

**Client Name:** Blue Triton – Allentown, PA  
**AWS Registration Number:** AWS-000144  
**Client Representative:** Brandon Kienenberger, Blue Triton Sustainability Analyst  
**Audit Team:** Rae Mindock/Lead Auditor  
 Isabella Polenghi-Gross/Team Auditor  
**Audit Dates:** June 1, 2021  
**Stakeholder Notification:** AWS Website, SCS Website, Local Newspaper  
**Site Location:** 305 and 405 Nestle Way, Breinigsville, PA 18031  
**Report Date:** August 31, 2021

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

Audit Type	<input type="checkbox"/> Gap Analysis <input type="checkbox"/> Pre-assessment	<input type="checkbox"/> Initial Certification	<input type="checkbox"/> Surveillance <input checked="" type="checkbox"/> Recertification
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Level of Certification	<input type="checkbox"/> Core	<input type="checkbox"/> Gold	<input checked="" type="checkbox"/> Platinum
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## Site Information

### Site Description

The Blue Triton Allentown Campus has two water bottling facilities, producing bottled water products under the brand names of Deer Park 100% Natural Spring Water, and Nestlé Pure Life. The geographic scope of the Campus is limited to the contiguous property boundary of the two facilities. The Campus is located in an urban, light industrial setting. Five-gallon and three-gallon bottles are produced at this site for delivery in home and office settings, in addition to one-gallon and single serving bottles. Water for the bottling facilities comes from several sources, including spring water delivered by truck from several regional springs outside of the catchment to produce bottled spring water; municipal water and water from an on-site groundwater well to produce bottled purified water.

### Catchment Description

The Allentown Catchment is comprised of the Factory sub-catchment and eight discontinuous Spring sub-catchments. The Factory sub-catchment is approximately 59,900 acres (93.6 sq. miles), encompasses the Allentown East Factory, Allentown West Factory, on-site well PW-1, the Lehigh County Authority Water Filtration Plant and Municipal Supply and the Lehigh County Authority Wastewater Treatment Plant. The Allentown factories receive water from eight off-site springs, from an on-site groundwater well, and from Municipal water supplied by Lehigh County Authority. The onsite well and municipal sources are located within the Little Lehigh Creek watershed. The eight spring sub-catchments are listed below:



- Greenwalt Springs Catchment = 2,520 acres
- Hoffman Springs Catchment = 3,187 acres
- Arrowhead Springs Catchment = 1,850 acres
- Sasoonan Springs Catchment = 549 acres
- Pine Grove Springs Catchment = 192 acres
- Valley View Springs Catchment = 330 acres
- Nature's Way Springs Catchment = 125 acres
- Boiling Springs Catchment = 300 acres

### 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. Primary water-related risks to the site include water quality concerns; other shared water challenges

include site water use efficiency, water quantity, and public education surrounding water use. A prioritized list of shared water challenges addressing the outcomes was provided.

To better understand catchment issues and opportunities, Blue Triton regularly meets with catchment authorities including Lehigh County Authority and others. Information is shared with regulators and community leaders including the Annual Monitor Report and water quality data. Events typically attended and/or hosted by Blue Triton were not held in 2020 due to COVID-19 restrictions.

### Audit Attendees

Participant Title	Opening Meeting	Document Review	Site Inspection	Closing Meeting
Sustainability Analyst	X	X	X	X
Natural Resources Manager	X	X	X	X
Campus Factory Manager	X	X	X	X
SH&E Manager	X	X	X	X
SH&E Resource	X	X	X	X
QA Manager	X	X	X	X
External Stakeholders: Township Manager, Upper Macungie Township; CEO, Lehigh County Authority and Executive Director, Wildlands Conservancy.  Internal Stakeholders: Campus Factory Manager and Natural Resources Manager				
<b>Supporting Documentation:</b> The Blue Triton Allentown Factory provided documentation using SharePoint file share to support conformity with the AWS Standard v2.0 including: Stakeholder Outreach Log, Community Relations Program (CRP) Summary, Factory AWS Presentation 2021, Blue Triton Water Map, 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 included progress, performance evaluation and stakeholder feedback. Other supporting documentation were also provided as evidence.				

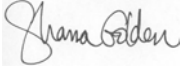
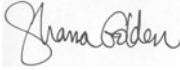
### Summary of Findings

Step	Major	Minor	Observations	Advanced Criteria Total Points
1. Gather & Understand				21
2. Commit & Plan				11
3. Implement				64
4. Evaluate				6
5. Communicate & Disclose				0
TOTAL	0	0	0	102

### Audit Non-conformities and Observations

Non-Conformity (Major or Minor) or Observation	Citation	Criteria/ Indicator	Due Date	Detail and Corrective Action
				Root Cause Analysis and Corrective Action

### 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>		AWS Core
		AWS Gold
	X	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>		September 20, 2021
<i>Surveillance Schedule:</i>		Next audit is scheduled for: December 1, 2022 18 Month Surveillance recommended

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

*Surveillance audits shall cover at a minimum those requirements highlighted in light green.*

