

Client Name:	General Mills
AWS Registration Number:	AWS-000056
Client Representative:	Guilherme Basto, Environmental Engineer/Project Manager
Audit Team:	Rae Mindock/Lead Auditor
	Shana Golden/Team Auditor
Audit Dates:	July 9, 2021 (Pre-Assmt) & November 11, 2021
Stakeholder Notification:	May 18, 2021, SCS and AWS websites, June 3, 2021, The Albuquerque Journal newspaper
Site Location:	3501 Paseo Del Norte Albuquerque, NM 87113
Report Date:	February 28, 2021

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

Audit Type	Gap Analysis	☑ Initial Certification	□ Surveillance
	Pre-assessment	🛛 Remote Audit	□ Recertification

Level of	🛛 Core	🗆 Gold	Platinum
Certification			



#### **Site Description**

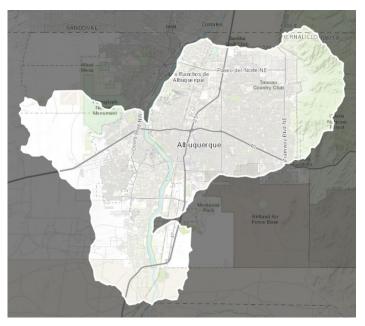
The General Mills Albuquerque site is a dry cereal and granola bar product manufacturing plant. The factory began production in 1992 as a cereal plant and currently has three cereal production lines and two granola bar product lines. The geographic scope of the site is limited to the property boundary of the facility. The facility is located in a suburban industrial setting. Water for the facility comes from the Albuquerque Bernalillo County Water Utility Authority. A well on the property is used for irrigation only. Wastewater services are provided by Albuquerque Bernalillo County Water Utility.

### **Catchment Description**

The site is located in the Upper Rio Grande subbasin. The catchment is approximately 172,480 acres and includes the ABCWUA Surface Water and Wastewater Treatment Plants. The area is defined and mapped. The catchment is located within the City of Albuquerque-Rio Grande watershed, HUC-10 Watershed ID 1302020303.

### **Shared Water Challenges**

Shared water challenges are catchment waterrelated issues shared by the site and stakeholders. Stakeholder engagement was documented, and auditor interviews confirmed the topics of engagement. The primary shared water challenge is quantity. Other shared water challenges include natural



disasters and emergencies. Water quality is addressed on-site through monthly inspections of the stormwater retention ponds.



## **Audit Attendees**

Participant/Title	Opening Meeting	Document Review	Site Inspection	Closing Meeting					
General Mills Environmental Engineer/Project Manager	х	Х	Х	Х					
Internal Stakeholders: Technical Plant Manager, Associate Manager-Regen Ag Water Packaging,									
Engineering and Maintenance									
External Stakeholders: Manager ABCWUA, The Nature Co	nservancy, V	Vater Resou	rces Divisio	n					
Manager ABCWUA									
Supporting Documentation:									
The General Mills Albuquerque site provided documentati	on using One	Note and S	harePoint f	ile share					
to support conformity with the AWS Standard v2.0 includi	ng: Stakehol	der Outreac	h Log, AWS						
Summary Presentation, Catchment Water Balance, and W	ater Stewarc	lship Plan. T	he Water						
Stewardship Plan is a working document which is continua	lly updated	with inform	ation regard	ding how					
shared water challenges are being addressed included pro	gress, perfor	mance eval	uation and						
stakeholder feedback. Other supporting documentation w	ere also prov	vided as evi	dence.						

## Summary of Findings

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



Non-Conformity (Major or Minor) or Observation	Citation	Criteria/ Indicator	Due Date	Detail and Corrective Action
Observation	OBS 2021.01	1.2.1	NR	OBS 2021.01 was issued. The site has been engaged with AWS stakeholder engagements since 2015. The stakeholders have varied over time and outreach has been limited during COVID-19. The Site should attempt to re-engage with former stakeholder providing updates on water stewardship advances. Root Cause Analysis and Corrective Action Not required for observation.
Observation	OBS 2021.02	1.5.5	NR	OBS 2021.02 was issued. The site should continue to identify potential IWRAs within the Rio Grande HUC 10 watershed as additional stakeholders are engaged.         Root Cause Analysis and Corrective Action Not required for observation.
Observation	OBS 2021.03	1.6.2	NR	OBS 2021.03 was issued. The site should review, and update initiatives as shared water challenges evolve. Root Cause Analysis and Corrective Action Not required for observation.
Minor	Minor 2021.01	2.1.1	90 Days	<ul> <li>Minor 2021.01 was issued. A site statement or organizational document including the indication requirements such as improvements based on the site water stewardship program, alignment with catchment plans, stakeholder engagement and allocation of resources should be prepared and disclosed.</li> <li>Root Cause Analysis and Corrective Action The site will create a standard organizational document signed by the Plant Manager to publicly disclose progress on the water stewardship plans, improvements and outcomes aligned with the catchment plans, stakeholder engagement and resource allocation. The site</li> </ul>

