

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)



Audit Number: AO-000778

SITE DETAILS

Site: **Abbott CRM Sylmar**

Address: 15900 Valley View Court, 91342, Sylmar, California, UNITED STATES

Contact Person: Roy Gan

AWS Reference Number: AWS-000585

Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Core

Date of certification decision: 2023-Nov-29

Validity of certificate: 2026-Nov-29

AUDIT DETAILS

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

Audit Type(s): Initial Audit

Audit Start Date: 2023-Sep-25

Lead Auditor: Gisela Galan

Audit team participants:

Monserath Zamora, Observer

Gisela Galan, Lead Auditor

Site Participants:

Abbott CMR Sylmar, Factory EHS Manager

Abbott CRM Sylmar, Operations manager

Abbott CRM Sylmar, Environmental Manager and NCI Coordinator

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)



Audit Number: AO-000778

ADDITIONAL INFO

Summary of Audit Findings: A total of 19 findings were raised during the certification audit: no major non-conformities, 5 minor non-conformities, 14 observations.

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 30 days of receipt of the audit report by 13 December 2023.

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

The audit team recommends certification of Abbott CRM Sylmar at Core level pending approval of the corrective actions plans.

Scope of Assessment: The scope of services covers the Initial certification audit for assessing conformity of Abbott CRM Sylmar against the AWS International Water Stewardship Standard Version 2.

Abbott is located in the State of California, San Fernando Valley, in the City of Sylmar.

Abbott CRM (Cardiac Rhythm Management) assembles, sterilizes, labels, packages, and ships pacemakers, implantable cardioverter defibrillators, cardiac resynchronization therapy devices, cardiac monitors and cardiac leads.

The Site is divided in two buildings, Telfair and Valley View. Telfair host offices and stores a small part of chemical and other hazardous materials and Valle View host offices, manufacture operations and stores the majority of chemicals and other hazardous materials. Part of the manufacturing activities is polishing some of the metal components of the final products, the water produced is consider categorical by the Environmental Protection Agency and therefore is handle separately.

The audit was conducted onsite on September 25 to 28th, 2023. The onsite site visit included manufacturing areas, waste storage, offices, outdoors and important water related infrastructure such as water meters, chillers, cooling towers and internal water conditioning areas. Some manufacturing area were observed from a window to avoid contamination of the final products.

FINDINGS

NUMBER OF FINDINGS PER LEVEL

Observation	14
Minor	5

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000778

FINDING DETAILS

Finding No:	TNR-007325
Checklist Item No:	1.1.1
Status:	For information
Finding level:	Observation
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">- 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.
Findings:	Observation: Although The Site identified and mapped the catchments of its ultimate water source, the information should be integrated in a single map indicating the the name and number of the catchment and the Site's location. Figure 14 could be modified to fill this gap. This would give the site a bigger picture of its geographic location with respect with its water sources and probably guidance in the identification of water challenges since an event on the water sources or along the aqueduct pipes could affect its operations.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000778

Finding No: TNR-006292
Checklist Item No: 1.2.1
Status: For information
Finding level: Observation
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: A more detailed description of each water challenge could inform The Site of more opportunities to collaborate.

Abbott has made a substantial effort to identify and engage with stakeholders but the list is missing representatives of the site's ultimate water source, which is common for a Site that is starting the AWS journey and whose water source is far away. Note that La Aqueduct water source is 233 miles away and State aqueduct source is approximately 477 miles away.

Finding No: TNR-007301
Checklist Item No: 1.2.2
Status: For information
Finding level: Observation
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:

a) Abbott has made a substantial effort to identify and engage with stakeholders but the list is missing representatives of the site's ultimate water source which is common for a Site that is starting the AWS journey and whose water source is far away. Note that La Aqueduct water source is 233 miles away and State aqueduct source is approximately 477 miles away.

b) A more detailed description of each water challenge could inform The Site of more opportunities to collaborate.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000778

Finding No: TNR-006323
Checklist Item No: 1.3.2
Status: For information
Finding level: Observation
Checklist item: Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped
Findings: Water from humidifiers and dehumidifiers shall be included in the next water balance.

