

Client Name: Primo Water North America – Georgia Mountain Spring, GA

AWS Registration Number: AWS-000343

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

Audit Team: Rae Mindock - Lead Auditor
Isabella Polenghi-Gross - Team Auditor

Audit Date: September 16, 2021

Stakeholder Notification: AWS and SCS websites 7/16/21, local newspaper 7/28/21

Site Location: Southwest of the City of Blue Ridge, Fannin County, Georgia, near the intersection of Sugar Creek Road and Willow Creek Drive

Report Date: November 2, 2021

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

Audit Type	<input type="checkbox"/> Gap Analysis	X Initial Certification	<input type="checkbox"/> Surveillance
	<input type="checkbox"/> Pre-assessment		<input type="checkbox"/> Recertification

Level of Certification	X Core	<input type="checkbox"/> Gold	<input type="checkbox"/> Platinum

Site Information

Site Description

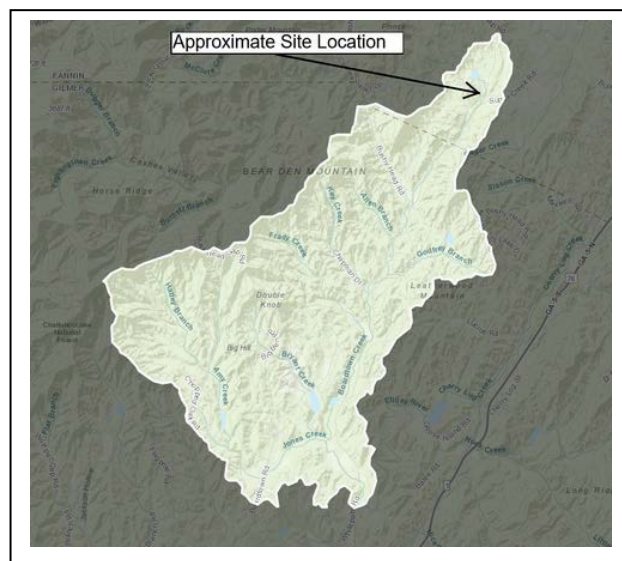
The Georgia Mountain site is located on a 110-acre parcel located within the Chattahoochee-Oconee National Forest southwest of the City of Blue Ridge, Fannin County, Georgia, near the intersection of Sugar Creek Road and Willow Creek Drive. The Site has been in use as a source of bulk spring water since 1981. The water used for bottling is obtained from four (4) onsite boreholes associated with the onsite springs. Water is extracted and stored onsite in two (2) storage silos. Primo Water owns and operates both the boreholes and spring sources. The water is then transported by tanker trucks to Primo Water's Crystal Springs - Mableton, GA bottling plant. The Mableton bottling plant is not included in the scope of this project / certification.

Catchment Description

The Georgia Mountain Site and associated features are situated along the Boardtown Creek, which discharges into the Ellijay River (Confluence Point). The Ellijay River is located within the Coosawattee River Sub-Catchment (HUC8: 03150102) of the larger Coosa River Catchment, which eventually flows into the Alabama River, and ultimately discharges to the Gulf of Mexico. The areas are well defined and mapped.

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.



Audit Attendees

Participant/Title	Opening Meeting	Document Review	Site Inspection	Closing Meeting
Director Water Resources	X	X	X	X
VP Water Resources	X	X	X	X
VP Gov. Affairs and ESG Programs	X	X	X	X
EARTHRES Consultant Project Manager	X	X	X	X
Internal Stakeholders: Tanker Truck Driver, Regional Quality Assurance Manager, VP Water Resources External Stakeholder: Adjacent Property Owner, Executive Director Fanning County, Nature Conservancy				
Supporting Documentation: The Georgia Mountain 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 that 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.				

Summary of Findings

Step	Major	Minor	Observations	Advanced Criteria Total Points
1. Gather & Understand	0	0	2	
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	2	n/a

Audit Non-conformities and Observations

Non-Conformity (Major or Minor) or Observation	Citation	Criteria/ Indicator	Due Date	Detail and Corrective Action
Observation	OBS 2021.01	1.3.1	NR	OBS 2021.01 was issued. The spring total withdrawal quantities are estimates based on tankered volumes amounts and are not measurements of the actual extraction quantities. The Site plans to add flow meters to the monitoring network which would provide measured data to support water balance.
				Root Cause Analysis and Corrective Action Not required for Observation.
Observation	OBS 2021.02	1.5.3	NR	OBS 2021.02 was issued. While four years of annual data were provided, no seasonal variance was discussed. It would be sufficient to show monthly values throughout at least a whole year, if available.
				Root Cause Analysis and Corrective Action Although action is not required for an Observation, the water balance was updated on November 4 th to show seasonal variation.

