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Client Name:	Primo Water North America – Mountain Valley, AR
AWS Registration Number:	AWS-000344
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:	August 19, 2021
Stakeholder Notification:	AWS, SCS, Local newspaper 7/16/21
Site Location:	283 Mountain Valley Water Place, Hot Springs Village, Arkansas, 71909
Report Date:	October 28, 2021

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

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

Level of Certification	X Core	☐ Gold	☐ Platinum

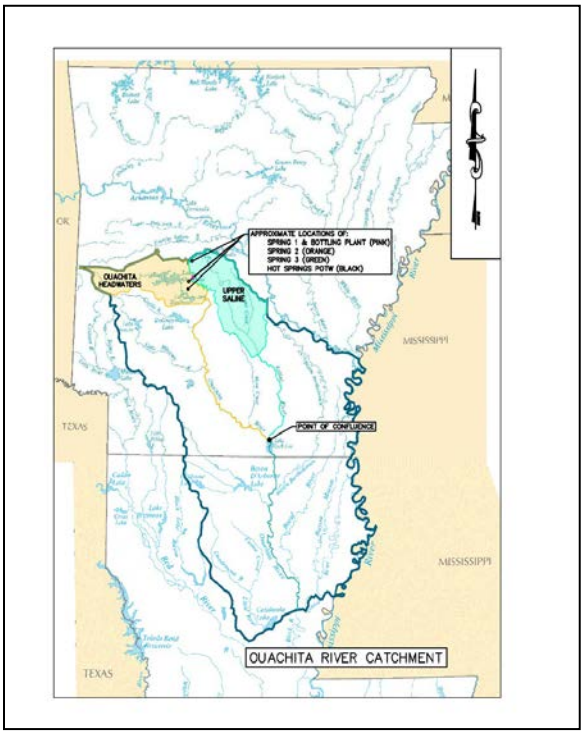
Site Information

Site Description

The Mountain Valley site is located in Garland County, Arkansas. The water used for bottling is obtained from three natural spring sources located on three parcels including the bottling plant; the separate parcels total approximately 2,076 acres . One spring source is located onsite, while two spring sources are located on nearby, separate parcels. Primo Water owns and operates both the bottling plant and spring sources. The water from each spring is transported via underground pipelines to the Mountain Valley bottling plant for treatment, processing, packaging, and ultimately distribution to home and office (HOD) customers via route trucks. Water use from each spring is monitored continuously with separate level sensors and flow meters, respectively. A plastics supply plant is located on the property adjacent to the bottling plant. The facility, now owned by Mountain Valley Water, is used to manufacture plastic bottles for the Mountain Valley bottling facility.

Catchment Description

The Mountain Valley Bottling Plant and associated NPDES Outfall 002 discharge, Spring 1, and Spring 2 are situated along the Glazypeau Creek, which is located within the Ouachita Headwaters Sub-Catchment (HUC: 08040101). Spring 3 is situated along an unnamed tributary to Coleman Creek, which is located in the Upper Saline Sub-Catchment (HUC: 08040203). Flow from both sub-catchments eventually combine in the Ouachita River, at a confluence point just north of Lake Jack Lee and Marais Saline and ultimately drain into the Gulf of Mexico.



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

Title	Opening Meeting	Document Review	Site Inspection	Closing Meeting
Director Water Resources	x	x	x	x
VP Water Resources	x	x	x	x
Chief Operating Officer	x	x		x
Quality Manager	x	x		x
EARTHRES Consultant Project Manager	x	x	x	x
Quality Control Supervisor			x	
Tank Room Tech			x	

External Stakeholders – Hot Springs Wastewater Treatment, Garland County Environmental Inspections, Adjacent Property Owner

Internal Stakeholders – Chief Executive Officer, Quality Control Supervisor, Tank Room Tech (Treatment)

Supporting Documentation:

The Mountain Valley 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.

Summary of Findings

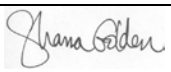
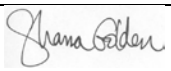
Step	Major	Minor	Observations	Advanced Criteria Total Points
1. Gather & Understand	0	1	3	
2. Commit & Plan	0	0	0	
3. Implement	0	0	0	
4. Evaluate	0	0	0	
5. Communicate & Disclose	0	0	0	
TOTAL	0	1	3	n/a

