

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000240

SITE DETAILS

Site: **Boehringer Ingelheim Fremont Inc.**

Address: 6701 Kaiser Drive, 94555, Fremont, California, UNITED STATES

Contact Person: Mark Nool

AWS Reference Number: AWS-000336

Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Core

Date of certification decision: 2022-Nov-01

Validity of certificate: 2025-Nov-01

AUDIT DETAILS

Audited Service(s): AWS Standard v2.0 (2019)

Audit Type(s): Initial Audit

Audit Start Date: 2022-Apr-05

Lead Auditor: Claudia M. Jaime

Audit team participants:

Hartmann Joerg, Local Auditor

Claudia M Jaime, Lead Auditor

Site Participants:

Shayla Bergeron, Sr. Manager Environment Health and Safety

Mark Nool, Sr. Associate Director EH&S

DR. Reinold Maeck, Corporate EHS + S

David Redaliev, VS Director EHS

Nina Schmid, Corporate Environment & Sustainability

Ingo Weiss, Corporate Env. & Sust.

Ted Hoffman, Site Engineer

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ADDITIONAL INFO

Summary of Audit Findings: A total of 16 major non-conformities, 12 minor non-conformities and 6 observations have been raised during the audit process.

The audit team has recommended certification of Boehringer Ingelheim Fremont Inc. at Core level pending approval of the corrective actions plan and closure of the major non-conformities.

The Client has defined corrective actions for each of the non-conformities and has submitted these to WSAS within 60 days of receipt of the audit report.

The major non-conformities were sufficiently addressed and proof of implementation submitted to WSAS within 90 days.

Minor non-conformities must be addressed and closed out by the time of the next annual audit.

Scope of Assessment: The scope of services covers the Initial Certification Audit for assessing conformity of Boehringer-Ingelheim Fremont Inc., against the AWS International Water Stewardship Standard Version 2.

Boehringer Ingelheim Fremont, Inc. is the growing U.S. arm of BI's Biopharmaceuticals Business Unit. With a diverse team of over 500 people, the Site covers biopharmaceutical development and manufacturing from small scale to commercial, from drug substance manufacturing to fill/finish, packaging and medical device assembly. They have a focus on helping patients - through the reliable supply of high quality medicines, and being on the cutting edge of technology and innovation and description of all facilities, process activities and outputs that were included in the assessment.

The facility is located in the urbanized East Bay region of the San Francisco Bay Area in Fremont, Alameda County, California, southeast of San Francisco.

The Site is located within the Lower Alameda Creek Watershed - the largest watershed in the Bay Area. Numerous tributaries empty into Alameda Creek that flows west towards the 55-acre Demonstration Urban Stormwater Treatment (DUST) Marsh.

The audit was conducted onsite on 5-7 of April 2022.

The onsite site visit included the assessment of installations, production, storage area, and the view of the creek next to the site.

FINDINGS

NUMBER OF FINDINGS PER LEVEL

Observation	6
Minor	12
Major	16

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FINDING DETAILS

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Audit Number: AO-000240

Finding No:	TNR-000493
Checklist Item No:	1.2.1
Status:	Closed
Finding level:	Major
Due date:	2022-Oct-04
Checklist item:	Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall: <ul style="list-style-type: none">- Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people;- Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies;- Provide evidence of stakeholder consultation on water-related interests and challenges;- Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups;- Identify the degree of stakeholder engagement based on their level of interest and influence.
Findings:	<p>The Site has identified their stakeholders and developed a stakeholder database. However:</p> <ul style="list-style-type: none">a) The Site has not initiated the communication with 10 out of 12 stakeholders.b) The Site has not included on their list the neighbouring farmers.c) The Site has not provided evidence on Stakeholder consultation on water-related interests and challenges;d) The Site has not Identified the degree of stakeholder engagement based on their level of interest and influence.
Corrective action:	<ol style="list-style-type: none">1. BIFI is in the progress of creating a water stewardship program document that will be implemented at the BI Fremont site. This program document will be implemented into our GMP Document Management system (IDEA for Con) and will become a part of the site's policy. This document will layout the process for identifying stakeholders, maintaining communication, documenting communication, and how the stakeholder database will be continuously evaluated. A stakeholder engagement log will be created and maintained as a part of this process.2. BIFI is in the progress of increasing communication (including consultation of water-related interests and challenges) with external stakeholders and document it according to the process described in the BIFI Water Stewardship program document.3. BIFI will add and track the degree of stakeholder engagement based on their level of interest and influence to the stakeholder database in the OneNote Report.

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Evidence of implementation:	<p>BIFI has evaluated its current list of stakeholders and revised accordingly in the stakeholder database and updated the list to include the degree of stakeholder engagement based on the level of interest. The site has developed a Water Stewardship Management Plan which outlines the process for stakeholder selection and the process around maintaining and documenting communication. The site has increased communication which can be seen in the Stakeholder Engagement Log and in the supporting documentation folders.</p> <p>BIFI has indicated that no specific farmer/landowner was identified as a stakeholder as there are not any farmlands within the catchment.</p>
Finding No:	TNR-000505
Checklist Item No:	1.2.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Apr-11
Checklist item:	Current and potential degree of influence between site and stakeholder shall be identified, within the catchment and considering the site's ultimate water source and ultimate receiving water body for wastewater.
Findings:	<p>The Site has identified the Stakeholder's impact and level of interest in water-related issues, however, the current and potential degree of influence between the Site and the stakeholders has not been identified.</p> <p>The organization should review its stakeholders and categorize them according to the five categories: inform, consult, involve, partner and reciprocate vary based on the degree of power to influence and their interest in water stewardship.</p>
Corrective action:	<p>1. BIFI is in the progress of adding the degree of stakeholder engagement perceived (according to the five categories) based on their level of interest and influence to the stakeholder database in the OneNote Report.</p>

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Audit Number: AO-000240

Finding No:	TNR-000574
Checklist Item No:	1.3.3
Status:	Closed
Finding level:	Major
Due date:	2022-Oct-04
Checklist item:	Site water balance, inflows, losses, storage, and outflows, including indication of annual variance in water usage rates, shall be quantified. Where there is a water-related challenge that would be a threat to good water balance for people or environment, an indication of annual high and low variances shall be quantified.
Findings:	Water quantities have not been updated since April 2021. There is no data on variability of water use within the year, and there is no trend analysis.
Corrective action:	1. BIFI is in the progress of creating a water stewardship program document that will be implemented at the BI Fremont site. This program document will be implemented into our GMP Document Management system (IDEA for Con) and will become a part of the site's policy. This document will layout the process of how the water balance will be updated on a monthly basis. The process will also include an annual evaluation of the site water map to determine if anything has changed and whether an update is necessary.
Evidence of implementation:	<p>In April 2021, the site conducted a full water balance study to create a full site water map. BIFI tracks its water usages vs. discharges on a monthly basis using an excel spreadsheet tool that is also submitted to Union Sanitary every 6 months for approval. If water inflow and/or wastewater discharge versus production vary in the site water balance by approximately +/-5-10% at the end of the 6 months of data input, BIFI EHS will initiate investigation to explain the variance. The site water map will be updated if there are any major changes to the site, e.g., major infrastructure is added or a major process changes.</p> <p>BIFI utilizes Alameda County Water District's Consumption Analysis tool to trend water usage and quantify annual high and low variances. This process is documented in the Water Stewardship Management Plan.</p>

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Audit Number: AO-000240

Finding No: TNR-000478
Checklist Item No: 1.3.7
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Apr-11
Checklist item: Annual water-related costs, revenues, and a description or quantification of the social, cultural, environmental, or economic water-related value generated by the site shall be identified and used to inform the evaluation of the plan in 4.1.2.
Findings: The Site has calculated their annual water-related costs, however, there is no information on any water-related value (revenues or social, cultural or environmental benefits) generated by the Site.
Corrective action: 1. BIFI is in the progress of creating a water stewardship program document that will be implemented at the BI Fremont site. This program document will be implemented into our GMP Document Management system (IDEA for Con) and will become a part of the site's policy. This document will layout the process on how the site will report water costs and water-related values.

Finding No: TNR-000591
Checklist Item No: 1.5.3
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Apr-11
Checklist item: The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.
Findings: The site is located in a water stressed area. The water balance presented does not show indication of seasonal variance.
Corrective action: 1. Catchment water balances are extremely complicated and thus Alameda County Water District has conducted extensive research on future water supply and demand in the catchment in their Urban Water Management Plan. BIFI has studied this report and reported all pertinent information on the catchment water balance that is available, including data on:

- Median Year, long-term averages, and max and min water supplies
- legal, environmental, water quality, and climatic conditions that could affect supply
- Dry-Year water demand values

2. BIFI will continue to monitor for updates to ACWD's Urban Water Management Plan and update the information in the OneNote Report as needed. BIFI is in the progress of adding a checklist into the water stewardship program document that will ensure all sections of the OneNote Report are updated on an annual basis.

