

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-000335

### SITE DETAILS

Site: **Molson Coors Milwaukee Brewery**

Address: 4000 West State Street, 53208, Milwaukee, Wisconsin, UNITED STATES

AWS Reference Number: AWS-000136

Site Structure: Single Site

### CERTIFICATION DETAILS

Certification status: Certified Core

Date of certification decision: 2023-Jan-31

Validity of certificate: 2026-Jan-31

### AUDIT DETAILS

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

Audit Type(s): Re-Certification Audit

Audit Start Date: 2022-Aug-16

Lead Auditor: Claudia M. Jaime

Audit team participants:

Gisela Galan

Kimberly Worsham

Site Participants:

Lauren Hill, Corporate Environmental & Sustainability

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)



Audit Number: AO-000335

### ADDITIONAL INFO

Summary of Audit Findings: A total of 20 findings were raised during the certification audit, 3 major non-conformities, 10 minor non-conformities and 7 observations. The major non-conformities were of sufficient concern to warrant the categorization of the non-conformity as major and related to Communicate and Disclose.

The Client is requested to perform a root cause analysis and define corrective actions for each of the non-conformities and to submit these to WSAS within 60 days of receipt of the audit report.

The major non-conformities must be sufficiently addressed and evidence submitted to WSAS within 90 days of receipt of the report.

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

The audit team recommends re-certification of Molson Coors Milwaukee Brewery at Core level pending approval of the corrective actions plan and closure of the major non-conformities.

Scope of Assessment: The scope of services covers the recertification audit for assessing conformity of [name of site] against the AWS International Water Stewardship Standard Version 2.

The site operations include brewing operations (mashing, lautering, boiling, cooling, fermenting, filtration, aging), bottling, and packaging in addition to corporate offices. The Site is located in what is locally known as the "Miller Valley" in the City of Milwaukee, Wisconsin. There are two local arterial thoroughfares that traverse through this site—W. State St. and W. Wisconsin Ave. Hwy 175 is located to the west of the site and connects Molson Coors to the interstate highway network. The Soo Line of the Canadian Pacific Railroad runs north and south through the site and is used to deliver intermediate goods, such as barley, to the brew house. Additionally, the Menomonee River traverses through the site's boundaries flowing southward and description of all facilities, process activities and outputs that were included in the assessment.

The facility campus is located adjacent to the Menomonee River. The catchment includes portions of the Menomonee River Basin (upgradient) and the Lake Michigan (downgradient).

o The Menomonee River is approximately 30 miles long, flowing from Waukesha County east into Lake Michigan. It's 140 square mile watershed is home to more than 300,000 people and the valley it forms through downtown Milwaukee is heavily industrialized.

The audit was conducted onsite on 16-18 August 2022.

The onsite visit included the assessment of brewery, production area can line, historic storage area (tunnels), distribution area, chemical storage area, water treatment and storage area, water meters, IWRA (onsite and catchment) were visited (onsite) as part of the audit.

### FINDINGS

#### NUMBER OF FINDINGS PER LEVEL

Observation	7
Minor	10
Major	3

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Audit Number: AO-000335

### FINDING DETAILS

Finding No:	TNR-001577
Checklist Item No:	1.1.1
Status:	Open
Finding level:	Observation
Due date:	2023-Aug-15
Checklist item:	The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including: <ul style="list-style-type: none"><li>- Site boundaries;</li><li>- Water-related infrastructure, including piping network, owned or managed by the site or its parent organization;</li><li>- Any water sources providing water to the site that are owned or managed by the site or its parent organization;</li><li>- Water service provider (if applicable) and its ultimate water source;</li><li>- Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies;</li><li>- Catchment(s) that the site affect(s) and is reliant upon for water.</li></ul>
Findings:	The Site should include a map with the discharge points and wastewater service provider and ultimate receiving water body.
Corrective action:	Update existing map with the discharge points (002) and wastewater service provider (Jones Island Water Reclamation Facility WI0036820) and ultimate receiving water body (Lake Michigan)
Evidence of implementation:	Maps combined to show discharge points, wastewater service provider, and ultimate receiving water body

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## Alliance for Water Stewardship (AWS)

Audit Number: AO-000335

Finding No: TNR-001294  
 Checklist Item No: 1.2.1  
 Status: In Progress - CA plan approved  
 Finding level: Minor  
 Due date: 2023-Aug-15  
 Checklist item: 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.

Findings: The Site needs to:  
 -Reaching out or engaging with stakeholders whose water challenges have not been identified.  
 -Include local brewery in stakeholder’s list if Site considers it appropriate. (As it was presented for interview)  
 -Describe each stakeholder, its role in the catchment and identify its water-related interest and challenges.  
 -Establish level of engagement and ranking for 2 of the identified stakeholders.

Corrective action: Update the stakeholder matrix to include role in catchment and water related challenges in 2023

Finding No: TNR-001299  
 Checklist Item No: 1.2.2  
 Status: In Progress - CA plan approved  
 Finding level: Minor  
 Due date: 2023-Aug-15  
 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: The Site should Understand, identify and explain the site’s capacity to influence and be influenced by the stakeholders in order to understand future risk and potentiate opportunities especially regarding the Menomonee River.

Corrective action: Conduct new brainstorming session on stakeholders and document methodology and stakeholder influence

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## Alliance for Water Stewardship (AWS)

Audit Number: AO-000335

Finding No:	TNR-001923
Checklist Item No:	1.3.4
Status:	In Progress - CA plan approved
Finding level:	Observation
Checklist item:	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.
Findings:	The site has not maintained records to validate that the wastewater treatment service provider (Jones Island Water Reclamation Plant) complies with effluent quality parameters before it is discharged to ultimate receiving body.
Corrective action:	Records are publically available from the EPA ECHO database related to WPDES Permit No. WI0036820-04 Outfall 002 <a href="https://www.mmsd.com/application/files/6316/2937/8882/MMSD_Permit_FI_NAL_signed_WEB.pdf">https://www.mmsd.com/application/files/6316/2937/8882/MMSD_Permit_FI_NAL_signed_WEB.pdf</a>
Evidence of implementation:	Attached MMSD WPDES Permit and US EPA Enforcement and Compliance History Online Report for Effluent Limit Exceedances
Finding No:	TNR-001579
Checklist Item No:	1.5.5
Status:	Open
Finding level:	Observation
Due date:	2023-Aug-15
Checklist item:	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.
Findings:	The site does not present the concentrations of the identified pollutants, it will be necessary to include them in the future to determine the severity of the contamination of these water bodies.
Corrective action:	Compile publicly available water quality data of IWRA will gathered and presented as part of the WSP.

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## Alliance for Water Stewardship (AWS)



Audit Number: AO-000335

Finding No:	TNR-001336
Checklist Item No:	2.3.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Aug-15
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 describes its strategy and does not clearly define the mission, vision and objectives towards good water stewardship in line with the AWS Standard
Corrective action:	Current strategy is outlined in ESG Report and was reiterated in the comments section.  See sections of ESG Report and discuss how this can be expanded to be in line with AWS Standard.  Tie ESG water related goals/mission/vision into WSP
Evidence of implementation:	Update WSP to include strategy tab for a clearer tie between ESG water related goals and WSP

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## Alliance for Water Stewardship (AWS)

Audit Number: AO-000335

Finding No: TNR-001580  
Checklist Item No: 2.3.2  
Status: Closed  
Finding level: Major  
Due date: 2023-Feb-08  
Checklist item: 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.

Findings: The risk should include those related to the watershed  
A water stewardship plan has been updated in 2022. The plan lacks the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes. For example IWRA in the catchment-  
Restoration/maintenance objectives should consider other AWS objectives in addition to sustainable water balance.  
The frequency of monitoring should be specified and how analysis of the information generated will allow the plan to be updated with the goal of continuous improvement.

Corrective action: Update water stewardship plan with monitoring frequency and evaluation of all AWS objectives

Evidence of implementation: Updated the WSP to include monitoring frequency and inclusion of all AWS outcomes

Finding No: TNR-001581  
Checklist Item No: 3.1.1  
Status: Open  
Finding level: Observation  
Due date: 2023-Aug-15  
Checklist item: Evidence that the site has supported good catchment governance shall be identified.

Findings: Molson Coors identified actions to supported good catchment governance, however, it does not present concrete evidence that its participation in Sweet Water and The Water Council has promoted or encourage actions that have lead to changes in water stewardship in the catchment.  
Does not provide evidence of sponsorship of Discovery World Freshwater Lab.  
The Site should provide evidence of sponsorship of Discovery World Freshwater Lab., and  
Present concrete actions taken by the Site to promote good water governance in the catchment Sweet Water and The Water Council.

Corrective action: Provide evidence of sponsorship of Discovery World Freshwater Lab.,and participation in Sweet Water and The Water Council

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## Alliance for Water Stewardship (AWS)

Audit Number: AO-000335

Finding No: TNR-001582  
Checklist Item No: 3.4.1  
Status: Open  
Finding level: Observation  
Due date: 2023-Aug-15  
Checklist item: Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.  
Findings: The site should include water quality objectives for the catchment.  
Corrective action: Water quality within the catchment will be monitored via publically available data.  
Evidence of implementation: Identified in 2023 WSP

Finding No: TNR-001584  
Checklist Item No: 3.5.1  
Status: In Progress - CA plan approved  
Finding level: Minor  
Due date: 2023-Aug-15  
Checklist item: Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.  
Findings: The actions described are included in its water stewardship plan. They are minimal and ad hoc  
They do not represent a significant effort to improve IWRA in the catchment identified by the site, they do not include actions focused on the river that runs adjacent to the company.  
The company should include objectives related to IWRA in the catchment included at their water stewardship plan. as has been mentioned at 2.3.2  
Corrective action: Incorporate actions in 2023 WSP related to the Menomonee River as an IWRA  
Other IWRA such as sanitary and storm sewer systems and waterbodies within the Lake Michigan catchment are addressed in the WSP.  
Evidence of implementation: Updated WSP to include actions related to Menomonee River as IWRA



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## Alliance for Water Stewardship (AWS)

Audit Number: AO-000335

Finding No: TNR-001585  
Checklist Item No: 3.8.1  
Status: In Progress - CA plan approved  
Finding level: Minor  
Due date: 2023-Aug-15  
Checklist item: Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.  
Findings: The site should submit evidence of communication with MWW, particularly in relation to the old water meters that they suspect to be one of the sources of the unaccounted for water in their water balance.  
Corrective action: Unaccounted for water in water balance is due to a difference in monitoring of incoming potable water supply (which is done daily via water meters) and wastewater discharges (which is only monitored quarterly). All water meters are calibrated and accurately tracking usage.  
Evidence of implementation: Emails concerning potential potable water leaks with the MWW Water Distribution Scheduling Manager are included. Attachments include: Communications with external agencies on reportable incidents that occurred in 2021 and 2022 Notification of potential water leaks to Milwaukee Water Works via email

Finding No: TNR-001344  
Checklist Item No: 3.9.2  
Status: In Progress - CA plan approved  
Finding level: Minor  
Due date: 2023-Aug-15  
Checklist item: Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.  
Findings: The Site should updated, data more than one year old do not allow to know how the best practices related to water balance targets have been implemented. Present evidence of water balance continual improvement. Data accompanied by graphs are better than graphs alone.  
Corrective action: Water balance template will be updated to include historical data going forward in order to document progress.  
Evidence of implementation: Attached ongoing daily tracking of water usage and other sustainability KPIs - MCBC MKE 2023 Performance Tracker attached

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## Alliance for Water Stewardship (AWS)

Audit Number: AO-000335

Finding No: TNR-001586  
 Checklist Item No: 3.9.4  
 Status: Open  
 Finding level: Observation  
 Due date: 2023-Aug-15  
 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: Once the targets for IWRA at the catchment have been updated, it should be relevant to implement actions towards best practice related.  
 Corrective action: Stormwater best management practices are implemented to protect the Menomonee River as an IWRA; the Stormwater Pollution Prevention Plan will be updated to reflect these best management practices  
 Evidence of implementation: SWPPP Updates ongoing

Finding No: TNR-001588  
 Checklist Item No: 4.1.3  
 Status: In Progress - CA plan approved  
 Finding level: Minor  
 Due date: 2023-Aug-15  
 Checklist item: The shared value benefits in the catchment shall be identified and where applicable, quantified.  
 Findings: The Site should identify and where applicable quantified the benefits in the catchment  
 Corrective action: The shared value benefits in the catchment shall be identified and quantified, if possible, in the WSP  
 Evidence of implementation: Updated the WSP to include Shared Value Benefits

Finding No: TNR-001589  
 Checklist Item No: 4.3.1  
 Status: In Progress - CA plan approved  
 Finding level: Minor  
 Due date: 2023-Aug-15  
 Checklist item: Consultation efforts with stakeholders on the site’s water stewardship performance shall be identified.  
 Findings: The Site should identify the performance on their water stewardship plan  
 Corrective action: Review supporting documentation  
 Evidence of implementation: Initial stakeholder interviews were conducted in March 2022 (see 1.2.1) and the WSP was updated based on the identified shared water challenges. The findings from the outcome of the stakeholder interviews were shared with the Sweet Water Board Members, which includes MMSD, WDNR, WE Energies, Southeastern Wisconsin Regional Planning Commission) in June 2022 with a request for further input. As a follow up to this presentation, an email update was sent to the Sweet Water Board Members detailing actions taken by Molson Coors in the WSP and an update on performance against the WSP.

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## Alliance for Water Stewardship (AWS)



Audit Number: AO-000335

Finding No:	TNR-001590
Checklist Item No:	4.4.1
Status:	Open
Finding level:	Observation
Due date:	2023-Aug-15
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:	The Site should update their WSP for 2023 to meet the nonconformities identified during the present audit related to the water stewardship plan.
Corrective action:	Update 2023 WSP to address nonconformities
Evidence of implementation:	Attached is the updated WSP for 2023

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)



Audit Number: AO-000335

Finding No:	TNR-001781
Checklist Item No:	5.1.1
Status:	Closed
Finding level:	Major
Due date:	2023-Feb-08
Checklist item:	The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.
Findings:	The site's related internal governance, including positions of those accountable for compliance with water laws and regulations has not been disclosed.
Corrective action:	<p>Additional supporting documentation provided to demonstrate disclosure both internally to Molson Coors employees (email and contact list) and externally to regulatory personnel (air annual certification, hazardous waste report, chemical inventory).</p> <p>The EPA FRS Facility Detail Report shows regulatory contact and responsible official. <a href="https://frs-public.epa.gov/ords/frs_public2/fii_query_dtl.disp_program_facility?p_registry_id=110000418174">https://frs-public.epa.gov/ords/frs_public2/fii_query_dtl.disp_program_facility?p_registry_id=110000418174</a></p>

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Evidence of implementation: Brewery internal governance is disclosed through the following actions/methods:

Internal: Ongoing new employee orientation, people announcement to all staff upon hiring, and annual distribution of EHS Contact List from Corporate.