**STEP 1: Gather and Understand**

Criteria	Indicator	Yes	No	NA	Objective Evidence/Finding	Points
1.1 Gather information to define the site’s physical scope for water stewardship purposes, including: its operational boundaries; the water sources from which the site draws; the locations to which the site returns its discharges; and the catchment(s) that the site affect(s) and upon which it is reliant.	1.1.1 The physical scope of the site shall be <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 Blue Triton Allentown site is located in an urban, light industrial area in Allentown, PA. The Allentown site covers an area of approximately 84 acres. A map of the site was provided. Two factories are included in the map. They operate under the same management and are considered as one single site. The map includes the property boundaries of the factories, as well as one groundwater well (PW-1), wastewater discharge points, storm water retention ponds and Iron Run Creek, and public water supply line.</p> <p>Allentown factories can receive water from eight off-site springs, from an on-site groundwater well, and from Municipal water supplied by Lehigh County Authority (LCA). LCA sources of water include groundwater sources within Allentown catchment (from supply wells, Schantz Spring, and Crystal Spring) and surface water sources (from Little Lehigh Creek Surface Water Intake and Lehigh River Surface Water Intake for emergency use only). A map with the names and locations of Allentown water sources was reviewed. Blue Triton Allentown Spring sources include: Greenwaltz Springs, Hoffman Springs, Arrowhead Springs, Sasoonan Springs, Pine Grove Springs, Valley View Springs, Nature's Way Spring, and Boiling Springs. Spring water, all outside the Factory Sub-catchment, is delivered by truck.</p> <p>Wastewater discharges go to LCA Kline’s Island Wastewater Treatment Plant. The treated effluent discharge goes to Lehigh River.</p> <p>The Allentown catchment (59,900 acres) is comprised of discontinuous sub-catchments for the site and spring sources. The Factory sub-catchment is located within the Lehigh River Watershed, and includes the Allentown factories, the on-site groundwater well, the effluent discharge point from the Klins Island Wastewater Treatment Plant, LCA groundwater wells and</p>	

				<p>surface water sources, and Lehigh River which is the ultimate receiving water body.</p> <p>A separate sub-catchment has been delineated to include all the Blue Triton Allentown Spring sources. The spring sub-catchments are defined by up-gradient recharge area, down-gradient discharge area, the spring and water-related infrastructure.</p>	
1.2 Understand relevant stakeholders, their water related challenges, and the site's ability to influence beyond its boundaries.	<p>1.2.1 Stakeholders and their water-related challenges shall be <b>identified</b>. The process used for stakeholder identification shall be <b>identified</b>.</p> <p>This process shall:</p> <ul style="list-style-type: none"> <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 groups;</li> <li>- Identify the degree of stakeholder engagement based on their level of interest and influence.</li> </ul>	Yes		<p>The stakeholder map created during the Community Relations Process (CRP) was reviewed. The CRP includes identification of local population, authorities (municipalities), businesses (economic neighbors), and NGOs. Stakeholders identified include Lehigh County Authority, Wildlands Conservancy, local suppliers, manufacturers, school districts, community outreach programs, regional and state representatives.</p> <p>The Outreach log included individuals and organizations consulted, including notes on conversations which provided information on water-related interests/challenges. The summary includes actions, follow-up and feedback.</p> <p>The CRP includes ranking of stakeholder influence and interest with levels of influence and interest defined.</p>	
	<p>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.</p>	Yes		<p>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 Blue Triton.</p>	
1.3 Gather water-related data for the site, including: water balance; water	<p>1.3.1 Existing water-related incident response plans shall be <b>identified</b>.</p>	Yes		<p>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.</p>	

<p>quality, Important Water-Related Areas, water governance, WASH; water-related costs, revenues, and shared value creation.</p>	<p>1.3.2 Site water balance, including inflows, losses, storage, and outflows shall be <b>identified</b> and <b>mapped</b>.</p>	Yes			<p>Blue Triton prepared and provided example snapshots of water maps containing inputs, outputs, and losses of water at both factories. Data showing monthly water withdrawals, and production volumes were also provided with a comparison with the monthly values of the previous year.</p>	
	<p>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>.</p>	Yes			<p>Blue Triton provided water maps containing inputs and outputs of water at this facility. The site utilizes a Water Withdrawal Ratio (WWR) to evaluate efficiency, measuring Liters of water used to produce a Liter of product (L/L). The WWR goals for Allentown East and West in 2020 were 1.339 L/L and 1.430 L/L, respectively, with corresponding actual WWRs of 1.328 L/L and 1.425 L/L. Blue Triton provided WWR monthly for 2020 with high and low variance. A comparison with annual WWR provided for the last 5 years, shows an overall increase in water efficiency.</p>	
	<p>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>.</p>	Yes			<p>A summary of water quality tests conducted at the site on incoming source water and finished product was provided. To verify the internal water quality results, samples get sent once a year to an external accredited laboratory. Monthly or higher frequency data were provided for water quality of spring sources and effluent. Blue Triton water quality protocol includes pH, T, DO, TDS, and other constituents. Water quality data is regularly compared to Blue Triton and MCL available screening criteria. The records reviewed showed that no parameters exceeded any regulatory standards. The system is automated so that if a value is out of limits, the system shuts down. Blue Triton is notified and must respond if the effluent quality is out of required limits (e.g. if pH exceeds pre-programmed limit).</p>	
	<p>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.</p>	Yes			<p>A list of all onsite chemicals stored at the site was provided. Chemical storage was inspected during virtual audit of the facility</p>	
	<p>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.</p>	Yes			<p>On-Site groundwater well PW-1 is an on-site IWRA. The location was mapped, and a description of the status was provided.</p>	
	<p>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</p>	Yes			<p>Site level costs were presented including costs to implement water stewardship actions and factory-related costs were provided and reviewed. Finances are prepared by Blue Triton corporate headquarters with revenues compiled at a company level. Annual revenue for Blue Triton is publicly available on the Blue Triton website. The shared value generated</p>	