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Finding No: TNR-000601
Checklist Item No: 1.5.4
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Apr-11
Checklist item: Water quality, including physical, chemical, and biological status, of the catchment shall be identified, and where possible, quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be identified.
Findings: The site has defined water quality as a shared water challenge but has not yet identified the annual (or seasonal) high and low variances.
Corrective action: 1. BIFI will continue to monitor Alameda County Water District's annual water quality reports. BIFI is in the progress of adding a checklist into the water stewardship program document that will ensure all sections of the OneNote Report are updated on an annual basis.

Finding No: TNR-000602
Checklist Item No: 1.7.2
Status: For information
Finding level: Observation
Checklist item: Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.
Findings: The Site could assess further potential water-related savings and business opportunities.

Finding No: TNR-000479
Checklist Item No: 1.8.1
Status: For information
Finding level: Observation
Checklist item: Relevant catchment best practice for water governance shall be identified.
Findings: The identified catchment best practice for water governance has not been consistently incorporated in the Water Stewardship Plan.

Finding No: TNR-000480
Checklist Item No: 1.8.2
Status: For information
Finding level: Observation
Checklist item: Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.
Findings: The identified catchment best practice for water balance has not been consistently incorporated in the Water Stewardship Plan.

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Audit Number: AO-000240

Finding No:	TNR-000483
Checklist Item No:	1.8.4
Status:	Closed
Finding level:	Major
Due date:	2022-Oct-04
Checklist item:	Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.
Findings:	The catchment best practice for site maintenance of IWRAs have not been identified. These shall be determined in line with the information identified in 1.5.5.
Corrective action:	1. BIFI is in the progress of creating a water stewardship program document that will be implemented at the BI Fremont site. This program document will be implemented into our EHS Management system (IDEA for Con) and will become a part of the site's policy. This document will layout the site's best practices that will be implemented at the site, including the volunteer activity that employees will engage in on an annual basis. BIFI has already conducted significant research on volunteer activities in the catchment and has selected to participate in the Coastal Cleanup Day organized by the City of Fremont.
Evidence of implementation:	BIFI has identified a best practice to engage the site in at least one volunteer opportunity involving the restoration of an important water-related area on an annual basis. This Best Practice is included in the Best Practices section of BIFI's Water Stewardship Management Plan.

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Audit Number: AO-000240

Finding No:	TNR-000605
Checklist Item No:	2.3.1
Status:	Closed
Finding level:	Major
Due date:	2022-Oct-04
Checklist item:	A water stewardship strategy shall be identified that defines the overarching mission, vision, and goals of the organization towards good water stewardship in line with this AWS Standard.
Findings:	The site has not identified a water stewardship strategy defining the mission, vision and overall organisational objectives towards good water stewardship in accordance with the AWS Standard.
Corrective action:	1. BIFI is in the progress of creating a water stewardship program document that will be implemented at the BI Fremont site. This program document will be implemented into our EHS Management system (IDEA for Con) and will become a part of the site's policy. This document will layout the site's water stewardship strategy at the local level and will be based on corporate goals of the clean water program.
Evidence of implementation:	BIFI has developed a Water Stewardship Management Plan to tie the global water stewardship strategy to the local strategy. The Water Stewardship Management Plan is a part of the site's policy and therefore incorporates the water stewardship strategy into the site's policy as well. The Water Stewardship Strategy for the site is incorporated in the Water Stewardship Management Plan.

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Audit Number: AO-000240

Finding No:	TNR-000606
Checklist Item No:	2.3.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Apr-11
Checklist item:	A water stewardship plan shall be identified, including for each target: <ul style="list-style-type: none">- 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.
Findings:	<p>There is a Water Stewardship Plan (WSP) which includes 22 planned actions. However:</p> <ol style="list-style-type: none">1. The site has not defined how the plan will be measured and monitored.2. The required resources and budget are not sufficiently broken down. For example, Action Plan 2 states: 'Conduct a wastewater contaminant load study to evaluate potential opportunities to reduce pollution and surcharges and provide a cushion against possible more stringent discharge standards.' Only staffing costs have been identified for this action.3. The targets have not been fully set, and in some cases, the set targets are not clearly defined following the SMART approach (Specific, Measurable, Achievable, Realistic, and Time-based). Where possible, annual targets should be defined.
Corrective action:	<ol style="list-style-type: none">1. BIFI is in the progress of creating a water stewardship program document that will be implemented at the BI Fremont site. This program document will be implemented into our EHS Management system (IDEA for Con) and will become a part of the site's policy. This document will layout the process for measuring and monitoring the water stewardship plan and how financial budgets will be allocated.2. The water stewardship program document will also describe how the plan will be evaluated and updated. BIFI will conduct an annual review of the plan and update the targets created following the SMART approach. The annual review will be documented as described in the water stewardship program document.
Evidence of implementation:	<p>The site has developed a Water Stewardship Management Plan that governs the process of how the WSP will be measured and monitored. The site conducted a full review of the WSP using the WSP Annual Review Form outlined in the Water Stewardship Management Plan. The site has revised the plan to more follow the SMART approach and will use the site's compliance calendar to update quarterly progress checks.</p> <p>This finding has been downgraded to a minor, as BIFI has successfully addressed items 1 and 2 of the finding, however the targets set by BIFI are actions rather than targets. Targets must be specific, measurable and time-bound.</p>

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Audit Number: AO-000240

Finding No:	TNR-000898
Checklist Item No:	3.1.1
Status:	Closed
Finding level:	Major
Due date:	2022-Oct-04
Checklist item:	Evidence that the site has supported good catchment governance shall be identified.
Findings:	There is no evidence that the site has supported or has contributed to good catchment governance.
Corrective action:	1. BIFI is in the progress of creating a water stewardship program document that will be implemented at the BI Fremont site. This program document will be implemented into our GMP Document Management system (IDEA for Con) and will become a part of the site's policy. This document will layout the process for identifying stakeholders, maintaining communication, documenting communication, and how the stakeholder database will be continuously evaluated. A stakeholder engagement log will be created and maintained as a part of this process. By continuing to engage relevant stakeholders, including government authorities, BIFI will continue to show support for good catchment governance.
Evidence of implementation:	The site maintains routine contact with local regulators, demonstrating support for good water governance. The site has created a stakeholder engagement log to better document all engagement with stakeholders. In addition, the site has developed a Water Stewardship Management Plan that outlines the process for stakeholder engagement. The site has increased communication which can be seen in the Stakeholder Engagement Log and in the supporting documentation folders.

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Audit Number: AO-000240

Finding No:	TNR-000607
Checklist Item No:	3.2.1
Status:	Closed
Finding level:	Major
Due date:	2022-Oct-04
Checklist item:	A process to verify full legal and regulatory compliance shall be implemented.
Findings:	There is no evidence of an implemented process to verify full legal and regulatory compliance by the Site.
Corrective action:	<ol style="list-style-type: none">1. BIFI maintains an EHS management system and a compliance calendar to maintain full legal and regulatory compliance for all BI sites globally. If an incident occurs, an incident report would be documented in the site's incident investigation program, Cority. The type of incident that was described in the audit would have required an investigation be conducted to identify a root cause analysis and corrective and preventative actions (CAPAs) that would be implemented. All CAPAs for this incident was integrated into site SOPs to ensure compliance moving forward. BIFI communicated the root cause analysis and CAPAs implemented to Union Sanitary District, which was deemed satisfactory. BIFI received a Notice of Violation for the incident and has not received further violations.2. BIFI will submit all relevant documentation for the incident above as evidence of compliance.
Evidence of implementation:	BIFI maintains an EHS management system, compliance calendar, and incident investigation program to maintain full legal and regulatory compliance. BIFI has identified that this was not sufficiently described in the AWS Audit.

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Audit Number: AO-000240

Finding No:	TNR-000899
Checklist Item No:	3.3.1
Status:	For information
Finding level:	Observation
Due date:	2023-Apr-11
Checklist item:	Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.
Findings:	There is no evidence confirming progress towards meeting the Site's water balance targets.
Corrective action:	1.BIFI is in the progress of creating a water stewardship program document that will be implemented at the BI Fremont site. This program document will be implemented into our GMP Document Management system (IDEA for Con) and will become a part of the site's policy. This document will layout the process for conducting an annual review of the plan and update the targets created following the SMART approach. The annual review will be documented in an annual review form as described in the water stewardship program document. BIFI is in the progress of completing an annual review of the water stewardship plan and will document it as described above.
Evidence of implementation:	<p>The site is making significant progress in completing the target to conduct a Water Efficiency Study for the site. There was significant data that the site needed to collect as the first step in the study, which has been completed. The next step, the onsite facility assessment with third party consultants, is scheduled for the week of 11/14/22. Therefore, the target of completing this study by the end of this year is still achievable. The goal of the water efficiency study is to identify further opportunities to increase water efficiency. Once the opportunities are reviewed, the site will add additional targets to the WSP. The site has also added additional long-term targets to the WSP to reduce overall water usage and install additional permanent water meters at the site to increase granularity of the water balance.</p> <p>This finding has been downgraded to an observation as the site will have to set new specific and measurable water balance targets once the Water Efficiency Study is complete.</p>