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	1.33	NR	**OBS 2021.01 was issued**. The water balance is intended to show the variance between inflow and outflow, demonstrating that the water volumes and flows are reliably measured and accounted for. The reliable input/output/storage/losses values can be used to determine if the site maintains a sustainable water balance. The groundwater discharge was calculated using a difference in the water balance equation. Local or publicly available evidence should be provided to validate the water balance.
				Root Cause Analysis and Corrective Action Although observations are not required to be addressed, the information provided was updated to provide groundwater recharge verification language.
Minor	MN 2021.01	1.3.5	NR	**Minor 2021.01 was issued**. The chemical storage area was a potential source of pollution to the environment if a release occurred. The chemical storage should be improved to meet

				containment requirements and prevent direct discharge to the Creek. **Minor 2021.01 was closed**. Corrective action taken to address the non-conformity was two-fold: 1) Installation of an absorbent boom surrounding the Ecology Room floor drain; and 2) Installation of a secondary containment spill pallet. Evidence of corrective action was provided to the audit team.
				Root Cause Analysis and Corrective Action Minor closed.
Observation	OBS 2021.02	1.5.3	NR	**OBS 2021.02 was issued.** Four years of annual data were provided, although seasonal variance was not discussed. It would be sufficient to show monthly values throughout at least a whole year, if available
				Root Cause Analysis and Corrective Action Although observations are not required to be addressed, the seasonal water balance has been updated to included requested information.
Observation	OBS 2021.03	1.5.4	NR	**OBS 2021.03 was issued.** It would be beneficial to present more recent and reliable water quality information for the catchment in order to appropriately describe and quantify its physical, chemical, and biological status. If more recent information does not exist, that should be stated.
				Root Cause Analysis and Corrective Action Although observations are not required to be addressed, water quality information has ben added to provide requested information.

Certification Decision

Auditor's recommendation for initial, continued or re-certification based on compliance with requirements:	X	Recommended
		Not Recommended
Level of Certification recommended	X	AWS Core
		AWS Gold
		AWS Platinum
SCS Certification Decision:	X	Approved
		Denied
Certification Decision by:		 Shana Golden
Technical Review by:		 Shana Golden
Date of Decision:		11/11/2021
Surveillance Schedule:		Next audit is scheduled for: October 2022 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: - 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			Primo Water North America (PWNA) Mountain Valley Spring site is located in Garland County, Arkansas. The Site consists of three separate parcels that total approximately 2,076 acres. One parcel includes the bottling plant, the plastic supply plant, and one spring source. The other two parcels are each developed with spring sources. All three spring sources, owned and operated by Primo Water, are located in remote areas with minimal development. The water from each spring is piped directly into the bottling plant storage tanks through underground pipelines. The bottling plant treats, processes, packages, and distributes the spring water as a finished product. Drinking water from the Site is delivered to customers via route trucks. Municipal water (originally derived from Lake Hamilton and Rick's Lake) is also used onsite for restrooms and for water cooling in the plastics plant process. Water is also extracted from the Mountain Valley Site through two of the four on-site water wells. The site boundaries and water-related infrastructure were mapped including: the bottling plant, Spring 1 (Glazypeau Spring), the underground piping network from Spring 2 (Ross/Diamond Springs) and from Spring 3 (Jessieville Spring), a plastics supply plant (used to manufacture plastic bottles for the Mountain Valley bottling facility), the septic system/leach fields, a tank farm, NPDES Outfall 002, and four water wells of which two (Well 4 and Well 6D) are used for site operations (rinse/wash water). Wastewater from the Bottling Plant operations are discharged at Outfall 002. Effluent includes process rinse water, spring overflow, and stormwater runoff from paved areas of the bottling plant and associated lot. Surface water runoff at the site (including around Spring 1) and around Spring 2 generally flows to the south, draining into an unnamed tributary of Glazypeau Creek. Surface water around Spring 3 generally flows to the northwest to an unnamed tributary of Coleman Creek. Industrial wastewater discharge from the Bottling Plant is transported via tanker trucks and subsequently conveyed to the City of Hot Springs Regional Municipal Wastewater Collection System.	

					Mountain Valley Spring 1 and Spring 2 are situated along the Glazypeau Creek, which is within the Ouachita Headwaters Sub-Catchment. Spring 3 is situated along an unnamed tributary to Coleman Creek, which is in the Upper Saline Sub-Catchment. Flow from both sub-catchments eventually combine in the Ouachita River, at a confluence point just north of Lake Jack Lee and Marais Saline, and eventually 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.	1.2.1 Stakeholders and their water-related challenges shall be ***identified***. The process used for stakeholder identification shall be ***identified***. This process shall: - Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people; - Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies; - Provide evidence of stakeholder consultation on water-related interests and challenges; - Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups; - Identify the degree of stakeholder engagement based on their level of interest and influence.	Yes			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: Arkansas Department of Energy & Environment, Arkansas Department of Health, Arkansas Natural Resources Commission, City of Hot Springs Regional Wastewater Treatment, Garland County, Hot Springs Village, and adjacent landowners. 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.	
	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			Existing site water-related incident response plans were identified: Site Spill Plan, Chemical Spill Response Plan and local Emergency Plans.	
	1.3.2 Site water balance, including inflows, losses, storage, and outflows shall be ***identified*** and ***mapped***.	Yes			Water usage at the site comes from the three spring sources, water wells, and the municipal water source (water inflows, all metered). Water outflows from the Site includes Bottling Plant production, Outfall 002	