	be <b>identified</b> and used to inform the evaluation of the plan in 4.1.2.				included examples such as donations to local food banks and during emergency situations, preserving and improving catchment quality, education provided to inform public, improved IWRAs, etc.	
	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. Information on water source with annual water consumption values, and origin for each input was provided by the Factory. Analysis includes water use associated with packaging, transportation, cooling, and end of life. The level of water stress and the overall water risk are quantified and projected changes in water stress from the current baseline are estimated based on "business as usual" scenarios. A report of the study "Cubes 2016" prepared for Blue Triton for the US and Canada market was reviewed. It contained a detailed footprint analysis of the water embedded in all the products used. This analysis showed that there is a clear decreasing trend in greenhouse effects, water consumption and non-renewable energy use from 2010 to 2015.	
	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			Documentation provided shows values of water consumptions and availability. Calculations conducted indicate the score of the water stress. Current Baseline Water Stress ranges from low to high for all vendors and outsourced services.	
	1.4.3 <b>Advanced Indicator</b> The embedded water use of primary inputs in catchment(s) of origin shall be <b>quantified</b> .	Yes			Available vendors' water use information was provided and reviewed, which included their annual water used and the catchment of origin (mostly outside of site catchment). Vendors were selected if accounting for over 5 % of the total weight of goods produced or representing over 5 % of the costs.  In addition, the site provided the Cube Reports, prepared by RDC Environmental, 2016 which measures sustainability as assessed by GHG, water consumption, non-renewable energy including on-site impacts and supply chain.	7



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			A list of significant publicly led initiatives and water related public policy goals for the catchment was provided at the state, regional, county, city, and district level. A description of the purpose and relevance of the water-related legal and regulatory requirements is included in the catchment plan review summary provided and discussed.	
	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. List of relevant and applicable legal and other requirements were also provided.	
	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, surface runoff, and evapotranspiration data were provided for the Allentown Campus catchment (from Model My Watershed Multi-Year Model). Data is presented as an average from a 30-year period and indicates monthly/seasonal fluctuation. Spring water comes from separate catchments. Monitoring and community reports with information on water withdrawals and recent sampling results were made available for each water spring site, except for Nature's Way Spring, which was added recently, and its report is currently being prepared. In addition, recent hydrological data and several links were provided for the larger Delaware River Basin (containing the site and the spring sources catchments).	
	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			Spring water undergoes the standard State required annual water quality testing performed by third party, accredited laboratories. Additionally, Blue Triton performs quarterly, monthly, and weekly water quality testing on additional constituents and parameters. City of Allentown water is treated according to federal and state standards to remove any possible harmful contaminants. Documentation was also reviewed about Lehigh County Authority (LCA) Source Water Protection approved by the Pennsylvania Department of Environmental Protection (DEP), with the objective to develop a plan delineating the recharge areas for the LCA groundwater wells, determining the transport times and pathways of potential contaminants, identifying potential sources of contamination, and	

				<p>complying with DEP regulations. Trending of both water quality sources is evaluated annually and compared to historical data and water quality goals. Spring water comes from separate catchments. Monitoring and community reports with information on water withdrawals and recent sampling results were made available for each water spring site, except for Nature's Way Spring, which was added recently, and its report is currently being prepared.</p>	
<p>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.</p>	Yes			<p>IWRAs have been identified and mapped by Blue Triton, along with a description of their water-related issues. The IWRA evaluation include the site catchment area and each spring source catchment. IWRAs include:</p> <ul style="list-style-type: none"> <li>- Allentown Factory Sub-catchment: LCA Groundwater Sources - Zone 2 Wellhead Protection Areas, Upper Macungie Park, Cedar Creek West Park, Trexler Memorial Park, Fountain Park, Union Terrace Park, Cedar Creek East Park, Little Lehigh Parkway, Winding Brook Manor Recreation Area, Harris York Public Open Space, Millbrook Farms Recreation Area, Danfield Run Passive Recreation Area, Ancient Oak West Recreation Area, Kalmbach Memorial Park, Lock Ridge Park, Hunsicker's Grove, Crackersport Road Wetlands, Allentown 8th Street Bridge-PPL Office Building, Lower Macungie Road Wetlands, The Jungle, Mountain Road Seep, Little Lehigh Grasslands, Spring Ridge Crossings, Cedar Beach Park, and Cedar Creek Parkway.</li> <li>- Greenwaltz Springs Sub-catchment: Greenwalk Creek, Green Walk Trout Hatchery, Roseto Ponds, Slatebelt Wetlands, and Angle Swamp</li> <li>- Hoffman Springs catchment: Ontelaunee Creek, Nestle Vernal Pools, and Jordan Creek Headwaters Vernal Pools</li> <li>- Arrowheads Springs Sub-catchment: UNT to Mill Creek, Newmanstown Ponds, and Millbach Springs Wetlands</li> </ul> <p>No IWRAs have been identified within the sub-catchments of Pine Grove Springs, Sasoonan Springs, Valley View Springs, Boiling Springs, and Nature's Way Springs.</p>	
<p>1.5.6 Existing and planned water-related infrastructure shall be <b>identified</b>, including condition and potential exposure to extreme events.</p>	Yes			<p>A list of publicly available reports/data of water-related infrastructure with a description, exposure scenarios and opportunities were provided and reviewed. Infrastructure includes municipal wells, treatment plants, pump stations, storage tanks, and pipelines.</p>	