Finding No: TNR-007302
Checklist Item No: 1.3.4
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Nov-13
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: Regarding the site's receiving bodies of water, since 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 - this has not been provided.
Corrective action: Seasonal, high and low variances of Bull Creek and the Los Angeles River will be quantified by reviewing water quality reporting information from Council for Watershed Health, one of our stakeholders with a shared water challenge of water quality.

Finding No: TNR-007303
Checklist Item No: 1.3.4
Status: For information
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: Obs. - Even though The Site is not required to sample its stormwater, doing so will be a good practice since it is released in Bull Creek which has been declared impaired.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000778

Finding No: TNR-007304
Checklist Item No: 1.5.3
Status: For information
Finding level: Observation
Checklist item: The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.

Findings: The Site demonstrated a great effort to determine the catchment water balance but the information in Southern California is very fragmented, this was corroborated during the stakeholder interviews. Also, a clearly positive balance appears to be in contrast to the high water stress indicated in public tools like Aqueduct water risk atlas, or the publicized draughts. Understanding of the source catchments is also relevant. Therefore the site should continue the effort to address the data gaps and to improve the understanding of the catchment's water balance and/or other data indicating the quantitative status.

Finding No: TNR-007328
Checklist Item No: 1.5.4
Status: For information
Finding level: Observation
Checklist item: Water quality, including physical, chemical, and biological status, of the catchment shall be identified, and where possible, quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be identified.

Findings: The site looked for information on seasonal variances of the catchment water quality and so far faced difficulties but will continue the effort. This will be checked at the next audit.

Finding No: TNR-006515
Checklist Item No: 1.6.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Nov-13
Checklist item: Shared water challenges shall be identified and prioritized from the information gathered.

Findings: Explanation or description about the shared water challenges identified (water quality, water quantity and extreme weather events) is missing. The Site should make an effort to describe each challenge to better inform the targets and activities in the Water Stewardship Plan.

Corrective action: Descriptions of shared water challenges for water quality, water quantity, and extreme weather events will be expanded to be more specific.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000778

Finding No: TNR-007312
Checklist Item No: 1.8.1
Status: For information
Finding level: Observation
Checklist item: Relevant catchment best practice for water governance shall be identified.
Findings: Relevant catchment best practice for water governance have been identified however new practices should be included to demonstrate continual improvement.

Finding No: TNR-007315
Checklist Item No: 1.8.2
Status: For information
Finding level: Observation
Checklist item: Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.
Findings: Relevant catchment best practice for water balance have been identified however new practices should be included to demonstrate continual improvement.

Finding No: TNR-007314
Checklist Item No: 1.8.3
Status: For information
Finding level: Observation
Checklist item: Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.
Findings: Relevant catchment best practice for water quality have been identified however new practices should be included to demonstrate continual improvement.

Finding No: TNR-007310
Checklist Item No: 1.8.4
Status: For information
Finding level: Observation
Checklist item: Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.
Findings: Relevant catchment best practice for maintaining IWRA have been identified however new practices should be included to demonstrate continual improvement.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000778

Finding No:	TNR-007311
Checklist Item No:	1.8.5
Status:	For information
Finding level:	Observation
Checklist item:	Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.
Findings:	Relevant catchment best practice for WASH have been identified however new practices should be included to demonstrate continual improvement.
Finding No:	TNR-007308
Checklist Item No:	2.3.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Nov-13
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:	Some of the targets for the WST are not clearly defined as they are combined with actions.] The standard requires continual improvement, maintaining the status quo is not considered continual improvement. Other targets for water quality must be included.
Corrective action:	Targets will be revised to be more clearly defined and separated from the action to be taken to achieve them. The Site will include a new water quality target that is not related to status quo maintenance.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000778