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Audit Number: AO-000240

Finding No:	TNR-000608
Checklist Item No:	3.3.2
Status:	Closed
Finding level:	Major
Due date:	2022-Oct-04
Checklist item:	Where water scarcity is a shared water challenge, annual targets to improve the site's water use efficiency, or if practical and applicable, reduce volumetric total use shall be implemented.
Findings:	The site has identified water availability as one of the shared water challenges. The site has identified some 'possible targets' for 2023 and 2024 most of these are not sufficiently specific or measurable.
Corrective action:	1. BIFI is in the progress of conducting an annual review of the plan and update the targets created following the SMART approach. The annual review will be documented as described in the water stewardship program document.
Evidence of implementation:	BIFI has completed a review of the site's WSP and revised it to make its targets more closely follow the SMART approach. BIFI tracks its water usages vs. discharges on a monthly basis using an excel spreadsheet tool that is also submitted to Union Sanitary every 6 months for approval. The site has included a final water balance equation in the excel spreadsheet to conduct the water balance. BIFI utilizes Alameda County Water District's Consumption Analysis tool to trend water usage and quantify annual high and low variances. In April 2021, the site conducted a full water balance study to create a full site water map. There haven't been any changes to the site and therefore this water map is still accurate. If there is a change to the site water processes, the map will be updated. This process is documented in the Water Stewardship Management Plan. The site is making significant progress in completing the target to conduct a Water Efficiency Study for the site. There was significant data that the site needed to collect as the first step in the study, which has been completed. The next step, the onsite facility assessment with third party consultants, is scheduled for the week of 11/14/22. Therefore, the target of completing this study by the end of this year is still achievable. The goal of the water efficiency study is to identify further opportunities to increase water efficiency. Once the opportunities are reviewed, the site will add additional targets to the WSP. The site has also added additional long-term targets to the WSP to reduce overall water usage and install additional permanent water meters at the site to increase granularity of the water balance.

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Audit Number: AO-000240

Finding No: TNR-000900
Checklist Item No: 3.4.1
Status: Closed
Finding level: Major
Due date: 2022-Oct-04
Checklist item: Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.
Findings: The site has identified water quality as one of the shared water challenges. The site has identified some 'possible targets' for 2023 and 2024 most of these are not sufficiently specific or measurable. Status of progress towards meeting water quality targets have not been supported by evidence.
Corrective action: 1.BIFI is in the progress of conducting an annual review of the plan and update the targets created following the SMART approach. The annual review will be documented as described in the water stewardship program document. 2.Additionally, BI is in the progress of ensuring to have a long term plan, which will be revised every 5 Years.
Evidence of implementation: The site has identified Best Practices for the site to implement and are outlined in the Best Practices Section of BIFI's Water Stewardship Management Plan. The site has 100% achieved BI's Global Clean Water Initiative certification which ensures no active pharmaceutical ingredients or other harmful contaminants are released through wastewater which may potentially have an adverse effect on the environment.

Finding No: TNR-000576
Checklist Item No: 3.4.2
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Apr-11
Checklist item: Where water quality is a shared water challenge, continual improvement to achieve best practice for the site's effluent shall be identified and where applicable, quantified.
Findings: Although the Water Stewardship Plan includes various efforts concerning water quality, these are usually one-time reductions efforts. The plan does not explicitly call for continuous improvement to achieve best practice for the Site's effluent.
Corrective action: 1. BIFI will provide additional documentation to reflect that it is implementing these best practices.

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Audit Number: AO-000240

Finding No:	TNR-000903
Checklist Item No:	3.8.1
Status:	Closed
Finding level:	Major
Due date:	2022-Oct-04
Checklist item:	Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.
Findings:	There is no evidence of engagement with the owners of any water-related infrastructure.
Corrective action:	<ol style="list-style-type: none">1. BIFI is in the progress of creating a water stewardship program document that will be implemented at the BI Fremont site. This program document will be implemented into our GMP Document Management system (IDEA for Con) and will become a part of the site's policy. This document will layout the process for identifying stakeholders, maintaining communication, documenting communication, and how the stakeholder database will be continuously evaluated. A stakeholder engagement log will be created and maintained as a part of this process.2. BIFI will increase the communication (including consultation of water-related interests and challenges) with external stakeholders and document it according to the process described in the BIFI Water Stewardship program document.
Evidence of implementation:	Union Sanitary District are owners of water-related infrastructure for the catchment. BIFI has extensive engagement with them through quarterly IAC meetings and communication surrounding the site's wastewater permit. The site has identified Best Practices for the site to implement and are outlined in the Best Practices Section of BIFI's Water Stewardship Management Plan. The site has created a stakeholder engagement log to better document all engagement with stakeholders. In addition, the site has developed a Water Stewardship Management Plan that outlines the process for stakeholder engagement. The site has increased communication which can be seen in the Stakeholder Engagement Log and in the supporting documentation folders.

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Finding No:	TNR-000905
Checklist Item No:	3.9.1
Status:	Closed
Finding level:	Major
Due date:	2022-Oct-04
Checklist item:	Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.
Findings:	There is no evidence of implemented first actions towards achieving best practice related to water governance.
Corrective action:	<ol style="list-style-type: none">1. BIFI is in the progress of creating a water stewardship program document that will be implemented at the BI Fremont site. This program document will be implemented into our GMP Document Management system (IDEA for Con) and will become a part of the site's policy. This document will layout the process for identifying stakeholders, maintaining communication, documenting communication, and how the stakeholder database will be continuously evaluated. A stakeholder engagement log will be created and maintained as a part of this process.2. BIFI is in the progress of increasing communication (including consultation of water-related interests and challenges) with external stakeholders and document it according to the process described in the BIFI Water Stewardship program document.
Evidence of implementation:	The site has identified Best Practices for the site to implement and are outlined in the Best Practices Section of BIFI's Water Stewardship Management Plan. The site has created a stakeholder engagement log to better document all engagement with stakeholders. In addition, the site has developed a Water Stewardship Management Plan that outlines the process for stakeholder engagement. The site has increased communication which can be seen in the Stakeholder Engagement Log and in the supporting documentation folders.

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Audit Number: AO-000240

Finding No:	TNR-000906
Checklist Item No:	3.9.2
Status:	For information
Finding level:	Observation
Due date:	2023-Apr-11
Checklist item:	Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.
Findings:	There is no evidence of implemented first actions towards achieving best practice related to targets in terms of water balance.
Corrective action:	<ol style="list-style-type: none">1. BIFI is in the progress of updating the actual incoming/outgoing flows of the site water balance on a monthly basis.2. BIFI is in the progress of creating a water stewardship program document that will be implemented at the BI Fremont site. This program document will be implemented into our GMP Document Management system (IDEA for Con) and will become a part of the site's policy. This document will layout the process on how the water balance will be updated on a monthly basis and the site water map evaluated annually and updated as needed.
Evidence of implementation:	<p>The site is making significant progress in completing the target to conduct a Water Efficiency Study for the site. There was significant data that the site needed to collect as the first step in the study, which has been completed. The next step, the onsite facility assessment with third party consultants, is scheduled for the week of 11/14/22. Therefore, the target of completing this study by the end of this year is still achievable. The goal of the water efficiency study is to identify further opportunities to increase water efficiency. Once the opportunities are reviewed, the site will add additional targets to the WSP. The site has also added additional long-term targets to the WSP to reduce overall water usage and install additional permanent water meters at the site to increase granularity of the water balance.</p> <p>This finding has been downgraded to an observation as the site will have to redefine best practice related to targets in terms of water balance once the Water Efficiency Study is complete.</p>

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000240

Finding No: TNR-000907
Checklist Item No: 3.9.3
Status: Closed
Finding level: Major
Due date: 2022-Oct-04
Checklist item: Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.
Findings: There is no evidence of implemented first actions towards achieving best practice related to targets in terms of water quality.
Corrective action: 1. BIFI will provide additional documentation to reflect that it is implementing these best practices.
Evidence of implementation: The site has identified Best Practices for the site to implement and are outlined in the Best Practices Section of BIFI's Water Stewardship Management Plan. The site has 100% achieved BI's Global Clean Water Initiative certification which ensures no active pharmaceutical ingredients or other harmful contaminants are released through wastewater which may potentially have an adverse effect on the environment.

Finding No: TNR-000908
Checklist Item No: 3.9.4
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Apr-11
Checklist item: Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.
Findings: There is no evidence of first implemented actions towards achieving best practice related to targets in terms of maintenance of IWRAs.
Corrective action: 1. BIFI is in the progress of communicating a volunteer opportunity to the site..
2. BIFI is in the progress of creating a water stewardship program document that will be implemented at the BI Fremont site. This program document will be implemented into our GMP Document Management system (IDEA for Con) and will become a part of the site's policy. This document will layout the process around Best Practices that the site will implement and how they will be maintained.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000240

Finding No: TNR-000909
Checklist Item No: 3.9.5
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Apr-11
Checklist item: Actions towards achieving best practice related to targets in terms of WASH shall be implemented.
Findings: There is no evidence of implemented actions towards achieving best practice related to WASH.
Corrective action:

1. BIFI is in the progress of completing the annual WASH survey and updating the results in the OneNote Report.
2. BIFI is in the progress of creating a water stewardship program document that will be implemented at the BI Fremont site. This program document will be implemented into our GMP Document Management system (IDEA for Con) and will become integrated into the site's policy. This document will layout the process on how the annual WASH survey will be completed.

