

Client Name: Primo Water North America – Wekiva Spring, FL

AWS Registration Number: AWS-000279

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 23, 2020

Stakeholder Notification: 9/4/2020 - AWS, SCS, Williston Pioneer Newspaper

Site Location: Morriston, FL

Report Date: December 28, 2020

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

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

Level of Certification	X Core	☐ Gold	☐ Platinum

Site Information

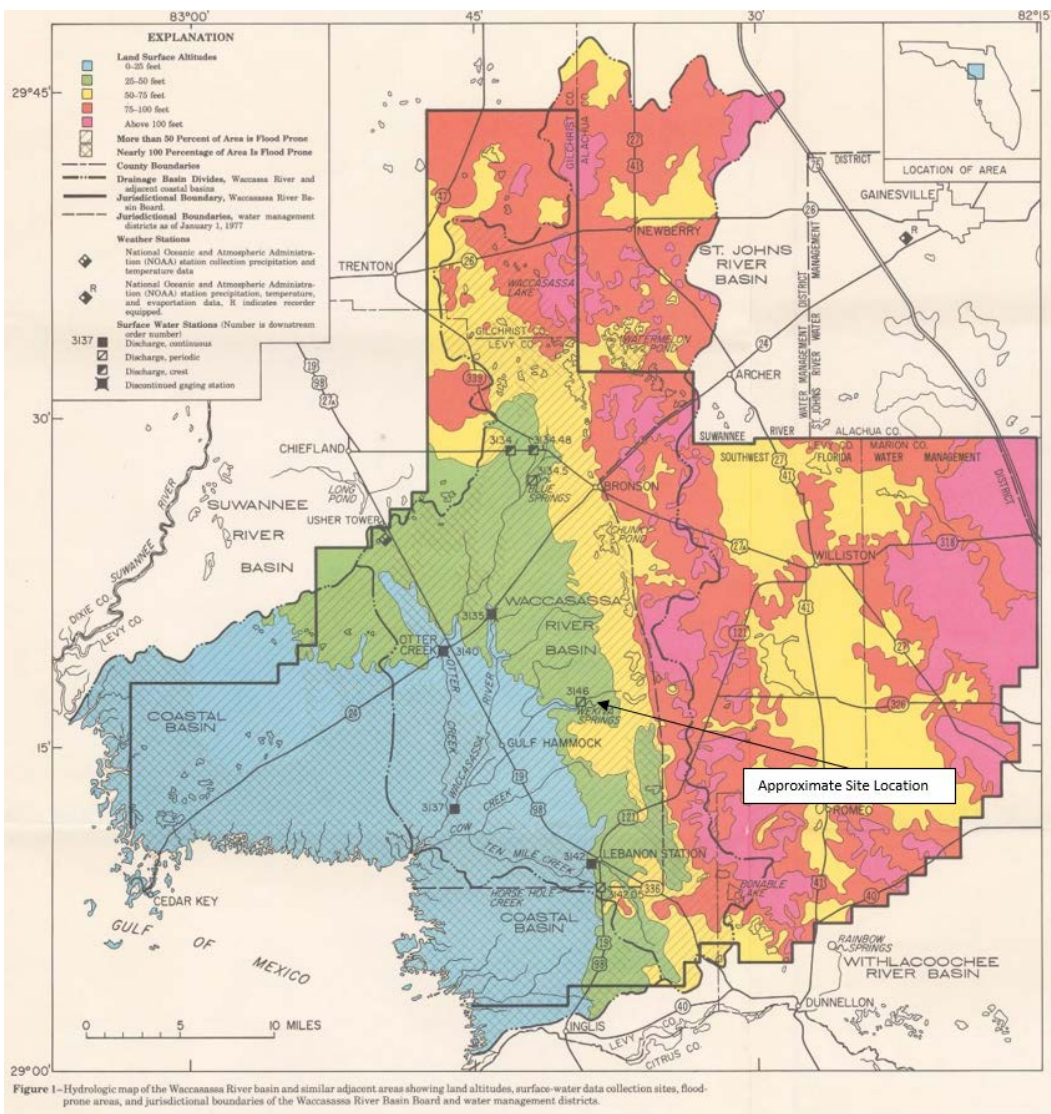
Site Description

The Wekiva Spring site is located on a 37-acre parcel located northeast of Gulf Hammock in Levy County, FL.