# **SCS**global

			1	7
				will re-organize/merge the Stakeholder Info and
				Extended Water Stewardship Plan spreadsheets
				to capture and easily disclose the requirements
				of indicator 2.1.1. The site will publish these
				updates on the General Mills public website and
				share with all stakeholders.
				To be completed within 90 days.
Minor	Minor	5.1.1	90	Minor 2021.02 was issued. The internal
	2024.04		Days	governance was described but does not appear
	2021.01			to have been disclosed.
				Root Cause Analysis and Corrective Action
				The site will incorporate the requirements of
				indicator 5.1.1 into the standard organizational
				document for indicator 2.1.1 as a way of
				managing and disclosing all the required
				information related to AWS. The site will add a
				matrix from CEO to Plant Technician to highlight
				their accountabilities and contributions to water
				stewardship.
				To be completed within 90 days.
Observation	OBS	5.2.1	NR	OBS 2021.04 was issued. Planned outcomes
				such as water reductions are stated, but the
	2021.04			more general AWS outcomes (Governance,
				Water Balance, Water Quality, IWRAs, WASH)
				should be referenced
				Root Cause Analysis and Corrective Action
				Not required for observation.
Observation	OBS	5.2.1	NR	OBS 2021.05was issued. The Consulted
	2024 65			Stakeholder is indicated for each target/action, a
	2021.05			brief summary of what was discussed could be
				included in the WSP.
				Root Cause Analysis and Corrective Action
				Not required for observation.
		I	1	



## **Certification Decision**

Auditor's recommendation for initial,	Х	Recommended
continued or re-certification based on		Not Recommended
compliance with requirements:		
Level of Certification recommended	Х	AWS Core
		AWS Gold
		AWS Platinum
SCS Certification Decision:	Х	Approved
		Denied
Certification Decision by:		Jatmalsen
		Jillian Olsen
Technical Review by:		Jatmolsen
		Jillian Olsen
Date of Decision:		March 2, 2022
Surveillance Schedule:		Next audit is scheduled for:
		January 2023



Surveillance audits shall co	over at a minimum those requirements hig	ghlight	ed in l	ight gre	en.	
STEP 1: Gather and	d 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.	<ul> <li>1.1.1 The physical scope of the site shall be <i>mapped</i>, considering the regulatory landscape and zone of stakeholder interests, including: <ul> <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> </li> </ul>	Yes			<ul> <li>The General Mills Albuquerque site is located in central New Mexico. The factory receives municipal water from the Albuquerque Bernalillo County Water Utility Authority (ABCWUA) and an onsite well used for irrigation only.</li> <li>The water-related infrastructure at the factory was mapped to include: layout of production lines, sanitary lines, municipal water Inlet and sanitary sewer discharge.</li> <li>The factory receives water from the Albuquerque Bernalillo County Water Utility Authority through metered pipeline connections. It is used for utilities, scrubbers, food production, and facility sanitary water supply.</li> <li>There is a well on the property used for landscape irrigation only. Sanitary discharge is sent to the Albuquerque Wastewater Utility.</li> <li>Stormwater received within pervious grassed areas around the perimeter of the site infiltrates directly into the subsurface soils. Runoff from impervious areas including buildings and paved surfaces is directed to a series of storm sewer catch basins that are connected to the facility's storm sewer ultimately discharging in either of two on-site retention basins.</li> <li>The catchment is approximately 172,480 acres and includes the ABCWUA Surface Water and Wastewater Treatment Plants. The area is defined and mapped. The catchment is located within the City of Albuquerque-Rio Grande watershed, HUC-10 Watershed ID 1302020303.</li> </ul>	
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 <i>identified</i> . The process used for stakeholder identification shall be <i>identified</i> . This process shall:	Yes			The stakeholder log was reviewed. The log includes identification of authorities (municipalities), businesses (economic neighbors), and NGOs. Stakeholders identified include Albuquerque Bernalillo County Water Utility Authority, The Nature Conservancy, Valle de Oro national Wildlife Refuge, Albuquerque School District, and East central ministries assisting the Navajo Nation during the COVID-19 pandemic.	



