

**Client Name:** Gränges Americas, Inc. – Newport, AR  
**AWS Registration Number:** AWS-000263  
**Client Representative:** Wesley Wells, Quality Assurance Manager  
**Audit Team:** Jillian Olsen/Lead Auditor  
 Rae Mindock/Team Auditor  
**Audit Dates:** May 25, 2021/June 23, 2021 (site visit)  
**Stakeholder Notification:** SCS and AWS Websites 5/18/21, Local Newspaper 6/15/21  
**Site Location:** 3814 Hwy 67N, Newport, Arkansas 72112  
**Report Date:** October 15, 2021

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

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

Level of Certification	<input checked="" type="checkbox"/> Core	<input type="checkbox"/> Gold	<input type="checkbox"/> Platinum
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## Site Information

### Site Description

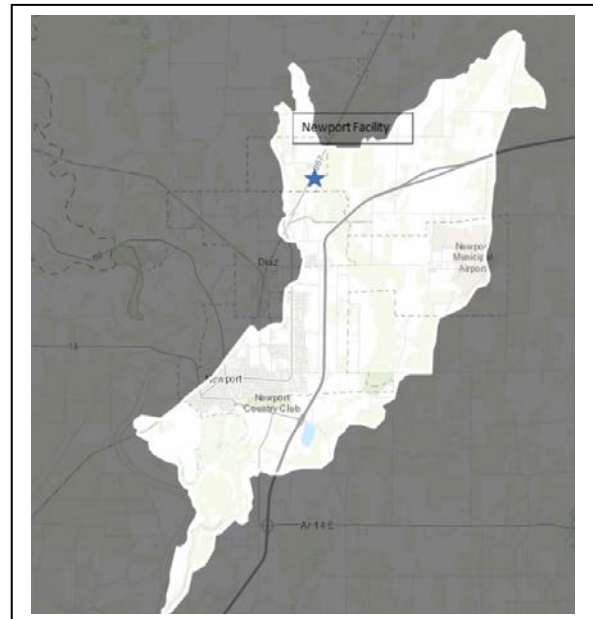
Gränges Newport Factory is located in Newport, AR in the central portion of the state. The approximately 56-acre site includes the office, manufacturing building and warehouse. The geographic scope of the site is limited to the property boundary. The factory is engaged in cold rolling of aluminum to form light gauge aluminum foil for snack food packing and air conditioner components. Industrial water use at the facility is a closed-loop system with municipal water being used to supply the cooling towers. The two on-site wells are present to fill back-up fire suppression tank only. Primary fire suppression is CO<sub>2</sub>, not water.

### Catchment Description

The Gränges Newport Catchment (55.5 square miles) is within the White River Subbasin, defined as the Locust Creek-Village Creek Sub watershed (HUC 110100130203) and includes the Newport Water (water service provider) and the City of Newport Waste Department (waste discharge).

### Shared Water Challenges

Shared water challenges are catchment water-related issues shared by the site and stakeholders. Stakeholder engagement was documented, and auditor interviews confirmed the topics of engagement. Shared water challenges for the site include water quality (outfall), water efficiency due to increased water usage and public awareness of water initiatives.



### Audit Attendees

Participant/Title	Opening Meeting	Document Review	Site Inspection	Closing Meeting
QA Manager	X	X	X	X
External Stakeholders: City Council Member, Manager of Economic Development Office, Chamber of Commerce Internal Stakeholders: Vice President of Human Resources, Plant Manager				
<b>Supporting Documentation:</b>  Gränges provided documentation using Teams file share to support conformity with the AWS Standard v2.0 including: Stakeholder Outreach Log, Facility Maps, 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. In addition, Gränges has incorporated supporting documentation into their ISO program which were also provided as evidence.				