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>		 Shana Golden
<i>Technical Review by:</i>		 Shana Golden
<i>Date of Decision:</i>		November 11, 2021
<i>Surveillance Schedule:</i>		Next audit is scheduled for: <div style="text-align: center;">November 2022</div> 12-month Surveillance Recommended

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: <ul style="list-style-type: none"> - 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			<p>Primo Water North America (Primo Water) Georgia Mountain Spring site is located within the Chattahoochee-Oconee National Forest, southwest of the City of Blue Ridge, Fannin County, Georgia.</p> <p>The Site, surrounded mostly by undeveloped forestland and by the Willow Falls Resort to the north, occupies 110 acres and includes several natural springs and seeps, four production boreholes, two water supply wells (one onsite and one offsite), underground piping, water treatment and storage equipment (silos), an existing loading station a warehouse, and Carrol Lake. The site boundaries and water-related infrastructure were mapped.</p> <p>Four boreholes (boreholes B3, B4, B5, and B6) are used to obtain spring water from the Site for bottling purposes. Water is pumped from the boreholes through underground pipelines to the on-site bulk water loading station for treatment (micron filters) and storage in two water storage silos. Water stored in the silos is pumped through additional micron filters, an ultraviolet unit for disinfection, and then into tanker trucks. The loaded spring water is transported approximately 90 miles to the Crystal Springs water bottling plant in Mableton, GA for final processing and packaging. The Mableton bottling plant treats, processes, packages, and distributes the spring water as a finished product to home and office customers via route trucks. The Georgia Mountain springs, boreholes and the Mableton bottling facility are owned and operated by Primo Water. The Mableton bottling plant not being included in the scope of the certification.</p> <p>There is no external water service provider for the site or site area. Water is extracted for local potable use from two water supply wells in the area of the property: W-1, which is onsite and is owned and operated by Primo Water for domestic use on their property; and W-2, which is just offsite and is owned and operated by the adjacent Willow Falls Resort for servicing their cabins.</p> <p>There is no wastewater service provider for the Site. Septic waste from the Warehouse building is conveyed to an onsite septic tank and subsequent leach fields. Stormwater runoff generally flows southeast and offsite to the Boardtown Creek.</p> <p>The Georgia Mountain Spring Site and associated features are situated along the Boardtown Creek, which discharges into the Ellijay River</p>	

					(Confluence Point). The Ellijay River is located within the Coosawattee River Sub-Catchment of the larger Coosa River Catchment, which eventually flows into the Alabama River, and ultimately discharges to the Gulf of Mexico. 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.	<p>1.2.1 Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified.</p> <p>This process shall:</p> <ul style="list-style-type: none"> - 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			<p>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: Crystal Springs Plant Manager, Georgia Department of Natural Resources, Georgia Department of Agriculture, Fanning County, and others. 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 and certified mail by Primo Water to relevant stakeholders.</p>	
	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	1.3.1 Existing water-related incident response plans shall be identified .	Yes			<p>Water-related Plans identified at the site include Site Spill Plan with other Emergency Plans referenced with contacts provided.</p> <p>OBS 2021.01 was issued. The spring total withdrawal quantities are estimates based on tankered volumes amounts and are not measurements of the actual extraction quantities. The Site plans to add flow meters to the</p>	

governance, WASH; water-related costs, revenues, and shared value creation.					monitoring network which would provide measured data to support water balance.	
	1.3.2 Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped .	Yes			The main on-site water balance components were identified and listed. Water Inputs include precipitation. Water outputs include evapotranspiration, runoff, consumptive use, Georgia Mountain Spring Site withdrawal, groundwater discharge to Coosa River, springs, and tributaries. Water usage at the site comes from the site spring sources (through boreholes and water supply wells). Water outflows from the Site include the water hauled offsite to the Mableton, GA bottling plant, and septic system wastewater.	
	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			<p>The site water balance was quantified and presented in two ways: 1) hydrogeologically as it relates to the spring recharge area; and 2) as it relates to site water operations.</p> <p>The hydrogeological spring basin water balance table shows the annual values of inputs and outputs of water at the spring site (including precipitation, evapotranspiration, runoff, domestic well use, Georgia Mountain spring withdrawals, groundwater discharge), and the changes in surface or groundwater storage. All data (some measured and some estimated) were provided over four years (2017-2020) and on a monthly basis for the 12-month period of January through December 2020, providing an indication of both annual and monthly high and low variances. An estimated site-specific water use efficiency parameter was provided to establish a baseline or future goals against which to measure future improvements or changes. The site-specific efficiency parameter is consistent with bench study published by the North America bottled water industry. The hydrogeological spring basin water balance indicates that the site maintains a sustainable water balance.</p>	
	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			<p>Georgia Mountain spring water flowing from the springs is reportedly tested daily, weekly, monthly, and annually by accredited laboratories. Raw water and finished products are tested on an on-going and regular basis, and throughout the bottling process. Both raw water and finished product sample results are reported annually.</p> <p>Annual sampling data were summarized and provided for water quality of the spring sources. Tests include pH, alkalinity, turbidity, TDS and other parameters (inorganics, organics, disinfection byproducts, bacteria, and radiological constituents). Water quality data is regularly compared to available applicable screening criteria. 2017-2020 annual reports were</p>	