	<ul> <li>Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people;</li> <li>Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies;</li> <li>Provide evidence of stakeholder consultation on water-related interests and challenges;</li> <li>Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder engagement based on their level of interest and influence.</li> </ul>		The outreach log included individuals and organizations consulted with since 2016, including notes on conversations which provided information on water-related interests/challenges. The summary includes actions, follow-up and feedback. The outreach log includes ranking of stakeholder influence and interest with levels of influence and interest defined. <b>OBS 2021.01 was issued</b> . The site has been engaged with AWS stakeholder engagements since 2015. The stakeholders have varied over time and outreach has been limited during COVID-19. The Site should attempt to re- engage with former stakeholder providing updates on water stewardship advances.
	1.2.2 Current and potential degree of influence between site and stakeholder shall be <i>identified</i> , within the catchment and considering the site's ultimate water source and ultimate receiving water body for wastewater.	Yes	Stakeholders are related to the site's catchment and identifies the stakeholders' ability to influence or be influenced. Influence/Interest is characterized (low to critical) and further describe opinions towards the site.
1.3 Gather water-related data for the site, including: water balance; water quality, Important Water- Related Areas, water	<ul> <li>1.3.1 Existing water-related incident response plans shall be <i>identified</i>.</li> <li>1.3.2 Site water balance, including inflows, losses, storage, and outflows shall</li> </ul>	Yes Yes	The Water Stewardship Plan, Spill Prevention Control Countermeasure Plan (SPCC) and Storm Water Pollution Prevention Plan (SWPPP) were reviewed. Incident response was addressed in the plans. General Mills provided water maps containing inputs and outputs of water at this facility. Data showing annual water inflows, outflows, storage and
governance, WASH; water- related costs, revenues, and shared value creation.	be <i>identified</i> and <i>mapped</i> .		losses for each production line at the factory were reviewed. The map indicates water sources, water treatment, process units, wastewater treatment and production.
	1.3.3 Site water balance, inflows, losses, storage, and outflows, including indication of annual variance in water usage rates, shall be <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	Yes	General Mills provided water maps containing inputs and outputs of water at this facility. General Mills water balance measured multiple locations and processes at the facility documented since 2015. Variances were measured over the timeframe.



	high and low variances shall be			
	quantified.			
	1.3.4 Water quality of the site's water	Yes	Water quality data for the water sources (on-site and provided), effluent	
	source(s), provided waters, effluent and		and receiving water through site analytical data and published sources. For	
	receiving water bodies shall be <i>quantified</i> .		some sources data is provided beginning in 2012. Monthly data was	
	Where there is a water-related challenge		provided for several site related analytes.	
	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> .			
	1.3.5 Potential sources of pollution shall	Yes	A list of all chemicals stored at the site was provided. The chemicals located	
	be <i>identified</i> and if applicable, <i>mapped</i> ,		within the Factory were mapped on the Facility Layout.	
	including chemicals used or stored on site.			
	1.3.6 On-site Important Water-Related	Yes	General Mills identified two stormwater retention ponds as the site's	
	Areas shall be <i>identified</i> and <i>mapped</i> ,		IWRAs. The ponds are inspected monthly per SWPPP guidelines and no	
	including a description of their status		runoff leaves the site. The quality of the ponds is impacted by debris and	
	including Indigenous cultural values.		requires manual cleaning.	
	1.3.7 Annual water-related costs,	Yes	Site level costs including costs to implement water stewardship actions and	
	revenues, and a description or		factory-related costs were provided and reviewed.	
	quantification of the social, cultural,			
	environmental, or economic water-			
	related value generated by the site shall			
	be <i>identified</i> and used to inform the			
	evaluation of the plan in 4.1.2.			
	1.3.8 Levels of access and adequacy of	Yes	WASH is available on-site with potable water, toilets, locker rooms, and	
	WASH at the site shall be <i>identified</i> .		cafeteria for employees and visitors.	
1.4 Gather data on the	1.4.1 The embedded water use of primary	Yes	A list of primary inputs for outsourced services was provided with	
site's indirect water use,	inputs, including quantity, quality and		designation of location. Information on water source with annual water	
including: its primary	level of water risk within the site's		consumption values, and origin for each input was provided by the Factory.	
inputs; the water use	catchment, shall be <i>identified</i> .		Analysis includes water use associated with packaging, transportation,	
embedded in the			cooling, end of life, and level of water stress.	
production of those	1.4.2 The embedded water use of	Yes	The site does not use or purchase ingredients or materials that originate	
primary inputs the status of	outsourced services shall be <i>identified</i> ,		from the same catchment as the site. The only outsourced service used by	
the waters at the origin of	and where those services originate within		the site which utilizes water from the same catchment is the uniform	
the inputs (where they can	the site's catchment, <i>quantified</i> .		laundry service company Aramark who has been unable to provide how	
be <i>identified</i> ); and water			much water is used to service the site's account.	