Finding No:	TNR-007307
Checklist Item No:	2.3.2
Status:	For information
Finding level:	Observation
Checklist item:	A water stewardship plan shall be identified, including for each target: <ul style="list-style-type: none">- How it will be measured and monitored- Actions to achieve and maintain (or exceed) it- Planned timeframes to achieve it- Financial budgets allocated for actions- Positions of persons responsible for actions and achieving targets- Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.
Findings:	A target related to closing the gap on the information available about the catchment water balance could be useful for The Site.
Finding No:	TNR-007309
Checklist Item No:	3.9.4
Status:	For information
Finding level:	Observation
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:	To maintain continual improvement, other practices regarding IWRAs should be proposed.
Finding No:	TNR-007305
Checklist Item No:	4.3.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Nov-13
Checklist item:	Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.
Findings:	Consultation efforts with stakeholders on the site's water stewardship performance are planned but have not been executed.
Corrective action:	The Site will consult and seek feedback from its stakeholders on WSP performance by the end of the Q1 2024.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)



Audit Number: AO-000778

Finding No:	TNR-007306
Checklist Item No:	5.3.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Nov-13
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.
Corrective action:	The summary of site's water stewardship performance will be shared with stakeholders by the end of the Q1 2024 via on-site meeting. If an on-site meeting cannot be scheduled, we will disclose via virtual meeting.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000778

Report Details

Report	Value
Report prepared by	Gisela Galan
Report approved by	Neringa Pumputyte
Report approved on (Date)	13 November 2023

Surveillance

Proposed date for next audit
2024-Sep-25

Stakeholder Announcements

Date of publication	Location
11/07/2023	https://watersas.org/wp-content/uploads/2023/07/Stakeholder-Announcement-Abbott-CRM-Sylmar-CA-USA-AWS-000585.pdf
12/07/2023	https://a4ws.org/wp-content/uploads/2023/07/AWS-000585-Abbott-CRM-Sylmar-2023-Stakeholder-Announcement.pdf
31/07/2023	https://www.abbott.com/content/dam/corp/abbott/en-us/documents/pdfs/transparency/Abbott-CA-Sylmar-Public-Stakeholder-Announcement.pdf

Audit Number: AO-000778

Catchment Information

Catchment Information

The Site is located in the Los Angeles River Regional Watershed (HUC 8: 18070105). This watershed encompasses 824 square miles, 43 cities + other unincorporated communities and is home to 9 million people. The main body of water is the LA River which is 55 miles long, runs from west to east and then south to drain to the Pacific Ocean. The majority of the approximately 100 permittees registered in the National Pollutant Discharge Elimination System (NPDES) released directly to the this river. In general, pollutants from dense clusters of residential, industrial and other urban activities have impaired water quality in the middle and lower watershed

(https://www.waterboards.ca.gov/rwqcb4/water_issues/programs/regional_program/Water_Quality_and_Watersheds/los_angeles_river_watershed/la_summary.shtml).

LA River Regional Watershed is one of the largest and most diverse in the region in terms of land use patterns. To ease its management, it was subdivided into 4 subwatersheds (HUC 10's), each divided into smaller local watersheds. Abbott is located in the San Fernando Valley, in Sylmar City, Upper Los Angeles River (HUC 10's), local watershed Bull Creek (180701050204), which covers 22 square miles.

Due to major flood events at the beginning of the century, by the 1950's most of the LA River was lined with concrete. The Sepulveda Flood Control Basin, located in the San Fernando Valley, is one of the few section of the river with soft bottom. The Basin is a 2,150-acre open space upstream of the Sepulveda Dam and collects flood waters during major storms.

Because the area is periodically inundated, it remains in a semi-natural condition and supports a variety of low-intensity uses as well as supplying wild life habitat. Here is where Abbott collaborates with other stakeholders.

(https://www.waterboards.ca.gov/rwqcb4/water_issues/programs/regional_program/Water_Quality_and_Watersheds/los_angeles_river_watershed/la_summary.shtml).

Abbott's stormwater discharges indirectly in Bull Creek, a tributary of the LA River. Its process water is treated all the way through dichlorination by a third party before being discharge into another tributary of the LA River or the river itself.

In general, California is under a severe drought that depleted all major reservoirs and underground basins. However, the rain and snow recorded at the end of 2022 and throughout 2023 left most of the reservoirs at full capacity. Restrictions on water use were eased and at the same time most of the cities are required to implement permanent water conservation measures. The message is contradictory.