Finding No: TNR-000910
Checklist Item No: 4.1.1
Status: For information
Finding level: Observation
Checklist item: Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.
Findings: As new targets are defined, the site shall evaluate performance against these.

Finding No: TNR-000912
Checklist Item No: 4.1.2
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Apr-11
Checklist item: Value creation resulting from the water stewardship plan shall be evaluated.
Findings: The value creation resulting from the WSP has not been evaluated.
Corrective action:

1. BIFI is in the progress of creating a water stewardship program document that will be implemented at the BI Fremont site. This program document will be implemented into our GMP Document Management system (IDEA for Con) and will become integrated into the site's policy. This document will layout the process on how the value creation resulting from the WSP will be evaluated and will be documented via the Water Stewardship Action Plan Annual Review Form.

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Alliance for Water Stewardship (AWS)

Audit Number: AO-000240

Finding No: TNR-000913
Checklist Item No: 4.1.3
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Apr-11
Checklist item: The shared value benefits in the catchment shall be identified and where applicable, quantified.
Findings: The shared value benefits in the catchment have not yet been evaluated.
Corrective action: 1. BIFI is in the progress of creating a water stewardship program document that will be implemented at the BI Fremont site. This program document will be implemented into our GMP Document Management system (IDEA for Con) and will become integrated into the site's policy. This document will layout the process on how the shared value benefits in the catchment will be evaluated and will be documented via the Water Stewardship Action Plan Annual Review Form.

Finding No: TNR-000609
Checklist Item No: 4.2.1
Status: Closed
Finding level: Major
Due date: 2022-Oct-04
Checklist item: A written annual review and (where appropriate) root-cause analysis of the year's emergency incident(s) shall be prepared and the site's response to the incident(s) shall be evaluated and proposed preventative and corrective actions and mitigations against future incidents shall be identified.
Findings: There is no evidence of an annual review and (where appropriate) root-cause analysis of the year's emergency incidents being performed. During the audit site personnel described a past incident of ammonia leakage, which was sanctioned by the responsible authority.
Corrective action: 1. BIFI is in the progress of creating a water stewardship program document that will be implemented at the BI Fremont site. This program document will be implemented into our GMP Document Management system (IDEA for Con) and will become a part of the site's policy. This document will layout the process on how the annual review of the site's emergency incidents will occur and be documented in an Emergency Incident Annual Review Form. A reminder to complete the annual review will be entered into BIFI's compliance calendar management system.
Evidence of implementation: The site reviewed it's incident management system for water-related incidents in 2021 and determined there were not any. The site documented this review in the Emergency Incident Annual Review Form as part of the Water Stewardship Management Plan. The site will again review all water-related incidents at the conclusion of 2022.

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Alliance for Water Stewardship (AWS)



Audit Number: AO-000240

Finding No: TNR-000610
Checklist Item No: 4.3.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Apr-11
Checklist item: Consultation efforts with stakeholders on the site’s water stewardship performance shall be identified.
Findings: There is no evidence of the Site's efforts to consult with stakeholders on their water stewardship performance.
Corrective action: 1. BIFI is in the progress of creating a water stewardship program document that will be implemented at the BI Fremont site. This program document will be implemented into our GMP Document Management system (IDEA for Con) and will become a part of the site's policy. This document will layout the process for the site’s consultation efforts with stakeholders on the site’s water stewardship performance.
2. BIFI is in the progress of consulting stakeholders on the site's water stewardship performance.

Finding No: TNR-000889
Checklist Item No: 4.4.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Apr-11
Checklist item: The site’s water stewardship plan shall be modified and adapted to incorporate any relevant information and lessons learned from the evaluations in this step and these changes shall be identified.
Findings: This is the first year of implementation of the site's Water Stewardship plan. There has not yet been a process of evaluation of the plan that would result in potential modifications to incorporate relevant information and lessons learned.
Corrective action: 1. BIFI is in the progress of creating a water stewardship program document that will be implemented at the BI Fremont site. This program document will be implemented into our GMP Document Management system (IDEA for Con) and will become a part of the site's policy. This document will layout the process on how the site will evaluate and document the site's water stewardship plan including any lessons learned and value creation for BIFI.

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Alliance for Water Stewardship (AWS)

Audit Number: AO-000240

Finding No: TNR-000611
Checklist Item No: 5.2.1
Status: Closed
Finding level: Major
Due date: 2022-Oct-04
Checklist item: The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.
Findings: The Site has not yet communicated to relevant local stakeholders their Water Stewardship Plan and how the plan contributes to AWS Standard outcomes.
Corrective action: 1. BIFI is in the progress of creating a water stewardship program document that will be implemented at the BI Fremont site. This program document will be implemented into our GMP Document Management system (IDEA for Con) and will become a part of the site's policy. This document will layout the process for communicating how the water stewardship plan contributes to AWS Standard Outcomes.
2.BIFI is in the progress of disclosing the site's water stewardship plan and how the plan contributes to AWS standard outcomes to relevant external stakeholders.
Evidence of implementation: The site has communicated the site's WSP and how the plan contributes to AWS Standard outcomes.

Finding No: TNR-000890
Checklist Item No: 5.3.1
Status: Closed
Finding level: Major
Due date: 2022-Oct-04
Checklist item: A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.
Findings: The Site has not yet prepared or disclosed a summary of their water stewardship performance, including quantified performance against targets.
Corrective action: 1. BIFI is in the progress of creating a water stewardship program document that will be implemented at the BI Fremont site. This program document will be implemented into our GMP Document Management system (IDEA for Con) and will become a part of the site's policy. This document will layout the process for disclosing the sites performance against its targets on an annual basis.
2.BIFI is in the progress of disclosing the site's water stewardship performance summary including quantified performance against targets internally as well as providing a summary to relevant external stakeholders.
Evidence of implementation: The site has disclosed a summary of their water stewardship performance to stakeholders.

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Audit Number: AO-000240

Finding No: TNR-000891
Checklist Item No: 5.4.1
Status: Closed
Finding level: Major
Due date: 2022-Oct-04
Checklist item: The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.
Findings: The Site has not yet actively disclosed their water-related challenges and efforts made to address these challenges, or communicated this information to interested stakeholders.
Corrective action: 1. BIFI is in the progress of creating a water stewardship program document that will be implemented at the BI Fremont site. This program document will be implemented into our GMP Document Management system (IDEA for Con) and will become a part of the site's policy. This document will layout the process for disclosing the site's shared water challenges and efforts made to address these challenges.
2. BIFI is in the progress of disclosing the site's shared water challenges and water stewardship efforts to relevant external stakeholders via Teams meetings/email communications.
Evidence of implementation: The site has disclosed shared water challenges and efforts made to address these challenges to their stakeholders.

Finding No: TNR-000892
Checklist Item No: 5.4.2
Status: Closed
Finding level: Major
Due date: 2022-Oct-04
Checklist item: Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.
Findings: The Site's WSP includes planned actions to engage stakeholders and coordinate efforts with public-sector agencies. There is no evidence that these actions have been initiated.
Corrective action: 1. BIFI is in the progress of creating a water stewardship program document that will be implemented at the BI Fremont site. This program document will be implemented into our GMP Document Management system (IDEA for Con) and will become a part of the site's policy. This document will layout the process for engaging stakeholders and supporting public-sector agencies.
2. BIFI is in the progress of disclosing the site's water stewardship efforts to relevant external stakeholders via Teams meetings/email communications.
Evidence of implementation: The site has made first efforts to engage and coordinate efforts with public sector agencies. The site has created a stakeholder engagement log to better document all engagement with stakeholders. In addition, the site has developed a Water Stewardship Management Plan that outlines the process for stakeholder engagement.

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Alliance for Water Stewardship (AWS)

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Signature WSAS

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

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Report Details

Report	Value
Report prepared by	Claudia Mendez Jaime
Report approved by	Lisa Seufert
Report approved on (Date)	04/07/2022

Surveillance

Proposed date for next audit
2023-Jun-13

Stakeholder Announcements

Date of publication	Location
2022-Mar-03	https://watersas.org/stakeholder-announcements/
2022-Mar-03	https://a4ws.org/certification/stakeholder-announcements/

Catchment Information



1.1.1_Q1_BIFI_WaterSourcesandWaterServices.jpg

Catchment Information

Audit Number: AO-000240

The site is located in the urbanized East Bay region of the San Francisco Bay Area in Fremont, Alameda County, California, southeast of San Francisco. It sits within the Lower Alameda Creek Watershed - the largest watershed in the Bay Area. Numerous tributaries empty into Alameda Creek that flows west towards the 55-acre Demonstration Urban Stormwater Treatment (DUST) Marsh. The DUST Marsh is an artificial wetland that has been installed to filter and treat urban runoff collected in the watershed prior to discharge to the Bay. From the artificial wetland, treated water is channeled to the main marsh of the Coyote Creek Regional Park which ultimately discharges to the San Francisco Bay. From the Southeast, surface water flows north towards the Bay. From the Northeast, surface water flows south towards the Bay.