External (agency): regulatory reporting including but not limited to annual hazardous waste reporting, annual EPCRA Tier II Chemical Inventory, and annual air reporting.

External (other): Sweet Water Board Meetings. Sweet Water's work is guided by our Board of Directors (<https://www.swwtwater.org/meet-our-team>). Members of the Board represent diverse stakeholders and include leaders of municipalities, businesses, utilities, and nongovernmental organizations. Board members serve three-year terms and meet on a bi-monthly basis. Board members including affiliations are as follows:

Alyssa Schmitt, (Co-Chair)

Elizabeth Hellman, (Vice Chair - Treasurer), WEC Energy Group

Benjamin Benninghoff (non-voting advisor), Wisconsin Department of Natural Resources

Brent Brown, Jacobs Engineering Group

Susan Coyle, Milwaukee Metropolitan Sewerage District

Brian Depies, Short Elliott Hendrickson, Inc.

Nancy Frank, University of Wisconsin - Milwaukee, School of Architecture & Urban Planning

Laura Herrick (non-voting advisor), Southeastern Wisconsin Regional Planning Commission

Lauren Hill, MolsonCoors

Karen Sands, Beth Foy & Associates, Planning Specialist

Marian Singer, WellIntel, Inc.

Andrew Struck, Ozaukee County Planning and Parks Department

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## Alliance for Water Stewardship (AWS)



Audit Number: AO-000335

Finding No:	TNR-001782
Checklist Item No:	5.3.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Aug-15
Checklist item:	A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.
Findings:	A summary of the site's water stewardship performance, including quantified performance against targets, has not been disclosed annually to internal and external stakeholders.
Corrective action:	Disclose annually to external stakeholders through Sweet Water Board Meetings and internally via email
Evidence of implementation:	See 4.3.1

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-000335

Finding No:	TNR-001490
Checklist Item No:	5.4.1
Status:	Closed
Finding level:	Major
Due date:	2023-Feb-08
Checklist item:	The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.
Findings:	The should disclose the site’s shared water related challenges and efforts made to address these challenges
Corrective action:	Address bullet points in guidance to make response more robust
Evidence of implementation:	<ul style="list-style-type: none"><li>• List all shared water challenges - All identified stakeholders were contacted via the initial outreach correspondence email in March 2022 as part of a partnership with UWM, and follow-up phone calls were conducted. For full details and evidence see 1.2.1. Shared water challenges were identified through these stakeholder interviews with the main themes being contamination, restoration/maintenance, and public perception. Identified shared water challenges were presented to Sweet Water Board on 06/21/2022 and additional input requested.</li><li>• Describe actions/efforts undertaken to address shared water challenges. - The WSP was reevaluated to ensure planned actions were in line with shared water challenges. The WSP was modified to make connections with these challenges and the actions to be taken by Molson Coors. See WSP under 2.3.2</li><li>• Discuss stakeholder engagement efforts, with an emphasis on engagement directed toward shared water challenges - Initial stakeholder interviews were conducted in March 2022 (see 1.2.1) and the WSP was updated based on the identified shared water challenges. The findings from the outcome of the stakeholder interviews were shared with the Sweet Water Board Members, which includes MMSD, WDNR, WE Energies, Southeastern Wisconsin Regional Planning Commission) in June 2022 with a request for further input. As a follow up to this presentation, an email update was sent to the Sweet Water Board Members detailing actions taken by Molson Coors in the WSP and an update on performance against the WSP.</li><li>• Actively disclose this information to target audience(s) and actively communicate this information to interested stakeholders in a suitable format(s). - All information was actively disclosed via telephone conversations, electronic mail, and in person meetings as discussed above.</li></ul>

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## Alliance for Water Stewardship (AWS)

Audit Number: AO-000335

Finding No:	TNR-001491
Checklist Item No:	5.4.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Aug-18
Checklist item:	Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.
Findings:	The Site should identify the efforts made to engage stakeholders and coordinate and support public-sector agencies
Corrective action:	Identify members of Sweet Water Board and cross reference with stakeholder list for clarity.
Evidence of implementation:	<p>Engagement and coordination with stakeholders and public sector agencies is accomplished through the Sweet Water Organization, which Molson Coors sits on the Board. Sweet Water's work is guided by our Board of Directors (<a href="https://www.swwtwater.org/meet-our-team">https://www.swwtwater.org/meet-our-team</a>). Members of the Board represent diverse stakeholders and include leaders of municipalities, businesses, utilities, and nongovernmental organizations. Board members serve three-year terms and meet on a bi-monthly basis. Board members including affiliations are as follows:</p> <p>Alyssa Schmitt, (Co-Chair)</p> <p>Elizabeth Hellman, (Vice Chair - Treasurer), WEC Energy Group</p> <p>Benjamin Benninghoff (non-voting advisor), Wisconsin Department of Natural Resources</p> <p>Brent Brown, Jacobs Engineering Group</p> <p>Susan Coyle, Milwaukee Metropolitan Sewerage District</p> <p>Brian Depies, Short Elliott Hendrickson, Inc.</p> <p>Nancy Frank, University of Wisconsin - Milwaukee, School of Architecture &amp; Urban Planning</p> <p>Laura Herrick (non-voting advisor), Southeastern Wisconsin Regional Planning Commission</p> <p>Lauren Hill, MolsonCoors</p> <p>Karen Sands, Beth Foy &amp; Associates, Planning Specialist</p> <p>Marian Singer, WellIntel, Inc.</p> <p>Andrew Struck, Ozaukee County Planning and Parks Department</p> <p>Additionally our Imprint Month Volunteer Event coordinates with the public sector and Molson Coors employees to conduct valuable clean up efforts within the Lake Michigan catchment.</p>



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A handwritten signature in black ink, appearing to read 'M. Waidner', is positioned above a horizontal line.

Signature WSAS

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Audit Number: AO-000335

### Report Details

Report	Value
Report prepared by	Claudia M. Jaime
Report approved by	Rizwan Masood
Report approved on (Date)	2 Nov, 2022

### Surveillance

**Proposed date for next audit**  
2023-Aug-15

Comment

### Stakeholder Announcements

Date of publication	Location
2022-Jul-14	AWS web page
2022-Jul-14	WSAS web page
2022-Jul-21	Molson Coors webpage

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## Alliance for Water Stewardship (AWS)

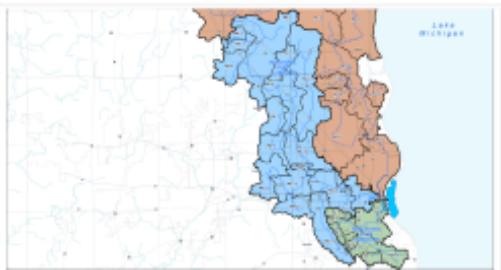
Audit Number: AO-000335

### Catchment Information

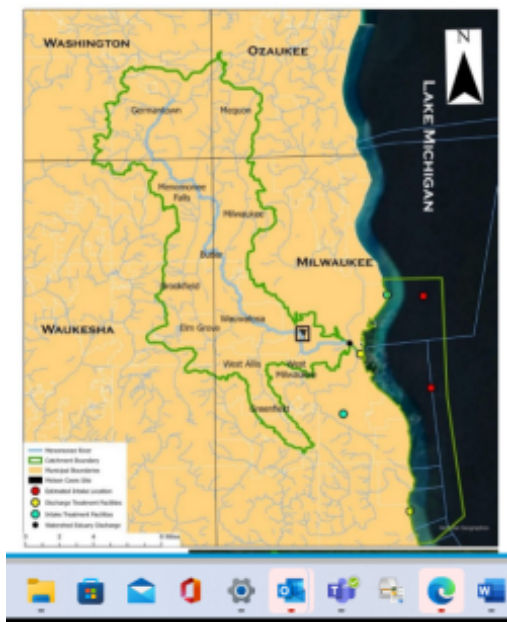
#### Catchment Information

The Molson Coors site is in the Menomonee River Watershed portion of the greater Milwaukee River Basin. The Milwaukee River Basin is included in the Great Lakes network. The Menomonee River watershed drainage area covers 136 square miles and includes portions of Washington, Waukesha, and Ozaukee counties. The watershed contains a total of 96 miles of streams. The Menomonee River originates in wetlands near the village of Germantown and the city of Mequon. The river flows south and southeast for approximately 32 miles, where it meets the Milwaukee and Kinnikinic Rivers at the Harbor Estuary before discharging into Lake Michigan.

Most of the land in the Menomonee River Watershed is incorporated among area municipalities including Germantown, Mequon, Menomonee Falls, Milwaukee, Butler, Brookfield, Elm Grove, Wauwatosa, West Allis, Greenfield, and West Milwaukee. Forty-two percent of the watershed is considered urbanized. Grasslands (22%), agriculture (17%), forests (8%), and wetlands (7%) make up the remaining land uses. The basin contains six dams, eight industrial wastewater treatment facilities, and one municipal wastewater treatment facility.



Catchment Map.png



Molson Coors Catctment.png

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Audit Number: AO-000335

### Client Description and Site Details

#### Client/Site Background

The site operations include brewing operations (mashing, lautering, boiling, cooling, fermenting, filtration, aging), bottling, and packaging in addition to corporate offices. The Site is located in what is locally known as the “Miller Valley” in the City of Milwaukee, Wisconsin. There are two local arterial thoroughfares that traverse through this site—W. State St. and W. Wisconsin Ave. Hwy 175 is located to the west of the site and connects Molson Coors to the interstate highway network. The Soo Line of the Canadian Pacific Railroad runs north and south through the site and is used to deliver intermediate goods, such as barley, to the brew house. Additionally, the Menomonee River traverses through the site’s boundaries flowing southward and description of all facilities, process activities and outputs that were included in the assessment.

### Summary of Shared Water Challenges

#### Summary of Shared Water Challenges

Three shared water challenges were identified and prioritized based on the stakeholders engagement from March 2022.

Priority #1 - Contamination, directly or indirectly, of the Menomonee River. The status of the Menomonee River as a 303(d) impaired waterway according to the EPA Clean Water Act ranks high on the priority list of shared water challenges as identified by multiple stakeholders. This identified challenge forms the foundation of the following two identified shared water challenges.

Priority #2 - Restoration and maintenance of areas around the Menomonee River or wetlands associated with the catchment was listed as another concern by multiple stakeholders.

Priority #3 - Public Perception regarding the quality of the areas along the river make residents less likely to engage in these outdoor spaces for recreation.

### 0.1 General Requirements for Single Sites, Multi-Sites and Groups

#### 0.1.1 Eligibility Criteria

0.1.1.1 *The site(s) occupy one catchment OR an exception has been granted.*



Yes

Comment The Site occupy one catchment

0.1.1.2 *The scope of the proposed certification shall be under the control of a single management system.*



Yes

Comment The scope of the proposed certification is under control of a single management system

0.1.1.3 *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.*



Yes

Comment The site scope of the proposed certification is homogeneous the produces beer.

**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.

 Obs.

Comment

-Physical Scope Maps:  
Water related infrastructure, including piping network, own or managed by the site or its parent organization:  
Maps of site drainage and storm and sanitation sewer outfalls (discharge points) were provided. The Site Drainage Map identifies impervious and total drainage acreage for each area subsection, site outfall locations, and potential pollution source locations. The Facility Layout Storm and Sanitary Sewers Outfall Identification Map provides detailed information for each outfall to include size and type (storm, sanitary, or combined) and provides a detailed blueprint of the sanitary and storm water piping network throughout the site.

- Map\_Site\_Drainage\_from\_2018\_SWPPP is more clear because we can see where it flows.
- Any water sources providing water to the site that are owned or managed by the site or its parent organization.

No water sources are owned or managed at the site.

- Sewer\_Drawings map
- The Site’s ultimate water source is Lake Michigan. It is extracted, treated and distributed by Milwaukee Water Works under the administration of the City of Milwaukee. The City has two water intakes and treatment plants in Lake Michigan: Linnwood Water Treatment Plant and Howard Water Treatment Plant (Map Milwaukee Water Works Intake).
- Molson Coors has two discharges: Stormwater and Operation’s wastewater. The first one is directly discharged to the Menomonee River and second one is discharge in the City’s combine sewage system. This effluent is treated by the City of Milwaukee via Milwaukee Metropolitan Sewage District (MMSD) in the Jones Island Water Reclamation Facility where four main treatment processes are performed: screening, primary clarification, biological treatment, and disinfection. Once treated, the water is safely released into Lake Michigan (Physical\_Scope\_Maps pag. 5).
- The Molson Coors site is in the Menomonee River Watershed portion of the greater Milwaukee River Basin. Milwaukee River Basin is included in the Great Lakes network which contain 21% of the world’s fresh water. The Menomonee River watershed drainage area covers 136 square miles and includes portions of Washington, Waukesha, and Ozaukee counties. The watershed contains a total of 96 miles of streams. The Menomonee River originates in wetlands near the village of Germantown and the city of Mequon. The river flows south and southeast for approximately 32 miles, where it meets the Milwaukee and Kinnikinic Rivers at the Harbor Estuary before discharging into Lake Michigan. The Site has identified the catchment as the Menomonee River Watershed (Physical Scope Maps pag.4).
- The water service provider and its ultimate water source are not mapped.

Discharge points and wastewater service provider and ultimate receiving water body or bodies are mapped, but not clearly identified in the map.

# CERTIFICATION REPORT


## Alliance for Water Stewardship (AWS)

Audit Number: AO-000335

**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.*

in progress 

Comment Identification of relevant stakeholders was developed by assessing organizations within the geographical footprint of the stakeholder catchment and also through knowledge/networks from Molson Coors previous interactions and engagements. Additionally, as interviews were conducted with identified stakeholders, input was requested on other groups that should be considered. Criteria that were used to facilitate the stakeholder identification process include the following:

- Relation to the water industry within the catchment
- Existing or historical relationship with Molson Coors
- Experience with water-related challenges within the catchment
- Active interest pertaining to water-related issues within the catchment
- Impacted by Molson Coors' water-related actions

Among the stakeholders identified are:

Milwaukee Water Works – Public water supplier who extracts water from Lake Michigan, treats it and distribute it to the Site and Milwaukee County. It also sells water in bulk to other Communities.