East of the site are 53,600 acres of protected lands associated with Goethe State Park and Forest. The maximum residential density for areas located near the site and zoned as forests or rural development is one (1) residential dwelling per twenty (20) acres, according to the Levy County zoning requirements. In general, this rural area is remote and sparsely inhabited, and surrounded by pine forests. Water at the site is extracted from borehole BH-2 and pumped through an underground stainless steel pipeline to the load station, where it is treated with micron filtration and ultraviolet (UV) disinfection system prior to being loaded into tanker trucks. The water is transported to the Crystal Springs® plant in Orlando, FL. 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 the Wekiva River in the Waccasassa River Basin (the catchment), a river basin managed by the Suwannee River Management District (SRWMD). The spring-fed tributary combines with Black Prong Creek to become Wekiva River, which flows further west into other rivers that drain into the Gulf of Mexico. The Waccasassa River Catchment (Hydrologic Unit Code 03110101) comprises 820 square miles, of which 72% (approx. 590 square miles) is in Levy County, where the site is situated. The site is located in the east central portion (along the eastern boundary) of the catchment.



Waccasassa River Basin Catchment

Shared Water Challenges

Shared water challenges are catchment water-related issues shared by the site and stakeholders. Stakeholders were contacted though input was not received. Primo Water North America has identified and prioritized a list of shared water challenges addressing the outcomes, based on local agencies' written plans and their internal assessment. Water challenges include water quantity, water quality, 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. To improve their understanding of catchment shared water challenges and opportunities, Primo Water North America plans to continue their efforts to pursue engagement and consultation opportunities and obtain more direct feedback from stakeholders.

Post-Audit Update: Primo Water North America has continued stakeholder outreach and has received feedback from the Suwannee River Management District (SRWMD) and the Florida Forest Service (FFS) regarding implementation of a forest management plan to maintain water quality and enhance groundwater recharge at the Wekiva Spring site and host an onsite monitoring well maintained and used by Suwannee River Water Management District for aquifer water level monitoring (data are publicly available), they have provided presentation on water stewardship to stakeholders, and plan to get more involved with local watershed associations and to perform more stakeholders outreach, education, and engagement.

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 - James Steinke	X	X		X
VP Gov. Affairs and ESG Programs - Shayron Barnes-Selby	X	X	X	X
Earthres Consultant Hydrogeologist - Matt Weikel	X			X
Earthres Consultant Project Manager - Shae Porter	X			X
Earthres Consultant Sr. Project Manager - Scott Campbell	X			X
SCS Lead Auditor - Isabella Polenghi-Gross	X	X	X	X
SCS Team Auditor - Shana Golden	X	X	X	X
Supporting Documentation: The Wekiva 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	1	1	6	
2. Commit & Plan	0	0	1	
3. Implement	0	0	0	
4. Evaluate	0	0	1	
5. Communicate & Disclose	0	0	0	
TOTAL	1	1	8	n/a

Audit Non-conformities and Observations

Non-Conformity (Major or Minor) or Observation	Citation	Criteria/ Indicator	Due Date	Detail and Corrective Action
Major	MR 2020.01	1.2.1	2/21/ 2021	Insufficient stakeholder feedback on water related interests and challenges was obtained. Therefore, no direct stakeholder input was used to identify shared water challenges. Stronger stakeholder engagement and consultation should be implemented in order to obtain direct feedback on shared water challenges. Response: Primo Water will continue stakeholder outreach and consultation around water related interests and shared water challenges. The indicator requires providing evidence of stakeholder consultation on water-related interests and challenges. The outreach will specifically include holding webinars, meetings, calls, and/or sending emails as Primo Water continues to complete actions identified in the Water Stewardship Plan in consultation with the identified stakeholders. The stakeholder feedback received through these efforts will be incorporated into the shared water challenges. The Water Stewardship Plan