					provided and reviewed. 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, and other potential pollution sources at the site was provided, mapped and reviewed during the site visit.	
	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 IWRA include: Two spring pools collectively known as Georgia Mountain Springs (Big Spring and Little Spring), boreholes B3, B4, B5 and B6, Water Supply Well, Carroll Lake, and several unnamed tributaries. These site IWRA 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 Georgia Mountain 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.	
	1.3.8 Levels of access and adequacy of WASH at the site shall be identified .	Yes			A restroom is provided for use by the water tanker drivers, maintenance staff, and any supervised site visitors. At the time of the site visit, the water line supplying the water had been damaged during actions at an adjacent property. Actions to repair the line were already in place.	
1.4 Gather data on the site's indirect water use, including: its primary inputs; the water use embedded in the production of those primary inputs the status of the waters at the origin of the inputs (where they can be identified); and water used in out-sourced water-related services.	1.4.1 The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be identified .	Yes			A list of vendors for primary inputs was provided for the Georgia Mountain Spring site. The identified primary inputs (associated with cleaning in place products) originate from outside the Georgia Mountain Spring site catchment areas and account for less than five percent of the total weight of the goods generated at the site.	
	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 primary service used by the Georgia Mountain Spring site 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.	

1.5 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 the Regulatory Approval Georgia Mountain Spring issued by the Georgia Department of Natural Resources.	
	1.5.3 The catchment water-balance, and where applicable, scarcity, shall be quantified , including indication of annual, and where appropriate, seasonal, variance.	Yes			<p>The catchment water balance with precipitation, groundwater discharge, consumptive use, runoff, evapotranspiration, Georgia Mountain Springs withdrawal, and groundwater storage changes annual data were provided for the Coosa River catchment.</p> <p>The mountainous region around the Site is susceptible to regional droughts and according to the WRI Aqueduct Tool analysis, water scarcity is currently considered to be a low-medium risk in this basin; however, no groundwater table decline is reportedly observed, the site springs continue to flow, and boreholes are unaffected. Water quantity information of the Coosa River Catchment was made available through references.</p> <p>OBS 2021.02 was issued. While four years of annual data were provided, no seasonal variance was discussed. It would be sufficient to show monthly values throughout at least a whole year, if available.</p> <p>OBS 2021.02 was addressed. Although action is not required for an Observation, the water balance was updated on November 4th to show seasonal variation.</p>	
	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	Yes			Water quality information including physical, chemical, and biological status of the Coosa River Catchment was summarized and made available through links to publicly multi-annual available reports prepared by the City of Blue Ridge, Fannin County, and Coosa River Basin Management agencies. Water quality was also evaluated using the <i>Model My Watershed</i> , a watershed-modeling web app that enables the public to analyze water-quality impacts among other useful applications.	

	annual, and where appropriate, seasonal, high and low variances shall be identified .					
	1.5.5 Important Water-Related Areas shall be identified , and where appropriate, mapped , and their status assessed including any threats to people or the natural environment, using scientific information and through stakeholder engagement.	Yes			IWRAs have been identified and mapped, along with a description of their water-related issues and risks. IWRAs include: Weiss Lake, Allatoona Lake, and Carters Lake. 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. Fannin County census information was provided and reviewed.	
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 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.	
	1.6.2 Initiatives to address shared water challenges shall be identified .	Yes			A list of initiatives was provided and reviewed including collecting site specific data on water levels, water use, rainfall, and water quality data, involvement with local watershed associations, more stakeholders outreach, education, and engagement.	
1.7 Understand the site's water risks and opportunities: Assess and prioritize the water risks and opportunities affecting the site based upon the	1.7.1 Water risks faced by the site shall be identified , and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.	Yes			A prioritized list of water risks was provided and reviewed. 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 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.	