Milwaukee Metropolitan Sewage District – Public supplier who collects the city's waste-water, treats it and discharge it in Lake Michigan. This supplier uses the sludge from the WWTP to make compost that is later is sold in the market.

Department of Natural Resources – Public Agency in charge of all natural resource in the State, including the Menomonee River and Lake Michigan. It also issues the permits effluent and stormwater discharge in Wisconsin's waterways. Its water challenges were identified.

29 stakeholders were identified, briefly described or not described at all and their role in the catchment is missing. Their degree of influence and interest was determined using a predefined numeric scale from 1 to 4 that subsequently, was used to define their level of engagement and ranking.

Feedback from 12 of the 29 stakeholders was obtained, and their water-related interest and challenges were included in the matrix under "feedback", but not clearly identified. No relevant information was presented about the other 17 stakeholders including two big water users Coca Cola (inside the catchment) and Ocean Spray (outside) whose level of influence was set a 1 out of 4.

A presentation regarding AWS, the water stewardship plan, along with feedback request was made to Sweet Water Group (one of the stakeholders identified). Lauren Hills explained that some of the stakeholders in the matrix are part of this group and its engagement was done through this presentation, however it is not clear who are the stakeholders that conform the board. See doc attached.

An interview was conducted to a local brewery; however, it is not listed as a stakeholder.

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-000335

**Finding No: TNR-001294**

**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

**Comment** The site has identified the degree of influence for each stakeholder based on the stakeholder’s size and influence using a predefined numeric scale from 1 to 4 explained in the top part of the stakeholders mapping exercise. However, did not explain its capacity to influence and be influenced by the stakeholders in order to understand future risk and potentiate opportunities, especially regarding the Menomonee River where the site discharges it storm water that eventually ends in Lake Michigan. The Site identified the degree of influence for each stakeholder but did not explain its capacity to influence and be influenced by them.

**Finding No: TNR-001299**

**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

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-000335

Comment	<p>The site presented three plans:</p> <ol style="list-style-type: none"><li>1. Emergency Procedures Plan (updated in 2022) which includes the following water related incidents along with its mitigation, preparedness and response:<ul style="list-style-type: none"><li>- Chemical released when necessary to shelter in place instead of evacuate page - 48</li><li>- Chemical spills and leaks – page 61</li><li>- Utilities (water and power) – page 67</li><li>- Flooding/water leaks – page 73</li><li>- Protection systems, inspections and maintenance</li></ul></li></ol> <p>Each of this chapters describes in detail:</p> <ul style="list-style-type: none"><li>-Responsible person</li><li>-Specific procedures</li><li>-Response guidelines and responsibilities for all employees and visitors</li><li>-Prevention pre-planning systems and procedures</li><li>-Training requirements</li><li>-Maps and location of meeting points</li><li>-Reporting procedures</li></ul> <ol style="list-style-type: none"><li>2. Spill Prevention Control Plan made according to the requirements of the Oil Pollution Prevention Regulation. It does not need to be approved by the authority. Includes three sections:<ul style="list-style-type: none"><li>- General information</li><li>- Oils spill contingency plan</li><li>- Spill/release prevention – explains, among other things, where and how oils are store and the environmental receptors that may be affected. It mentions the Menomonee River as a receptor.</li><li>- Appendices containing mapping location of all oil storage facilities, inspection point, reporting procedures, equipment required, etc.</li></ul></li><li>3. Storm Water Pollution and Prevention Plan. This plan is required by the Wisconsin Department of Natural Resources to obtain and maintain the storm water discharge permit. It does not need to be approved by the authority. Includes several sections such as: Site description – Acknowledges the Menomonee River as a receiver of the storm water,<ul style="list-style-type: none"><li>- List all materials store on site</li><li>- List potential sources of pollution divided by drain area, their location, engineered controls to avoid/mitigate pollution and the specific or potential pollutant.</li></ul></li></ol> <p>Storm water control</p> <ul style="list-style-type: none"><li>-List of all devices and infrastructure in place to prevent and capture spills, including best management practices.</li></ul> <p>Monitoring requirements and record keeping.</p> <p>During the preparation of this plan, the Spill Prevention Control Plan was consulted to assure consistency.</p> <p>The Milwaukee Brewery is also equipped with an onsite HAZMAT Team. The number of employees certified as HAZMAT responders typically ranges between 35 to 45 individuals. Each shift is staffed with a HAZMAT team made up of volunteer employees who undergo monthly training sessions to perform spill response, control, and clean-up measures. Their responsibilities and procedures to contact this team are specified in the three plans mentioned above.</p> <p>The site presents three detailed plans that cover almost all possible activities except:</p> <p>Shortage/drought (not mention the plan due to it being highly unlikely but addressed by Molson during our visit) the brewery would scale back or halt production, with other breweries in the network picking up the displaced volume. In the unlikely event that our</p>
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# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)


Audit Number: AO-000335

facilities are unable to discharge to MMSD, operations would be appropriately shut down.

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

Comment Site mapped outflows but not inflows because map of incoming potable water is maintained confidential by Municipal Water Works for security reasons. Municipal Water Works has 21 water meters in the Site.

The site has an automatic dosifier to adjust the pH of the “dumped beer” to aprox 7.0. This is the beer that did not meet the quality control and it is sent to the WWTP of the Milwaukee Metropolitan Sewage District.  
Loses and storage has been identified but not mapped.

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

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-000335

### Comment

Potable water usages at the Brewery can be broken into two categories: consumption and wastewater discharge. Consumption includes packaged beer shipped offsite, water loss through evaporation, and water contained in waste products shipped offsite (i.e., spent grain). At a water use ratio of 3.5 hl/hl, this would equate to roughly 29% of purchased water consumed and 71% discharged as wastewater. These percentages are directly correlated to the reported water use ratio. Historical water purchases and operational data display a clear trend indicating that peak production begins around April and concludes around October. Between 2020 and 2021, there was an increase in water purchased during peak production of approximately 5 million gallons per month. According to certification responsible at the site, it is due to changes in production line. Molson Coors started to produce the beer Blue Moon and the cleaning process of the equipment after brewing requires more water.

Graphs for inflows and are attached. The data for outflows was supplied by Milwaukee Metropolitan Water District, which is the City's entity that test and treats the wastewater, manages the sewer system and reads the water meter quarterly.

Molson Coors quantifies its water balance daily. The attached document presents the data yearly and monthly for 2020 and 2021 including inflows, storage (mostly in the form of embebed water), unaccounted (losses) and outflows.

The water balance presents an increment of 200% (from 20,965,439 - 61,237,693) in its unaccounted water. Strange data because the 20,965,439 is negative. See attached document.

According to the Site, the unaccounted water in the balance should be related to the frequency in which the suppliers read the water inflow (monthly) and the outflow (quarterly). Even though the meters are inside Molson Coors' property, they belong to the suppliers, are old, and the Site is not allowed to change, install adjacent smart meters or connect a reader on top of the meters. The site has 21 water meters, most of them underground and can only be accesses by crawling in tunnels. Nevertheless, meters are read daily, along with routine inspections to check the premises looking for water leaks. Employees are required to report any leaks immediately.

Molson Coors says that has requested the city in various occasions to change the meters, but it has been denied or has not gotten any response.

Storm water from the Site is directly discharged to the Menomonee River and is not quantified. To quantify runoff, the site's impervious acreage is multiplied by average annual precipitation (the mean monthly precipitation over the year, including rain, snow, hail, etc.). Average annual precipitation for Milwaukee, Wisconsin is 34.69 inches. Considering the estimated impervious surface acreage on site is approximately 95%, equating to 92.454 acres (or 579,930,659 in<sup>2</sup>). The approximate estimate of site water runoff is 87.06 million gallons per year.

No water-related challenges that would be a threat to good water balance for people or the environment was identified.

### 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.*

  
Obs.

Comment

Water is taken from Lake Michigan and treated by Milwaukee Water Works. This is the source of water for the city of Milwaukee and its surrounding. According to the Consumer Confidence Report (2021) published by Milwaukee Water Works, once it is treated, meets all EPA criteria for drinking water including bacteria, fluoride, chlorite and TDS. See attached document for complete list of parameters.

Water discharged from the site's buildings and operations is discharged into sanitary and combined sewer regulated by the Milwaukee Metropolitan Sewerage District (MMSD). MMSD does not classify Molson Coors as a significant industrial user according to sec. 11.103, MMSD Rules. No categorial pretreatment of wastewater applies to the Milwaukee Brewery, as the operations do not involve pollutants for which MMSD has established prohibitions or limits.

MMSD Industrial Waste Monitoring Personnel collect wastewater samples on a quarterly basis to monitor BOD and TSS. Reports show that the effluent has an average BOD of 2,016,508.28 lb/month and 548,453.06 lb/month of TSS. It is received and treated at the Jones Island Water Reclamation Plant and discharge into Lake Michigan. The sludge is used to make compost as a side business of MMSD. Attach is a quarterly report from MMSD shown water quality and quantity.

Water quality of the Menomonee River, which receives the storm water of the Site is classified as impaired due to phosphorus, bacteria and chloride from stormwater runoff and overflow of sanitary sewage discharges. According to the Milwaukee Metropolitan Sewerage District, phosphorous comes from agriculture and from the facilities such as the municipal water supplier who adds it for corrosion control and to limit the amount of copper/lead that could leach to the drinking water. However, the Lake Michigan Report (LAMP) 2021 removed the lower part of this river from the list of the 43 most polluted places in the Great Lakes. Molson Coors visually evaluates its storm water per requirement of the department of Natural Resources. Reports indicate that Molson is not contributing to deteriorate the quality of the Menomonee River (see docs attached).

Lake Michigan is the ultimate receiving water body from Molson's effluent via the wastewater treatment plant or the storm water discharge in the Menomonee River. The area of the Menomonee River presents challenges regarding invasive species, PCBs, paint sludge, heavy metals and arsenic that has been discharge by many industries through the years. EPA has accepted a project from Sweet Water to improve this river and has given the necessary funds, but its implementation remains a challenge. See attached minute from Sweet Water Board.

Site presents quantification of water quality of the influent and effluent and visual inspection of storm water but not quantification of the water quality of Lake Michigan and the Menomonee River. Although there are several publications related to the water quality of both water bodies, none present specific quantification.

No water-related challenges that would be a threat to good water quality status for people or the environment was identified.

No water-related challenges that would be a threat to good water quality for people or the environment was identified.

**1.3.5**

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



Yes

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-000335

**Comment** The Site has identified and mapped the following potential sources of pollution:

- Storm water runoff that carries salt during deicing and truck oil into the Menomonee River. According to information provided by Lauren Hill, the company purchased 601.3 tons of salt in the 2020/2021 season. Based on our rough estimates, runoff from average annual rainfall contributes to approximately 87.06 million gallons of storm water runoff into the catchment area or combined sewer.
- Oil from trucks. Approximately 140 to 150 trucks ship product to and from the site each day, with a total capacity of 300 trucks per day.
- Chemical unloading activities take place across the brewery and are typically conducted outdoor in the vicinity of storm sewers.
- Chemical storage.
- Outdoor storage of materials such as dextrose, liquid adjunct, spent grain, recycling material such as scrap metal, crushed glass and organics.
- Any transient equipment laydown areas could potentially contribute pollutants to storm water that falls on the drainage area.

All these activities have been mapped in the document 1.3.5\_Map\_Potential Pollution Source\_2018\_SWPPP.

Site lists all chemicals used and stored on site and its characteristics in the “Tier II Emergency and Hazardous Chemical Inventory Report” presented and approved annually by the Wisconsin Emergency Management Dep. See doc attached.

Map of Storm and combined sanitary sewers system is also attached.

**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** Site has identified, described and mapped 6 IWRA build by the Site. None of them present water related risks or has a special status. The most relevant were constructed to control runoff water:

- 1- Green roof - ~0.25 acre on a roof top– made of recycled plastic trays containing soil and sedum plants which captures and evaporates stormwater. In 2021, muss started to colonize the trays and was removed. The trays are in improving condition and expected to work as designed by next winter.
- 2- Cistern, green space and porous pavements- ~0.06 acres - in good operating condition with no known issues. The cistern holds ~200,000 gallons.
- 3- Rain garden and bioswale - ~0.23 acre - located at expanded parking Lot 55 in the combined sewer area. Both appear to be in good condition.

Other IWRA are a fountain, another green space (~0.9 acre) and water pipes for inflows and outflows.

Map, pictures and additional details of the IWRA are in the attached documents.

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

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-000335

Comment      Applicable water-related costs as part of the Milwaukee Brewery Operations have been identified in the attached excel spread sheet and include:

- Utility cost of potable water supplied by Milwaukee Water Works (MWW).
- On-site treatment of incoming potable water for brewing processes and diluent.
- Sewerage cost for treatment of sanitary and process wastewater by MMSD.
- Storm water permit fees.
- Fines and penalties, if applicable
- Water and wastewater infrastructure repairs
- Implementation of water savings projects.
- Water related payroll including labor hours from Molson Coors salaried employees for time attributed to water related projects and contracted support for water-related audits, certifications, and compliance assistance.
- Donations to water related non-profit organizations with includes donations of water to NGO for diverse events.

Annual water related revenues has been defined as the Milwaukee Brewery revenue for packaged barrels. An estimate of this number is determined based on the total reported revenue for North America times the ratio of Milwaukee-based production as compared to total North America production.

Water related value creation

a)    The redirection of Molson’s wastewater to the Jones Island Water Reclamation Facility at the end of 2018 created two important values:  
The wastewater of the site is now used by Milwaukee Metropolitan Sewage System to produce compost that is sold in the local markets and is part of the revenue required to operate the WWTP.  
Contributes to the restoration and protection of the Menomonee River and Lake Michigan.

b)    The infrastructure repair presented in the excel spread sheet includes the lining of old pipes that in the past dragged sediments and metals along with the runoff water. This also contributes to the restoration and protection of the Menomonee River and Lake Michigan.

c) Social value - Molson Coors acts as a community leader in water-related concerns with the implementation of the AWS standard.