From the governance perspective, the Site's catchment is LA River because its main activities are regulated by public agencies that oversee the whole region. From the water stewardship and stakeholder's perspective, The Site has chosen Bull Creek because it can deliver more local impact. Risk was assessed based on both catchments.

See attached maps of the three watersheds and a fourth map indicating the location of Sylmar, CA.

CERTIFICATION REPORT

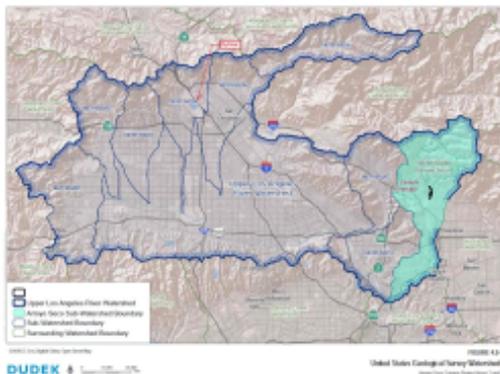
Alliance for Water Stewardship (AWS)

Audit Number: AO-000778



Abbott is located in the city of Sylmar. See location in red letters in the upper center of the map.

1.1.1_Bull Creek Subwatershed_HUC-10.JPG



1.1.1_Upper Los Angeles Watershed (HUC-10).JPG

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000778

Client Description and Site Details

Client/Site Background

Abbott CRM (Cardiac Rhythm Management) assembles, sterilizes, labels, packages, and ships pacemakers, implantable cardioverter defibrillators, cardiac resynchronization therapy devices, cardiac monitors and cardiac leads. The site was owned by St. Jude Medical until 2017 when it was bought by Abbott. Now it is the CRM division headquarters. That is why some of the evidence presented still says St. Jude Medical. The Site has been updating the permits as they are renewed.

The Site is divided in two buildings, Telfair and Valley View. Telfair host offices and stores a small part of chemical and other hazardous materials and Valley View host offices, manufacture operations and stores the majority of chemicals and other hazardous materials. Therefore most of the water related infrastructure is located in Valley View. Part of the manufacturing activities is polishing some of the metal components of the final products, the water produced is consider categorical by the Environmental Protection Agency and therefore is handled separately.

To provide optimum environment for its 1,300 employees and its business, the Site requires: humidifiers, dehumidicators, reverse osmosis systems that supply water to chillers, cooling towers and the "water loops" where water passes through UV, micro and endotoxin filters before entering the manufacturing process. The total under roof footprint of the Site is 450,000 square feet.



Abbott CRM Sylmar site boundaries.png

Summary of Shared Water Challenges

Summary of Shared Water Challenges

The following water challenges are shared between Abbott and at least one of the stakeholders:

- Water quality
- Water quantity
- Extreme weather events

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000778

0.1 General Requirements for Single Sites, Multi-Sites and Groups	
0.1.1	<i>Eligibility Criteria</i>
0.1.1.1	<i>The site(s) occupy one catchment OR an exception has been granted.</i>
Comment	The Site occupies one catchment: Bull Creek (180701050204)
	✔ Yes
0.1.1.2	<i>The scope of the proposed certification shall be under the control of a single management system.</i>
Comment	The site is a single management system.
	✔ Yes
0.1.1.3	<i>The scope of the proposed certification shall be homogeneous with respect to primary production system, water management, product or service range, and the main market structures.</i>
Comment	The Site is a homogeneous system.
	✔ Yes

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000778

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.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000778