				identifies actions, responsible individuals, and timing for each action.
Minor	MN 2020.01	1.2.1	Dec 2021	Limited evidence of stakeholder feedback on water related concerns and challenges was provided. The site should continue their efforts toward stronger stakeholder consultation to demonstrate effectiveness of their engagement process with stakeholders and incorporation of their feedback into the Water Stewardship Plan.
				Response: Primo Water will continue to provide evidence of stakeholder feedback on water related concerns and challenges. The efforts will focus on stakeholder consultation and documentation to demonstrate effectiveness of the stakeholder engagement process. Based upon the stakeholder feedback received, additionally identified water related concerns and challenges will be incorporated into the Water Stewardship Plan.
Observation	OBS 2020.01	1.3.1	NR	No site water-related incident response plans were available for review. While the water-related risks were identified and described, an emergency-response plan that addresses these water risks and clearly describes the response actions, should be readily available (current, dated, and signed).
				Response: The preparation and implementation of water-related incident response plans is part of the Site's Water Stewardship Plan. Emergency spill response equipment (i.e., spill kits) will be purchased will be maintained at the site. Spill Plan Language is provided in the project documentation.
Observation	OBS 2020.02	1.3.3	NR	Monthly Site water balance data are only available for the most recent nine months. In order 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.

				Response: Historical (from 2000 onward) and seasonal water level data for the onsite well managed by the SRWMD was added to the OneNote. The data shows onsite water balance based upon stable water levels. However, in order to provide evaluation of seasonal variations in water usage rates going forward, Primo Water will continue to update the site water balance using meters (see below) and also with monthly/seasonal values.
Observation	OBS 2020.03	1.3.3	NR	Primo Water reported that they plan to install a meter at Borehole BH-2. Once that gets accomplished, it will be useful to • update the water balance; and • update the site-specific water efficiency parameter using the metered water extraction quantities.
				Response: Meters are targeted for install in 2021 per the Water Stewardship Plan. The meters as well as publicly available SRWDM water level data will be used to update the extraction quantities and overall water balance using seasonal data in an ongoing manner.
Observation	OBS 2020.04	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 Wekiva 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 Wekiva 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 Wekiva Spring is publicly provided and readily available online.
Observation	OBS 2020.05	1.5.3	NR	To provide an indication of seasonal variations of the water usage rates in the catchment, the inclusion of monthly or seasonal data would be valuable.
				Response: Seasonal variance data (precipitation) obtained from Utah State University Climate Center (https://climate.usu.edu/) has been added to the OneNote. Additionally, seasonal catchment hydrograph data, obtained from SRWMDs public website has been added to the OneNote. Water levels further indicate sustainable water balance in the catchment. Seasonal variations in the catchment will be assessed in an ongoing manner.
Observation	OBS 2020.06	1.6.1	NR	As stated in MR 2020.01, evidence of stakeholder consultation on shared water challenges was insufficient. Once the corrective action plan is provided, the list of shared water challenges should be updated accordingly. Shared water challenges do not include stakeholder feedback and therefore do not meet the requirement, challenges are based on Primo Water's internal assessment only.
				Response: Shared Water Challenges are currently being assessed through ongoing stakeholder consultation and engagement. Determined Shared Water Challenges will be updated in an ongoing manner and will be further reflected as appropriate in the Water Stewardship Plan. Specific details will be provided in the response to MR 2020.01.
Observation		2.3.2	NR	The Water Stewardship Plan would benefit from having more specific targets, especially for the

	OBS 2020.07			Sufficient Water Availability shared water challenge, in order to establish comparison points for future review.
				Response: Specific targets were clarified in the WSP. The changes were completed in the OneNote and a revised Excel file of the WSP has been included therein.
Observation	OBS 2020.08	4.1.1	NR	As discussed during the audit, most of the targets in the water stewardship plan have been set up recently and the corresponding actions to meet them have a start date of end of 2020/2021, so while the site is already planning to start implementing plans, it is still too early to gather evidence of any results or improvements. Therefore, further evaluation will be conducted during the surveillance and renewal audits to check on the progress of the site performance against the set targets.
				Response: Detail was added to the OneNote regarding plans for outreach to gain stakeholder feedback for assessment of the WSP's performance targets. This observation will be addressed in an ongoing manner and will be evaluated during the assessment and renewal audits.