	1.5.7 The adequacy of available WASH services within the catchment shall be <i>identified</i> .	Yes			State and local water quality (availability) information was reviewed. WASH for the catchment is adequate based on demographic information Blue Triton supports local food banks and disaster relief organizations. Local agencies work to meet the needs of populations who do not have access to WASH.	
	1.5.8 <b>Advanced Indicator</b> Efforts by the site to support and undertake catchment level water-related data collection shall be <i>identified</i> .	Yes			Documentation was shown as evidence of the continual efforts undertaken by the Allentown site to monitor groundwater and surface water levels at the water sources. Annual monitoring and community reports and other documents were provided and reviewed for all spring sources, containing onsite stream flow data, total monthly water withdrawals and evidence of monitoring efforts conducted regularly and frequently at the water sources and nearby streams and wetlands showing that the water withdrawals are conducted sustainably. These data are reported to local and state agencies and the local communities on a monthly, quarterly and/or annual basis and are available to agencies for water governance tracking and planning within the catchment. Other efforts conducted by the sites include bio-monitoring work at all the spring sites. The 2020 Annual Monitoring Report prepared for the Hoffman Springs was provided and reviewed as example. The report describes on-going, long-term monitoring program at the Hoffman Springs facility, which includes several flumes to monitor streamflow, flow meters to monitor the rate of withdrawals and spring discharge, piezometers to monitor water levels in several nearby wetlands, and a recording rain gauge. In addition, aquatic biological assessments are conducted annually. Reportedly, similar work is being conducted at all other springs site.	7
	1.5.9 <b>Advanced Indicator</b> The adequacy of WASH provision within the catchments of origin of primary inputs shall be <i>identified</i> .	Yes			The currently available Annual Drinking Water Quality Report for each municipality (12) was provided for review.	4
1.6 Understand current and future shared water challenges in the catchment, by linking the water challenges <i>identified</i>	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 quality is prioritized as first, on a scale of 1-4. Blue Triton challenges were prioritized based on stakeholder feedback and corporate initiatives.	
	1.6.2 Initiatives to address shared water challenges shall be <i>identified</i> .	Yes			A list of existing initiatives was provided and reviewed.	

by stakeholders with the site's water challenges.	1.6.3 <b>Advanced Indicator</b> Future water issues shall be <i>identified</i> , including anticipated impacts and trends	Yes			Future water risks were summarized with initiatives in the Water Stewardship Plan.	3
	1.6.4 <b>Advanced Indicator</b> Potential water-related social impacts from the site shall be <i>identified</i> , resulting in a social impact assessment with a particular focus on water.				This Advanced Indicator was not considered for this site.	
1.7 Understand the site's water risks and opportunities: Assess and prioritize the water risks and opportunities affecting the site based upon the status of the site, existing risk management plans and/or the issues and future risk trends <i>identified</i> in 1.6.	1.7.1 Water risks faced by the site shall be <i>identified</i> , and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.	Yes			A prioritized list of water risks was provided and reviewed. Water risks matched shared water challenges. Water quality is prioritized first, on a scale of 1-4.	
	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. First priority is based on water quality. A prioritized list of projects, savings and value creation was submitted and reviewed. Value creation was quantified, as applicable.	
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			Blue Triton has identified multiple best practices toward achieving AWS outcomes at the site and in the catchment. The following best practices are examples for Indicators 1.8.1 - 1.8.5 Blue Triton identified the Pacific Institute/CEO Water Mandate, Setting Site Water Targets informed by Catchment Context, Case Study: Santa Ana River Watershed, CA. The study which references AWS, was supported by companies endorsing CEO Mandate, including Blue Triton. Blue Triton engages with catchment authorities and other stakeholders to share information, practices and drive water stewardship practices.	
	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			Blue Triton identified The Beverage Industry Continues to Drive Improvement in Water, Energy, and Emissions Efficiency, 2108 Benchmarking Study. Blue Triton uses the sector specific efficiency metric of water use ratio (liters of water used in the process/liter of bottled water) to track onsite efficiency and established a target to monitor continual improvement.	

	1.8.3 Relevant sector and/or catchment best practice for water quality shall be <b>identified</b> , including rationale for data source.	Yes			Blue Triton identified Sector best practice for Processing and Bottling of Bottled Drinking Water is established in CFR Title 21, Part 129. Blue Triton exceeds requirements outlined with sampling frequency, parameters analyzed and consistency across the business unit.	
	1.8.4 Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be <b>identified</b> .	Yes			Blue Triton 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. Blue Triton follows practices described by ProForest by assigning Natural Resources Manager for each site whose focus is on maintenance of springs and other IWRAs.	
	1.8.5 Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be <b>identified</b> .	Yes			Blue Triton 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. Blue Triton utilizes the Guidelines on Respecting the Human Rights to Water and Sanitation, which is extended to suppliers.	

**Advanced Points Step 1    21**

## STEP 2: Commit and Plan

Criteria	Indicator	Yes	No	NA	Objective Evidence/Findings	Points
2.1 Commit to water stewardship by having the senior-most manager in charge of water at the site, or if necessary, a suitable individual within the organization head office, sign and publicly disclose a commitment to water stewardship, the implementation of the AWS Standard and achieving its five outcomes,	2.1.1 A signed and publicly <b>disclosed</b> site statement OR organizational document shall be <b>identified</b> . The statement or document shall include the following commitments: - That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes - That the site implementation will be aligned to and in support of existing catchment sustainability plans - That the site's stakeholders will be engaged in an open and transparent way	Yes			A pledge was reviewed, signed by the site factory manager, containing all elements described in this criterion.	