used in out-sourced water- related services.			Corporate has provided water footprint data for its entire supply chain (internal and external) which is found in the 2021 GRR	
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 <i>identified</i> , 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	The site has correctly identified Albuquerque Bernalillo County Water Utility Authority (ABCWUA), New Mexico Environment Department (NMED) and the Office of the State Engineer as the agencies responsible for water governance initiatives. Links were provided for the Agencies and some engagement has been documented. Specific initiatives, plans and goals were not identified.	
	1.5.2 Applicable water-related legal and regulatory requirements shall be <i>identified</i> , including legally-defined and/or stakeholder-verified customary water rights.	Yes	Water-related permits were provided, including permits issued by the Albuquerque Bernalillo County Water Utility Authority (ABCWUA) and the State Engineer's Office. List of relevant and applicable legal and other requirements were also provided and reviewed.	
	1.5.3 The catchment water-balance, and where applicable, scarcity, shall be <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 ET data were provided catchment based on Model My Watershed Multi-Year Model. Data is presented as an average from a 30-year period and indicates seasonal fluctuation.	
	1.5.4 Water quality, including physical, chemical, and biological status, of the catchment shall be <i>identified</i> , and where possible, <i>quantified</i> . 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 <i>identified</i> .	Yes	Catchment water quality data (physical, chemical and biological data) was provided from multiple public sources including the New Mexico Department of Health, Albuquerque and Bernalillo County Water Authority, Middle Rio Grande Basin (EPA Approved), Water Quality in the Middle Rio Grande (University of New Mexico) and Geology, Climate, Land and Water Quality (USDA Forest Service), and Stroud Water Research Center (Model My Watershed).	
	1.5.5 Important Water-Related Areas shall be <i>identified</i> , and where appropriate, <i>mapped</i> , 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 described, along with their water-related issues. Watersheds, State Waterbodies, monitoring locations and permits (if applicable). IWRAs include multiple locations on the Rio Grande river, Conservancy Park Lake, and Isleta Lakes.	



			<b>OBS 2021.02 was issued</b> . The site should continue to identify potential IWRAs within the Rio Grande HUC 10 watershed as additional stakeholders are engaged.
	1.5.6 Existing and planned water-related infrastructure shall be <i>identified</i> , including condition and potential exposure to extreme events.	Yes	A detailed list of ABCWUA's water-related infrastructure projects for 2021 was provided along with descriptions of the catchment water and sanitary sewer systems, current condition, and opportunities for improvements. Infrastructure includes water lines and sewer collection systems. Extreme events such as pipeline failures due to sinkholes was discussed.
	1.5.7 The adequacy of available WASH services within the catchment shall be <i>identified</i> .	Yes	The site provided WASH information from the New Mexico Department of Health. Availability of services varies in rural areas. General Mills assists the Navajo Nation with ongoing donations of IBC totes for use as water storage reservoirs.
1.6 Understand current and future shared water challenges in the catchment, by linking the	1.6.1 Shared water challenges shall be <i>identified</i> and prioritized from the information gathered.	Yes	A prioritized list with rationale of shared water challenges was provided and reviewed. Drivers and public-sector agency efforts are noted as well. Water quantity is prioritized as first, on a scale of 1-4. The site's challenges were prioritized based on stakeholder feedback.
water challenges <i>identified</i> by stakeholders with the site's water challenges.	1.6.2 Initiatives to address shared water challenges shall be <i>identified</i> .	Yes	A list of existing initiatives to address shared water challenges was provided and reviewed. OBS 2021.03 was issued. The site should review, and update initiatives as
			shared water challenges evolve.
1.7 Understand the site's water risks and opportunities: Assess and prioritize the water risks and opportunities affecting	1.7.1 Water risks faced by the site shall be <i>identified</i> , and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.	Yes	A list of water risks was provided for the site summarizing risk, likelihood, costs (high to low), and severity of impact.
the site based upon the status of the site, existing risk management plans and/or the issues and future risk trends <i>identified</i> in 1.6.	1.7.2 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 list of water-related opportunities was provided for the site. A list of engagement opportunities, savings and value creation was submitted and reviewed. Value creation was included, as applicable.



	equitable and adequate WASH services shall be <i>identified</i> .		perspective, the site donates IBC totes to the Navajo Nation for water storage.
	best practice for site provision of	Yes	The site identified on-going WASH services at the at the site including providing water bottles, cooling vests and uniform. From a community
	<ol> <li>1.8.4 Relevant catchment best practice for site maintenance of Important Water- Related Areas shall be <i>identified</i>.</li> <li>1.8.5 Relevant sector and/or catchment</li> </ol>	Yes	The site identified financial support through donations to the Rio Grande Water Fund and volunteer work with community cleanup projects (suspended during COVID 19).
	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 site identified the site improvement projects impacting water quality including zero down drain initiatives, non-exposure stormwater permit and acknowledgement from ABCWUA for reduction in surcharge loads.
or national relevance.	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	The site identified multiple best practices for water balance based on factory efficiency, irrigation improvements and species selection (supply chain).
1.8 Understand best practice towards achieving AWS outcomes: Determining sectoral best practices having a local/catchment, regional,	1.8.1 Relevant catchment best practice for water governance shall be <i>identified</i> .	Yes	The site identified the General Mills 2021 Global Responsibility Report, siting corporate level programs and recognizing the AWS actions at the Albuquerque site.