**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)

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**Comment** The Molson Coors site provides safe drinking water sourced from Milwaukee Water Works, as well as 5 gallon bottled water dispensers provided by Premium Waters throughout the site to all employees. In 2021, roughly 25,000 gal were consumed by site employees, or 70 gallons per day.

Adequate sanitation is provided to all workers including bathrooms and locker rooms with sinks and soap provided for hand washing, hand sanitizer dispensers, and wastewater treatment through MMSD. The 18 brewery is staffed with a full-time sanitation maintenance team of roughly 18 individuals with the primary responsibilities of cleaning common areas such as cafeterias, lunchrooms, washrooms, locker rooms, and restocking consumables throughout the brewery.

The number of toilets required is determined by the number of employees at the worksite. Per OSHA requirements, six toilets are required for the first 150 employees and one additional toilet for every 40 employees over 150. Therefore, conservatively assuming a brewery workforce of 650 employees, the Molson Coors Milwaukee Brewery must provide 19 toilets at a minimum. The brewery is equipped with roughly 92 restrooms containing at least one hand washing station and toilet with a closed door. Therefore, the brewery maintains adequate access to toilets per OSHA standards. Inventory of washrooms was identified in AWS\_Standard\_Molson\_Coors\_Milwaukee:Brewery\_2022 (pp. 18-20).

Site uses the Self-Assessment Tool of the WASH Pledge for implementing and verifying WASH at the Workplace. This tool has instructions, and a detail scoring system from 0-2. Number 2 means full compliance with WASH and is evaluated in terms of cleanliness, provision of water, sanitary and medical waste product disposal, etc. The result shows that the lowest score for the site is 89% in workplace appropriate hand washing behaviour and sanitary and hygiene promotion material. The results of the tool indicate that the site fulfil its pledge. See attached doc.

Hygiene awareness is provided through annual training of all employees based on good manufacturing practices, food safety, and food defense. All WASH aspects have been addressed.

**1.4** *Gather data on the site's indirect water use, including: its primary inputs; the water use embedded in the production of those primary inputs the status of the waters at the origin of the inputs (where they can be identified); and water used in out-sourced water-related services.*

**1.4.1** *The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be identified.*



Yes

**Comment** The site has identify their embedded water use of primary inputs. Key ingredients and inputs in the brewing process include barley, hops, dextrose, liquid adjunct, cardboard, cans, and bottles. None of the primary inputs identified are sourced within the site's catchment area. However, given the corporate strategy for water sustainability, Molson Coors has worked to identify the quantity and level of water risk for all primary inputs outside the catchment and, as a Company, has implemented actions to make its product more sustainable in those catchments

In 2021, Molson Coors, bought 682,960,091 gallons of water, all extracted from Lake Michigan. 190,755,695 (27.3%) was embedded in beer; 37,738,361 (5.53%) was lost in cooling and pasteurizing activities and 393,228,342 (57.58%) was returned to Lake Michigan. See evidence in indicator 1.3.2.



The water used by the Site Water quality meets EPA criteria for drinking water. See evidence in indicator 1.3.2.

The catchment is not in a water stress area.

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

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- 1.4.2** *The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.*   
Yes
- Comment Water-related outsourced services for Molson Coors include potable drinking water, in the form of 5-gal bottles, provided by Premium Waters, Inc. and laundering services for Molson Coors uniforms provided by AlSCO. Premium Waters, Inc. is in New Berlin, WI which lies within the defined catchment area, but this facility is merely a distribution center. The water consumed by Premium Waters' products is not sourced from within the catchment. AlSCO laundering services is in Wauwatosa, WI which also lies within the defined catchment area. It is currently in the process of renewing its license with MMSD. It should be noted that the annual consumption for the laundering outsourced service is roughly 37,000 gallons, making up less than 0.01% of the annual water usage from brewery operations. Additionally, landscaping services are provided by Trees on the Move and BrightView Landscape. Trees on the Move provides salt application and snow removal services to Molson Coors' Milwaukee facilities during the winter. BrightView Landscape provides mowing, weeding, and additional lawn services during the months of April through October. Any water used by landscaping services is provided by Molson Coors and therefore quantified with existing potable water purchases.
- 1.5** *Gather water-related data for the catchment, including water governance, water balance, water quality, Important Water-Related Areas, infrastructure, and WASH*
- 1.5.1** *Water governance initiatives shall be identified, including catchment plan(s), water-related public policies, major publicly-led initiatives under way, and relevant goals to help inform site of possible opportunities for water stewardship collective action.*   
Yes

Comment

Catchment related water governance initiatives address quality control, treatment, management, monitoring, protection, regulation, and allocation of water resources. This section serves to further Molson Coors' understanding of the potential impact of the plans and policies happening within the region.

1. Menomonee River Watershed Restoration Plan

The Milwaukee River Keeper, an organization working to improve and advocate for water quality, wildlife habitat, and sound land management in area rivers has developed the Menomonee River Watershed Restoration Plan (WRP) [24]. The WRP was developed to improve water quality within the Menomonee River and its tributaries [24]. This plan includes general recommendations for clean-up activities beyond 2015. It builds upon the Southeastern Wisconsin Regional Planning Commission (SEWRPC) Regional Water Quality Management Plan Update (RWQMUP) and incorporates input from members of the Southeastern Wisconsin Watershed Trust, Inc. (SWWT) as well as its associated Menomonee River Watershed Action Team (WAT) and Science Committee.

Key focus areas that were identified during the planning process included fecal coliform bacteria and public health, habitat and aesthetics, and nutrients such as phosphorus [24]. The WRP sets watershed targets with foundational actions. Improved conditions from efforts of the WRP directly impacts Molson Coors as they are circumscribed to the conditions of the Menomonee River watershed area.

2. TMDLs

Total Maximum Daily Load (TMDL) analysis for the Milwaukee River watershed is one of the major drivers for water governance within the region. The Milwaukee River TMDL sets a pollution "budget" for various pollutants such as suspended solids, fecal coliform bacteria, and phosphorus in the river system. This program is mandated by U.S. Environmental Protection Agency (USEPA) regulations and the Clean Water Act. Wisconsin Department of Natural Resources (DNR) identifies bodies of water which are not sufficient at supporting aquatic life and recreation. This program permits municipalities to regulate land use and wastewater discharges to meet TMDL limits [16].

MMSD and the DNR commissioned Southeastern Wisconsin Watershed Trust, Inc. (SWWT), a nonprofit that works to restore the Greater Milwaukee watersheds to develop a plan and function as a liaison between different regional actors such as municipalities, the private sector, nonprofits, MMSD, and academic institutions [25]. The Menomonee River watershed is part of the greater the Milwaukee River Basin TMDL analysis, which is pertinent to the Molson Coors site.

3. City of Milwaukee Water Quality Monitoring Program

Milwaukee Water Works (MWW) is the agency in Milwaukee County that oversees providing safe, high-quality drinking water to meet federal and state regulations. They also conduct water monitoring to meet clean water targets. Additionally, MWW collaborated with the Milwaukee Health Department to form the Interagency Clean Water Advisory Council (IAWAC). This advisory body tracks and relays critical information about newly emerging contaminants, water treatment, and water quality monitoring [26].

4. Water Centric City and the Environmental Collaboration Office (ECO)

The Water Centric City initiative is a program of the City of Milwaukee's Environmental Collaboration Office [27]. ECO strives to make Milwaukee more resilient and sustainable with consideration of changing climate conditions in the future. ECO programs are intended to improve people's lives and the economy while protecting and restoring the natural ecosystems that support our long-term prosperity [28].

ECO also developed the City's ReFresh MKE Sustainability Plan. In this plan they set goals with substantive targets. In the section regarding water resources, they have outlined the highest-priority strategies to meet their goals. These strategies include developing a city green infrastructure policy plan, collaborate with Milwaukee County Parks and land trusts to maximize greenspace for stormwater management, replace and maintain city sewers and work with private property owners to maintain private laterals, promote water efficiency and smart water use practices, and many more [29].

5. Wisconsin PFAS Action Plan

PFAS, formally known as per- and poly-fluoroalkyl substances, are a group of over 5,000 chemicals that were created and used throughout the twentieth century. Today they have been discovered in groundwater, soil, air, sediment, surface and drinking water. These chemicals pose a concerning risk to human health and are known carcinogens [29].



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Wisconsin Governor, Tony Evers, created the Wisconsin PFAS Action Committee (WisPAC) which directs the DNR to lead a council in coordinating the state's response to PFAS. The Wisconsin PFAS Action Plan was developed to serve as a roadmap for the State in its efforts to address PFAS contamination. The guiding principles of this plan include environmental justice, health equity, innovation, and pollution prevention [30]. PFAS have been detected in the Milwaukee Estuary [31]. This area includes contaminated waterways within the Menomonee River Basin.

### 6. DNR Water Conservation and Water Use Goals

The DNR regulates public waterways in the state of Wisconsin. Their mission is to sustainably manage the quantity and quality of water in the state to ensure that water is available to be used to protect and improve our health, economy, and environment [32]. The DNR has outlined their statewide water conservation and water use efficiency goals. These goals include:

1. Ensuring improvement of the waters and water dependent natural resources.
2. Protecting and restoring hydrologic and ecosystem integrity.
3. Retaining the quantity of surface water and groundwater.
4. Ensuring sustainable use of water.
5. Promoting the efficiency of use and reducing losses and waste of water.

1.5.2

*Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.*



Yes

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### Comment

Water-related legal and regulatory requirements including federal, state, municipal and organizational regulations such as MMSD rules that directly affect this Molson Coors site have been identified. Compliance with legal and regulatory requirements is essential to Molson Coors to avoid reputational risk and regulatory risk such as penalties and fines.

#### Drinking Water Quality

The Safe Drinking Water Act (SDWA) aims to protect the quality of drinking water in the United States. The EPA has established primary and secondary drinking water standards for more than 90 common contaminants. A list of regulated contaminants and their levels is provided by the Environmental Protection Agency [33]. The EPA also requires community water systems to publish Consumer Confidence Reports (CSR), Milwaukee Water Works (MWW) most recently published their 2021 report [10].

#### Environmental Regulations to Protect Water Bodies/ Water Quality

The Clean Water Act (CWA) is an action enforcing law that regulates discharges of pollutants into the waters of the United States, among its several responsibilities. The CWA also includes guidelines to develop effective watershed plans, NPDES requirements and stormwater compliance monitoring. National Pollution Discharge Elimination System (NPDES) requires facilities that discharge to waters of the United States to obtain a permit. Molson Coors does not require a NPDES stormwater permit due to the facility's Standard Industrial Classification (SIC) code [34]. The Wisconsin Department of Natural Resources (WDNR) sets standards to aid in the state's ability to meet CWA regulations. CWA also developed effluent limitations guidelines for industrial wastewater discharges to surface waters and publicly owned treatment works, pretreatment programs for the control of industrial discharges and requirements for the final use/disposal of sewage sludge.

Section 303(d) of the Clean Water Act authorizes the EPA to assist states in creating a list of impaired waters and developing Total Maximum Daily Loads (TMDLs) for these waterbodies [35]. An effort to address nonpoint source pollution, the Wisconsin DNR aids in implementing and enforcing these TMDL regulations. MMSD has proposed to develop third-party pathogen, phosphorus, and sediment TMDL's for the Milwaukee Estuary in Southeastern Wisconsin [36]. The Wisconsin DNR provides a TMDL load map that includes TMDL state, waters, pollutants, and restoration efforts [36].

The Great Lakes-St. Lawrence River Basin Water Resource Compact is a legally binding regional compact which details how states will work together to govern water use and wastewater effluents to protect the nearby water resources [37]. The state of Wisconsin must follow guidelines of the compact focusing on water diversions. This compact requires all water-intensive businesses within the watershed to implement water conservation practices [38]. The 1972 Great Lakes Water Quality Agreement represents the commitment of the United States and Canada in restoring and protecting the waters of the Great Lakes. Water quality programs including recording of water quality data and the required transparency of this information, were later added to ensure the "chemical, physical and biological integrity" of the Great Lakes.

#### Drinking Water Pricing

The Public Service Commission of Wisconsin (PSC) determined it would be discriminatory for water utilities to charge lower rates based on income. Water rates in Wisconsin are based on the based on the cost of service and water service charges are based on the size of the water meter. Single family homes and duplexes have meters 5/8" or 3/ 4" in size. Industrial and commercial meters range from 1" to 12". Water usage charge is based on the amount of water that is used. For residential use, the charge is \$2.14 per Ccf, or 100 cubic feet, equal to 748 gallons (April 2022). Water meters measure water in Ccf [39].

The Declining Block Rate (DBR), as shown on Milwaukee Water Works water usage charts, applies to large commercial or industrial users of water in the Milwaukee area, in which the charge per volume of water decreases as water use increases [40]. The city of Milwaukee deems this rate structure appropriate due to the abundant, renewable supply of water, Lake Michigan in which most water is returned to the lake.

#### Requirements to Provide Water and Sanitary Facilities

The Occupational Safety and Health Administration (OSHA) has established requirements for employers to provide sanitary and immediately available toilet facilities (restrooms) for all workers through sanitation standards (29 CFR 1910.141, 29 CFR 1926.51 and 29 CFR 1928.110) [41].

Other sanitary requirements employers must provide include soap, air dryers, hand towels

and running water. Establishing and implementing a schedule for servicing, cleaning, and supplying each facility is required by the employer to ensure amenities are kept in a clean, sanitary, and serviceable condition. Providing potable drinking water in amounts that are adequate to meet the health and personal needs of employees is required by employers. Drinking water must be dispensed from a fountain, a covered container with single-use drinking cups stored sanitarily, or single-use water bottles. The use of shared drinking cups, dippers, and water bottles is prohibited by all employers.

#### Wastewater Discharge Standards

Wisconsin Statute 283 outlines pollution discharge elimination including statewide variance for phosphorus, standards of performance, toxic and pretreatment effluent standards, water pollutant discharge elimination permits.

MMSD rules, Chapter 11 sets Discharge Regulations and Enforcement Procedures for all users of the sewerage system served by the MMSD. A defined purpose of this chapter is to ensure compliance with all applicable State and Federal statutes and regulations. Molson Coors does not classify as a significant industrial user (SIU) according to section 11.103 of MMSD rules [42]. No categorical pretreatment standards apply as the operations do not involve dissolving or suspending metals, cyanide, grease, or toxic organic compounds in water.