The site receives 100% of its water from Alameda County Water District, which supplies the water to the site from two sources (<https://www.acwd.org/ArchiveCenter/ViewFile/Item/433>):

1. Blending Facility- blends water from local groundwater and San Francisco Public Utilities Commission (SFPUC). SFPUC sources water from central sierra runoff and is stored in the Hetch-Hetchy Reservoir in Yosemite National Park.
2. Newark Desalination Facility- receives brackish water from the Aquifer Reclamation Program Wells and is blended with local groundwater.

The Alameda County Water District provides water to businesses, industrial users, and more than 330,000 residents in the cities of Fremont, Union City, and Newark. It has a full-time staff of approximately 230 and is governed by a publicly elected five-member board of directors. ACWD was founded in 1914, making it the first public water agency created under California's County Water District Law, adopted in 1913.

ACWD's mission is to provide reliable, high quality water at a reasonable price. In the District's early years, meeting these goals meant securing legal rights to what was then the region's only source of water, runoff from the Alameda Creek Watershed. Today, ACWD has a broad portfolio of water sources: runoff from the Alameda Creek Watershed; the local groundwater basin, which the District continually recharges; desalinated water produced from the brackish water pumped by the District's Aquifer Reclamation Program wells; the State Water Project; and the San Francisco Public Utilities Commission (SFPUC) water system. This mix of sources, along with customer conservation, provides high resilience to drought and has allowed the District to improve water reliability even as the Tri-City area has added new homes and businesses.

Client Description and Site Details

Client/Site Background

Boehringer Ingelheim Fremont, Inc. is the rapidly growing U.S. arm of BI's Biopharmaceuticals Business Unit. With a diverse team of over 500 people, the Site covers biopharmaceutical development and manufacturing from small scale to commercial, from drug substance manufacturing to fill/finish, packaging and medical device assembly. The Site has a particular focus to help patients - through the reliable supply of high quality medicines, and being on the cutting edge of technology and innovation.

Summary of Shared Water Challenges

Summary of Shared Water Challenges

The Site has identified the shared water challenges as follows:

-Water availability: California depends on groundwater and surface water for its water sources and has a fairly complex water system to combat the over extraction of groundwater and diminished surface water supplies.

State agencies and Alameda County Water District have implemented several initiatives related to water conservation, reducing the need to import water from other areas around California, and recharge groundwater aquifers.

-Water Quality: The Site's surface water sources are considered impaired waters and exceed California's Water Quality Standards for pesticides, metals and other toxic substances.

Groundwater quality in the region is unreliable with many of the aquifers polluted with saline water.




-Extreme events: The catchment is located in an area subject to high drought, earthquake and flooding risks. Following a recent drought, the State of California developed the initiative "Marking Conservation a Way of Life 2018" to promote water conservation practices.

Alameda County Water District is responsible for providing water to Alameda County, including the Site. ACWD could provide insight into emergency management plans for extreme events and potential damage to groundwater wells and water conveyance systems.

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Audit Number: AO-000240

0.1 General Requirements for Single Sites, Multi-Sites and Groups	
0.1.1	<i>Eligibility Criteria</i>
0.1.1.1	<i>The site(s) occupy one catchment OR an exception has been granted.</i>
Comment	The Site is based in one catchment.
	 Yes
0.1.1.2	<i>The scope of the proposed certification shall be under the control of a single management system.</i>
Comment	The Site has a single management system.
	 Yes
0.1.1.3	<i>The scope of the proposed certification shall be homogeneous with respect to primary production system, water management, product or service range, and the main market structures.</i>
Comment	The site has a homogeneous production of pharmaceutical products.
	 Yes

1 STEP 1: GATHER AND UNDERSTAND

1.1 *Gather information to define the site’s physical scope for water stewardship purposes, including: its operational boundaries; the water sources from which the site draws; the locations to which the site returns its discharges; and the catchment(s) that the site affect(s) and upon which it is reliant.*

- 1.1.1** *The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including:*
- Site boundaries;
 - Water-related infrastructure, including piping network, owned or managed by the site or its parent organization;
 - Any water sources providing water to the site that are owned or managed by the site or its parent organization;
 - Water service provider (if applicable) and its ultimate water source;
 - Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies;
 - Catchment(s) that the site affect(s) and is reliant upon for water.



Yes

Comment Site boundaries have been mapped. The Site shares a campus with other tenants. The Site receives treated water from Alameda County Water District (<https://www.acwd.org/>), and discharges wastewater to Union Sanitary District (<https://www.unionsanitary.com/>). The service areas of the two districts are mapped. ACWD sources water from local supplies (surface and groundwater), the San Francisco Public Utilities Commission (SFPUC) from the Hetch Hetchy system (central Sierras), and the California State Water Project from the northern Sierras. The local catchment of the Alameda Creek and the other catchments discharging into the southern San Francisco Bay have been mapped. The catchments indicated on maps are very large and complex, and the site could benefit from defining narrower catchment boundaries to facilitate stakeholder identification and positive actions in the catchment.

1.2 *Understand relevant stakeholders, their water related challenges, and the site’s ability to influence beyond its boundaries.*

- 1.2.1** *Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall:*
- Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people;
 - Consider the physical scope identified, including stakeholders, representative of the site’s ultimate water source and ultimate receiving water body or bodies;
 - Provide evidence of stakeholder consultation on water-related interests and challenges;
 - Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups;
 - Identify the degree of stakeholder engagement based on their level of interest and influence.



closed

Comment The Stakeholder list includes those identified and mapped, twelve (12) of which are related to the Site: Government agencies, water utility supplier, park, community-based organization, academic institution, and diverse industries. The list includes the level of interest in water related issues. The Site has identified the water-related challenges of stakeholders as a part of the stakeholder engagement process. However, the stakeholder identification process does not cover all elements stated in this indicator.

Finding No: TNR-000493

1.2.2 *Current and potential degree of influence between site and stakeholder shall be identified, within the catchment and considering the site’s ultimate water source and ultimate receiving water body for wastewater.*



in progress

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Comment Stakeholders have been identified, however, the Site has not identified the potential degree of influence between the Site and the stakeholders.

Finding No: TNR-000505

1.3 *Gather water-related data for the site, including: water balance; water quality, Important Water-Related Areas, water governance, WASH; water-related costs, revenues, and shared value creation.*

1.3.1 *Existing water-related incident response plans shall be identified.*

✔
Yes

Comment BIFI has an Emergency Action Plan that covers a range of water-related scenarios; a Hazardous Waste Contingency Plan (federal and state regulatory requirement); and a Slug Discharge Control Plan, which is a requirement of the Union Sanitary District; and a Business Continuity Plan (in the process of being updated, to reflect the risk of water supply interruptions).

1.3.2 *Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped*

✔
Yes

Comment Water flows have been identified in detail, and added to a site map of water infrastructure.

1.3.3 *Site water balance, inflows, losses, storage, and outflows, including indication of annual variance in water usage rates, shall be quantified. Where there is a water-related challenge that would be a threat to good water balance for people or environment, an indication of annual high and low variances shall be quantified.*

✔
closed

Comment Water flows have been identified in detail up to April 2021, and added to a site map of water infrastructure. Variability has been quantified between years, and the increase in water use is explained by expansion of site and increase in production.

Finding No: TNR-000574

1.3.4 *Water quality of the site's water source(s), provided waters, effluent and receiving water bodies shall be quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be quantified.*

✔
Yes

Comment The Site has in place Standard Operating Procedures for water quality monitoring. Effluent quality is monitored and data provided. For source water and receiving water quality, see also 1.5.4.

1.3.5 *Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.*

✔
Yes

Comment The Site has a list of the chemicals used and chemical storage locations are mapped. See also 1.3.1 for management of incidents that could lead to pollution. Standard operating procedures for quality monitoring are in place.

1.3.6 *On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.*

✔
Yes

Comment There are no IWRA's on site. See 1.5.5.

1.3.7 *Annual water-related costs, revenues, and a description or quantification of the social, cultural, environmental, or economic water-related value generated by the site shall be identified and used to inform the evaluation of the plan in 4.1.2.*

↗
in progress

Comment The Site has calculated their annual water-related costs, however, there is no information on any water-related value (revenues or social, cultural or environmental benefits) generated by the Site.