Certification Decision

<i>Auditor's recommendation for initial, continued or re-certification based on compliance with requirements:</i>	X	Recommended
		Not Recommended
<i>Level of Certification recommended</i>	X	AWS Core
		AWS Gold
		AWS Platinum
<i>SCS Certification Decision:</i>	X	Approved
		Denied
<i>Certification Decision by:</i>		 Nicole Munoz, November 20, 2020
<i>Technical Review by:</i>		 Nicole Munoz, November 20, 2020
<i>Date of Decision:</i>		
<i>Surveillance Schedule:</i>		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.	OBS			The Wekiva Spring site is located northeast of Gulf Hammock in Levy County, FL. It includes three spring pools collectively known as Wekiva Springs, two boreholes, two wells, and a small building. An unnamed tributary, eventually discharging to Wekiva River, runs along the northwestern border of the property. The Site occupies a 37-acre parcel and is surrounded mostly by undeveloped forestland, sparsely inhabited by scattered residents, with low-density horse and cattle farmland (no crops), and with protected lands associated with Goethe State Park and Forest to the east. Water at the Site is extracted from a borehole and is pumped through an underground stainless-steel pipeline to the load station, where it is treated with micron filtration and ultraviolet (UV) disinfection system prior to being loaded into tanker trucks. Spring water from this Site is transported by tankers to the DSS the Crystal Springs® plant in Orlando, FL, approximately 110 miles away. The site boundaries and water-related infrastructure were mapped including: the three water spring pools, the associated borehole BH-2, a second borehole BH-1, the Suwannee River Water Management District (SRWMD) monitoring well (used for aquifer water level monitoring), the utility well (used as a potable water supply for the site restroom), the underground piping network, the water treatment building, the tanker loading port, the onsite underground septic holding tank, and the swales from the loading station to the discharge area leading to the unnamed tributary. 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 restroom and associated zero discharge septic holding tank, which is pumped out by a local wastewater disposal contractor on a quarterly basis. Surface water runoff at the site generally flows from east to west across the site, draining into the unnamed tributary to the west of the site, and	

				eventually to the Wekiva River which discharges to the Gulf of Mexico. Water from the three Spring pools also flows to the Unnamed Tributary to the west. The Wekiva Spring site is located in the east central portion of Waccasassa River Basin (the Catchment, 820 square miles). The areas are well defined and mapped.	
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.		NCR	Primo Water's process of stakeholder identification includes local population, government organizations, non-governmental organizations, regulatory agencies, employees, and shareholders. A brief description of the process for stakeholder identification, ranking and degree of interest and influence, was provided during the audit, based on the level of their involvement, response and sphere of influence. Primo Water's communications log lists the following identified external stakeholder organizations: Suwannee River Water Management District, Florida Department of Environmental Protection Springs Division, Levy County Health Department, Levy County Soil & Water Conservation, Sierra Club, and Goethe State Forest. Primo Water sent the water stewardship plan, the AWS overview presentation (including water-related challenges), and an interview or feedback request on shared water challenges to all these organizations. A PowerPoint presentation was sent via email by Primo Water to relevant stakeholders. The communication log included individuals and organizations that Primo Water attempted to contact (most of them since September 2020) and notes regarding the presentation and Water Stewardship Plan sent via email. Primo Water received limited responses by these stakeholders and general requests to be kept updated. Primo Water reported that communication delays are also due to the COVID-19 pandemic and that they are currently in the process to schedule webinar with different organizations. Major NCR 2020.01 was issued: Insufficient stakeholder feedback on water related interests and challenges was obtained. Therefore, no direct stakeholder input was used to identify shared water challenges. Stronger stakeholder engagement and consultation should be implemented in order to obtain direct feedback on shared water challenges.	

					Minor NCR 2020.01 was issued: Limited evidence of stakeholder feedback on water related concerns and challenges was provided. The site should continue their efforts toward stronger stakeholder consultation to demonstrate effectiveness of their engagement process with stakeholders and incorporation of their feedback into the Water Stewardship Plan.	
	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 .	OBS			Existing site water-related risks have been identified as tankers spills and Riverine flood (the latter is the only high climatic water risk identified using the Aqueeduct Web Tool). OBS 2020.02 was issued: No site water-related incident response plans were available for review. While the water-related risks were identified and described, an emergency-response plan that addresses these water risks and clearly describes the response actions, should be readily available (current, dated, and signed).	
	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 borehole BH-2 and is transported via underground pipelines to the on-site bulk water loading station for treatment. All water loaded to the tankers is metered. The PLC/Computer system controls tanker truck loading. Once loaded the water is transported to the Crystal Springs bottling plant for further processing and packaging. 0.097% of water is also extracted from the utility well and is used as a potable water supply for the site restroom. Most of the water lost during site operations is returned to the basin via discharge to the ground. The main on-site water balance components were identified and listed.	
	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	OBS			The site water balance was presented 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 precipitation, evapotranspiration, runoff, site operations, domestic well use). The	