governance, WASH; water-related costs, revenues, and shared value creation.					discharge, tankered wastewater to the Hot Springs POTW, and septic system wastewater. Meters at each spring source are manually read on a monthly basis. Pressure transducers are installed in all silos, and water levels in the silos are monitored on a HMI readout. All water loaded to the tankers is metered and the data is stored on the onsite computer. The main onsite water balance components were identified and listed. Most of the water lost during site operations is returned to the basin via discharge to the ground/surface water.	
	1.3.3 Site water balance, inflows, losses, storage, and outflows, including indication of annual variance in water usage rates, shall be ***quantified***. Where there is a water-related challenge that would be a threat to good water balance for people or environment, an indication of annual high and low variances shall be ***quantified***.	Yes			The site water balance was presented in two ways: 1) hydrogeologically as it relates to the spring recharge area; and 2) as it relates to site water operations. 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, groundwater discharge, spring withdrawals, domestic well use), and the changes in surface or groundwater storage. The hydrogeological spring basin water balance indicates that the site maintains a sustainable water balance (i.e.: there is sufficient water available for site use). This is also confirmed by local hydrogeologic data. The site water balance is provided in a table which accounts for metered water pumped from the springs, wells and obtained from the municipal supplier (inflows), estimated water used at the site (storages and losses), and metered water transported/discharged offsite (outflows). The data were provided from site meters over four years and on a monthly basis for the period January through December 2020. An estimated site-specific water 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. **OBS 2021.01 was issued**. The water balance is intended to show the variance between inflow and outflow, demonstrating that the water volumes and flows are reliably measured and accounted for. The reliable input/output/storage/losses values can be used to determine if the site maintains a sustainable water balance. The groundwater discharge was calculated using a difference in the water balance equation. Local or	

					publicly available evidence should be provided to validate the water balance. **OBS 2021.01 was addressed**. Ground water recharge verification language added to information.	
	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			Mountain Valley spring water flowing from the springs is reportedly tested daily by quality control staff, weekly by National Testing Laboratories, at least monthly by the Arkansas Department of Health, annually by NSF International Laboratories, and periodically by other governmental bodies and private companies. Annual 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 applicable 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. At the chemical storage are in the factory, containment was adequate and there were no floor drains at the area. The factory did improve chemical containment with secondary storage with documentation forwarded to the audit team. During the site walk-through in the Ecology Room (wastewater treatment area), an open drain was observed adjacent to another chemical storage area. The drain/piping discharged outside near the outfall and Glazypeau Creek. There was no history of past chemical releases in the area. An inspection of the discharge areas did not exhibit stressed vegetation. **Minor 2021.01 was issued**. The chemical storage area was a potential source of pollution to the environment if a release occurred. The chemical storage should be improved to meet containment requirements and prevent direct discharge to the Creek. **Minor 2021.01 was closed**. Corrective action taken to address the non-conformity was two-fold: 1) Installation of an absorbent boom surrounding the Ecology Room floor drain; and 2) Installation of a secondary containment spill pallet. Evidence of corrective action was provided to the audit team.	
	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 Mountain Valley, four onsite wells use for wash water or discontinued use, NPDES Outfall 002, low-flow septic system and leach fields, two unnamed tributaries, and adjacent wetlands. 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.	
	1.3.8 Levels of access and adequacy of WASH at the site shall be ***identified.***	Yes			WASH is available on-site with potable water and toilets for employees and visitors.	
1.4 Gather data on the site's indirect water use, including: its primary inputs; the water use	1.4.1 The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be ***identified.***	Yes			A list of primary inputs for outsourced services was provided for the Mountain Valley site with estimated origin for each input and water use. All the identified primary inputs either originate from outside the Mountain Valley site catchment areas or account for less than five percent of the total	