### Summary of Findings

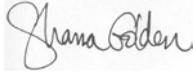
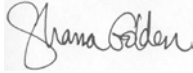
Step	Major	Minor	Observations	Advanced Criteria Total Points
1. Gather & Understand	0	5	5	
2. Commit & Plan	0	0	1	
3. Implement	0	0	0	
4. Evaluate	0	0	0	
5. Communicate & Disclose	0	0	1	
TOTAL	0	5	7	n/a

## Audit Non-conformities and Observations

Non-Conformity (Major or Minor) or Observation	Citation	Criteria/ Indicator	Due Date	Detail and Corrective Action
Minor	Minor 2021.01	1.1.1	NR	<p><b>Minor 2021.01 was issued.</b> The site boundaries need to be mapped.</p> <p><b>Minor 2021.01 was closed.</b> The maps and figures were updated to include indicator requirements.</p>
Minor	Minor 2021.02	1.1.1	NR	<p><b>Minor 2021.02 was issued</b> The water-related infrastructure at the factory should be mapped to include: the incoming City water supply line, sanitary sewer discharge, stormwater discharge, and industrial discharge as applicable.</p> <p><b>Minor 2021.02 was closed.</b> The maps and figures were updated to include indicator requirements.</p>
Observation	OBS 2021.01	1.1.1	NR	<p><b>OBS 2021.01 was issued.</b> Figures in the SPCC also provide supporting information on the physical scope of the site. Additional mapping of the layout of piping should be provided.</p> <p><b>Root Cause Analysis and Corrective Action</b> Not required for observations.</p>
Observation	OBS 2021.02	1.1.1	NR	<p><b>OBS 2021.02 was issued.</b> The locations of the water source (City), WWT Plant and Discharge point should be provided on the catchment map.</p> <p><b>Root Cause Analysis and Corrective Action</b> Not required for observations.</p>
Observation	OBS 2021.03	1.2.1	NR	<p><b>OBS 2021.03 was issued</b> . An outreach log was available but partially completed. The summary should include follow-up and feedback.</p> <p><b>Root Cause Analysis and Corrective Action</b> Not required for observations</p>
Minor	Minor 2021.03	1.3.2	NR	<p><b>Minor 2021.03 was issued</b> A flow diagram should be provided showing water inflows, outflows, storage and losses for the production lines at the factory. The map should indicate water sources, water treatment and water effluents.</p> <p><b>Root Cause Analysis</b> The process was described and shown during on-site visit. A flow diagram was not prepared.</p> <p><b>Corrective Action</b> A process flow diagram will be prepared.</p>
Minor	Minor 2021.04	1.3.4	NR	<p><b>Minor 2021.04 was issued.</b> Water quality of receiving water quality was not provided. Data for the receiving water body should be included.</p> <p><b>Root Cause Analysis</b></p>

				<p>The Site reached out to local water providers and water treatment plant but did not receive a response. The availability of data is not known.</p> <p><b>Corrective Action</b> The site has been able to contact local water services and will option information and data from the receiving water body.</p>
Observation	<b>OBS 2021.04</b>	1.3.7	NR	<p><b>OBS 2021.04 was issued.</b> Costs to implement water stewardship-related initiatives could be provided for completeness. It is understood that COVID prevented some initiatives.</p> <p><b>Root Cause Analysis and Corrective Action</b> Not required for observations</p>
Observation	<b>OBS 2021.05</b>	1.5.1	NR	<p><b>OBS 2021.05 was issued.</b> The list of publicly led initiatives and water-related public policy goals for the catchment should be expanded or it should be noted that local policies are not available.</p> <p><b>Root Cause Analysis and Corrective Action</b> Not required for observations</p>
Observation	<b>OBS 2021.06</b>	1.5.4	NR	<p><b>OBS 2021.06 was issued.</b> The types of water quality data should be expanded with other publicly available data.</p> <p><b>Root Cause Analysis and Corrective Action</b> Not required for observations</p>
Minor	<b>Minor 2021.05</b>	1.5.5	NR	<p><b>Minor 2021.05 was issued.</b> A description of the assessed status of the IWRAs was not provided.</p> <p><b>Root Cause Analysis</b> The catchment IWRAs were identified and discussed during the audit. The IWRAs were not assessed based on status.</p> <p><b>Corrective Action</b> The IWRAs will be reviewed and their status assessed.</p>
Observation	<b>OBS 2021.06</b>	1.5.6	NR	<p><b>OBS 2021.06 was issued.</b> The types of water quality data should be expanded with other publicly available data.</p> <p><b>Root Cause Analysis and Corrective Action</b> Not required for observations</p>
Observation	<b>OBS 2021.07</b>	2.1.1	NR	<p><b>OBS 2021.07 was issued.</b> The pledge specifies adoption of AWS but does not include the entirety of the specified AWS commitments.</p> <p><b>Root Cause Analysis and Corrective Action</b> Not required for observations</p>
Observation	<b>OBS 2021.08</b>	5.1.1	NR	<p><b>OBS 2021.08 was issued.</b> The AWS Update 2021 references the requirements of Step Five but does not include the entirety of the indicators.</p> <p><b>Root Cause Analysis and Corrective Action</b> Not required for observations</p>