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.	<ul> <li>2.1.1 A signed and publicly <i>disclosed</i> site statement OR organizational document shall be <i>identified</i>. The statement or document shall include the following commitments:</li> <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>		No		<ul> <li>The site has provided multiple public documents disclosing policy on water practices including Public Engagement for the Greater Good, General Mills Water Policy, Planet, 2021 Global Responsibility Report. The Introduction to the Global Responsibly Report provides a letter to stakeholders signed by the CEO. AWS and site participation is mentioned in the Global Responsibility Report, but the indicator criteria is not provided.</li> <li>Minor 2021.01 was issued. A site statement or organizational document including the indication requirements such as improvements based on the site water stewardship program, alignment with catchment plans, stakeholder engagement and allocation of resources should be prepared and disclosed.</li> </ul>	
2.2 Develop and document a process to achieve and maintain legal and regulatory compliance.	<ul> <li>2.2.1 The system to maintain compliance obligations for water and wastewater management shall be <i>identified</i>, including:</li> <li>Identification of responsible persons/positions within facility organizational structure</li> <li>Process for submissions to regulatory agencies.</li> </ul>	Yes			The site uses GSTEMS, a centralized database, to stores all safety and environmental data, incidents, near misses, and investigations. A list of water management compliance obligations and responsible position was provided.	
2.3 Create a water stewardship strategy and plan including addressing risks (to and from the site), shared catchment water challenges, and	2.3.1 A water stewardship strategy shall be <i>identified</i> 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 is included in General Mills' 2021 Global Responsibility Report was provided and reviewed. The GRR strategy is a high-level document stating the overall strategy is in alignment with the AWS Standard.	
opportunities.	<ul> <li>2.3.2 A water stewardship plan shall be</li> <li><i>identified</i>, including for each target:</li> <li>How it will be measured and monitored</li> </ul>	Yes			A detailed water stewardship plan was created as part of the AWS process. The plan is broken into objectives, targets, and actions. There are different	