status of the site, existing risk management plans and/or the issues and future risk trends identified in 1.6.	1.7.2 Water-related opportunities shall be identified , including how the site may participate, assessment and prioritization of potential savings, and business opportunities.	Yes			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 Georgia Mountain 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, the Coosa River Plan (1998) 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 Coosa River Plan (1998). 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 Coosa River Plan (1998) 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 available for the water tanker drivers and maintenance staff. At the time of the site visit, the water line supplying the water had been damaged during actions at an adjacent property. Actions to repair the line were already in place.	
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.	
2.2 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. The strategy also includes a signed commitment that is publicly disclosed. 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.	Yes			A detailed Water Stewardship Plan was created as part of the AWS process. The plan is broken down into, targets, metrics, actions, and outcomes. There are different actions corresponding to different targets, each with their own metrics, costs, responsible person, anticipated timing and criteria. Sufficient Water Availability, Water Quality, and Education and shared water challenges are water topics identified in this Plan.	
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 also include quarterly education outreach to stakeholders 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. The Georgia Mountain Spring Site also provided a detailed description of their existing water-related incident response plans: Spill Plan, the Drought Emergency Mitigation Plan, the Dam Emergency Mitigation, the Earthquake Emergency Mitigation, the Flood Emergency Mitigation, Landslide Emergency Mitigation Plan, the Tornado/Severe Weather Emergency Mitigation Plan, and the Wildfire Emergency Mitigation.	
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.	
	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 State of Georgia. Indigenous people have not been identified in the site area.	
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.	
	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 the State of Georgia. Indigenous people have not been identified in the site area.	
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 medium risk, based on site and catchment water balance and on the Aqueduct Tool Analysis.	
	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.	
	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 Georgia Mountain Spring site in its current undeveloped state as forest land to	

3.4 Implement plan to achieve site water quality targets.					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. 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 IWRA's 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 forest management.	
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			A restroom is provided for use by the water tanker drivers and maintenance staff and any supervised site visitors (tour groups, regulatory or audit inspectors, contractors and company officials). At the time of the site visit, the water line supplying the water had been damaged during actions at an adjacent property. Actions to repair the line were already in place.	
	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 annual site reports as well as the disclosures provided with stakeholders per the Water Stewardship Plan.	
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 negligible, 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	Yes			Indirect water use at the site is negligible, and no targets have been set.	

	engagement related to indirect water use, shall be identified .					
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			Shared-water infrastructure includes the well W-1 which supplies water to the restrooms in the former bottling plant and adjacent brown house. The Site is in communication with the 3 rd party property owner.	
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.	
	3.9.2 Actions towards achieving best practice, related to targets in terms of water balance shall be implemented .	Yes			The Georgia Mountain 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.	
	3.9.3 Actions towards achieving best practice, related to targets in terms of water quality shall be implemented .	Yes			The site exceeds requirements outlined with sampling frequency, and parameters analyzed. Water quality data provided meets and exceeds regulatory requirements. Actions toward best practice will be further implemented through engagement and disclosure to the stakeholders as detailed in the water stewardship plan.	
	3.9.4 Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented .	Yes			Relevant sector best practices for maintenance of IWRAs have been identified 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 IWRAs will be further implemented through engagement and disclosure to the stakeholders as provided in the water stewardship plan.	
	3.9.5 Actions towards achieving best practice related to targets in terms of WASH shall be implemented .	Yes			There is adequate WASH in the catchment based on demographics. Additionally, Primo Water routinely engages in water donations during community crises where access to potable water is diminished or need is high. A summary of corporate water donation to the community in response to emergency events was provided.	
Advanced Points Step 3						
STEP 4: Evaluate						

Criteria	Indicator	Yes	No	NA	Objective Evidence/Findings	Points
4.1 Evaluate the site's performance in light of its actions and targets from its water stewardship plan and demonstrate its contribution to achieving water stewardship outcomes.	4.1.1 Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated .	Yes			Primo Water has evaluated performance of the Stewardship Plan, which is aligned with realizing the AWS Outcomes. 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.	
	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 quantified.	
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.	
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. The site continues to pursue engagement and consultation opportunities.	

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 mailed and/or 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 or certified mail.	
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, 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.	

5.4 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 there are no corrective actions to disclose. In the event of such an occurrence, they will be publicly available through state and federal reporting (ECHO/US EPA) and will be disclosed annually to stakeholders.	
	5.5.2 Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.	Yes			See 5.5.1	
	5.5.3 Any site water-related violation that may pose significant risk and threat to human or ecosystem health shall be immediately communicated to relevant public agencies and disclosed .	Yes			Violations are publicly available through state and federal reporting (ECHO/U.S. 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						