### 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>		October 28, 2021
<i>Surveillance Schedule:</i>		Next audit is scheduled for: August 12, 2022 12 Month Surveillance is 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, plus 1.1 and 1.2.*

**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 <b>mapped</b> , considering the regulatory landscape and zone of stakeholder interests, including: <ul style="list-style-type: none"> <li>- Site boundaries;</li> <li>- Water-related infrastructure, including piping network, owned or managed by the site or its parent organization;</li> <li>- Any water sources providing water to the site that are owned or managed by the site or its parent organization;</li> <li>- Water service provider (if applicable) and its ultimate water source;</li> <li>- Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies;</li> <li>- Catchment(s) that the site affect(s) and is reliant upon for water.</li> </ul>	Yes			<p>The Gränges facility (56 acres) is located in Newport, AR. The site produces manufacturers light gauge aluminum foil. Primary water use is in cooling towers (flow through system). The site receives water from the City of Newport (Newport Waterworks) which source groundwater. Factory effluent is sent to the City of Newport Waste Department.</p> <p>The Gränges Newport Catchment (55.5 square miles) is within the White River Subbasin, defined as the Locust Creek-Village Creek Sub watershed (HUC 110100130203). The source of water and discharge facility are located within the catchment. The catchment area is defined and mapped.</p> <p><b>Minor 2021.01 was issued.</b> The site boundaries need to be mapped.  <b>Minor 2021.02 was issued</b> The water-related infrastructure at the factory should be mapped to include: the incoming City water supply line, sanitary sewer discharge, stormwater discharge, and industrial discharge as applicable.</p> <p><b>Minor 2021.01 and Minor 2021.02 were closed.</b> The maps and figures were updated to include indicator requirements.</p> <p><b>Observation 2021.01 was issued.</b> Figures in the SPCC also provide supporting information on the physical scope of the site. Additional mapping of the layout of piping should be provided.  <b>Observation 2021.02 was issued.</b> The locations of the water source (City), WWT Plant and Discharge point should be provided on the catchment map.</p>	

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 <b>identified</b> . The process used for stakeholder identification shall be <b>identified</b> . This process shall: - Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people; - Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies; - Provide evidence of stakeholder consultation on water-related interests and challenges; - Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups; - Identify the degree of stakeholder engagement based on their level of interest and influence.	Yes			The stakeholder map was reviewed. The mapping includes identification of local population, authorities (municipalities), businesses (economic neighbors), and NGOs. The mapping includes ranking of stakeholder influence and interest with targeted levels of engagement defined.  <b>Observation 2021.03 was issued</b> An outreach log was available but partially completed. The summary should include follow-up and feedback.	
	1.2.2 Current and potential degree of influence between site and stakeholder shall be <b>identified</b> , within the catchment and considering the site's ultimate water source and ultimate receiving water body for wastewater.	Yes			Stakeholders are related to the site's catchment and process identifies the stakeholders' ability to influence or be influenced. Influence/Interest is characterized (low to high) and further describe opinions toward Gränges.	
1.3 Gather water-related data for the site, including: water balance; water quality, Important Water-Related Areas, water governance, WASH; water-related costs, revenues, and shared value creation.	1.3.1 Existing water-related incident response plans shall be <b>identified</b> .	Yes			The Water Stewardship Plan, Spill Prevention Control Countermeasure Plan (SPCC) and EHS Management System, Emergency Preparedness and Response Procedures were reviewed. Incident response was addressed in the plans.	
	1.3.2 Site water balance, including inflows, losses, storage, and outflows shall be <b>identified</b> and <b>mapped</b> .	Yes			Gränges provided an excel spreadsheet containing inputs and outputs of water use at this facility.  <b>Minor 2021.03 was issued</b> A flow diagram should be provided showing water inflows, outflows, storage and losses for the production lines at the	