	- Actions to achieve and maintain (or				actions corresponding to different targets, each with their own metrics,	
	exceed) it				budget, responsible person, status, and other criteria.	
	- 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.					
2.4 Demonstrate the site's	2.4.1 A plan to mitigate or adapt to	Yes			The site provided their current SWPPP/SPCC documents which included a	
responsiveness and	identified water risks developed in co-				description of their required responses and resilience operations to water-	
resilience to respond to	ordination with relevant public-sector and				related issues and risks. Modifications to the plans are captured through	
water risks	infrastructure agencies shall be <i>identified</i> .				revision/amendment comments and an annual review is part of standard	
					procedures to evaluate the plan's effectiveness.	-
					Advanced Points Step 2	
STED 2. Implomon	•				Auvanceu Points Step 2	
•				1		
Criteria	Indicator	Yes	No	NA	Objective Evidence/Findings	Points
Criteria 3.1 Implement plan to	Indicator 3.1.1 Evidence that the site has supported	<b>Yes</b> Yes	No	NA	Objective Evidence/Findings           The site provided documentation of their efforts to support good	Points
Criteria 3.1 Implement plan to participate positively in	Indicator 3.1.1 Evidence that the site has supported good catchment governance shall be		No	NA	Objective Evidence/Findings           The site provided documentation of their efforts to support good catchment governance through participation with the local NGO, The	Points
Criteria 3.1 Implement plan to participate positively in	Indicator 3.1.1 Evidence that the site has supported		No	NA	Objective Evidence/Findings           The site provided documentation of their efforts to support good catchment governance through participation with the local NGO, The Nature Conservancy and received acknowledgment from Albuquerque	Points
Criteria 3.1 Implement plan to participate positively in	Indicator 3.1.1 Evidence that the site has supported good catchment governance shall be <i>identified</i> .		No	NA	Objective Evidence/Findings           The site provided documentation of their efforts to support good catchment governance through participation with the local NGO, The	Points
Criteria 3.1 Implement plan to participate positively in	Indicator 3.1.1 Evidence that the site has supported good catchment governance shall be		No	NA	Objective Evidence/Findings         The site provided documentation of their efforts to support good catchment governance through participation with the local NGO, The Nature Conservancy and received acknowledgment from Albuquerque Bernalillo County Water Utility Authority (ABCWUA) on site achievements.         The site's sole source of water within the facility is the Albuquerque	Points
Criteria 3.1 Implement plan to participate positively in	Indicator 3.1.1 Evidence that the site has supported good catchment governance shall be <i>identified</i> .	Yes	No	NA	Objective Evidence/Findings         The site provided documentation of their efforts to support good catchment governance through participation with the local NGO, The Nature Conservancy and received acknowledgment from Albuquerque Bernalillo County Water Utility Authority (ABCWUA) on site achievements.         The site's sole source of water within the facility is the Albuquerque Bernalillo County Water Utility Authority (ABCWUA). The site does not use	Points
Criteria 3.1 Implement plan to participate positively in	Indicator3.1.1 Evidence that the site has supported good catchment governance shall be identified.3.1.2 Measures identified to respect the	Yes	No	NA	Objective Evidence/Findings         The site provided documentation of their efforts to support good catchment governance through participation with the local NGO, The Nature Conservancy and received acknowledgment from Albuquerque Bernalillo County Water Utility Authority (ABCWUA) on site achievements.         The site's sole source of water within the facility is the Albuquerque Bernalillo County Water Utility Authority (ABCWUA). The site does not use water that impinges the on the rights of others including indigenous	Points
	Indicator 3.1.1 Evidence that the site has supported good catchment governance shall be <i>identified</i> . 3.1.2 Measures <i>identified</i> to respect the water rights of others including	Yes	No	NA	Objective Evidence/Findings         The site provided documentation of their efforts to support good         catchment governance through participation with the local NGO, The         Nature Conservancy and received acknowledgment from Albuquerque         Bernalillo County Water Utility Authority (ABCWUA) on site achievements.         The site's sole source of water within the facility is the Albuquerque         Bernalillo County Water Utility Authority (ABCWUA). The site does not use         water that impinges the on the rights of others including indigenous         peoples. The onsite well is used for irrigation only and there are no current	Points
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Criteria 3.1 Implement plan to participate positively in catchment governance. 3.2 Implement system to comply with water-related	Indicator3.1.1 Evidence that the site has supported good catchment governance shall be identified.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.3.2.1 A process to verify full legal and regulatory compliance shall be	Yes	No	NA	Objective Evidence/Findings         The site provided documentation of their efforts to support good         catchment governance through participation with the local NGO, The         Nature Conservancy and received acknowledgment from Albuquerque         Bernalillo County Water Utility Authority (ABCWUA) on site achievements.         The site's sole source of water within the facility is the Albuquerque         Bernalillo County Water Utility Authority (ABCWUA). The site does not use         water that impinges the on the rights of others including indigenous         peoples. The onsite well is used for irrigation only and there are no current         restrictions or conditions imposed by the State of New Mexico on the water         well permit.	Points
Criteria 3.1 Implement plan to participate positively in catchment governance. 3.2 Implement system to comply with water-related legal and regulatory	Indicator3.1.1 Evidence that the site has supported good catchment governance shall be <i>identified</i> .3.1.2 Measures <i>identified</i> to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be <i>implemented</i> .3.2.1 A process to verify full legal and regulatory compliance shall be <i>implemented</i> .	Yes Yes Yes	No	NA	Objective Evidence/Findings         The site provided documentation of their efforts to support good catchment governance through participation with the local NGO, The Nature Conservancy and received acknowledgment from Albuquerque Bernalillo County Water Utility Authority (ABCWUA) on site achievements.         The site's sole source of water within the facility is the Albuquerque Bernalillo County Water Utility Authority (ABCWUA). The site does not use water that impinges the on the rights of others including indigenous peoples. The onsite well is used for irrigation only and there are no current restrictions or conditions imposed by the State of New Mexico on the water well permit.         The site uses GSTEMS, a centralized database, to stores all safety and environmental data, incidents, near misses, and investigations.	Points
Criteria 3.1 Implement plan to participate positively in catchment governance. 3.2 Implement system to comply with water-related legal and regulatory requirements and respect	Indicator3.1.1 Evidence that the site has supported good catchment governance shall be <i>identified</i> .3.1.2 Measures <i>identified</i> to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be <i>implemented</i> .3.2.1 A process to verify full legal and regulatory compliance shall be <i>implemented</i> .3.2.2 Where water rights are part of legal	Yes	No	NA	Objective Evidence/Findings         The site provided documentation of their efforts to support good catchment governance through participation with the local NGO, The Nature Conservancy and received acknowledgment from Albuquerque Bernalillo County Water Utility Authority (ABCWUA) on site achievements.         The site's sole source of water within the facility is the Albuquerque Bernalillo County Water Utility Authority (ABCWUA). The site does not use water that impinges the on the rights of others including indigenous peoples. The onsite well is used for irrigation only and there are no current restrictions or conditions imposed by the State of New Mexico on the water well permit.         The site uses GSTEMS, a centralized database, to stores all safety and environmental data, incidents, near misses, and investigations.         There are no legal or regulatory requirements for the site surrounding	Points
Criteria 3.1 Implement plan to participate positively in catchment governance. 3.2 Implement system to comply with water-related legal and regulatory	Indicator3.1.1 Evidence that the site has supported good catchment governance shall be <i>identified</i> .3.1.2 Measures <i>identified</i> to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be <i>implemented</i> .3.2.1 A process to verify full legal and regulatory compliance shall be <i>implemented</i> .	Yes Yes Yes	No	NA	Objective Evidence/Findings         The site provided documentation of their efforts to support good catchment governance through participation with the local NGO, The Nature Conservancy and received acknowledgment from Albuquerque Bernalillo County Water Utility Authority (ABCWUA) on site achievements.         The site's sole source of water within the facility is the Albuquerque Bernalillo County Water Utility Authority (ABCWUA). The site does not use water that impinges the on the rights of others including indigenous peoples. The onsite well is used for irrigation only and there are no current restrictions or conditions imposed by the State of New Mexico on the water well permit.         The site uses GSTEMS, a centralized database, to stores all safety and environmental data, incidents, near misses, and investigations.	Points