Finding No: TNR-000478



1.3.8 *Levels of access and adequacy of WASH at the site shall be identified.*

✔
Yes

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Alliance for Water Stewardship (AWS)

Audit Number: AO-000240

Comment	Comprehensive and adequate access to WASH at site has been documented and observed on site.	
1.4	<i>Gather data on the site's indirect water use, including: its primary inputs; the water use embedded in the production of those primary inputs the status of the waters at the origin of the inputs (where they can be identified); and water used in out-sourced water-related services.</i>	
1.4.1	<i>The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be identified.</i>	 Yes
Comment	The Site has not identified embedded water use of primary inputs within the catchment.	
1.4.2	<i>The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.</i>	 Yes
Comment	According to the information gathered by the site, there is no indirect water use deriving from suppliers or service providers from within the catchment	
1.5	<i>Gather water-related data for the catchment, including water governance, water balance, water quality, Important Water-Related Areas, infrastructure, and WASH</i>	
1.5.1	<i>Water governance initiatives shall be identified, including catchment plan(s), water-related public policies, major publicly-led initiatives under way, and relevant goals to help inform site of possible opportunities for water stewardship collective action.</i>	 Yes
Comment	<p>The site has identified through the main water management plans the main stakeholders involved in the decision-making process in the basin in which they are established. The main plans that address water governance topics and that guide related planning in the catchment are the following (more details in list (attached) and in documents attached on the links):</p> <ul style="list-style-type: none"> • Alameda County Water District Urban Water Management Plan • Alameda County Water District Integrated Resources Planning <p>The list details the key water management topics that each document addresses. Based on listed documents, key water topics/issues that are of concern in the catchment are:</p> <ul style="list-style-type: none"> • Sustainable water management, supply and demand. • Impacts of climate change in water-related risks such as drought and flooding. <p>Management plans for earthquakes.</p>	
1.5.2	<i>Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.</i>	 Yes
Comment	<p>The site has identified the water-related and regulatory requirements applicable to them. The site holds a wastewater discharge permit aligned with national and local pretreatment regulations, which establishes the conditions the effluent shall meet in order to allow discharge to the sewer system, and further treatment in the municipal wastewater treatment plant.</p> <p>As per the information provided by the site representatives, the site currently generally complies with all the applicable regulations with a few non-compliance occurrences noted in section 1.3.4.</p>	
1.5.3	<i>The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.</i>	 in progress
Comment	<p>The Site has identify studies and reports that shows the water balance at the district level. These include some projections for future water demand and projections of meeting dry-year demands.</p> <p style="text-align: right;">Finding No: TNR-000591</p>	
1.5.4	<i>Water quality, including physical, chemical, and biological status, of the catchment shall be identified, and where possible, quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be identified.</i>	 in progress

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Comment The Site has collected information about water quality of the catchment. Boehringer Ingelheim Fremont Inc. is located within the Alameda Creek Watershed, a tributary to San Francisco Bay. Water supplies within Alameda County include groundwater and surface water resources. Water quality was analyzed for each of the water sources as Alameda County Water District (ACWD) blends these sources together to reduce costs and improve water quality.


Groundwater Resources:

The water quality of groundwater resources is brackish and desalination is required to treat the groundwater. The groundwater is also reported to have a high hardness and must be blended with other softer water sources to meet California Water Quality Standards. ACWD obtains desalinated water produced at the Newark Desalination Facility (NDF). Since the 1920s, over extraction of the Niles Cone Groundwater Basin has occurred and results in saltwater intrusion 8 miles inland from San Francisco Bay. ACWD began an aquifer reclamation program in 1974 to recharge Niles Cone. The Aquifer Reclamation Program pumps brackish water from the basin and recharges the Quarry Lakes Groundwater Recharge System with water from Alameda Creek and the South Bay Aqueduct to replace water pumped out by ACWD. Following this program and other recharge efforts, the salt water intrusion reduced to 3 miles inland, but still presents a significant challenge for groundwater use and requires inputs from water sources outside of the catchment.


ACWD also obtains water from the production wellfield in the Above Hayward Fault (AHF) and Below Hayward Fault (BHF) sub-basins located within the larger Niles Cone Groundwater Basin. Groundwater within the BHF aquifer has been degraded by saltwater intrusion and requires treatment prior to potable use. The AHF aquifer is still acceptable for potable use. There is also some evidence that saline water has migrated into the deeper aquifers through improperly sealed water wells is a conceptual diagram of the historical intrusion of saltwater into the Niles Cone Basin.

The Site has presented water quality information that is useful to define a baseline. However, they have not analysed whether the organization may already be contributing to water quality problems.

Finding No: TNR-000601

1.5.5 *Important Water-Related Areas shall be identified, and where appropriate, mapped, and their status assessed including any threats to people or the natural environment, using scientific information and through stakeholder engagement.* 
Yes

Comment The Site has identified a list of 20 IWRA
 · There are 18 IWRA found in the site’s catchment.
 · There is 1 IWRA found adjacent to the site’s property/boundaries, Don Edwards San Francisco Bay National Wildlife Refuge.
 · The IWRA provide primarily environmental and social value to the catchment.
 The IWRA comprise recreation areas, parks, and reserves.
 The site does discharge treated wastewater to two IWRA, Hayward Marsh on the Hayward Regional Shoreline and San Francisco Bay.

1.5.6 *Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.* 
Yes

Audit Number: AO-000240

Comment

Overview

The Site is located in the urbanized East Bay region of the San Francisco Bay Area in Fremont, Alameda County, California. The Site is situated within the Lower Alameda Creek Watershed - the largest watershed in the Bay Area. Numerous tributaries empty into Alameda Creek that flows west towards the 55-acre Demonstration Urban Stormwater Treatment (DUST) Marsh. The DUST Marsh is an artificial wetland that has been installed to filter and treat urban runoff collected in the watershed prior to discharge to the Bay. From the artificial wetland, treated water is channeled to the main marsh of the Coyote Creek Regional Park which ultimately discharges to the San Francisco Bay. Wastewater generated in the catchment is treated by the Union Sanitary District and discharged to the Bay.

Key Natural and Artificial Water Supply Infrastructures

- Water use within the Alameda County Water District (ACWD) service area is divided as follows: Residential (69%), Businesses (16%), Industry (9%), and Institutional (6%). The District service area includes the Tri-Cities area of Fremont, Newark, and Union City and is serviced by 900 miles of water pipe infrastructure.
- Local water supplies include a portfolio of groundwater sourced from wellfields in the Niles Cone Groundwater Basin aquifers, desalinated groundwater from a saltwater-impacted wells, and fresh water from Del Valle Reservoir. Supplemental water is supplied to the watershed via two aqueducts - South Bay Aqueduct (from the State Water Project) and Hetch-Hetchy Aqueduct (from the San Francisco Public Utilities Commission).
- As a contingency, ACWD has a water distribution system connection with neighboring cities Hayward and Milpitas for emergency situations such as earthquakes.
- ACWD utilizes 16 wells for production, eight wells are located in the Peralta-Tyson Wellfield and eight wells are located in the Mowry Wellfield. Eleven additional wells are utilized in the ACWD's Aquifer Reclamation Program (discussed in other sections below).
- Approximately 40% of water used in the ACWD is sourced from the Niles Cone Groundwater Basin.
- Inflatable rubber dams extend across Alameda Creek Flood Control Channel to divert water to large gravel ponds (former gravel quarry) to recharge groundwater supplies. Fish ladder installation projects on ongoing to allow steelhead trout migrations.
- The main surface water entry into the Niles Cone Groundwater Basin is Alameda Creek, its tributaries, and the recharge ponds.
- The ACWD can receive direct, treated water supply from the San Francisco Regional Water Supply system at eight connection locations.
- The ACWD Blending Facility plant mixes groundwater withdrawn from the wellfields with treated water supplied from the San Francisco Regional Water Supplies. Normal output from the plant is 45 million gallons per day. The plant began operations in 1992 and serves to dilute/ lower the hardness of the groundwater supply.
- The ACWD Newark Desalination Facility treats brackish groundwater via reverse osmosis and blending with other water supplies before entering the distribution system. The brackish concentrate is discharged to the Bay via NPDES permit. The facility opened in 2003 and was expanded in 2010 to a production capacity of 12.5 million gallons per day to the water supply distribution system. The ACWD Water Treatment Plant No. 2 receives and treats raw water from the South Bay Aqueduct. Normal output from the plant is 26 million gallons per day. The plant opened in 1993 and uses hydroelectric generation, ozone disinfection, and mechanical solids dewatering.

1.5.7

The adequacy of available WASH services within the catchment shall be identified.