				factory. The map should indicate water sources, water treatment and water effluents.	
1.3.3 Site water balance, inflows, losses, storage, and outflows, including indication of annual variance in water usage rates, shall be <b>quantified</b> . 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 <b>quantified</b> .	Yes			Granges provided and excel spreadsheet containing inputs and outputs of water at this facility for quantification purposes. Industrial water use at the facility is a closed-loop system with municipal water being used to supply the cooling towers. On-site wells are present to fill back-up fire suppression tank only. Primary fire suppression is CO2, not water.	
1.3.4 Water quality of the site's water source(s), provided waters, effluent and receiving water bodies shall be <b>quantified</b> . 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 <b>quantified</b> .		No		A summary of water quality tests conducted at the site on incoming source water (Diaz Waterworks) and effluent (Cooling Tower) from multiple testing sources was provided. .  <b>Minor 2021.04 was issued.</b> Water quality of receiving water quality was not provided. Data for the receiving water body should be included.	
1.3.5 Potential sources of pollution shall be <b>identified</b> and if applicable, <b>mapped</b> , including chemicals used or stored on site.	Yes			A list of all chemicals stored at the site, their location, and typical quantities were provided in the SPCC Plan. The storage locations were observed during the on-site visit.	
1.3.6 On-site Important Water-Related Areas shall be <b>identified</b> and <b>mapped</b> , including a description of their status including Indigenous cultural values.	Yes			No IWRAs are present at the site.	
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 <b>identified</b> and used to inform the evaluation of the plan in 4.1.2.	Yes			Site level costs were presented and reviewed, including water supply, water treatment and maintenance.  <b>OBS 2021.04 was issued.</b> Costs to implement water stewardship-related initiatives could be provided for completeness. It is understood that COVID prevented some initiatives.	

	1.3.8 Levels of access and adequacy of WASH at the site shall be <b>identified</b> .	Yes			WASH is available on-site with potable water and toilets for employees and visitors. The Factory utilized “Self-Assessment Tool for Evaluating Access to Water, Sanitation and Hygiene (WASH) at the Workplace”.	
1.4 Gather data on the site’s indirect water use, including: its primary inputs; the water use embedded in the production of those primary inputs the status of the waters at the origin of the inputs (where they can be <b>identified</b> ); 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 <b>identified</b> .	Yes			A list of primary inputs for outsourced services was provided with designation of location within catchment. Gränges has requested the information from the suppliers and has not yet received responses. Gränges will continue to engage suppliers on primary inputs.	
	1.4.2 The embedded water use of outsourced services shall be <b>identified</b> , and where those services originate within the site’s catchment, <b>quantified</b> .	Yes			There were no suppliers identified in the catchment.	
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 <b>identified</b> , 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			State level water initiatives prepared by the Arkansas Pollution Control & Ecology Commission was provided.  <b>OBS 2021.05 was issued.</b> The list of publicly led initiatives and water-related public policy goals for the catchment should be expanded or it should be noted that local policies are not available.	
	1.5.2 Applicable water-related legal and regulatory requirements shall be <b>identified</b> , including legally-defined and/or stakeholder-verified customary water rights.	Yes			A list of federal, state, local permits and regulatory requirements was provided, including permits issued as summarized in the ISO documentation. There were no legally defined water rights identified.	
	1.5.3 The catchment water-balance, and where applicable, scarcity, shall be <b>quantified</b> , including indication of annual, and where appropriate, seasonal, variance.	Yes			The catchment water balance with precipitation, point source flows, subsurface flow, runoff, and evapotranspiration data were provided for the catchment. Data are presented as an annual average for a 30-year period.	