#### Applicable Stormwater Regulations

- Wisconsin Statute 283.33 Stormwater discharge permits [43]
- City of Milwaukee Ordinance- Chapter 120 (impervious area and peak run-off flow) [44]
- Milwaukee Metropolitan Sewerage District (MMSD)- Chapter 13 (MMSD service area stormwater detention requirements)- Amended July 2020 [45]
- Section 404 of the Federal Clean Water Act (regulates discharges to "Waters of the U.S") [46]

#### Wisconsin Administrative Codes

- Chapter NR 116.03 (16)- Wisconsin's Floodplain Management Program [47]
- Chapter NR 151- Runoff Management (runoff pollution performance standards) [48]
- Chapter NR 216- Revised Stormwater Discharge Permits (currently in legislative review, to be signed and published in Spring-Summer 2022) [49]

#### Wisconsin Water Law

The Wisconsin Water Law, by Kent, P.G. (2001), states, "The state has general police powers to establish regulations which promote public health, safety, and welfare... The state's police power enables it to regulate any state water regardless of whether it is subject to the public trust doctrine, including non-navigable surface water and groundwater...The Wisconsin Legislature has charged the Wisconsin Department of Natural Resources (DNR) to be the principal agency for protecting water quality the State of Wisconsin... The authority of Local units of government to regulate activities in and near water comes from two sources. The first source of authority comes directly from the Wisconsin Constitution and is known as the Home Rule Amendment... The Second source of authority for local governments is statutory authority from the Legislature." [50].

Section 1.5.2 of AWS requires that water-related legal and regulatory requirements that directly affect the site are identified. These requirements have been met in this section, and the 1.5.2 indicator has been satisfied.

### 1.5.3

*The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.*



Yes

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**Comment** The primary water balance concerns within the catchment are the average annual precipitation rates within the area, the flow of the Menomonee River through the area, and the water balance of Lake Michigan. The provided calculation below estimates the annual precipitation in the watershed, a portion of which is discharged into the Menomonee River:  
 $(P_{rain} + P_{snow}) \times A_{catchment} = \text{Average Annual Total}$   
 $P_{rain} = \text{Average rainfall per year (in inches) [112]}$   
 $P_{snow} = \text{Average snowfall per year (in inches) [51]}$   
 $A_{catchment} = \text{Area of the catchment (in square miles) [52]}$

$$34.8 \text{ in/yr} + 48.4 \text{ in/yr} = 83.5 \text{ in/yr} \Rightarrow 83.5 \text{ in/yr} \times 136.12 \text{ mi}^2 = 2.64 \times 10^6 \text{ (ft}^3\text{)/yr}$$

It is estimated that  $2.64 \times 10^6 \text{ ft}^3$  falls throughout the catchment annually via snow and rain accumulation [51, 52]. Based on findings from previous sections, a portion of this water goes to the sanitary and combined sewers to be treated by MMSD, with the remaining going into the stormwater system to be discharged directly into the Menomonee River. The destination for this water is largely dependent on when the infrastructure was installed [53]. Older parts of the city are entirely combined sewer, while newer areas are separated into combined sewer and stormwater systems. Improvements to existing infrastructure would provide an area of opportunity for improvement if old, combined sewer systems can be upgraded to include a separate stormwater system. This would reduce the loading on the water treatment facilities during rain events.

The Menomonee River flowing through the catchment fluctuates seasonally, with mean high value of  $140 \text{ ft}^3/\text{min}$  in March and a low value of  $24 \text{ ft}^3/\text{min}$  in September [54]. Due to the number of impermeable surfaces in the catchment area from urbanization, stormwater runoff is a large concern within the catchment. The opportunities for improvement to direct the flow of water through the catchment include the ability to estimate the effect of replacing impermeable surfaces with green infrastructure and how reclamation projects to the Menomonee River could affect flow through the area.

A water balance for a body of water like Lake Michigan can be represented by the following [110]:

$$P + R - E = Q_{in} - Q_{out}$$

P = Precipitation into the lake

R = Runoff into the lake

E = Evaporation from the Lake

$Q_{in}$  = Inlet flows into the lake

$Q_{out}$  = Outlet flows from the lake

A sample water balance calculation for the combined Michigan-Huron basin is as follows:

$$23.44 \text{ (mi}^3\text{)/yr} + 20.42 \text{ (mi}^3\text{)/yr} - 14.37 \text{ (mi}^3\text{)/yr} = 40.81 \text{ (mi}^3\text{)/yr} - 16.62 \text{ (mi}^3\text{)/yr}$$

For any given calculated period, the equation may not appear balanced (as shown above).

This may be due to inaccuracy or uncertainty of the measurement method for the inputs, or represent a changing lake level, either increasing or decreasing. Lake Michigan contains roughly  $1180 \text{ mi}^3$  of water [111].

Section 1.5.3 of AWS requires that the catchment water-balance be quantified, to include annual and seasonal variances. It is estimated that  $2.64 \times 10^6 \text{ ft}^3$  falls throughout the catchment annually. The Menomonee River experiences seasonal fluctuations in flow with a mean high value of  $140 \text{ ft}^3/\text{min}$  in March and a low value of  $24 \text{ ft}^3/\text{min}$  in September. Finally, a sample water balance equation for Lake Michigan was provided with variances attributed to fluctuating lake levels.

**1.5.4** *Water quality, including physical, chemical, and biological status, of the catchment shall be identified, and where possible, quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be identified.*



Yes

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**Comment** This section identifies water quality through physical, chemical, and biological means in the catchment area, which includes Lake Michigan and the Milwaukee River Basin. For annual loading variances of pollutants (phosphorus, specific conductivity, and bacteria) previously identified as major concerns for the catchment, refer to section 1.3.4 Water Quality Table 3.

Impacts of climate change and urban growth on the streamflow of the Milwaukee River (Wisconsin, USA). Regional Environmental Change.

Water collected in the Milwaukee River Basin is susceptible to a variety of pollutants from point and non-point sources. Point source pollution comes from an identifiable location like a pipe or industrial site. Non-point source pollution originates across larger areas of land. For example, when water flows over agricultural fields it can pick up pesticides, fertilizer, feces, and other harmful substances before flowing into open waterways. Runoff can also acquire toxic substances when it occurs over developed land.

The Milwaukee water basin map in Figure 28 (B) above displays the amount of planted/cultivated land area in orange [55]. This area is primarily in the north of the watershed with the highest elevation. The south of the watershed is largely developed with a high percentage of impervious surface coverage. Milwaukee River Basin's varied landscape provides water access for various pollutants. Milwaukee Riverkeeper identifies 5 major pollution categories affecting the Milwaukee River Basin [58]:

#### Pathogenic Organisms

Pathogenic organisms cause harm to humans and ecosystems alike. In the spring of 1993, an outbreak of the pathogenic organism, *Cryptosporidium*, caused a major public health crisis in the city of Milwaukee [57]. *Cryptosporidium* spread through the local water supply and was not filtered out by one of the city's water treatment plants. After the outbreak, the City of Milwaukee increased water quality standards and decreased the likelihood of a similar pathogenic outbreak.

#### Oxygen-Demanding Substances

Oxygen is required by most organisms for survival. The decomposition of organic material requires substantial amounts of oxygen and can deplete water of its oxygen content which restricts the natural biodiversity of an ecosystem. In the Milwaukee River Basin, excess nitrogen and phosphorus loading contributes to oxygen depletion via algal growth (and subsequent decomposition). Non-point sources like runoff over urban and agricultural areas contribute to excess nitrogen and phosphorus loading. Milwaukee Riverkeeper's 2015 report card scored phosphorus loading an F for the Milwaukee River Basin [56].

#### Suspended Solids

Suspended Solids are typically made up of organic material or sediment particles. The major issue with suspended solids is the tendency for toxic chemicals and heavy metals to adhere to suspended solids and be transported downstream. Suspended solids can be "sedimented out" whereby they become too heavy to be suspended in water and settle into the sediment.

#### Toxic Substances

Toxic substances make up a large group of heavy metals and organic chemicals that can be emitted from point and non-point pollution sources.

#### Persistent, Bioaccumulative, Toxic Substances (PBT's)

PBT's are toxic substances which persist in the environment and bioaccumulate in the ecosystem. Their toxicity makes them harmful to the environment and humans alike.

Polychlorinated biphenyls or PCBs are one group of PBTs of particular concern in watersheds across the country.

#### Lake Michigan Water Quality Data

Lake Michigan water quality fluctuates seasonally and is dependent upon physical, chemical, and biological inputs from surrounding land and other bodies of water flowing into the lake. Primary areas of concern for Lake Michigan are like those of the Milwaukee River Basin, but also include harmful algal blooms (HABs) and fish contamination [116]. As mentioned in the previous section "Oxygen Demanding Substances," HABs can be caused by an overabundance of phosphorus and nitrogen loading within the catchment. Much of this loading comes from direct stormwater runoff carrying these pollutants into water bodies which discharge into the Lake. Fish contamination occurs when fish breathe in polluted waters and consume contaminated food sources, such as vegetation which has taken up

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heavy metals and toxic substances from water and sediments.

**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.*

  
Obs.

Comment

Both the Menomonee River, and Lake Michigan have been identified as an important water related areas within the catchment. The Menomonee River is directly impacted by stormwater discharges associated with industrial activity from the site. While Lake Michigan is not only the sole water supplier to the facility, but also immediately impacted by the Menomonee River due to the ultimate discharge to the Great Lakes Basin. Currently, both Lake Michigan and the Menomonee River provide many economic benefits, such as fish spawning areas, outdoor activities like kayaking, canoeing, trail biking/running, fishing, and avion habitats. Per the AWS Standard 2.0, Molson Coors should have knowledge of how their water-related activities and discharges on-site affect relevant IWRAs within the catchment.

The Milwaukee Riverkeeper 2020 Annual Report Card states the status of the Menomonee River currently fails to meet standards for phosphorus, turbidity, specific conductance, and bacteria. Molson Coors currently only discharge stormwater associated with industrial activity to the Menomonee River southwest of the property boundary. The site stormwater discharges associated with industrial activity have the potential to contribute specific conductance (i.e., chlorides) and turbidity to the receiving stream.

Lake Michigan is identified as an important water related area as the large water source for community and as a part of the Great Lakes Basin, which collectively account for 20% of the world's freshwater and 95% of the surface supply of freshwater in the United States. Lake Michigan water quality fluctuates seasonally and is dependent upon physical, chemical, and biological inputs from surrounding land and other bodies of water flowing into the lake. Primary areas of concern for Lake Michigan are like those of the Milwaukee River Basin, but also include harmful algal blooms (HABs) and fish contamination. As mentioned in the previous section "Oxygen Demanding Substances," HABs can be caused by an overabundance of phosphorus and nitrogen loading within the catchment. Much of this loading comes from direct stormwater runoff carrying these pollutants into water bodies which discharge into the Lake. Fish contamination occurs when fish breath in polluted waters and consume contaminated food sources, such as vegetation which has taken up heavy metals and toxic substances from water and sediments.

Fluctuations in Great Lakes water levels have occurred continually since the Great Lakes formed at the end of the Ice Age. Lake levels can affect the extent of shoreline erosion and shoreline property damage, riparian interests (beach widths and public access), dredging and shipping (depth of navigation channels), construction of marinas and other water dependent facilities, drinking water intakes, cooling water intakes for steel mills and electric generating stations, wetland acreage, and coastal flooding. Lake level records have been kept for "Lake Michigan/Huron" at various gage stations around these lakes since 1860. The "monthly average" lake levels presented below cover the time period from 1918 to present.

Obs

The site does not present the concentrations of the identified pollutants, it will be necessary to include them in the future to determine the severity of the contamination of these water bodies.

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

  
Yes

Comment

Existing water-related infrastructure includes the two drinking water intakes and water treatment plants, potable water conveyance piping, wastewater and stormwater conveyance piping, and the two MMSD wastewater treatment facilities.

The Milwaukee Water Works is owned by the City of Milwaukee. Policy is set by the Mayor and Common Council. MWW adheres to regulations of the Environmental Protection Agency (EPA) and the Wisconsin Department of Natural Resources (DNR) for facilities, operations, and water quality. The Public Service Commission of Wisconsin (PSC) sets water rates and service charges and monitors our accounting. MWW purifies Lake Michigan water to provide pure and fresh drinking water to 866,993 people in 16 communities in Milwaukee, Ozaukee and Waukesha Counties.

- Average daily pumpage in 2020 was 89.1 million gallons.
- We maintain 1,960 miles of water mains, 19,889 hydrants and 50,460 valves.
- Daily per-person, indoor and outdoor use in Milwaukee is 41 gallons.
- The utility has 345 employees in Plants, Distribution, Business, Engineering, and Water Quality work units.

Milwaukee Water Works (MWW) provides potable water to the Molson Coors site. Presently, MWW's facilities which provide water are operating at roughly 50 % capacity, allowing room for an expanding population within their service area. Treatment capacity is 360 million gallons per day (MGD), allowing the system to "provide an additional 100 MGD over current system usage without requiring expansion or affecting fire suppression needs."

Water reclamation facilities can efficiently clean only a certain amount of water a day (about 150 million gallons on a dry day and 630 million gallons during a rain event for Jones Island and South Shore combined). When more water gets into the sewers than the water reclamation facilities can handle, you need somewhere to store it so the excess water doesn't cause basement backups or sewer overflows. Prior to the Deep Tunnels, the Greater Milwaukee region used to pollute Lake Michigan with an average of 50-60 overflows a year and now we average 2.3. Although the deep tunnels can hold 520 million gallons, our climate is changing, and increasingly intense storms and record-setting rainfall in the Greater Milwaukee region make sewer overflows, basement backups, and flooding even greater threats to our community. As a region, we've invested more than \$4 billion to reduce sewer overflows. Our current financial forecast through 2027 calls for investing \$1.6 billion in clean water infrastructure, flood management, and debt financing to help protect public health and Lake Michigan.

Investment in green infrastructure (GI) is crucial to alleviate the stress on the existing water systems. The City of Milwaukee's Green Infrastructure Plan highlights for 2035, a goal of MMSD is to collect the first half-inch of rainfall on impervious surfaces, or 740 million gallons of stormwater runoff in their entire service area [62, p. 6]. The Menomonee River Watershed contains 5.7 sq miles of a combined sewer system in which high-volume rain/snow events elevate the risks of untreated sewage overflowing [62, p. 8]. The current implementation of GI may be found within the Menomonee River Watershed Restoration Plan update of 2021 [15]. This plan aims to naturalize channels by taking away concrete barriers along the Menomonee River. The MMSD Regional Green Infrastructure Plan suggests organizations have opportunities for improvements as "green roofs and rain barrels, or cisterns are the best options for treating building imperviousness in [the Menomonee River Watershed]" [64, p.47].