<p>and the allocation of required resources.</p>	<p>- That the site will allocate resources to implement the Standard.</p>					
<p>2.2 Develop and document a process to achieve and maintain legal and regulatory compliance.</p>	<p>2.1.2 <b>Advanced Indicator</b> A statement that explicitly covers all requirements set out in Indicator 2.1.1 and is signed by the organization’s senior-most executive or governance body and publicly <b>disclosed</b> shall be <b>identified</b>.</p> <p>2.2.1 The system to maintain compliance obligations for water and wastewater management shall be <b>identified</b>, including: - Identification of responsible persons/positions within facility organizational structure - Process for submissions to regulatory agencies.</p>	<p>Yes</p>			<p>This Advanced Indicator was not considered for this site.</p> <p>The Blue Triton Compliance Matrix was provided and reviewed. Included in the matrix are the listed permits and responsible staff to ensure maintenance of compliance. A third-party is contracted to confirm compliance is maintained. In addition, the facility is ISO 14001 Certified.</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 signed by the campus factory manager was provided and reviewed. Blue Triton Allentown strategy is a high-level document stating the 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: - How it will be measured and monitored - Actions to achieve and maintain (or exceed) it - Planned timeframes to achieve it - Financial budgets allocated for actions - Positions of persons responsible for actions and achieving targets - Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.</p>	<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. Public Consumer/Education, Water Efficiency, Water Quality, and Water Quantity are the water topics identified in this plan.</p>	

	<p><b>2.3.3 Advanced Indicator</b> The site’s partnership/water stewardship activities with other sites within the same catchment (which may or may not be under the same organizational ownership) shall be <b>identified</b> and described.</p>	Yes		<p>The following documentation was provided and reviewed:</p> <ul style="list-style-type: none"> <li>- Quarterly Operations Assistance Committee Reports for the City of Allentown (2018 -2020) summarizing actions within the City and with local businesses</li> </ul> <p>The site is open and available to share AWS-related experience, contacts, lessons learned and consultation for the benefit of others who want to embark in similar AWS efforts.</p>	4
	<p><b>2.3.4 Advanced Indicator</b> The site’s partnership/water stewardship activities with other sites in another catchment(s) (either under same corporate structure or with another corporate site) shall be <b>identified</b>.</p>			<p>This Advanced Indicator was not considered for this site.</p>	
	<p><b>2.3.5 Advanced Indicator</b> Stakeholder consensus shall be sought on the site’s water stewardship plan. Consensus should be achieved on at least one target. A list of targets that have consensus and in which stakeholders are involved shall be <b>identified</b>.</p>	Yes		<p>Documentation of stakeholder consensus included meeting notes and photographs of various activities with catchment stakeholders. This was also confirmed through stakeholder interviews.</p>	7
<p>2.4 Demonstrate the site’s responsiveness and resilience to respond to water risks</p>	<p><b>2.4.1</b> 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>.</p>	Yes		<p>Blue Triton Allentown provided their current Preparedness, Prevention, and Contingency (PPC) plan documents for both the East and West facilities, as well as the Incident Response Plans for their spring sites. All these documents include a description of their required responses and resilience operations to water related issues and risks. Modifications to the plans are captured through revision/amendment comments. Additionally, a periodic review is part of standard procedures to evaluate the plan’s effectiveness. 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>	
	<p><b>2.4.2 Advanced Indicator</b> A plan to mitigate or adapt to water risks associated with climate change projections developed in co-ordination with relevant</p>			<p>This Advanced Indicator was not considered for this site.</p>	

	public-sector and infrastructure agencies shall be <i>identified</i> .					
<b>Advanced Points Step 2</b>						<b>11</b>
<b>STEP 3: Implement</b>						
<b>Criteria</b>	<b>Indicator</b>	<b>Yes</b>	<b>No</b>	<b>NA</b>	<b>Objective Evidence/Findings</b>	<b>Points</b>
3.1 Implement plan to participate positively in catchment governance.	3.1.1 Evidence that the site has supported good catchment governance shall be <i>identified</i> .	Yes			The Factory provided documentation of their efforts to support good catchment governance through participation with the local governing agencies, sharing information with agencies and through continuing to expand education on AWS and outcomes toward good water governance.	
	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> .	Yes			Blue Triton utilizes the Guidelines on Respecting the Human Rights to Water and Sanitation as one tool to access the impact of operations on communities to access water (water rights) and sanitation. Additional tools and efforts complementing the Guidelines include the Community Relations Process and water-related outreach. Excluded water rights have not been identified through stakeholder engagements, including with key water agencies. As part of a continued dialog with the community, Blue Triton pursue feedback on this topic.	
	3.1.3 <b>Advanced Indicator</b> Evidence of improvements in water governance capacity from a site-selected baseline date shall be <i>identified</i> .				This Advanced Indicator was not considered for this site.	
	3.1.4 <b>Advanced Indicator</b> Evidence from a representative range of stakeholders showing consensus that the site is seen as positively contributing to the good water governance of the catchment shall be <i>identified</i> .	Yes			Documentation of conversations with stakeholders specifically addressing consensus with Indicators 3.1.4, 3.5.3, 3.6.2 and 4.3.2 were provided for review.	2
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 <i>implemented</i> .	Yes			The Blue Triton Compliance Matrix was provided and reviewed. Included in the matrix are the listed permits and responsible staff to ensure maintenance of compliance. A third-party is contracted to confirm compliance is maintained. In addition, the facility is ISO 14001 Certified.	
	3.2.2 Where water rights are part of legal and regulatory requirements, measures	Yes			Blue Triton utilizes the Guidelines on Respecting the Human Rights to Water and Sanitation as one tool to access the impact of operations on	