	1.5.4 Water quality, including physical, chemical, and biological status, of the catchment shall be <b>identified</b> , and where possible, <b>quantified</b> . 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 <b>identified</b> .	Yes			Water quality data as presented in Model My Watershed was provided for the catchment.  <b>OBS 2021.06 was issued.</b> The types of water quality data should be expanded with other publicly available data.	
	1.5.5 Important Water-Related Areas shall be <b>identified</b> , and where appropriate, <b>mapped</b> , and their status assessed including any threats to people or the natural environment, using scientific information and through stakeholder engagement.		No		Catchment IWRAs were identified and mapped.  <b>Minor 2021.05 was issued.</b> A description of the assessed IWRAs status was not provided.	
	1.5.6 Existing and planned water-related infrastructure shall be <b>identified</b> , including condition and potential exposure to extreme events.		No		Infrastructure includes municipal wells, reservoirs, treatment plants, pump stations, storage tanks, pipelines, and reclamation plant.  <b>Minor 2021.06 was issued.</b> A list of publicly available reports/data of water-related infrastructure with a description, exposure scenarios and opportunities was not provided.	
	1.5.7 The adequacy of available WASH services within the catchment shall be <b>identified</b> .	Yes			State water quality availability information was reviewed. WASH for the catchment is adequate based on demographic information and confirmation with the stakeholders.	
1.6 Understand current and future shared water challenges in the catchment, by linking the water challenges <b>identified</b> by stakeholders with the site's water challenges.	1.6.1 Shared water challenges shall be <b>identified</b> and prioritized from the information gathered.	Yes			A rationale of shared water challenges was provided and reviewed prioritized list and incorporated into the Water Stewardship Plan.	
	1.6.2 Initiatives to address shared water challenges shall be <b>identified</b> .	Yes			A list of existing initiatives was provided and reviewed.	
1.7 Understand the site's water risks and opportunities: Assess and prioritize the water risks	1.7.1 Water risks faced by the site shall be <b>identified</b> , and prioritized, including likelihood and severity of impact within a	Yes			A prioritized list of water risks was provided and reviewed. Water risks matched shared water challenges. Water quantity is prioritized first, on a scale of 1-4.	

and opportunities affecting the site based upon the status of the site, existing risk management plans and/or the issues and future risk trends <i>identified</i> in 1.6.	given timeframe, potential costs and business impact.					
	1.7.2 Water-related opportunities shall be <i>identified</i> , including how the site may participate, assessment and prioritization of potential savings, and business opportunities.	Yes			A prioritized list of water-related opportunities for the site and match the shared water challenges and water risks lists.	
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 <i>identified</i> .	Yes			The Pacific Institute/CEO Water Mandate, Setting Site Water Targets informed by Catchment Context, Case Study: Santa Ana River Watershed, CA was identified.	
	1.8.2 Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be <i>identified</i> .	Yes			Catchment best practice was identified as the VWBA Method for Valuing Water Stewardship Activities.	
	1.8.3 Relevant sector and/or catchment best practice for water quality shall be <i>identified</i> , including rationale for data source.	Yes			The City of Newport Industrial Pretreatment Program was identified as the site only use water for the cooling towers.	
	1.8.4 Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be <i>identified</i> .	Yes			Gränges identified 1) Assessment, management and monitoring of High Conservation Value Forest (HCVF) A practical guide for forest managers and 2) Good practice guidelines for High Conservation Value assessments, A practical guide for practitioners and auditors both by ProForest.	
	1.8.5 Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be <i>identified</i> .	Yes			Gränges 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.	
<b>Advanced Points Step 1</b>						
<b>STEP 2: Commit and Plan</b>						
Criteria	Indicator	Yes	No	NA	Objective Evidence/Findings	Points
2.1 Commit to water stewardship by having the	2.1.1 A signed and publicly <i>disclosed</i> site statement OR organizational document	Yes			A pledge, signed by Gränges's President was reviewed and contains all elements described in this indicator.	