Yes

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Comment	<p>The Site has collected information about the availability of WASH within the catchment, according to which:</p> <ul style="list-style-type: none">- WASH services are available within the catchment for >89% of the population.- Based on national estimates conducted in 2017, 99 % of the population in the United States have access to safely managed drinking water. (Source: WHO UNICEF, 2017. https://washdata.org/data/household#!/).- 89.97% of the population in the United States have access to safely managed sanitation services and 10% have access to basic status sanitation services per the 2017 estimates. (Source: WHO UNICEF, 2017. https://washdata.org/data/household#!/). <p>There is minimal difference in WASH services provided in urban versus rural areas (2.7% difference in access to safe drinking water and 4.41% difference in access to safely managed sanitation services).</p>
1.6	<p><i>Understand current and future shared water challenges in the catchment, by linking the water challenges identified by stakeholders with the site's water challenges.</i></p>
1.6.1	<p><i>Shared water challenges shall be identified and prioritized from the information gathered.</i></p> <p style="text-align: right;"> Yes</p>
Comment	<p>Shared challenges in terms of water availability, quality and extreme events have been identified and prioritized by the site, using well-considered . While these challenges have not been identified through direct stakeholder engagement, that is not considered an issues as there is a very large amount of publicly available data and analysis on water challenges and potential solutions in California in general and the Bay Area in particular, some of it published by the stakeholders previously identified.</p>
1.6.2	<p><i>Initiatives to address shared water challenges shall be identified.</i></p> <p style="text-align: right;"> Yes</p>
Comment	<p>See under 1.6.1, where several initiatives by public sector agencies are identified, and under the site's Water Stewardship plan. Public initiatives and the site's plans are consistent with each other.</p>
1.7	<p><i>Understand the site's water risks and opportunities: Assess and prioritize the water risks and opportunities affecting the site based upon the status of the site, existing risk management plans and/or the issues and future risk trends identified in 1.6.</i></p>
1.7.1	<p><i>Water risks faced by the site shall be identified, and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.</i></p> <p style="text-align: right;"> Yes</p>
Comment	<p>The Site has identified their water including Physical, Reputational & Regulatory risks: Water Availability, Water Quality, Wastewater Discharge, Extreme Weather, Water Infrastructure, Important Water Related Areas (IWRA), Site Effluents/Legal Requirements, Sustainable Water balance, Water Cost, Outsourced Services, Stakeholder Engagement, Internal Water Management Program Opportunities& Incident Response.</p>
1.7.2	<p><i>Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.</i></p> <p style="text-align: right;"> Obs.</p>
Comment	<p>The Site has identified one water-related opportunity. (See evidence under 1.7.1.)</p>
1.8	<p><i>Understand best practice towards achieving AWS outcomes: Determining sectoral best practices having a local/catchment, regional, or national relevance.</i></p>
1.8.1	<p><i>Relevant catchment best practice for water governance shall be identified.</i></p> <p style="text-align: right;"> Obs.</p>
Comment	<p>Relevant catchment best practice for water governance has initially been identified during the preparation of the Water Stewardship Plan.</p>
1.8.2	<p><i>Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.</i></p> <p style="text-align: right;"> Obs.</p>

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Comment Relevant catchment best practice for water balance has been initially identified during the preparation of the Water Stewardship Plan.


1.8.3 *Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.*  Yes

Comment Relevant catchment best practice for water quality has been adequately identified; with a focus on design and O&M of regular operations and on spill protection.

1.8.4 *Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.*  closed

Comment There are no IWRAs on site, but nearby in the lower section of the Alameda Creek watershed and the Bay shore. This indicator applies to both onsite and offsite (but within site catchment) IWRAs.

Finding No: TNR-000483

1.8.5 *Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.*  Yes

Comment See 1.3.8; the site has high level of access to WASH for employees and other users.

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2 STEP 2: COMMIT & PLAN - Commit to be a responsible water steward and develop a Water Stewardship Plan

2.1 *Commit to water stewardship by having the senior-most manager in charge of water at the site, or if necessary, a suitable individual within the organization head office, sign and publicly disclose a commitment to water stewardship, the implementation of the AWS Standard and achieving its five outcomes, and the allocation of required resources.*

2.1.1 *A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:*

- That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes
- That the site implementation will be aligned to and in support of existing catchment sustainability plans
- That the site's stakeholders will be engaged in an open and transparent way
- That the site will allocate resources to implement the Standard.

 Yes

Comment The Site presented a signed document stating its commitment to implement and disclose water related information to all relevant audiences in an appropriate format. The document includes the statement that the Site will allocate resources to implement the standard. The document is signed by the president and head of the Site.
The Site must present evidence of stakeholder engagement in an open and transparent way.

2.2 *Develop and document a process to achieve and maintain legal and regulatory compliance.*

2.2.1 *The system to maintain compliance obligations for water and wastewater management shall be identified, including:*

- Identification of responsible persons/positions within facility organizational structure
- Process for submissions to regulatory agencies.

 Yes

Comment The Site has presented evidence of their payments for water use and wastewater treatment to the local authorities.

- The local EHS team reviews local regulations and policies to meet compliance at the Site. The Site uses and maintains a compliance calendar which includes regulatory requirements as well as due dates. They also participate in different networking groups to increase knowledge of changing regulations. In addition, Global EHS within BI performs internal audits on a regular basis. Lastly, the Fremont Team are a part of the Environmental SCC network within BI US that holds quarterly meetings to go over corporate updates and regulatory changes.
- BI contracts a third party consulting company, ERM, to support compliance assessments. Site Legal and Government Affairs provides legal updates/changes that would affect the site. Responsibilities at the site and support from BI US and E&S consultants have been described. See also 3.2.1.

2.3 *Create a water stewardship strategy and plan including addressing risks (to and from the site), shared catchment water challenges, and opportunities.*

2.3.1 *A water stewardship strategy shall be identified that defines the overarching mission, vision, and goals of the organization towards good water stewardship in line with this AWS Standard.*

 closed

Comment Boehringer Ingelheim's Water Stewardship Statement describes BI's stance on water stewardship including their strategy to promote good water stewardship including pursuing AWS Certification.

Boehringer Ingelheim advertises its 2030 Sustainability goals on its Corporate 'Be Green' internal website. Water is addressed in their goals and environmental Performance Indicators can be found on their external corporate website.

Finding No: TNR-000605

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2.3.2 *A water stewardship plan shall be identified, including for each target:*
- How it will be measured and monitored
- Actions to achieve and maintain (or exceed) it
- Planned timeframes to achieve it
- Financial budgets allocated for actions
- Positions of persons responsible for actions and achieving targets
- Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.



in progress

Comment The Site has presented a Water Stewardship Plan including 22 planned actions (including timeframes) and the persons responsible for the implementation. The targets have not been entirely defined in the WSP.

Finding No: TNR-000606

2.4 *Demonstrate the site’s responsiveness and resilience to respond to water risks*

2.4.1 *A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.*



Yes

Comment The Water Stewardship Plan includes measures to address risks, update incident/response plans, and engage with public-sector and infrastructure agencies (in particular, service providers). See 2.3.2. In the Water Stewardship Plan, an action is included for the site to update its incident/emergency response plan/documents to reflect the external water-related risks identified under Step 1, indicator 1.7.1 , so that the site is responsive and resilient to these risks that are outside its direct control or responsibility.

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3 STEP 3: IMPLEMENT - Implement the site's stewardship plan and improve impacts	
3.1	<i>Implement plan to participate positively in catchment governance.</i>
3.1.1	<i>Evidence that the site has supported good catchment governance shall be identified.</i> ✔ closed
Comment	<p>The Site has identified through the main water management plans the main stakeholders involved in the decision-making process in the basin in which they are established. The main plans that address water governance topics and that guide related planning in the catchment are the following (more details in list (attached) and in documents attached on the links):</p> <ul style="list-style-type: none"> • Alameda County Water District Urban Water Management Plan • Alameda County Water District Integrated Resources Planning <p style="text-align: right;">Finding No: TNR-000898</p>
3.1.2	<i>Measures identified to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be implemented.</i> ✔ Yes
Comment	The site's sole source of water is Alameda County Water District. Alameda County Water District is the sole municipality with the authority to allocate water resources. BIFI's water use is within the water rights identified by Alameda County Water District.
3.2	<i>Implement system to comply with water-related legal and regulatory requirements and respect water rights.</i>
3.2.1	<i>A process to verify full legal and regulatory compliance shall be implemented.</i> ✔ closed
Comment	<p>The Site does not have a compliance process implemented.</p> <p style="text-align: right;">Finding No: TNR-000607</p>
3.2.2	<i>Where water rights are part of legal and regulatory requirements, measures identified to respect the water rights of others including Indigenous peoples, shall be implemented.</i> ✔ Yes
Comment	The site receives water from the service provider Alameda County Water District. The District's water sources have been allocated through political, regulatory and market processes. California has a strong framework to protect water rights, including indigenous people's water rights.
3.3	<i>Implement plan to achieve site water balance targets.</i>
3.3.1	<i>Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.</i> ➔ in progress
Comment	<p>The Water Stewardship Plan includes water balance targets for year 1 (2022), most importantly to conduct a water efficiency/reuse optimization study and implement cost-effective opportunities when results are available, and to update the site water balance as required. Status of progress will be tracked through internal evaluations.</p> <p>The water stewardship plan presents the state of progress in meeting the water balance targets up to March 2022.</p> <p style="text-align: right;">Finding No: TNR-000899</p>
3.3.2	<i>Where water scarcity is a shared water challenge, annual targets to improve the site's water use efficiency, or if practical and applicable, reduce volumetric total use shall be implemented.</i> ✔ closed