	<i>identified</i> to respect the water rights of others including Indigenous peoples, shall be <b>implemented</b> .				communities to access water (water rights) and sanitation. Additional tools and efforts complementing the Guidelines include the Community Relations Process and water-related outreach. Excluded water rights have not been identified through stakeholder engagements, including with key water agencies. As part of a continued dialog with the community, Blue Triton pursue feedback on this topic. operations on communities to access water (water rights) and sanitation.	
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			Water withdrawal, water withdrawal rates, energy consumption and production volume are tracked monthly and compared to previous years monthly values. The site has worked to improve its water efficiency as per its targets, by implementing the following measures: completed Line 13 filler rebuild resulting in annual savings of 528,344 gallons in Allentown East and Implemented bottle washer improvements resulting in annual savings of 10,000,000 gallons as well as Implemented reuse of washer and filler waste resulting in annual savings of 8,000,000 gallons for Allentown West. The WWR goals for Allentown East and West in 2020 were 1.339 L/L and 1.430 L/L, respectively, with corresponding actual WWRs of 1.328 L/L and 1.425 L/L.	
	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			Blue Triton establishes site targets annually to improve water balance by 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 <b>identified</b> .	Yes			The site is not re-allocating water savings.	
	3.3.4 <b>Advanced Indicator</b> The total volume of water voluntarily re-allocated (from site water savings) for social, cultural and environmental needs shall be <b>quantified</b> .				This Advanced Indicator was not considered for this site.	
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			Measurement system is in place for water quality targets throughout the site, data from previous monitoring reports were reviewed. Annual review of data was found to be within historic values and regulatory limits. Water	

					monitoring protocol was discussed with quality assurance manager. Wastewater results are within permitted values.	
	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 a shared water challenge and an AWS Outcome. Improvements to water quality are achieved through monitoring, and management.	
3.5 Implement plan to maintain or improve the site's and/or catchment's Important Water-Related Areas.	3.5.1 Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be <b>implemented</b> .	Yes			The on-site groundwater well PW-1 is identified as an IWRA. Practices are in place to maintain and manage the well. Catchment IWRAs have been identified together with their current status, future trends and site status. IWRAs are discussed in their AWS presentations to stakeholders.	
	3.5.2 <b>Advanced Indicator</b> Evidence of completed restoration of non-functioning or severely degraded Important Water-Related Areas including where appropriate cultural values from a site-selected baseline date shall be <b>identified</b> . Restored areas may be outside of the site, but within the catchment.				This Advanced Indicator was not considered for this site.	
	3.5.3 <b>Advanced Indicator</b> Evidence from a representative range of stakeholders showing consensus that the site is seen as positively contributing to the healthy status of Important Water-Related Areas in the catchment shall be <b>identified</b> .	Yes			Documentation of conversations with stakeholders specifically addressing consensus with Indicators 3.1.4, 3.5.3, 3.6.2 and 4.3.2 were provided for review.	2
3.6 Implement plan to provide access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers at all premises under the site's control.	3.6.1 Evidence of the site's provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers onsite shall be <b>identified</b> and where applicable, <b>quantified</b> .	Yes			Blue Triton uses a self-assessment tool at each site to review access to drinking water, sanitation and hygiene awareness (WASH). The nature of the product made at the facility requires strict adherence to these principals. Pledged compliance was achieved within the Blue Triton facility.	
	3.6.2 Evidence that the site is not impinging on the human right to safe water and sanitation of communities	Yes			Blue Triton 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. Blue Triton discussions with	

	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.				stakeholders did not indicate actual or perceived concern that site was impinging on human right to safe water and sanitation in catchment.	
	<b>3.6.3 Advanced Indicator</b> A list of actions taken to support the provision to stakeholders in the catchment of access to safe drinking water, adequate sanitation and hygiene awareness shall be <b>identified</b> .	Yes			Blue Triton Allentown site provided documentation with evidence of: <ul style="list-style-type: none"> <li>- Allentown Campus donations of bottles of waters to different organizations and</li> <li>- Donation of hand-sanitizer (280,000 blue bottles) to Angels of Action and other local hospitals during the pandemic</li> </ul>	5
	<b>3.6.4 Advanced Indicator</b> In catchments where WASH has been <b>identified</b> as a shared water challenge, evidence of efforts taken with relevant public-sector agencies to share information and to advocate for change to address access to safe drinking water and sanitation shall be <b>identified</b> .				This Advanced Indicator was not considered for this site.	
3.7 Implement plan to maintain or improve indirect water use within the catchment.	<b>3.7.1</b> Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be <b>quantified</b> .	Yes			Indirect water use targets in the Water Stewardship Plan include engaging with vendors both in and out of the catchment. There are no suppliers located in the catchment.	
	<b>3.7.2</b> 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			There are no suppliers located in the catchment. Water stress data have been compiled for the material Primary Input Providers and Outsourced Services based on Blue Water Scarcity.	
	<b>3.7.3 Advanced Indicator</b> Actions taken to address water related risks and challenges related to indirect water use outside the catchment shall be documented and <b>evaluated</b> .				This Advanced Indicator was not considered for this site.	

3.8 Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have.	3.8.1 Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be <b>identified</b> .	Yes			Evidence indicated there are no concerns with any shared water related infrastructure. Blue Triton regularly shares aquifer and surface water information with stakeholders.	
3.9 Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.	3.9.1 Actions towards achieving best practice, related to water governance, as applicable, shall be <b>implemented</b> .	Yes			Blue Triton team engages with catchment authorities and other stakeholders to share information, best practices and drive water stewardship efforts, one example is the data sharing and collaborative efforts.	
	3.9.2 Actions towards achieving best practice, related to targets in terms of water balance shall be <b>implemented</b> .	Yes			Sector specific efficiency metric of water use ratio (liters of water used in the process/liter of bottled water) are used to track onsite efficiency and established a target to monitor continual improvement. The 2020 site WWR for Allentown East of 1.328 l/l was below the goal of 1.339 and for Allentown West the WWR of 1.425 l/l was below the goal of 1.430 l/l.	
	3.9.3 Actions towards achieving best practice, related to targets in terms of water quality shall be <b>implemented</b> .	Yes			Blue Triton exceeds requirements outlined with sampling frequency, parameters analyzed and consistency across the business unit. Water quality data provided meets and exceeds regulatory requirements. Effluent is managed appropriately and in accordance with permit limits.	
	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			Blue Triton follows practices described by ProForest by assigning Natural Resource Manager for each site who focuses on maintenance of springs and other IWRAs. Blue Triton follows good practice guidelines for High Conservation Value Assessments A practical guide for practitioners and auditors and Assessment, management and monitoring of High Conservation Value Forest A practical guide for forest managers, as set by ProForest.	
	3.9.5 Actions towards achieving best practice related to targets in terms of WASH shall be <b>implemented</b> .	Yes			There is adequate WASH in the catchment. Blue Triton provides bottled water donations to the community. A report is included with details of the donations made, which includes the organizations supported, the products and the amounts.	
	3.9.6 <b>Advanced Indicator</b> Achievement of <b>identified</b> best practice related to targets in terms of good water governance shall be <b>quantified</b> .				This Advanced Indicator was not considered for this site.	