	or environment, an indication of annual high and low variances shall be quantified.			hydrogeological spring basin water balance indicates that the site maintains a sustainable water balance (i.e.: there is sufficient water available for site use). This is also confirmed by the stable long-term water level data (2000 - 2020) collected by the Suwannee River Water Management District (SRWMD) from the onsite monitoring. The site water balance is provided in a table which accounts for estimated water pumped from the primary borehole (inflows), estimated water used at the site (losses), and metered water transported offsite (outflows). The data were provided on a monthly basis and are available for the most recent nine months. The site plans to update the table going forward to provide variance and seasonal variations in water usage rates going forward. An estimated site-specific water efficiency parameter was provided to establish a baseline or future goals against which to measure future improvements or changes. OBS 2020.3 was issued: Monthly Site water balance data are only available for the most recent nine months. In order 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. OBS 2020.4 was issued: Primo Water reported that they plan to install a meter at borehole BH-2. Once that gets accomplished, it will be useful to • update the water balance; and • update the site-specific water efficiency parameter using the metered water extraction quantities.	
	1.3.4 Water quality of the site's water source(s), provided waters, effluent and receiving water bodies shall be quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be quantified.	Yes		Annual and quarterly sampling data were summarized and provided for water quality of the spring sources. Tests are performed by accredited laboratories on a regular basis and include pH, alkalinity, turbidity, TDS and other parameters (inorganics, organics, nutrients, disinfection byproducts, bacteria, and radiological constituents). Water quality data is regularly compared to available screening criteria. The records reviewed showed that no parameters exceeded any regulatory standards.	

	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 and stored at the site was provided. A restroom and an associated septic system were required to be installed at the site since 2008. The holding tank, “zero waste” and equipped with a high-level alarm, is pumped out by a local wastewater disposal contractor on a quarterly basis. Spill kits are kept in the treatment building in the unlikely event that onsite truck traffic may cause spill accidents. Due to the geology of Western Florida, the site is inherently vulnerable to groundwater contamination. Because of this known risk, the spring, site area, and site borehole are closely monitored. In addition, a vulnerability assessment was conducted of the Wekiva Spring site and surrounding areas to identify potential sources of contamination or security risks that could render the water source unusable.	
	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: Three spring pools collectively known as Wekiva Springs, boreholes BH-2 and BH-2, SRWMD monitoring well used for aquifer water level monitoring, and a utility well used for potable water supply for onsite restroom. 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 Wekiva 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 2020.04: 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 restroom with running potable water and soap is provided for use by the water tanker drivers, maintenance staff, and any supervised site visitors.	
1.4 Gather data on the site’s indirect water use, including: its primary inputs; the water use embedded in the	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 Wekiva 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 cleaning the septic tank) were estimated to account for less than 5 % of the total weight or cost of the goods generated at the site	

production of those primary inputs the status of the waters at the origin of the inputs (where they can be identified); and water used in out-sourced water-related services.	1.4.2 The embedded water use of outsourced services shall be identified , and where those services originate within the site's catchment, quantified .	Yes			The Wekiva 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 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 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 and regional permits and regulatory requirements was provided, including permits issued by Suwannee River Water Management District (SRWMD) and Florida Department of Health (FLDOH).	
	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, Wekiva Springs withdrawal, and groundwater storage changes annual data were provided for the Waccasassa River catchment. Primo Water withdrawals are estimated to be less than 2% the groundwater consumptive use. Water scarcity has not been identified as an issue for the site except in times of drought, which, based on the water balance and WRI Aqueduct Tool analysis is currently considered to be a low-medium risk and not an issue in this basin. If drought occurs the site plans to reduce the volumetric total use according to corresponding state mandated conservation restrictions. Water quantity information of the Waccasassa River Catchment was made available through links which include monthly data (stream flow, surface velocity, stream width and depth).	