The MMSD 2050 Facilities Plan predicts out of 284.4 miles of pipe and 4,400 assets reviewed, 49.1 miles of pipeline are at risk of physical mortality due to asset deterioration by 2049 [117, Chapter 5 p. 14 (5-14)]. The capacity risk of the conveyance system is estimated to impact 23.1 miles of pipe or 230 assets by 2049 [117, Chapter 5 p. 14 (5-8)]. In the event of a 1 percent annual probability of rainfall, there are an estimated 58 flooded structures in the Lake Michigan Drainage and Estuaries and 147 flooded structures in the Menomonee River Basin [117, Chapter 5 p. 14 (5-36)].

1.5.7

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



Yes

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**Comment** Milwaukee has highly advanced water treatment systems. Milwaukee Water Works oversees collecting, treating, and dispersing all water to the city of Milwaukee, including the facilities at Molson Coors.

The MWW Consumer Confidence Report is a valuable resource to understand MWW's commitment to treating Lake Michigan water [66]. This site describes the general chemistry of Lake Michigan in which MWW tests [66]. There are a variety of chemicals, metals, PFAS, and even pharmaceuticals they identify, test, and treat. The facility has advanced treatment technologies, such as ozone disinfection and biological filtration treatment processes, to stay in line with safe drinking water standards. The entire process for treating Lake Michigan water can be found on the City of Milwaukee's Water Treatment Process webpage]. Referenced above in Indicator 1.5.6.

Milwaukee Metropolitan Sewage District (MMSD) provides downstream treatment of combined sewage. The MMSD currently operates at an estimated one sixth of their total operational capacity for daily use [68]. The total portion of operational capacity used is higher during and immediately following a rain event. Additionally, since 1994, MMSD has maintained a wastewater treatment performance of 98.5 %. This exceeds the EPA goal of an 85 % wastewater capture [69].

Per the Wisconsin Public Water Systems 2021 Annual Drinking Water Report, the majority of Wisconsin's public water systems met all their regulatory requirements during 2021 – 88.1% of all systems. Most violations that did occur were for failing to meet monitoring, reporting and notification requirements.

These combined factors make WASH availability a minimal risk for the catchment.

**1.6** *Understand current and future shared water challenges in the catchment, by linking the water challenges identified by stakeholders with the site's water challenges.*

**1.6.1** *Shared water challenges shall be identified and prioritized from the information gathered.*



Yes

**Comment** Three shared water challenges were identified and prioritized based on the stakeholders engagement from March 2022.

Priority #1 - Contamination, directly or indirectly, of the Menomonee River. The status of the Menomonee River as a 303(d) impaired waterway according to the EPA Clean Water Act ranks high on the priority list of shared water challenges as identified by multiple stakeholders. This identified challenge forms the foundation of the following two identified shared water challenges.

Priority #2 - Restoration and maintenance of areas around the Menomonee River or wetlands associated with the catchment was listed as another concern by multiple stakeholders.

Priority #3 - Public Perception regarding the quality of the areas along the river make residents less likely to engage in these outdoor spaces for recreation.

Although the site identifies and prioritizes shared water challenges.

**1.6.2** *Initiatives to address shared water challenges shall be identified.*



Yes



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**Comment**      Site identified the following initiatives to address the shared water challenges:

Shared water challenge # 1. Milwaukee Brewery visually inspects its storm water effluent quarterly to verify that it is not contaminating the Menomonee River. Also has procedures in place to stop spills and collect and pollutant as soon as possible.

Shared water challenge # 2. Site did not identify specific activities to address this water challenge.

Shared water challenge # 3. Milwaukee Brewery participates in Imprint Month by partnering with River Keeper, a local non-profit to perform a river cleanup/brush removal and educate employees/local communities on water stewardship efforts within the catchment. See flyer attached.

**1.7**      *Understand the site’s water risks and opportunities: Assess and prioritize the water risks and opportunities affecting the site based upon the status of the site, existing risk management plans and/or the issues and future risk trends identified in 1.6.*

**1.7.1**      *Water risks faced by the site shall be identified, and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.*   
Yes

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### Comment

A proper risk assessment strategy involves identifying the risk and attempting to quantify it by nature of severity and likelihood. In this way, a risk can be determined to be acceptable or unacceptable in its current state. For risks deemed too high, mitigation efforts should be put in place. It is important to remember that “human-based” mechanisms to mitigate risk, such as personal protective equipment (PPE) and procedural compliance, are considered the least reliable form of risk mitigation and should only be considered when other methods, such as engineering solutions, are impractical or cannot be accomplished.

The following risks have been identified:

#### Pollution of Public Waterways

The largest reputational risk, and one of the most expensive risks by way of cleanup and regulatory contamination prevention, would come from pollution of public waterways.

Chemicals are used throughout the Molson Coors facility for water treatment and cleaning/sanitation. Miles of internal piping transport chemicals, as well as materials in various stages of production, from one process to the next. Contamination from chemical storage on site is a risk that can be controlled, though never fully eliminated. When chemicals are brought on site via outside services, this constitutes an increased immediate term risk due to the connection and disconnection of supply hoses and piping.

Molson Coors has implemented the emergency response plans to ensure an appropriate and timely response to emergency events. Despite plans being in place, this should be viewed as a moderate risk overall due to the continued need for these chemicals to be on site. There are high monetary and reputational costs incurred by failure to contain a hazardous material or production material spill.

#### Wastewater infrastructure and Flooding

The condition of the surrounding wastewater infrastructure poses another infrastructure risk for the Molson Coors site. The site itself is identified as having split sanitation and stormwater drains. However, the surrounding area still maintains many solely combined sewer systems. In the event of a large rain event leading to a flood, systems of this nature can become overloaded, causing backups of combined sewage material. Since the Molson Coors site remains attached to the combined sewer system by way of its sanitation system, the vulnerability of the surrounding area to flood and backup poses a corresponding risk to the site. Current risk can be seen as low to moderate based on the probability of severe flooding events and the impacts on infrastructure vulnerabilities; however, increased severity of rain events is expected in the future due to climate change which may result in an increase in the overall risk to medium or high. Whether or not this risk increases or decreases in the future will depend on infrastructure improvement projects by MMSD, and how climate change affects annual rainfall and the frequency of major flooding events.

#### Future Sustainability (Both Internal and External of the Watershed)

A sizable portion of the agricultural products used in the Molson Coors facility for production come from areas that are currently considered water stressed per the documentation provided. The conditions that threaten sustainability within the watershed are even more severe in some areas outside the watershed, putting resource availability in jeopardy. Reduced crop yields due to water stress could impact production and revenues for Molson Coors. Finding alternative sources for these agricultural products would help reduce the impacts of water stress in these areas. This risk is considered low to moderate given current conditions but could increase depending on future climate conditions.

A potential future risk is the possibility the water consumed by the Molson Coors facility is deemed unsustainable based on the needs of Milwaukee Water Works service area. This likelihood of this risk is low, however the business impact for the risk would be critical. Additionally, many future factors could change the likelihood. If the population in the Milwaukee area increases rapidly beyond the treatment capabilities, or if those capabilities are reduced for any reason (e.g., equipment failure, maintenance and/or chemical costs to continue operations) a large consumer and net exporter of water may be scrutinized. Even if their use is not directly questioned, price increases of clean water provided by the city may increase over time. These price increases could come from the need for capital improvement projects to expand the water service or increasing chemical costs to treat the water before distribution. An increase in the price of water could impact production values, rates, and revenue. Molson Coors maintains a position as a large economic presence in the Milwaukee area, providing jobs and commerce. This status would serve as a positive argument for continuing operations in any hypothetical imposed scarcity situation. Being able to quantify

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the amount of water being removed from the Great Lakes basin to other watersheds would also be useful in the debate, while providing additional information to subsequent steps for water stewardship in accordance with AWS standards.

As the effects of climate change worsen, the most likely need regardless of outcome will be adaptation to changing conditions. Uncertainty in modeling and not knowing what mitigation strategies (if any) will be undertaken in the coming years makes exact prediction difficult. However, the report on “Wisconsin’s Changing Climate” states the following:

- Wisconsin’s average daily temperature has become three degrees Fahrenheit warmer since the 1950’s.
- The last two decades have been the warmest on record, and the past decade has been the wettest.
- Wisconsin has become wetter – average precipitation has increased 17 percent (about 5 inches) since 1950.
- Warming is happening fastest in the winter and at night.
- Southern Wisconsin has experienced the highest increase in precipitation.
- Very extreme precipitation events will increase in the future.
- Extreme events are already causing immense impacts across the state, and the frequency of those events will generally increase.

Many of these changes are having a direct impact on the catchment the Molson Coors facility resides in. Rain events are becoming more frequent and more extreme in severity. This will increase stormwater runoff within the catchment, increasing the chances of pollution to local waterways along with it. This also poses a risk to the integrity of the infrastructure moving stormwater within the catchment, as increased volume and energy of water degrade them over time. Any capital improvements to infrastructure for the area or the site should be aware of these additional risks and design accordingly. This includes increased stormwater carrying capacity as well as additional systems to slow the water and catch contaminants before they reach local waterways.

Water related risks are also identified in the annual 10K Report Filing (Molson Coors (TAP) SEC and 10K Reports) and included references to the following:

- Inadequate supply or availability of quality water
- Increased focus, including by governmental and non-governmental organizations, investors, customers and consumers on environmental sustainability matters, such as packaging waste, climate impact and water use; and
- An inadequate supply or availability of quality water could have a material adverse effect on, among other things, our sales, production processes, other costs and, in turn, profitability.

Based on the discussions above, the identified risks have been prioritized as shown

### 1.7.2

*Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.*



Yes

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Comment In some cases, these opportunities provide mitigation of reputational, regulatory, and physical risks, as well as provide opportunity for cost savings and operational efficiencies. The following opportunities have been identified and prioritized:

Priority #1 - Water Use Ratio  
An opportunity for improvement, as identified internally by Molson Coors, is increased efficiency in water use throughout the production process. Investigation should continue into how to decrease the amount of water used in sanitation either through process improvements that reduce the amount of sanitation runs required or through an internal treatment and reclamation process. In either case, this would reduce the purchased amount of water and the amount discharged for treatment by MMSD. This opportunity serves to support the AWS outcome of a sustainable water balance.

Priority #2 - Reduction of Contaminants  
With the Menomonee River being a 303(d) impaired waterway, efforts should be made to reduce pollutants that add to the total maximum daily load (TMDL) in the river. Anyone discharging into the river directly or through stormwater runoff affects these contaminant levels. Molson Coors has an opportunity to reduce its own impact on the impaired status of the river while proactively engaging in efforts to remove the river from the impaired waterway listing. This opportunity serves to support the AWS outcomes of good water quality status and important water related areas.

Priority #3 - Sewer Infrastructure Upgrade  
While Molson Coors does not have onsite treatment for wastewater generated, the Brewery does have an important role to operate and maintain conveyance systems onsite to ensure all wastewater generated is collected and effectively treated by MMSD. This opportunity serves to support the AWS outcomes of good water quality status, sustainable water balance, important water related areas, and safe water, sanitation and hygiene for all.

Priority #4 - Green Infrastructure Maintenance  
Pollutants discharged into waterways can also be reduced by maintain/expanding on-site green infrastructure. Stormwater effluent that discharges into the catchment should pass through bioswales or rain gardens. This will slow the introduction of water into the system and aid in pollutant filtration. Expansion of green infrastructure has a similar benefit and can be used to publicly demonstrate both commitment to water stewardship and advancements in the technology used to produce them. This opportunity serves to support the AWS outcomes of good water quality status, sustainable water balance, and important water related areas.

**1.8** *Understand best practice towards achieving AWS outcomes: Determining sectoral best practices having a local/catchment, regional, or national relevance.*

**1.8.1** *Relevant catchment best practice for water governance shall be identified.*



Yes

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-000335

Comment Engaging with other organizations to promote water stewardship:  
-Site partners with the NGO RiverKeeper once a year to sponsor and clean local rivers and streams. See attached document.  
-Site is part of Water Council and, as part of Molson Coors Beverage Company, is committed to CEO Water Mandate and Wash Pledge.

Contributing to multi stakeholder platform  
-Site holds a position on the Sweet Water Board, which allows communication with stakeholders on shared water challenges within the catchment and build relationships between organizations that value water stewardship.

Make information public  
-Site has made public its ESG report which is evaluated by Corporate Citizenship to assure that all the environmental compliance metrics are in accordance with ISAE3000.

Compliance  
-Site has presented evidence of water related permitting and record compliance. According to EPA ECHO report, Molson Coors does not have violations regarding the Clean Water Act. Doc attached.  
-Site presents evidence of executed inspections, reports and compliance with water related matters including root cause analysis and corrective measures.  
One of these reports has been attached.

-Molson Coors Milwaukee has an Environmental and Sustainability Engineer, with 7 yrs of experience in water compliance, oversees the implementation of the water stewardship plan and other environmental matters such as permits and compliance.

- Water Stewardship Planning: Create and execute a comprehensive water stewardship plan that is routinely reviewed and updated.
- Dedicated Staffing: Molson Coors has dedicated responsibility to the Environmental and Sustainability Engineer to provide oversight in achieving the goals of the water stewardship plan. Appointing staff to this responsibility ensures the site's overall goals will be balanced with water stewardship efforts. Water reduction efforts are driven by the FEWER and EHS Pillar Teams.
- Focus on Minimizing Environmental Losses: WCSC EHS Pillar drives efforts to minimize environmental losses including liability associated with significant environmental incidents. This process involves timely reporting, effective root cause analysis, and implementation of preventative/corrective actions.
- Process for Stakeholder Inclusion: Molson Coors holds a position on the Sweet Water Board, which allows Molson Coors to communicate with stakeholders on shared water challenges within the catchment and build relationships between organizations that value water stewardship.
- Community Affairs: Interactions and engagement with the public as well as investing in community efforts related to water stewardship, such as membership in the Water Council, sponsorship of the Water Leaders Summit, South Shore Beach/Park Clean Up, and Discovery World Freshwater Lab Sponsor.
- Educational Initiatives: Annual training in storm water and SPCC is required for all employees which educates personnel on Best Management Practices to prevent contamination.