	<p><b>3.9.7 Advanced Indicator</b> Achievement of <i>identified</i> best practice related to targets in terms of sustainable water balance shall be <i>quantified</i>.</p>	Yes		<p>Allentown site provided documentation to support evidence of improvements in the WWR in the last five years, despite a general increase in their production volume. Allentown’s Water Stewardship Plan was also provided showing evidence of best practice full implementation (improvements in the WWR, GHG emission rates, and energy consumption). The water savings initiatives undertaken by the site (i.e., water conservation, reuse and recycling, fill refinement, bottle washer improvements, RO optimization, cooling tower upgrades, etc.) and setting site water targets based on catchment evaluations represent best practice. It is noteworthy that Allentown East was reportedly the first industrial facility to be LEED certified in Pennsylvania.</p>	8
	<p><b>3.9.8 Advanced Indicator</b> Achievement of <i>identified</i> best practices related to targets in terms of water quality shall be <i>quantified</i>.</p>	Yes		<p>Monitoring data were shown for all the spring sources used by the Allentown factory, including flow data and evidence of water samples and monitoring efforts conducted regularly and frequently at the water source as well as in the adjacent environment. These data, all in compliance with local and federal screening criteria, are reported on a monthly basis. Other examples of best practices include:</p> <ul style="list-style-type: none"> <li>- Valid wastewater permits and effluent water quality results showing compliance with applicable criteria.</li> <li>- Annual review of incoming data to be within historic trends and values</li> <li>- Bio-monitoring work at all the spring sites.</li> <li>- Riparian Projects in collaboration with Upper Macungie Township &amp; Wildlands Conservancy</li> <li>- Cleanup work in the Iron Run</li> </ul>	8
	<p><b>3.9.9 Advanced Indicator</b> Achievement of <i>identified</i> best practices related to targets in terms of the site’s maintenance of Important Water-Related Areas have been <i>implemented</i>.</p>	Yes		<p>Several documents were reviewed with evidence of best practices achieved related to the Allentown site maintenance of IWRA. Examples include:</p> <ul style="list-style-type: none"> <li>- Preservation and improvement of IWRA health through continued hydro-monitoring, fish monitoring and evaluation of water data on a regular basis and making those data publicly available through Community Annual Summary Reports.</li> <li>- Maintenance and improvement measures taken to ensure preservation of the groundwater and extraction points and to keep the well areas in good condition.</li> </ul>	8

					<ul style="list-style-type: none"> <li>- Contributing to the improvement of water quality conditions of groundwater with elevated concentration of TDS, sulfate and calcium through discharges of water withdrawals to Greenwalk Creek.</li> <li>- Supporting community and education programs related to water quality of IWRAs through community volunteering, engagement in classrooms, and donations.</li> <li>- Partnership with Upper Macungie Township for stream cleanup day; riparian improvement activity initiatives with Wildlands Conservancy, and 40 hours annually for community watershed improvement opportunities.</li> </ul>	
	<p><b>3.9.10 Advanced Indicator</b> Achievement of <i>identified</i> best practice related to targets in terms of WASH shall be <i>quantified</i>.</p>	Yes			Blue Triton donations of bottled water to the community is documented and quantified monthly for 2020. In addition, Blue Triton contributed 280,000 blue bottles for hand sanitizer during the pandemic.	4
	<p><b>3.9.11 Advanced Indicator</b> A list of efforts to spread best practices shall be <i>identified</i>.</p>	Yes			Monitoring and Community Reports in the form of brochures were prepared by the Blue Triton Allentown site for each water springs. The brochures well summarize Blue Triton activities and monitoring data within their spring source communities. These are great examples of good practice on how to promote best practices within the catchments and show Blue Triton 's commitment to being more transparent in their operations In addition, a list of several outreach efforts is compiled and provided containing specific names of different agencies, companies, foundations points of contacts, and dates and notes of meetings.	3
	<p><b>3.9.12 Advanced Indicator</b> A list of collective action efforts, including the organizations involved, positions of responsible persons of other entities involved, and a description of the role played by the site shall be <i>identified</i>.</p>	Yes			A list of several collective actions was provided and reviewed. The list contains information on parties and individuals involved, roles played by the Allentown Campus, and references to the evidence of the change obtained through effective implementation of the actions. During the audit, additional information was provided regarding the multiple projects to improve water balance, quality, and/or governance within and outside the catchment. The common denominator of their successful collaborations with different agencies and companies is the site's willingness to share their water stewardship experience, technology, contacts, hydrogeologic understanding, and ability to access funding.	14
	<p><b>3.9.13 Advanced Indicator</b> Evidence of the <i>quantified</i> improvement that has resulted from the collective action relative to a site-selected baseline</p>	Yes			Documentation was provided on evidence of the positive impact of collaborative efforts towards more efficient governmental policies, increased education and outreach, technical assistance, increased project opportunities. The documentation also includes explicit acknowledgement	10