					OBS 2020.5 was issued: To provide an indication of seasonal variations of the water usage rates in the catchment, the inclusion of monthly or seasonal data would be valuable.	
	1.5.4 Water quality, including physical, chemical, and biological status, of the catchment shall be identified , and where possible, quantified . Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be identified .	Yes			Water quality information of the Waccasassa River Catchment was summarized and made available through links to the publicly available USGS water information system, which includes monthly chemical, physical, and biological data.	
	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.				IWRAs have been identified and mapped, along with a description of their water-related issues and risks. IWRAs include: Henry Beck Park, Lower Waccasassa Conservation Area, Waccasassa Bay Preserve State Park, and the Waccasassa River Basin drainage area (which includes the unnamed tributary to the Wekiva River). The status and condition of these IWRAs is based on publicly available documentation.	
	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 existing and planned water-related infrastructure in the catchment was provided with a description, exposure scenarios and opportunities. Infrastructure includes drinking water, waste water, stormwater, hydrologic and habitat restoration, and green infrastructure.	
	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. Levy County census information was provided and reviewed.	
	1.5.8 Advanced Indicator Efforts by the site to support and undertake catchment level water-related data collection shall be identified .			NA	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 .			NA	Advanced criteria not considered for the Site.	

1.6 Understand current and future shared water challenges in the catchment, by linking the water challenges <i>identified</i> by stakeholders with the site's water challenges.	1.6.1 Shared water challenges shall be <i>identified</i> and prioritized from the information gathered.	OBS			A prioritized list with rationale of potential shared water challenges was provided and reviewed. Relevance is noted as well. The site's challenges were prioritized based on internal assessment and on local agencies' public reports. OBS 2020.06 was issued: As stated in Major 2020.01, evidence of stakeholder consultation on shared water challenges was insufficient. Once the corrective action for this major finding is provided, the list of shared water challenges should be updated accordingly.	
	1.6.2 Initiatives to address shared water challenges shall be <i>identified</i> .	Yes			A list of initiatives was provided and reviewed including collecting site specific data on water levels, water use, rainfall, and water quality data, involvement with local watershed associations, more stakeholders outreach, education, and engagement.	
	1.6.3 Advanced Indicator Future water issues shall be <i>identified</i> , including anticipated impacts and trends			NA	Advanced criteria not considered for the Site.	
	1.6.4 Advanced Indicator Potential water-related social impacts from the site shall be <i>identified</i> , resulting in a social impact assessment with a particular focus on water.			NA	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 <i>identified</i> in 1.6.	1.7.1 Water risks faced by the site shall be <i>identified</i> , 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. Sufficient Water Availability is identified as a high priority risk for the site during times of drought, which, based on the site and catchment water balance and WRI Aqueduct Tool analysis is currently considered to have a low-medium likelihood to occur. The WRI Aqueduct Web Tool (link provided) was used to assess water risks for the site. Water risks matched the water challenges identified by Primo Water.	
	1.7.2 Water-related opportunities shall be <i>identified</i> , 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 water challenges identified by Primo Water and water risks lists. First priority is based on water availability and the risk of over extraction and drought. (Drought is currently considered to be low-medium risk based on the water balance and WRI Aqueduct Web Tool.) 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 Wekiva Springs 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 a regional plan, Coastal Rivers Basin Surface Water Improvement and Management (SWIM) Plan, prepared for Suwannee River Water Management District, November 2017 as catchment best practice for water governance. Primo Water engages with regulatory agencies to share information and best 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 in the Coastal Rivers Basin Surface Water Improvement and Management (SWIM) plan. Primo Water operates and maintains its spring site in accordance with the following approvals and regulatory requirements: Permit (also see 40 CFR Part §141.403), FDA Report (also see 21 CFR Part §165.110).	
	1.8.4 Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified .	Yes			Primo Water identified the SWIM Plan as catchment best practice for site maintenance of IWRAs. The site follows practices which focus on preventative maintenance and monitoring of the site 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. An on-site restroom is provided for the water tanker drivers and maintenance staff. Running potable water and soap are provided. A water cooler is kept inside the building for drinking.	
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, 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 Vice-President, Government Affairs and ESG Programs, was reviewed and contains all elements described in this indicator.	
	2.1.2 Advanced Indicator A statement that explicitly covers all requirements set out in Indicator 2.1.1 and is signed by the organization's senior-most executive or governance body and publicly disclosed shall be identified .			NA	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.	