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.					weight of the goods generated at the site. Water use includes industrial, agricultural, and municipal and is associated with packaging, transportation, and cooling.	
	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 Mountain Valley site was identified as the tanker trucking. Truck wash water use estimates were provided. Calculations were also 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 permits issued by the Arkansas Department of Health (water bottling permit), Arkansas Department of Energy & Environment (NPDES discharge permit), City of Hot Springs (industrial wastewater discharge permit), Arkansas Natural Resource Commission (annual water-use registration), and various states (licensing).	
	1.5.3 The catchment water-balance, and where applicable, scarcity, shall be ***quantified***, including indication of annual, and where appropriate, seasonal, variance.	Yes			The catchment water balance with precipitation, groundwater discharge and consumptive use, runoff, evapotranspiration, Mountain Valley Springs withdrawal, and groundwater storage changes annual data were provided for the Ouachita River catchment. Water scarcity has not been identified as an issue: based on Garland County there is abundance of water in the area within the county lakes. This was also confirmed by the WRI Aqueduct Tool analysis, according to which water scarcity is currently considered to be a low-medium risk and not an issue in this basin. Water quantity information of the Ouachita River Catchment was made available through references. **OBS 2021.02 was issued.** Four years of annual data were provided, although seasonal variance was not discussed. It would be sufficient to show monthly values throughout at least a whole year, if available. **OBS 2021.02 was addressed.** The seasonal water balance has been updated to included requested information.	

	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 Ouachita River Catchment was summarized and made available through a link to a publicly available 2003 report containing limited data collected between 1993 and 2003. According to this report, the data collected for the Ouachita River Catchment is of poor quality (inaccurate, incomplete, and anecdotal), and limited both temporally and spatially, making the information insufficient to thoroughly assess any adverse impacts affecting the watershed. **OBS 2021.03 was issued.** It would be beneficial to present more recent and reliable water quality information for the catchment in order to appropriately describe and quantify its physical, chemical, and biological status. If more recent information does not exist, that should be stated. **OBS 2021.03 was addressed**. Water quality reports and summary table information was provided.	
	1.5.5 Important Water-Related Areas shall be ***identified,*** and where appropriate, ***mapped***, and their status assessed including any threats to people or the natural environment, using scientific information and through stakeholder engagement.	Yes			IWRAs have been identified and mapped, along with a description of their water-related issues and risks. IWRAs include: Felsenthal National Wildlife Refuge – Lake Jack Lee and Marais Saline, Lake Hamilton, Lake Ouachita, Lake Balboa, Lake Cortez, and Lake De Soto. 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. Garland 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 stakeholder 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 status of the site, existing risk management plans and/or the issues and future risk trends ***identified*** in 1.6.	1.7.1 Water risks faced by the site shall be ***identified***, and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.	Yes			A prioritized list of water risks was provided and reviewed. 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 ***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. 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 Mountain Valley 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, Arkansas State Water Plan – Lower Ouachita Basin 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 Arkansas State Water Plan – Lower Ouachita Basin. Primo Water operates and maintains its spring site in accordance with the following approvals and regulatory requirements.	
	1.8.4 Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be ***identified***.	Yes			Primo Water identified the Arkansas State Water Plan – Lower Ouachita Basin 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	Yes			Primo Water identified the Water Aid Corporate engagement on water supply, sanitation and hygiene: Driving progress on Sustainable	

	equitable and adequate WASH services shall be ***identified***.				Development Goal 6 (SDG6) through supply-chains and voluntary standards.	
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:	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.	

	- 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.				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 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. The Mountain Valley Chemical Spill Response Plan, the Dam Emergency Mitigation, the Earthquake Emergency Mitigation, the Flooding Emergency Mitigation, Landslide Emergency Mitigation, Wildfire Emergency Mitigation were provided and reviewed.	
					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 State of Arkansas. 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.	
3.2 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 regulatory requirements of the State of Arkansas. 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 natural disaster 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, and the area has no drought contingency plan due to the abundance of water.	
	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 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 Mountain Valley site spring areas 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. Good water quality will be continually measured through monitoring and management.	
3.5 Implement plan to maintain or improve the	3.5.1 Practices set in the water stewardship plan to maintain and/or	Yes			Continual improvement of IWRAs status at the site or in the catchment is identified in the Water Stewardship Plan to be implemented through	

site's and/or catchment's Important Water-Related Areas.	enhance the site's Important Water-Related Areas shall be ***implemented***.				monitoring, regulatory compliance, community support in water stewardship efforts, such as participating in stream and litter clean-up days and education material and programs to the public/stakeholders.	
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			Potable drinking water and restrooms) are available to all employees and visitors. The facility is a bottling facility for natural spring water. The Mountain Valley Water brand is provided in the employee breakroom and various locations throughout the facility. Running potable water, soap, and hand sanitizer are provided. Water coolers are maintained throughout the bottling plant 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 wells 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 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.	
3.8 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:	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.	

continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.	3.9.2 Actions towards achieving best practice, related to targets in terms of water balance shall be ***implemented***.	Yes			Primo Water implements sector best practice for water balance through water efficiency metrics/ratio tracking. Primo Water estimates water efficiency is 1.97 liters of water used per 1 -liter water of product (bottled water).	
	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. 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.	
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 tallied and 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. 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. 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.	
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 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 were no corrective actions to disclose. In the event of such an occurrence, they will be publicly available through state and federal reporting (ECHO/U.S. 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. .	