	date shall be <b>identified</b> and evidence from an appropriate range of stakeholders linked to the collective action (including both those implementing the action and those affected by the action) that the site is materially and positively contributing to the achievement of the collective action shall be <b>identified</b> .				from different stakeholders that the Allentown Campus contributed to the positive outcome.	
<b>Advanced Points Step 3</b>						<b>64</b>
<b>STEP 4: Evaluate</b>						
<b>Criteria</b>	<b>Indicator</b>	<b>Yes</b>	<b>No</b>	<b>NA</b>	<b>Objective Evidence/Findings</b>	<b>Points</b>
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			Blue Triton 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. Further evaluation will be conducted during the surveillance and renewal audits.	
	4.1.2 Value creation resulting from the water stewardship plan shall be <b>evaluated</b> .	Yes			Blue Triton has created value related to multiple efforts including WASH access in the catchment, water efficiency upgrades, and IWRA preservation. Knowledge gained through implementation is being shared with key stakeholders.	
	4.1.3 The shared value benefits in the catchment shall be <b>identified</b> and where applicable, <b>quantified</b> .	Yes			Refer to 4.1.1	
	4.1.4 <b>Advanced Indicator</b> A governance or executive-level review, including discussion of shared water challenges, water risks, and opportunities, and any water-related cost savings or benefits realized, and any relevant incidents shall be <b>identified</b> .				This Advanced Indicator was not considered for this site.	
4.2 Evaluate the impacts of water-related emergency incidents (including	4.2.1 A written annual review and (where appropriate) root-cause analysis of the year's emergency incident(s) shall be	Yes			No water-related emergency events occurred since the last Surveillance Audit. No shutdown occurred that was water related. The annual	

extreme events), if any occurred, and determine the effectiveness of corrective and preventative measures.	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> .				environmental reviews would document these emergency events, if any. The facility has a current SWPPP and SPCC.	
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 <b>identified</b> .	Yes			Internal and external stakeholder outreach conducted and documented in the Stakeholder Outreach Log. Responses covered the main topics of catchment areas, WASH, IWRAs, water efficiency, water savings projects.	
	4.3.2 <b>Advanced Indicator</b> The site's efforts to address shared water challenges shall be <b>evaluated</b> by stakeholders. This shall include stakeholder reviewing of the site's efforts across all five outcome areas, and their suggestions for continual improvement.	Yes			Documentation of conversations with stakeholders specifically addressing consensus with Indicators 3.1.4, 3.5.3, 3.6.2 and 4.3.2 were provided for review.	6
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 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. Stakeholder consultation has led to sharing projects and adapting to stakeholder projects as requested. The site presents the updated plan indicating the progress or fulfillment of the established goals. COVID-19 has delayed meeting various goals.	
<b>Advanced Points Step 4</b>						<b>6</b>
<b>STEP 5: Communicate and Disclose</b>						
<b>Criteria</b>	<b>Indicator</b>	<b>Yes</b>	<b>No</b>	<b>NA</b>	<b>Objective Evidence/Findings</b>	<b>Points</b>
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			Blue Triton facility posts the factory organization chart in the entry of the factory floor where it will be observed by staff and during factory open houses with operational tours. The organization chart includes the staff and relevant responsible personnel for water-related laws and regulations. Factory open houses also include presentations on the site's water stewardship projects and implementation of the AWS International Water Stewardship Standard.	



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			Blue Triton provided the outreach log and communication with catchment authorities about the AWS process. The AWS Presentation summarizes the water stewardship plan and outcomes. The Presentation was shared with stakeholders. Communication and outreach confirmed through stakeholder interviews. The site presents documents including communication (messages).	
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			The stakeholder presentation was reviewed, the presentation includes the site's water stewardship performance results. Blue Triton conducted public/consumer education outreach; distribution of stakeholder presentations and providing stakeholders presentations that reviewed the sites water challenges, stakeholder feedback, targets, with implementation outcomes.	
	<b>5.3.2 Advanced Indicator</b> The site's efforts to <b>implement</b> the AWS Standard shall be <b>disclosed</b> in the organization's annual report.				This Advanced Indicator was not considered for this site.	
	<b>5.3.3 Advanced Indicator</b> Benefits to the site and stakeholders from implementation of the AWS Standard shall be <b>quantified</b> in the organization's annual report.				This Advanced Indicator was not considered for this site.	
5.4 Disclose efforts to collectively address shared water challenges, including: associated efforts to address the challenges; engagement with stakeholders; and co-ordination with public-sector agencies.	5.4.1 The site's shared water-related challenges and efforts made to address these challenges shall be <b>disclosed</b> .	Yes			The stakeholder presentation was reviewed. Presentation includes the site's water stewardship performance results. The presentation was provided to stakeholders prior to the onsite audit. List of attendees reviewed. Blue Triton conducted public/consumer education outreach and providing stakeholders presentations that reviewed the sites water challenges, stakeholder feedback, targets, with implementation outcomes.	
	5.4.2 Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be <b>identified</b> .				See 5.4.1	
5.5 Communicate transparency in water-related compliance: make any site water-related compliance violations available upon request as	5.5.1 Any site water-related compliance violations and associated corrections shall be <b>disclosed</b> .	Yes			Violations are publicly available through state and federal reporting (ECHO/US EPA). There were no violations reported via ECHO.	
	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	

well as any corrective actions the site has taken to prevent future occurrences.	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 <i>disclosed</i> .	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.	
<b>Advanced Points Step 5</b>						<b>0</b>