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 Vice President, Government Affairs and ESG Program was provided and reviewed. Primo Water's stated strategy and commitment are 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.	OBS			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. Sufficient Water Availability, Water Quality, and Education are water topics identified in this plan. OBS 2020.06 was issued: The Water Stewardship plan would benefit from having more specific targets, especially for the Sufficient Water Availability shared water challenge, in order to establish comparison points for future review. Water Stewardship Plan should be updated with feedback from stakeholders on shared water challenges.	
	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.			NA	Advanced criteria not considered for the Site.	
	2.3.4 Advanced Indicator The site's partnership/water stewardship activities with other sites in another catchment(s) (either under same corporate structure or with another corporate site) shall be identified .			NA	Advanced 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			NA	Advanced criteria not considered for the Site.	

	consensus and in which stakeholders are involved shall be identified .					
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 education outreach to stakeholders, and quarterly outreach on shared water challenges to disclose site operations and discuss potential water risks identified. The planned actions 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 .			NA	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 seek input, feedback, and participation from the identified stakeholders to support good catchment governance by sharing their Water Stewardship Plan and AWS presentation with regulatory agencies, surrounding land users and watershed groups, and through continuing education on AWS and outcomes toward good water governance. Meetings are scheduled with these goals in mind, as stakeholder input has yet to be received.	
	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 permit issued by Suwanee River Water Management District (SRWMD). 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			NA	Advanced criteria not considered for the Site.	

	Evidence of improvements in water governance capacity from a site-selected baseline date shall be identified .					
	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 .			NA	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 actions was provided and reviewed. The list includes responsible staff to ensure maintenance of compliance. A third-party is contracted to confirm compliance is maintained.	
	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 water rights at the site are part of the legal and regulatory requirements of the site permits provided by Suwannee River Water Management District, the FL DEP and Levy County. 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 or potential water challenge except in times of drought, which is considered to be a low – medium risk, based on site and catchment water balance and on the Aqueduct Tool Analysis. 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 .			NA	The site is not re-allocating water savings.	
	3.3.4 Advanced Indicator			NA	Advanced criteria not considered for the Site.	

	The total volume of water voluntarily re-allocated (from site water savings) for social, 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			Water quality targets have been defined as maintaining the site as a high-quality potable spring water site. Primo Water plans to keep the Wekiva Spring 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 potential 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 Suwannee River Water Management District (SRWMD) and education material and programs to the public/stakeholders.	
	3.5.2 Advanced Indicator Evidence of completed restoration of non-functioning or severely degraded Important Water-Related Areas including where appropriate cultural values from a site-selected baseline date shall be identified . Restored areas may be outside of the site, but within the catchment.			NA	Advanced 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 .			NA	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 restroom is provided for use by the water tanker drivers and maintenance staff and any supervised site visitors (tour groups,	

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 .				regulatory or audit inspectors, contractors and company officials). Running potable water and soap are provided. A water cooler is kept inside the building for drinking.	
	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. 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 well 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 .			NA	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 .			NA	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 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 no targets have been set.	

	3.7.3 Advanced Indicator Actions taken to address water related risks and challenges related to indirect water use outside the catchment shall be documented and evaluated .			NA	Advanced criteria not considered for the Site.	
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 area water users (sparse residential well use). As part of the water stewardship plan Primo Water plans to 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 provided documentation of their efforts to engage with regulatory agencies, surrounding land users and watershed groups. Feedback has not yet been received.	
	3.9.2 Actions towards achieving best practice, related to targets in terms of water balance shall be implemented .	Yes			The Wekiva site is a spring site only, bottling activity does not occur at the site. Water loss (as it may affect the water balance) is reportedly insignificant. Catchment best practices identified to maintain good water balance include: monitoring water extractions, water supply planning, maintaining minimum flows and levels, water resource development, aquifer recharge, and conservation. Per the water stewardship plan, Primo Water will install a computer data collection system that records data at a frequency above regulatory requirement.	
	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 IWRA's have been identified and provided through links. 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 IWRA's 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 .	Yes			There is adequate WASH in the catchment.	
	3.9.6 Advanced Indicator Achievement of identified best practice related to targets in terms of good water governance shall be quantified .			NA	Advanced criteria not considered for the Site.	
	3.9.7 Advanced Indicator Achievement of identified best practice related to targets in terms of sustainable water balance shall be quantified .			NA	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 .			NA	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 .			NA	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 .			NA	Advanced criteria not considered for the Site.	
	3.9.11 Advanced Indicator A list of efforts to spread best practices shall be identified .			NA	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 .			NA	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			NA	Advanced criteria not considered for the Site.	