	others including Indigenous peoples, shall be <i>implemented</i> .			
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 <i>identified</i> .	Yes	Water reduction goals are tracked by product type and measured by fisca year. Current targets are water use reduction rates of 1% year over year (gallons of water used to produce one lb of finished product). The site has worked to improve its water efficiency through production efficiencies ar water conservations efforts.	;
	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 <i>implemented</i> .	Yes	The site has a target use reduction rate towards improving efficiency and strives to reduce volumetric total.	
	3.3.3 Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be <i>identified</i> .	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 <i>identified</i> .	Yes	The site participates in General Mills' "Zero down the drain" initiative whi supports improved water quality targets.	ch
	3.4.2 Where water quality is a shared water challenge, continual improvement to achieve best practice for the site's effluent shall be <i>identified</i> and where applicable, <i>quantified</i> .	Yes	Water quality is not identified as a shared water challenge.	
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 <i>implemented</i> .	Yes	Site IWRAs were identified and are inspected monthly per SWPPP guidelines, and no runoff leaves the site. The quality of the ponds is impacted by debris and requires manual cleaning. General Mills supports local water-related projects through donations and volunteering on cleanup projects.	
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 <i>identified</i> and where applicable, <i>quantified</i> .	Yes	The site provided an evaluation including detail of the number of toilets, urinals, showers, handwash sinks, foot wash stations, drinking water fountains, foot sanitizer stations at various site locations. Ratios of Toilet/Shift for both men and women exceeded to OSHA Guidance.	



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	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.
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 <i>quantified</i> .	Yes	The site does not have indirect water use targets. Larger corporate initiatives address stewardship efforts in the supply chain, but are not directly related to the site.
	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 <i>identified</i> .	Yes	The site has engaged with the sole supplier within the catchment regarding indirect water use.
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 <i>identified</i> .	Yes	ABCWUA's water-related infrastructure is owned and maintained by the organization. The site has not identified any concerns. The site continues to engage with ABCWUA.
3.9 Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral	3.9.1 Actions towards achieving best practice, related to water governance, as applicable, shall be <i>implemented</i> .	Yes	The site identified the General Mills 2021 Global Responsibility Report, siting corporate level programs and recognizing the AWS actions at the Albuquerque site as best practice. The site has engaged with ABCWUA, promoting and implementing their public lead initiatives. The site has received several awards from ABCWUA for their actions.
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 <i>implemented</i> .	Yes	The site identified multiple best practices for water balance based on factory efficiency, irrigation improvements and species selection (supply chain). The site has made progress toward best practice with their WOW project saving approximately 400,000 GPY.



	<ul> <li>3.9.3 Actions towards achieving best practice, related to targets in terms of water quality shall be <i>implemented</i>.</li> <li>3.9.4 Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-</li> </ul>	Yes			The site has made improvements in reducing its wastewater loads and reducing wastewater surcharges. The site will continue training its employees on zero down the drain and environmental awareness. The site will also continue to evaluate opportunities to reduce water use in sanitation and other processes and improve its processes to reduce wastewater loads. Site IWRAs are inspected monthly and tracked via internal system. Employees have participated in local cleanup projects on the Rio Grande River, and the site donates to a local fund supporting the river.	
	Related Areas shall be <i>implemented</i> . 3.9.5 Actions towards achieving best practice related to targets in terms of WASH shall be <i>implemented</i> .	Yes			The site donates IBC totes to the community to provide water access and storage.	
CTED A. Fusikusta					Advanced Points Step 3	
STEP 4: Evaluate	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	4.1.1 Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be <i>evaluated</i> .	Yes			The site has evaluated performance of the Water Stewardship Plan which is aligned with realizing the AWS Outcomes. Targets established in the Plan are tracked based on multiple actions with measurable metrics, and engagement feedback. The evaluation also includes a cost/benefits review and shared value benefits for each target. Further evaluation will be conducted during the surveillance and renewal audits.	
water stewardship outcomes.	4.1.2 Value creation resulting from the water stewardship plan shall be <b>evaluated.</b>	Yes			The value creation focused on water use reduction was provided for multiple tasks, some completed and others on-going.	
	4.1.3 The shared value benefits in the	Yes		1	The shared value benefits, focused on water conservation was provided for	