**1.8.2** *Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.*



Yes

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-000335

**Comment** Water performance is measured by the intensity of water used per unit of beer produced. While this metric is a good indicator it is not a straight number because it is highly dependent upon brand mix as well as production volumes. Molson have set a 2025 target to reduce water consumption by 22% in 2025 taking as a baseline its average 2016 consumption of 3.58 hl/hl water to product ratio. This is part of the ESG goals of the company, however, applies to every site, including Milwaukee.

Site implemented a reclaim water system to reuse their process water and achieve the 22% target. Although, the measure has not yielded the expected results due to technical implementation problems, the site's daily reporting and monitoring practices allows it to keep track of its water balance and is working in solving this technical issue. Reclaiming water from the process is one of the brewery's best practices for water balance. See pictures attached.

THE DOC 1.3.3\_Water meters 2012 Daily Data THAT I AM ATTACHING presents the water meter readings since 2012. They implemented the reclamation system since 2012 but in the audit looks like it was for 2019. Is that important?

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



Yes

**Comment** Until 2018, the site discharged its effluent into de Menomonee River. In 2018, adequations were made to send this water to the MMSD. This action eliminated the amount of phosphorous, salt and TSS and therefore directly contribute to the improvement of the water quality. The map attached shows the modified locations of the drain system. See doc 1.3.5\_Map\_Site\_Storm\_and\_Sanitary\_Drawings.

In 2022, the re-lining and/or replacement of old sewer lines was completed. This infrastructure upgrade avoids overflow and leaching of lead and other sediments to the Menomonee River and to the wastewater treatment plant. Is important to mention that the authorities do not test for lead in the effluent, only DBO and TSS. By repairing the pipes, Molson Coors is beyond compliance in water quality. See doc attached in 1.3.4 - Effluent quality

Site makes quarterly visual inspection of the stormwater. Records show that the flow is medium/low even in wet months and the water looks in good condition. See docs attached in point 1.3.4 visual inspection.

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



Yes

**Comment** Installation and maintenance of the green roof is done by site employees and outsourced professionals. In the past months, overgrown muss diminished the roof's capacity to retain water. Muss was removed and the roof is under constant evaluation.

Rain gardens and the cistern are maintained by the site to control the runoff water that drains into the river during the winter. Rain garden will be evaluated for performance in 2023 according to the 2023 water stewardship plan.

As mentioned in 1.8.3 the lining of the old pipes and the redirection of effluent from the river to the WWTP are very important best management practices to protect the water quality of the Menomonee River and Lake Michigan.

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



Yes

**Comment** As mentioned in 1.3.8, Site provides adequate drinking water stations, bathrooms and 18 full time sanitation staff and has commit to the WASH Pledge for implementing and verifying WASH at the Workplace.

2 STEP 2: COMMIT & PLAN - Commit to be a responsible water steward and develop a Water Stewardship Plan	
<b>2.1</b>	<p><i>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.</i></p>
<b>2.1.1</b>	<p><i>A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:</i></p> <ul style="list-style-type: none"> <li>- <i>That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes</i></li> <li>- <i>That the site implementation will be aligned to and in support of existing catchment sustainability plans</i></li> <li>- <i>That the site's stakeholders will be engaged in an open and transparent way</i></li> <li>- <i>That the site will allocate resources to implement the Standard.</i></li> </ul>
Comment	A statement that includes all the required commitments was presented.
<b>2.2</b>	<p><i>Develop and document a process to achieve and maintain legal and regulatory compliance.</i></p>
<b>2.2.1</b>	<p><i>The system to maintain compliance obligations for water and wastewater management shall be identified, including:</i></p> <ul style="list-style-type: none"> <li>- <i>Identification of responsible persons/positions within facility organizational structure</i></li> <li>- <i>Process for submissions to regulatory agencies.</i></li> </ul>
Comment	<p>Site assures environmental compliance by appointing an Environmental and Sustainability Engineer, or an Environmental, Health and Safety Manager for each operation and an Environmental and Sustainability Engineer (Laurence Hill) to oversee compliance for the whole site.</p> <p>Compliance with legal and regulatory requirements is established through an extensive internal auditing process. Internal audits are led by the Corporate EHS Team with support of consultants and legal utilizing the ENHESA tool. See doc attached</p> <p>The Environmental and Sustainability Engineer keeps up to date with compliance through Molson's EHS section of GovernIT, a web-based program that is used to track legal requirements, check permits and permit activity, as well as report/track environmental incidents and corrective actions. See doc attached.</p> <p>The Appendix D of the Spill Prevention Control Plan presented in indicator 1.3.1 has a process and guidelines to submit incidents to the proper chain of command.</p>
<b>2.3</b>	<p><i>Create a water stewardship strategy and plan including addressing risks (to and from the site), shared catchment water challenges, and opportunities.</i></p>
<b>Finding No: TNR-001336</b>	
<b>2.3.1</b>	<p><i>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.</i></p>
Comment	<p>Based on the general document submitted by the site, the strategy has the required scope, direction and resources at the corporate level, however, mission, vision and strategy have been defined for Molson Coors Beverage Company.</p> <p>The site describes its strategy and does not clearly define the mission, vision and objectives.</p>


# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-000335

**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.

 closed

Comment The site presents its sustainable water management plan, which it addresses from the perspective of the shared challenges identified:

- Pollution
- Restoration/maintenance
- Public perception.

Which it breaks down by describing the following components:  
Site Risk, Site Opportunity, Project, Action, Benefits, Start Target, Completion Target, Responsible, Measured/Monitored, Budget, AWS Outcome, Completion (%), Performance Status.


Overall, the plan is consistent in all respects.  
However, in describing the outcomes of the AWS there are significant omissions. None of the proposed 2022 objectives elaborate on any identified IWRA at the catchment. For 2023 it is not specified that the IWRA can be included within its public perception objectives, Community Outreach. as its description is generic "Conduct Footprint Month event to clean up the area within the watershed".  
Another inconsistent aspect is observed in the restoration and maintenance objectives that do not consider any of the IWRA on or off site and only focus on sustainable water balance.

Evidence  
2.3.2\_Molson\_Coors\_Milwaukee\_Brewery\_-\_AWS\_Water\_Stewardship\_Plan\_updated\_2022 (1).  
The site should include off-site IWRA related objectives.  
Restoration/maintenance objectives should consider other AWS objectives in addition to sustainable water balance.  
The frequency of monitoring should be specified and how analysis of the information generated will allow the plan to be updated with the goal of continuous improvement.  
The risk should include those related to the watershed

**Finding No: TNR-001580**

**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



# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-000335

Comment	Shared Challenge	Site Risk	Site Opportunity
	Contamination	Infrastructure and Flooding	Stormwater/Wastewater Infrastructure
	Evaluation and Repair		
	Restoration/ Maintenance	Future Sustainability with Water Uncertainty	Water
	Efficiency Improvements		
	Public Perception	Pollution of Public Waterways	Community Outreach and Watershed Clean Up

The most likely water risk identified within the Emergency Response Plan is a flood event, which the plan addresses and notes actions to mitigate or adapt to such incident.

In the event of a water shortage/drought (not addressed in the plan due to it being highly unlikely) the brewery would scale back or halt production, with other breweries in the network picking up the displaced volume.

In the unlikely event that the site facilities are unable to discharge to MMSD, operations would be appropriately shut down.

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-000335

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>	🔍 Obs.
Comment	<p>The site is member of the Water Council Milwaukee and a silver sponsor of the Water Leaders' Summit: UNIFYING INNOVATION &amp; STEWARDSHIP to be held in Milwaukee Oct 5-6, 2022.</p> <p>Participates in the South Shore Beach/Park Cleanup in partnership with Milwaukee Parks and UWM School of Freshwater Sciences to obtain the blue wave certification to help maintain healthy beaches.</p> <p>Is a board member of the Southeastern Wisconsin Watersheds Trust, Inc. (Sweet Water) since 2017 where ideas about water management are discussed. As a member of the Board, Molson participates in the development of policy and strategic decision-making at board meetings held at least six times per year. Another key responsibility is to actively serve on at least one standing board committee (Governance, Finance or Resource Development). Each September, Molson Coors employees around the globe come together to build a more sustainable future by celebrating, Our Imprint Month. In Milwaukee, it partners and sponsors with a group called River Keepers to clean up a designated stream. The sponsors the Discovery World Freshwater Lab located in Milwaukee.</p> <p>All employees are trained in the key elements of the Spill Presentation Control and Countermeasures (SPCC) Plan as well as Stormwater Pollution Prevention Plan (SWPPP). Training records are maintained within the LMS and are tracked by Learning and Development (L&amp;D) Department.</p> <p>All visitors (including WASAS auditors) are required to watch a one-hour video regarding safety measures and basic procedures in case a spill or any other abnormal situation arises.</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	<p>All water is supplied to the facility via the public water systems operated by MWW. The Molson Coors Milwaukee Brewery does not own or operate any surface water or groundwater intakes. Additionally, the public water systems in this area are supplied via the abundant water resources of Lake Michigan and the drinking water treatment systems are operating at roughly 50% capacity. For these reasons, no measures have been identified by the site as required regarding respect of water rights.</p>	
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>	✅ Yes

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-000335

**Comment** A process to verify full legal and regulatory compliance at the brewery has been implemented. Compliance with legal and regulatory requirements is established through an extensive internal auditing process. Internal audits are led by the Corporate EHS Team with support of consultants and legal utilizing the ENHESA tool. Additionally, reporting and compliance deadlines are tracked via GovernIT. Any environmental incidents that occur at the facility are entered into GovernIT, which includes tracking of investigation, root cause analysis, and implementation of corrective actions. Evidence was presented in indicator 2.2.1

A copy of the letter reissuing the permit for discharging runoff water to the Menomonee River is attached and can also be found at:  
[https://dnr.wi.gov/topic/stormwater/data/industrial/ind\\_detail.asp?FAC\\_SITE\\_ID=5597&PERMIT\\_NO=S067857](https://dnr.wi.gov/topic/stormwater/data/industrial/ind_detail.asp?FAC_SITE_ID=5597&PERMIT_NO=S067857)

This permit requires that the Site assess the stormwater visually every quarter. Evidence of this records with pictures were uploaded in indicator 1.3.4. Records do not need to be submitted but need to be available upon request by the Authorities.

Compliance with effluent quality is verified quarterly by Milwaukee Metropolitan Sewage District. During the interview with this stakeholder, no complaints were made regarding the water quality of the Site.

Water is supply by the Milwaukee Water Works and is paid monthly. No extraction permits are required.

The site has a WASH compliance file uploaded in indicator 1.3.8 to assure water access and sanitation for all employees, contractors and visitors.

Print out of the Facility Report issued by EPA shows that Molson Coors Milwaukee has not have any violations since 2019. See doc attached.

**3.2.2** *Where water rights are part of legal and regulatory requirements, measures identified to respect the water rights of others including Indigenous peoples, shall be implemented.* ✔  
Yes

**Comment** Site uses the water supplied by the city and returns to the source 70% of the volume it takes. Milwaukee, the catchment and the Great Lakes are not water stress areas, therefore the operations of Molson Coors are not infringing the water rights of others.

With respect to recreational water rights, although Molson Coors discharges its storm water into the Menomonee River, visual inspection record provided by Molson show that the flow is low/medium and the water seems to be of good quality. Evidence of this records with pictures were uploaded in indicator 1.3.4

**3.3** *Implement plan to achieve site water balance targets.*

**3.3.1** *Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.* ✔  
Yes

**Comment** The site identifies the progress status of each of the objectives and actions undertaken in its sustainable water stewardship plan in water in the "Completion" column. Evidence for indicator 3.3.1

**3.3.2** *Where water scarcity is a shared water challenge, annual targets to improve the site's water use efficiency, or if practical and applicable, reduce volumetric total use shall be implemented.* ✔  
Yes

# CERTIFICATION REPORT


## Alliance for Water Stewardship (AWS)

Audit Number: AO-000335

**Comment** The site has set a goal to reduce water consumption by 22% taking 2016 as a baseline across all of its locations.  
 Water efficiency project tracking for 2022 include the following efforts:


- Central reclaim system operability and installation of ultraviolet system.
- Pasteurizer Reclaim system optimization
- Chlorine Dioxide Expansion for BM aging/PR CIPS final rinse

Although water scarcity is not a challenge in Milwaukee, the site has implemented the following measures to improve its efficiency and meet the Company's goal:  
 -Improved Cleaning (CIP) of equipment after each batch:  
 The CIP process is a multi-step cleaning process. It consists of first passing water through the pump, valve, tank and piping system to remove heavy dirt, followed by a cleaning step and a sanitizing step to rinse out unwanted residual material. The result of this process is a clean and hygienic system. The recovery of water from the last rinse for use in the first ejection rinse of the next cycle dramatically improved water use efficiency. This system has been implemented in other breweries of the company. See attached document in indicator 3.9.2. page 21.  
 The implementation of this system at Molson Coors Milwaukee posed problems with biological growth, despite ongoing chemical treatment. The problem was solved by adding a UV system to the chemical treatment.  
 A similar system was implemented in the pasteurization process.  
 -Modification of the CIP for the Blue Moon aging and package release tanks (PRT).  
 Currently, these tanks are cleaned in place (CIP) after each use.  
 The site has continued to implement water consumption reduction projects, but, due to changes in brand mix, there has been a stagnation in the reported water usage ratio. Brand mix influences key water use metrics such as frequency and duration of pipe/vessel cleanings.  
 The site annually implements measures to improve water use efficiency. in line with the goal set in 2016 to reduce its water consumption per barrel produced ratio by 22%, expecting to reach a ratio of 2.8 :1 by 2025.

**3.3.3** *Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.*   
Yes

**Comment** The site has not identified any mandatory or legally binding reallocation of water to social, cultural or environmental needs within the basin.

**3.4** *Implement plan to achieve site water quality targets*

**3.4.1** *Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.*   
Obs.

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-000335

**Comment** The water stewardship plan identifies specific targets, and its status of progress is described and identified in percentage.

Sewer infrastructure evaluation and repair is identified as an action to ensure good water quality outcome target are met by minimizing liability for potential releases and losses due to inflow/infiltration.

According to the Water Stewardship Plan, 100% of the rehabilitation project planned for 2019, 2020 and 2021 was finish in 2022 at a cost of 3.25 million. This included relining of 2,314 linear feet of pipes and rehab of 8 manholes.

Evaluation of other pipes were done in 2022 at a cost of 200,000 dollars. Relining has not started.