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Comment	The site has identified water availability as one of the shared water challenges. The site has identified some 'possible targets' for 2023 and 2024 most of these are not sufficiently specific or measurable.	Finding No: TNR-000608
3.3.3	<i>Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.</i>	 Yes
Comment	Re-allocation of water is the responsibility of public agencies, and has been done regularly to benefit, in particular, environmental water needs (such as flow conditions in the Sacramento–San Joaquin River Delta). Alameda County Water District is the sole municipality with the authority to re-allocate water.	
3.4	<i>Implement plan to achieve site water quality targets</i>	
3.4.1	<i>Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.</i>	 closed
Comment	The Water Stewardship Plan includes water quality targets for year 1 (2022). Water quality has not been identified as a risk. However, the Site has included in the WSP the analysis of potential negative impacts under water quality main outcomes; "There is the potential for the site's wastewater permit limits to become more stringent, for discharge surcharge fees to increase, and additional/more extensive pre-treatment systems (CAPEX and OPEX) costs to increase."	Finding No: TNR-000900
3.4.2	<i>Where water quality is a shared water challenge, continual improvement to achieve best practice for the site's effluent shall be identified and where applicable, quantified.</i>	 in progress
Comment	The Water Stewardship Plan recognizes water quality as a shared water challenge, but it does not explicitly call for continuous improvement of quality.	Finding No: TNR-000576
3.5	<i>Implement plan to maintain or improve the site's and/or catchment's Important Water-Related Areas.</i>	
3.5.1	<i>Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.</i>	 Yes
Comment	The Site has not identified any IWRA onsite.	
3.6	<i>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.</i>	
3.6.1	<i>Evidence of the site's provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers onsite shall be identified and where applicable, quantified.</i>	 Yes
Comment	The site presents evidence of provision for all WASH workers. During the audit it was observed that toilets are available, workers have access to drinking water and, as it is a pharmaceutical industry, hygiene measures are very strict.	
3.6.2	<i>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.</i>	 Yes
Comment	WASH status of communities is described under 1.5.7. The Site has no influence on water allocation and safe sanitation practices, which are defined by public agencies at the state, regional and local level.	

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3.7	<i>Implement plan to maintain or improve indirect water use within the catchment:</i>	
3.7.1	<i>Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.</i>	✔ Yes
Comment	There is no indirect water use deriving from suppliers or service providers from within the catchment	
3.7.2	<i>Evidence of engagement with suppliers and service providers, as well as, when applicable, actions they have taken in the catchment as a result of the site's engagement related to indirect water use, shall be identified.</i>	✔ Yes
Comment	There is no indirect water use deriving from suppliers or service providers from within the catchment.	
3.8	<i>Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have.</i>	
3.8.1	<i>Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.</i>	✔ closed
	Finding No: TNR-000903	
3.9	<i>Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.</i>	
3.9.1	<i>Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.</i>	✔ closed
Comment	The Water Stewardship Plan includes actions to progress towards best practice in water governance, including actions 1, 4, 12, 15-17.	
	Finding No: TNR-000905	
3.9.2	<i>Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.</i>	➔ in progress
Comment	The Water Stewardship Plan includes actions to progress towards best practice in water balance, including actions 8 and 9.	
	Finding No: TNR-000906	
3.9.3	<i>Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.</i>	✔ closed
Comment	The Water Stewardship Plan includes actions to progress towards best practice in water quality, including actions 6, 7, 13, 14.	
	Finding No: TNR-000907	
3.9.4	<i>Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.</i>	➔ in progress
Comment	The Water Stewardship Plan includes actions to progress towards best practice in IWRAs, including actions 14, 17, 21.	
	Finding No: TNR-000908	
3.9.5	<i>Actions towards achieving best practice related to targets in terms of WASH shall be implemented.</i>	➔ in progress
Comment	The Water Stewardship Plan includes actions to progress towards best practice in WASH, principally action 22.	
	Finding No: TNR-000909	

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4 STEP 4: EVALUATE - Evaluate the site's performance.	
4.1	<i>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.</i>
4.1.1	<i>Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.</i>
Comment	The site officially updates its progress toward targets that have been set on a quarterly basis, entering any updates and/or comments in the water stewardship action plan. Quarterly update reminders will be set in the site's compliance calendar.
4.1.2	<i>Value creation resulting from the water stewardship plan shall be evaluated.</i>
Comment	The site will evaluate value creation resulting from the water stewardship plan on an annual basis. The annual water stewardship plan evaluation reminder has already been set in the site's compliance calendar.
	Finding No: TNR-000912
4.1.3	<i>The shared value benefits in the catchment shall be identified and where applicable, quantified.</i>
Comment	The annual water stewardship plan review will include an evaluation and identification of any shared value benefits and where applicable, quantified.
	Finding No: TNR-000913
4.2	<i>Evaluate the impacts of water-related emergency incidents (including extreme events), if any occurred, and determine the effectiveness of corrective and preventative measures.</i>
4.2.1	<i>A written annual review and (where appropriate) root-cause analysis of the year's emergency incident(s) shall be prepared and the site's response to the incident(s) shall be evaluated and proposed preventative and corrective actions and mitigations against future incidents shall be identified.</i>
Comment	The site does not present evidence to meet this indicator. No annual review and (where appropriate) root-cause analysis of the year's emergency incidents has been done. During the audit site personnel described a past incident of ammonia leakage, which was sanctioned by the responsible authority.
	Finding No: TNR-000609
4.3	<i>Evaluate stakeholders' consultation feedback regarding the site's water stewardship performance, including the effectiveness of the site's engagement process.</i>
4.3.1	<i>Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.</i>
Comment	The Site is in the initial stage of engaging with stakeholders. There is no evidence of the Site's efforts to consult with stakeholders on their water stewardship performance.
	Finding No: TNR-000610
4.4	<i>Evaluate and update the site's water stewardship plan, incorporating the information obtained from the evaluation process in the context of continual improvement.</i>

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4.4.1 *The site’s water stewardship plan shall be modified and adapted to incorporate any relevant information and lessons learned from the evaluations in this step and these changes shall be identified.*  in progress

Comment The current Water Stewardship Plan contains detailed actions for year 1 and indicative actions for years 2 and 3. The plan will be evaluated and updated annually.

Finding No: TNR-000889

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5 STEP 5: COMMUNICATE & DISCLOSE - Communicate about water stewardship and disclose the site's stewardship efforts	
5.1	<i>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.</i>
5.1.1	<i>The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.</i> ✔ Yes
Comment	The WSP identifies the Site Head as responsible for compliance, and the Site EHS Head as accountable for managing the programs to maintain compliance with water-related laws and regulations. Accountabilities will be documented in the annual AWS review.
5.2	<i>Communicate the water stewardship plan with relevant stakeholders.</i>
5.2.1	<i>The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.</i> ✔ closed
Comment	The Site has not yet communicated to relevant local stakeholders their Water Stewardship Plan and how the plan contributes to AWS Standard outcomes. <p style="text-align: right;">Finding No: TNR-000611</p>
5.3	<i>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.</i>
5.3.1	<i>A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.</i> ✔ closed
Comment	The Site has not yet prepared or disclosed a summary of their water stewardship performance, including quantified performance against targets. <p style="text-align: right;">Finding No: TNR-000890</p>
5.4	<i>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.</i>
5.4.1	<i>The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.</i> ✔ closed
Comment	Site plans to verbally disclose these challenges and efforts to relevant local stakeholders during periodic outreach and engagement. Minutes or other documentation of the disclosure shall be maintained by the site. <p style="text-align: right;">Finding No: TNR-000891</p>
5.4.2	<i>Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.</i> ✔ closed
Comment	Efforts to engage stakeholders and coordinate and support public-sector agencies according to the water stewardship plan will occur during periodic outreach and engagement. Minutes and/or other documentation of the communication will be maintained by the site. <p style="text-align: right;">Finding No: TNR-000892</p>
5.5	<i>Communicate transparency in water-related compliance: make any site water-related compliance violations available upon request as well as any corrective actions the site has taken to prevent future occurrences.</i>

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5.5.1 *Any site water-related compliance violations and associated corrections shall be disclosed.* ✔
Yes

Comment Local regulations require prompt reporting of site water-related compliance violations and associated corrective actions to the local regulatory authority. Agency-issued Notices of Violation are publicly available information. Compliance violations are captured in the EPA ECHO database which is accessible to the public (no violations currently shown). If applicable, compliance violations and associated corrective actions will be reviewed annually during the AWS audit.

5.5.2 *Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.* ✔
Yes

Comment Regulatory agencies require the identification of corrective actions to prevent future occurrences of non-compliance. Communications regarding compliance violations and associated corrective actions are publicly available information. When applicable this information will be disclosed via correspondence with the respective regulatory agency.

5.5.3 *Any site water-related violation that may pose significant risk and threat to human or ecosystem health shall be immediately communicated to relevant public agencies and disclosed.* ✔
Yes

Comment Local regulations require the immediate reporting of site water-related incidents that may pose significant risk and threat to human health or the environment. Site procedures are established for immediate reporting of such incidents if they were to occur. All correspondence between the site and regulatory agencies, in the event of a reportable incident, are publicly available.

Photographic Evidence from Audit

✔
Yes

Comment During the site visit the audit team was able to visit storage room, all the areas to collect chemicals they all include safety instructions. All production site is protected with glass walls; the auditor team were able to see through and the members of the staff were explaining the processes. We went out to see the creek next to the site; it's evident the connection of water with an IWRA not far from the site called "coyote hills"