SPCC.

4.2 Evaluate the impacts of

water-related emergency

extreme events), if any

occurred, and determine

incidents (including

the effectiveness of

catchment shall be *identified* and where

4.2.1 A written annual review and (where

appropriate) root-cause analysis of the

prepared and the site's response to the

proposed preventative and corrective

year's emergency incident(s) shall be

incident(s) shall be *evaluated* and

Yes

applicable, quantified.

multiple tasks, both completed and on-going.

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 facility has a current SWPPP and



corrective and preventative	actions and mitigations against future					
measures.	incidents shall be <i>identified</i> .					
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 <i>identified</i> .	Yes			<ul> <li>Internal and external stakeholder outreach efforts were conducted and documented in the communications log.</li> <li>The corporation reports annually via the GRR</li> <li>The site uses the RGWF meetings to learn about what is going on in the catchment and to consult/catch up with other stakeholders</li> <li>The site also communicates directly with other stakeholders via email and phone.</li> </ul>	
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 <i>identified.</i>	Yes			The Water Stewardship Plan is a working document updated annually to reflect on-going actions and completed projects. The WSP tracks targets, timelines, metrics and actions tied to best practice and AWS outcomes addressed.	
		•	•		Advanced Points Step 4	
STEP 5: Communic	ate and Disclose					
STEP 5: Communic Criteria	ate and Disclose	Yes	No	NA	Objective Evidence/Findings	Points
		Yes	No No	NA	Objective Evidence/FindingsThe site provided a detailed list positions and duties of internal corporate governance from CEO to VP Engineering to multiple site level engineers and managers, including supply chain command, was provided during the audit. It is unclear how the water-related governance is disclosed.Minor 2021.02 was issued. The internal governance was described but does not appear to have been disclosed.	Points



A summary of the site's water ardship performance, including tified performance against targets, be disclosed annually at a minimum. The site's shared water-related enges and efforts made to address challenges shall be disclosed. Efforts made by the site to engage	Yes	No	The site communicates and reports metrics and targets internally to the site and corporation, specially within semi-annual repots. Although an external target audience and disclosure format have not yet been identified. Water stewardship efforts are published in the annual GRR.
nges and efforts made to address challenges shall be <b>disclosed</b> .	Yes		The site discusses and discloses information on shared water challenges to
Efforts made by the site to engage			ABCWUA a primary stakeholder in the catchment.
holders and coordinate and support c-sector agencies shall be <i>identified</i> .	Yes		The stakeholder outreach log documents the site's ongoing communication with external stakeholders. The site communicates regularly with internal stakeholders such as the GSE and the Sustainability Teams about all aspects related to safety and environmental (weekly, monthly and quarterly). The communication to date has been published to stakeholders in the GRR.
Any site water-related compliance ions and associated corrections shall sclosed.	Yes		Violations are publicly available through state and federal reporting (ECHO/US EPA). There were no violations reported via ECHO.
Necessary corrective actions taken e site to prevent future occurrences pe <b>disclosed</b> if applicable.	Yes		See 5.5.1
Any site water-related violation that bose significant risk and threat to n or ecosystem health shall be diately communicated to relevant c agencies and <b>disclosed.</b>	Yes		Violations are publicly available through state and federal reporting (ECHO/US EPA). There were no violations reported via ECHO. The ECHO reporting system would include violations that pose a significant risk and threat to human or ecosystem health.
Ne e s De Ar Do: n	eccessary corrective actions taken ite to prevent future occurrences <i>disclosed</i> if applicable. by site water-related violation that se significant risk and threat to or ecosystem health shall be ately communicated to relevant	Accessary corrective actions takenYesite to prevent future occurrencesdiscloseddisclosedif applicable.my site water-related violation thatYesse significant risk and threat toor ecosystem health shall beately communicated to relevantately communicated to relevant	eccessary corrective actions taken ite to prevent future occurrences disclosed if applicable.       Yes         my site water-related violation that se significant risk and threat to or ecosystem health shall be ately communicated to relevant       Yes