<p>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.</p>	<p>shall be <b>identified</b>. The statement or document shall include the following commitments:</p> <ul style="list-style-type: none"> <li>- That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes</li> <li>- That the site implementation will be aligned to and in support of existing catchment sustainability plans</li> <li>- That the site’s stakeholders will be engaged in an open and transparent way</li> <li>- That the site will allocate resources to implement the Standard.</li> </ul>				<p><b>OBS 2021.07 was issued.</b> The pledge specifies adoption of AWS but does not include the entirety of the specified AWS commitments.</p>	
<p>2.2 Develop and document a process to achieve and maintain legal and regulatory compliance.</p>	<p>2.2.1 The system to maintain compliance obligations for water and wastewater management shall be <b>identified</b>, including:</p> <ul style="list-style-type: none"> <li>- Identification of responsible persons/positions within facility organizational structure</li> <li>- Process for submissions to regulatory agencies.</li> </ul>	<p>Yes</p>			<p>The Gränges Compliance Calendar included in the ISO files was provided and reviewed. Included in the matrix are the listed permits and reports associated with those permits, as well as responsible staff to ensure maintenance of compliance.</p>	
<p>2.3 Create a water stewardship strategy and plan including addressing risks (to and from the site), shared catchment water challenges, and opportunities.</p>	<p>2.3.1 A water stewardship strategy shall be <b>identified</b> that defines the overarching mission, vision, and goals of the organization towards good water stewardship in line with this AWS Standard.</p>	<p>Yes</p>			<p>A water stewardship strategy statement was provided and reviewed. The document states that Gränges’s overall strategy is in alignment with the AWS requirements.</p>	
	<p>2.3.2 A water stewardship plan shall be <b>identified</b>, including for each target:</p> <ul style="list-style-type: none"> <li>- How it will be measured and monitored</li> <li>- Actions to achieve and maintain (or exceed) it</li> <li>- Planned timeframes to achieve it</li> <li>- Financial budgets allocated for actions</li> </ul>	<p>Yes</p>			<p>A detailed water stewardship plan was created as part of the AWS process. The plan is broken into objectives, targets, and actions. There are different actions corresponding to different targets, each with their own metrics, budget, responsible person, status, and other criteria. Water Quality, Water Governance, and Water Quantity are the water topics identified in this plan.</p>	

	<ul style="list-style-type: none"> <li>- Positions of persons responsible for actions and achieving targets</li> <li>- Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.</li> </ul>					
2.4 Demonstrate the site's responsiveness and resilience to respond to water risks	2.4.1 A plan to mitigate or adapt to <b>identified</b> water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be <b>identified</b> .	Yes			<p>Gränges provided their current SPCC plan, and Emergency Action Plan, which included a description of their required responses and resilience operations to water-related issues and risks.</p> <p>In addition, the Water Stewardship Plan is a working document which documents identification of water risks through performance, evaluation, and stakeholder consultation. Stakeholders include the relevant public-sector agencies responsible for infrastructure.</p>	
<b>Advanced Points Step 2</b>						
<b>STEP 3: Implement</b>						
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 <b>identified</b> .	Yes			The Factory provided documentation of their efforts to support good catchment governance through engagement with the City of Newport Waterworks Executive Director.	
	3.1.2 Measures <b>identified</b> to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be <b>implemented</b> .	Yes			The Factory's water use is within the water rights identified by City of Newport Waterworks (water provider). Excluded water rights have not been identified.	
3.2 Implement system to comply with water-related legal and regulatory requirements and respect water rights.	3.2.1 A process to verify full legal and regulatory compliance shall be <b>implemented</b> .	Yes			The Compliance Matrix was provided and reviewed. Included in the matrix are the listed permits and responsible staff to ensure maintenance of compliance. The facility is ISO 14001 Certified (documentation for this certification were reviewed).	
	3.2.2 Where water rights are part of legal and regulatory requirements, measures <b>identified</b> to respect the water rights of others including Indigenous peoples, shall be <b>implemented</b> .	Yes			Municipal water is used at the facility and is provided by City of Newport Waterworks. Excluded water rights have not been identified.	