	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 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 .	OBS			Primo Water has evaluated performance of the Stewardship Plan which is aligned with realizing the AWS Outcomes. They have committed to track the targets established in the Plan based on multiple actions with measurable metrics, documentation of stakeholder engagement, and evaluation of changes in water risk for each target. The evaluation will also include a cost/benefits review and describe shared value benefits for each target. Further evaluation will be conducted during the surveillance and renewal audits. OBS 2020.07 was issued: As discussed during the audit, most of the targets in the water stewardship plan have been set up recently and the corresponding actions to meet them have a start date of end of 2020/2021, so while the site is already planning to start implementing plans, it is still too early to gather evidence of any results or improvements. Therefore, further evaluation will be conducted during the surveillance and renewal audits to check on the progress of the site performance against the set targets.	
	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, and through education. Knowledge gained through implementation is being shared with other water regulatory agencies and NGOs in and out of the catchment.	

	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. Quantification of these efforts are not currently possible. But with continued application of the stewardship plan, these efforts will be tallied and quantified.	
	4.1.4 Advanced Indicator A governance or executive-level review, including discussion of shared water challenges, water risks, and opportunities, and any water-related cost savings or benefits realized, and any relevant incidents shall be identified .			NA	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			No water-related emergency events occurred that impacted the site operations or that caused the site to impact the catchment. No shutdown occurred that was water related. Rain deficit and tropical storms occurred during the audit assessment period were listed by the site and their impact evaluated resulting in no necessary corrective actions or mitigation. The site plans to document any future emergency events as part of their annual environmental reviews, in addition to the evaluation of water related emergencies risks and mitigation measures included in the Water Stewardship Plan.	
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 efforts were conducted and documented in the communications log. The Water Stewardship Plan and AWS presentation were sent to the identified stakeholders. Input and feedback have not yet been received from external stakeholders. The site continues to pursue engagement and consultation opportunities. <i>See MR 2020.01 for the related finding.</i>	
	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			NA	Advanced criteria not considered for the Site.	

	across all five outcome areas, and their suggestions for continual improvement.					
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 and feedback will be incorporated in the plan.	
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			The site shared their water-related internal governance through materials emailed to stakeholders including an AWS PowerPoint presentation and the Water Stewardship Plan disclosing the positions of those accountable for compliance with water-related laws. 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 emailed communications with catchment authorities about the AWS process were provided. The AWS PowerPoint Presentation and the Water Stewardship Plan summarize the outcomes. Both documents were sent to identified relevant stakeholders via email.	
5.3 Disclose annual site water stewardship summary, including the relevant information about the site's annual water stewardship performance	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, which included sites 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.	
	5.3.2 Advanced Indicator			NA	Advanced criteria not considered for the Site.	

and results against the site's targets.	The site's efforts to implement the AWS Standard shall be disclosed in the organization's annual report.					
	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.			NA	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 site 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 so 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 compliance violations. There are no significant risks and threats to human or ecosystem anticipated or expected by site operations. However, any site water-related violations that may pose significant risk and threat to human or ecosystem health will be immediately communicated to relevant public agencies and disclosed.	
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: Stephen Montgomery, Florida Forest Service, (352) 395-4926 | Tara Maillard, Soil and Water Conservation District, taramsoilandwater@gmail.com | Sarah Younger, Suwannee - St. John's Group Sierra Club, youngersn@outlook.com

Stakeholder Matrix (page 1 of 1)			
Questions for conversation:	Stephen Montgomery	Tara Maillard	Sarah Younger
- 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 received some information via email, has received PowerPoint presentation and plans to review it before meeting with Primo 11/18. Not familiar with AWS or Primo's operations but interested to learn and engage. Willing to be interviewed again in the future.	Via email: Board has not had its regularly scheduled meeting yet this month. She will be discussing with them at that time and seeking interest in interviewees.	Via email: Indicated interest in interview, awaiting scheduling details for week of 11/9.