Other projects identified are:  
- Green Roof construction - 100% completed

See document in indicator 2.3.2.  
The AWS standard identifies that what happens in the watershed is very important, so objectives with off-site programs and actions should be included.

**3.4.2** *Where water quality is a shared water challenge, continual improvement to achieve best practice for the site’s effluent shall be identified and where applicable, quantified.*



**Comment** Water quality status of the Menomonee River was identified as shared water challenge. Since 2018, the Site has made important improvements (already mentioned) such as:

- 1- The redirection of its wastewater from the Menomonee River to the WWTP, the construction of the cistern and porous pavement, all done in 2018.
- 2- The relining of old pipes (still in execution) and explained in indicator 3.4.1
- 3- The installation of the green roof.  
Green Roof underwent a full effectiveness and status evaluation during 2022. Some problems were identified and are being addressed. Ensuring effective operation and maintenance of existing green infrastructure not only decreases the volume storm water discharges, but also minimizes the potential to pick up contaminants prior to discharge to the Menomonee River and yield detrimental impacts to water quality. Once this roof is working at 100%, it should retain and evaporate 10,890 gallon of water (1.0 gallon/sqf). See attached docs: 1.3.3\_Final W96001P15 RFA Attachment B - Tables - Porous pavement and cistern building 69 regarding the water retention capacity submitted by Molson Coors.
- 4- The site monitors all the activities that are potential pollution sources, especially those that are closed to the sewers that drain to the Menomonee River such as unloading of chemicals, barely and oil. Employees are trained to respond, contain and report any incidents to the Environmental and Sustainability Engineer and call the HAZMAT team immediately.

**3.5** *Implement plan to maintain or improve the site’s and/or catchment’s Important Water-Related Areas.*

**3.5.1** *Practices set in the water stewardship plan to maintain and/or enhance the site’s Important Water-Related Areas shall be implemented.*



# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-000335

**Comment** The site presents evidence for this indicator Various green infrastructure (GI), such as the green roof, rain garden, bioswale, permeable pavement, and cistern storage, comprise some of the Important Water Related Areas (IWRA) located on the Molson Coors campus. During the site visit it was possible to confirm the maintenance work that has been conducted recently.  
Respect to the IWRA at he catchment the site indicates that it contributes to maintaining the IWRA in the watershed during imprint month when it participates in and sponsors a designated river cleanup in partnership with River Keepers.  
AWS\_Standard\_Molson\_Coors\_Milwaukee\_Brewery\_2022, p55

**Finding No: TNR-001584**

**3.6** *Implement plan to provide access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers at all premises under the site's control.*

**3.6.1** *Evidence of the site's provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers onsite shall be identified and where applicable, quantified.*

  
Yes

**Comment** Evidence provided in indicator 1.3.8  
Adequate sanitation is provided to all workers including bathrooms and locker rooms with sinks and soap provided for hand washing, hand sanitizer dispensers, and wastewater treatment through MMSD. The 18 brewery is staffed with a full-time sanitation maintenance team of roughly 18 individuals with the primary responsibilities of cleaning common areas such as cafeterias, lunchrooms, washrooms, locker rooms, and restocking consumables throughout the brewery.  
The number of toilets required is determined by the number of employees at the worksite. Per OSHA requirements, six toilets are required for the first 150 employees and one additional toilet for every 40 employees over 150.

**3.6.2** *Evidence that the site is not impinging on the human right to safe water and sanitation of communities through their operations, and that traditional access rights for indigenous and local communities are being respected, and that remedial actions are in place where this is not the case, and that these are effective.*

  
Yes

**Comment** Site uses the water supplied by the city and returns to the source 70% of the volume it takes. The catchment is not a water stress area, there is no impingement on human rights to safe water and sanitation.

**3.7** *Implement plan to maintain or improve indirect water use within the catchment:*

**3.7.1** *Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.*

  
Yes

**Comment** The site has not included targets on indirect water use in its WSP due to the lack of identified input consumption and service providers in the same catchment.

**3.7.2** *Evidence of engagement with suppliers and service providers, as well as, when applicable, actions they have taken in the catchment as a result of the site's engagement related to indirect water use, shall be identified.*

  
Yes

**Comment** The site has not included targets on indirect water use in its WSP due to the lack of identified input consumption and service providers in the same catchment.

**3.8** *Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have.*

**3.8.1** *Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.*

  
in progress

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-000335

Comment Site did not present evidence of communicating to its water supplier (MWW) regarding the old water meters that they suspect is one of the sources for the unaccounted water in its water balance. However, its 2023 water stewardship plan includes addressing this issue. This will require communication with MWW. During the interview with Milwaukee Metropolitan Sewage District (MMSD), was clear that the communication among this organizations is good.

**Finding No: TNR-001585**

**3.9** *Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.*

**3.9.1** *Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.*



Yes

Comment - Within the catchment, Molson Coors is part of and the Sweet Water Board, a group committed to restore the Greater Milwaukee watersheds. Lauren Hills, Molson Coors’s Environmental and Sustainability Engineer, join the board in 2021 and has started the process of collaboration and feedback regarding the water stewardship plan. Evidence presented in 1.8.1.

- At International level, Molson Corrs has implemented a World Class Supply Chain (WCSC) program in all its large breweries, to track performance, drive improvements and, ultimately, improve operational efficiency, including water and energy. Complementing WCSC, members of our cross-functional, cross brewery FEWER (Fuel Energy Water Emissions Reduction) team meet regularly to identify areas for water-efficiency improvements and review gaps in performance. Supported by our Supply Chain Leadership Team, FEWER team members play an important role in sharing new and best practices across the Molson Coors network. This includes its breweries in Europe, America, Middle East and Africa and Asia.

- In the Global scheme, Molson Coors is part of The Water Council committed to CEO Water Mandate, the Wash Pledge and has published its Environmental, Social and Governance (ESG) Report in 2020 and 2021 aligned with the requirements of GRI, UNGC Communication in Progress and others. The 2022 report is attached.

**3.9.2** *Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.*



in progress

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-000335

**Comment** The Site produces daily, weekly and monthly water and energy consumption data by reading all water, electricity and gas meters. This data is compared with the predicted data to drive decisions and immediate actions as necessary, in order to achieve its corporate 2025 target to reduce water consumption by 22%. (See score card attached, and meter reading spread sheet).

Although the Milwaukee site is struggling to achieve the goal, due to technical difficulties, the Molson Coors Beverage Company, as a whole, achieved a reduction of 4.75% reduction from 2016 baseline by 2020. See doc attached Imprint of the Month 2020 verified by Corporate Citizenship in accordance with ISAE 3000.


The water stewardship plan presents the implementation of phase 3 of the water reclamation system by December 2022 and the improvement of the cleaning in process (CIP), that will allow even more water savings. The CIP process is a multi-step cleaning process. It involves first running the water through the system of pumps, valves, tanks and pipes to remove heavy soils, followed by a cleaning step and a sanitization step to rinse unwanted residual material. This process results in a clean and sanitary system. Reclaiming water from the final rinse for use in the first pushout rinse of the following cycle, we were able to drastically improve our water-use efficiency. See Imprint of the month doc attached, page 21.

The 2023 water stewardship plan includes the review of the water balance in order to have a better understanding of the unaccounted water and to achieve a 5% or less of unaccounted water.

Water consumption graph from document 1.8.1\_2022\_Brewery\_Monthly\_scorecard\_V1 need to include at least data from 2021 to 2022.

At a national level, Molson Coors Beverage Company set the goal to improve water-use efficiency in its agricultural supply chain by 10% in 2016. By 2020, it achieved a 10.1% decrease in m3 /MT based on a linear regression mode.


**Finding No: TNR-001344**

**3.9.3** *Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.*  **Yes**

**Comment** The site identifies that lining or replacing the old pipes improved the water quality of the effluent water that draining to the WWTP and the Menomonee River by removing sediment and lead leaching from the old cast iron and corroded reinforced concrete pipes. See attached assessment reports.


The 2022 and 2023 water stewardship plans show that Molson Coors is implementing or plans to implement the following continuous improvement projects:

- 1) Evaluate, prioritize and replace/replace additional pipelines.
- 2) Evaluate the green space south of the cistern (see attached document for location) to ensure that it continues to function

**3.9.4** *Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.*  **Obs.**

**Comment** The site presents evidence for this indicator Various green infrastructure (GI), such as the green roof, rain garden, bioswale, permeable pavement, and cistern storage, comprise some of the Important Water Related Areas (IWRA) located on the Molson Coors campus.

Molson Coors also contributes to the maintenance of IWRA in the catchment during the Imprint Month when it participates and sponsors the cleanup of a designated river in partnership with River Keepers.

**3.9.5** *Actions towards achieving best practice related to targets in terms of WASH shall be implemented.*  **Yes**



# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-000335

Comment      WASH inside the site is adequately provided as verified in indicator 1.3.8.  
In 2020 and 2021 Molson Coors Milwaukee donated 215,000.00 dollars in water related NGOs in the catchment.  
Since 2017, Molson Coors Corporation has donated nearly 1.8 million cans of clean drinking water to communities recovering from natural disasters.  
Molson Coors and Ball Corporation have committed to providing more than 2 million cans to the Red Cross and other organizations to help communities in crisis.  
With the widespread impact of the Coronavirus in 2020 and 2021, Molson Coors converted parts of its breweries to produce hand sanitizer distributed to first responders in Chicago, Denver, Detroit and Milwaukee. Also spearheaded an initiative to provide 154,000 cans of fresh drinking water to truck drivers across the U.S. and Canada, ensuring that drivers remained safe and hydrated and keeping the frontlines of the food and supply chain moving during the early months of the pandemic. All this was published in:  
<https://www.molsoncoors.com/uniting-together/responding-to-community-needs>

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-000335

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>	✔ Yes
Comment	Performance against the targets identified in the Water Stewardship Plan are evaluated intermittently throughout the year and progress is tracked within the 4.1 Performance Tracker Excel Based document.	
4.1.2	<i>Value creation resulting from the water stewardship plan shall be evaluated.</i>	✔ Yes
Comment	Performance against the targets identified in the Water Stewardship Plan are evaluated intermittently throughout the year and progress is tracked within the 4.1	
4.1.3	<i>The shared value benefits in the catchment shall be identified and where applicable, quantified.</i>	➔ in progress
Comment	The benefits in the catchment shall be identified and where applicable quantified. <b>Finding No: TNR-001588</b>	
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>	✔ Yes
Comment	Environmental incidents are reported and tracked via GovernIT. As part of the incident investigation process, a root-cause analysis of serious environmental incidents are completed, and preventative and corrective actions and mitigations are assigned and tracked. Water-related incidents are reviewed annually as part of the updates to the SPCC and Stormwater Plan. Evidence attached shows that Molson is in the process of updating both plans.  Site keeps records of incidents and HAZMAT team has responded as directed, none of records provided show the need for a root cause analysis.  Milwaukee area is prone to floods due to changing levels in Lake Michigan. The Site's Emergency Procedure Plan includes response activities for flood events. Although Milwaukee had mayor floods in 2020 the Molson Coors responded no flood or emergency incident. The Site prepare annual reports and they include root cause analysis.	
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>	➔ in progress
Comment	The site presents evidence of its efforts to consult with different stakeholders. <b>Finding No: TNR-001589</b>	

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-000335

**4.4** *Evaluate and update the site’s water stewardship plan, incorporating the information obtained from the evaluation process in the context of continual improvement.*

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

  
Obs.

Comment 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.

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-000335

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>
Comment	Site has maintained generic organogram which does not explicitly nominate the responsible for site's water related internal governance. Also, the positions of those accountable for compliance with water laws and regulations has not been disclosed. <b>Finding No: TNR-001781</b>
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>
Comment	The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, is communicated to internal stakeholders via email. Internal stakeholders are defined as those identified with responsibility for implementation within the Water Stewardship Plan. For the 2022 Water Stewardship Plan, relevant internal stakeholders included roughly 6 individuals from technical services, corporate EHS, and community affairs. Internal stakeholders can include Molson Coors staff as well as contracted support. External communication of the water stewardship plan is accomplished through the Sweet Water Executive Board via email or bimonthly Board Meetings. The Sweet Water Executive Board includes representation from WEC Energy Group, WDNR, MMSD, UWM, and SWRPC with roughly 11 total influential external stakeholders. Attachments: <ul style="list-style-type: none"><li>• 2022 Email to internal stakeholders</li><li>• Sweet Water Executive Board (<a href="https://www.swwtwater.org/meet-our-team">https://www.swwtwater.org/meet-our-team</a>)</li><li>• June 2022 Presentation to Sweet Water Board and follow up Email</li><li>• Previous email distribution to internal and external stakeholders (2019)</li></ul>
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>
Comment	A summary of the site's water stewardship performance, including quantified performance against targets, has not been disclosed annually to internal and external stakeholders. <b>Finding No: TNR-001782</b>
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>
Comment	The Site's shared water challenges has only been disclosed to one stakeholder (evidence shown in indicator 1.2.2). No other evidence of disclosing the plan has been presented. <b>Finding No: TNR-001490</b>

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-000335

**5.4.2** *Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.* 🚩  
in progress

Comment The Green Roof was designed based on a Stormwater Best Management Practice grant from Milwaukee Metropolitan Sewerage District (MMSD) who implemented a similar structure in its premises in 2009. For the construction of Molson Coors green roof MMSD provided guidance and experience and the Site provided labor and funds. Molson Coors Beverage Company discloses its shared water challenges at a world level in their Imprint of the Month Report and their ESG reports. However, the Milwaukee site has presented limited evidence of engagement with stakeholders.

**Finding No: TNR-001491**

**5.5** *Communicate transparency in water-related compliance: make any site water-related compliance violations available upon request as well as any corrective actions the site has taken to prevent future occurrences.*

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

Comment The Site has not had any water-related compliance violations since 2019 according to EPA report. Evidence attached in indicator 3.2.1

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

Comment No corrective actions have been needed regarding water-related compliance violations.

**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 Records disclosed by EPA show no evidence of water related violations that may pose significant and threat to humans or ecosystems sin 2017. This information is public and available for free in the EPA web page. See doc attached.

### Photographic Evidence from Audit

✅  
Yes

Comment In the pictures you can see that the brewery was visited, with a detailed description of the history of the silver, the processes, a visit to an old cellar which is now used only as a historical site. We visited the production line, chemical storage.

### Previous Findings

*All non-conformities raised in the previous audit have been satisfactorily closed.* ✅  
Yes