3.3 Implement plan to achieve site water balance targets.	3.3.1 Status of progress towards meeting water balance targets set in the water stewardship plan shall be <b>identified</b> .	Yes			A flow meter has been added on the in-flow side of water to the cooling towers to better quantify and track the site's water usage. Flow meters are also scheduled to be installed on the fire system (where water is used) to better quantify the water usage/replenishment of storage tanks.	
	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 <b>implemented</b> .	Yes			Water scarcity is not a shared water challenge.	
	3.3.3 Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be <b>identified</b> .	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 <b>identified</b> .	Yes			Quarterly and semi-annual inspections of cooling towers and the site outfall are completed by a third-party laboratory to ensure compliance with applicable Arkansas State water quality regulations.	
	3.4.2 Where water quality is a shared water challenge, continual improvement to achieve best practice for the site's effluent shall be <b>identified</b> and where applicable, <b>quantified</b> .	Yes			Water quality is identified as a shared water challenge as it relates to the site's stormwater outfall. There is the potential for spills to enter the outfall if not managed properly. Necessary repairs to the mechanical containment system on the outfall (steel door to stop discharge from leaving site) were completed in June 2021. An oil/water separator also runs continuously within the outfall channel to capture any minor contaminants and prevent discharge offsite.	
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 <b>implemented</b> .	Yes			No IWRAs are present at the Gränges site.	
3.6 Implement plan to provide access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all	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 <b>identified</b> and where applicable, <b>quantified</b> .	Yes			Gränges uses a self-assessment tool at each site to review access to drinking water, sanitation and hygiene awareness (WASH). Pledged compliance was achieved within the Gränges facility.	

workers at all premises under the site's control.	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			Gränges uses a self-assessment tool at each site to review access to drinking water, sanitation and hygiene awareness (WASH). The Factory is not impacting WASH of communities. Discussions with stakeholders did not indicate actual or perceived concern that site was impinging on human right to safe water and sanitation in catchment.	
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 <b>quantified</b> .	Yes			No suppliers for Gränges Newport facility are located within the catchment. Gränges did contact several of their suppliers to engage on the topic of AWS.	
	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 <b>identified</b> .	Yes			See 3.7.1	
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 <b>identified</b> .	Yes			Evidenced of engagement was reviewed, although not all the email correspondence was retained within the Teams files.	
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 <b>implemented</b> .	Yes			The Factory provided documentation of their efforts to support good catchment governance through engagement with the City of Newport Waterworks Executive Director.	
	3.9.2 Actions towards achieving best practice, related to targets in terms of water balance shall be <b>implemented</b> .	Yes			A flow meter has been added on the in-flow side of water to the cooling towers to better quantify and track the site's water usage. Flow meters are also scheduled to be installed on the fire system (where water is used) to better quantify the water usage/replenishment of storage tanks.	
	3.9.3 Actions towards achieving best practice, related to targets in terms of water quality shall be <b>implemented</b> .	Yes			Quarterly and semi-annual inspections of cooling towers and the site outfall indicate compliance with applicable Arkansas State water quality regulations.	



