Waples (Strategic Account Advisor, Commercial Delivery at Sacramento Municipal Utility District) – 916-732-5961 or damien.waples@smud.org | Matthew Tinker (Area Manager at NALCO Water/Ecolab) – 916-718-9735 or mmtinker@ecolab.com

Questions for conversation:	Matthew Tinker/NALCO Water/Ecolab	Damien Waples/ Sacramento Municipal Utility District
Stakeholder Info: Relationship, Years Working together, any financial relationship?	Ecolab is a vendor. Site is regular customer. Regular, strong communication. Discuss product needs, best options for site. Discuss water usage practices, efficient use of Ecolab products. Aware of AWS and associated practices.	Account Manager, SMUD is electrical provider. Site is large user; they are in touch frequently. Site works with SMUD to increase conservation to lower needs. Site reduces usage when requested, their efficiency plans makes this easier for SMUD. They regularly discuss plans for further efficiency and alternate forms of energy use. Informed on AWS progress.
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?		

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