	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 <b>implemented</b> .	Yes			No IWRAs are present at the Gränges site.	
	3.9.5 Actions towards achieving best practice related to targets in terms of WASH shall be <b>implemented</b> .	Yes			Stakeholder engagement indicates there is adequate WASH in the catchment.	
<b>Advanced Points Step 3</b>						
<b>STEP 4: Evaluate</b>						
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 <b>evaluated</b> .	Yes			Gränges has evaluated performance of the Stewardship Plan which is aligned with realizing the AWS Outcomes. Targets established in the Plan are tracked based on multiple actions with measurable metrics, documentation of stakeholder engagement, and evaluation of changes in water risk for each target. The evaluation also includes a cost/benefits review and describes shared value benefits for each target.	
	4.1.2 Value creation resulting from the water stewardship plan shall be <b>evaluated</b> .	Yes			Gränges has created value by engaging local community and educating on water stewardship efforts and investigating potential opportunities to work together. Stakeholder interviews supported the value creation.	
	4.1.3 The shared value benefits in the catchment shall be <b>identified</b> and where applicable, <b>quantified</b> .	Yes			Granges identified shared value benefits which are currently qualitative.	
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 <b>evaluated</b> and proposed preventative and corrective actions and mitigations against future incidents shall be <b>identified</b> .	Yes			No water-related emergency events have occurred at the facility. No shutdown occurred that was water related. The facility has a current SWPPP and SPCC.	
4.3 Evaluate stakeholders' consultation feedback regarding the site's water stewardship performance,	4.3.1 Consultation efforts with stakeholders on the site's water stewardship performance shall be <b>identified</b> .	Yes			Stakeholder outreach conducted and documented in the Stakeholder Outreach Log.	

including the effectiveness of the site's engagement process.						
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 <b>identified</b> .	Yes			The Water Stewardship Plan is a working document that will be updated annually to reflect on-going actions and completed projects. The Plan tracks targets and actions tied to best practice and AWS outcomes addressed. Performance and stakeholder consultation with respect to the projects are included.	
<b>Advanced Points Step 4</b>						
<b>STEP 5: Communicate and Disclose</b>						
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 <b>disclosed</b> .	Yes			Granges published the AWS Update 2021, A Better Focus on Sustainability. The Case Study provides a description of site and corporate level personnel responsible for water-related internal governance.  <b>OBS 2021.08 was issued.</b> The AWS Update 2021 references the requirements of Step 5 but does not include the entirety of the indicators.	
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			The performance and outcomes of the water stewardship plan were discussed with relevant stakeholders. Stakeholders were familiar with concepts of the plan. Local stakeholders indicated they do not feel water issues are critical but are appreciative of Granges efforts.	
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 <b>quantified</b> performance against targets, shall be <b>disclosed</b> annually at a minimum.	Yes			Refer to 5.2.1.	

5.4 Disclose efforts to collectively address shared water challenges, including: associated efforts to address the challenges; engagement with stakeholders; and coordination with public-sector agencies.	5.4.1 The site's shared water-related challenges and efforts made to address these challenges shall be <b>disclosed</b> .	Yes			The primary shared water challenge addressed was the removal of materials (machinery, rubbish) remaining on site by the former owner which may affect surface water runoff. The efforts were disclosed and recognized in stakeholder interviews.	
	5.4.2 Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be <b>identified</b> .	Yes			See 5.4.1.	
5.5 Communicate transparency in water-related compliance: make any site water-related compliance violations available upon request as well as any corrective actions the site has taken to prevent future occurrences.	5.5.1 Any site water-related compliance violations and associated corrections shall be <b>disclosed</b> .	Yes			There were no site water-related compliance violations disclosed by the facility and confirmed via ECHO EPA. (Violations are publicly available through state and federal reporting (ECHO/US EPA)).	
	5.5.2 Necessary corrective actions taken by the site to prevent future occurrences shall be <b>disclosed</b> 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 <b>disclosed</b> .	Yes			Violations are publicly available through state and federal reporting (ECHO/US EPA). There were no violations disclosed or reported via ECHO. The ECHO reporting system would include violations that pose a significant risk and threat to human or ecosystem health	
<b>Advanced Points Step 5</b>						