Comment	Evidence:
	Site boundaries - Mapped in Abbott's Manual
	Water related infrastructure. 1.1.1_Chilled Water Lines.pdf 1.1.1_60080090_PWL1_Process Water Loop 1.pdf 1.1.1_60081413_Process Water Loop #2.pdf 1.1.1_600085794_ES Process Water Loop #3.pdf 1.1.1_60099104_Rev A_RO-A.pdf 1.1.1_60099105_Rev A_RO-B.pdf 1.1.1_Telfair Plumbing Plan.pdf 1.1.1_Diagram Water source and ultimate receiving bodies of water Abbott.pptx 1.1.1_Abbott CRM Sylmar ultimate water sources.pdf
	Water service provider and ultimate water source - Mapped in Abbot's Manual
	Wastewater service provider and ultimate receiving bodies of water - 1.1.1_Abbott CRM Sylmar Wastewater, Stormwater, and IWRA Map.pdf 1.1.1_Diagram Water source and ultimate receiving bodies of water Abbott.pptx
	Comments: Site boundaries: The Site is located in a light industrial park, surrounded by other companies such as Pearson Dental, Rowe Furniture Coop. and Siege. At the west is highway #5 and Van Norman Complex. The Site is divided in two buildings (Telfair and Valley View), located in the same industrial park but not adjacent. The Telfair building holds offices and stores part of the hazardous supplies, the Valley View building holds the manufacturing section, some offices and stores the majority of hazardous supplies and waste material.
	Water-related infrastructure: Water-related infrastructure was mapped for both buildings, including inflows, outflows, piping network, sewer and runoff discharge points, bathrooms, chillers, cooling towers and water conditioning areas (water loops) for manufacturing. The reverse osmosis system is placed next to the water loops therefore are mapped as the same unit. Roof top humidifiers and dehumidifiers are located next to the chillers, this equipment maintains the temperature and humidity required by the manufacturing area. It is important to note that, although figure 12 (Abbott's Manual) shows that categorical water is discharged in the clarifier and later in the sewer system, the water treated in the clarifier is non categorical water. The categorical water produced by the site is treated off site by a third party. This will be explained later. Figure 7 to 13th in Abbotts Manual map all water related infrastructure.
	No water sources providing water to the site that are owned or managed by the site or its parent organization were identified.
	Water Service Provider: The Site's water provider is the Metropolitan Water District who operates the Joseph Jensen Treatment Plant. It obtains water from three sources: LA Aqueduct (15%),The State Water Project (73%) and underground or recycled (2%). Los Angeles Aqueduct brings water from the Owens Valley and Mono Basin (Carroll Creek-Owens Lake # 180901030407). The State Water Project takes water from Lake Oroville (catchment Oregon Gulch-Feather River #180201590202). The Site's ultimate water sources were mapped. Abbott does not receives water from the Colorado River. Note on Figure 16: The State Water Project passes through the Sacramento-San Joaquin River Delta Watershed but this last one is not part of the water source. In Abbott's Manual, Figure 14 shows the Site's location and the two main water sources, Figures 15 and 17 show the water sources separately.

Audit Number: AO-000778

Site catchment:

The Site is located in the LA River Regional Watershed (HUC 8: 18070105), Abbott is located in the Upper Los Angeles River (HUC 10's), local watershed Bulls Creek (180701050204). A map with title, reference points, scale bar, legend, border, name of the two main structures was identified.

Discharge points and wastewater service provider (if applicable) and ultimate receiving water body or bodies.

Abbott has three main discharge points:

a) stormwater runoff:

Discharged in the municipal storm water system, where eventually reaches the LA River via the Bull Creek.

b) Categorical process water:

Abbott's categorical wastewater is treated off site at the US Ecology Treatment, Storage, and Disposal Facility (TSDf) in Beatty, NV. located in the Carrara Canyon Watershed #180902020602, approx. 375 miles from Abbott. Figure 20 of the main document.

c) Domestic and non categorical process water:

Released into a clarifier for sediment separation, and from there to the municipal sewer system and the waste water treatment plant. Wastewater service is provided by Los Angeles Bureau of Sanitation (LASAN) via Donald C. Tillman Water Reclamation Plant (DCTWRP). The DCTWRP treats up to 80 million gallons/day all the way through dichlorination. 2.5 million gallons of treated water are released in the Japanese Gardens (and artificial lake and gardens), property of LASAN. The rest of the effluent drains to the Wildlife Lake, Balboa Lake and golf courses in the Sepulveda Basin. The ultimate discharge point for the DCTWRP is Los Angeles River directly and indirectly via Lake Balboa, Wildlife Lake, Hayvenhurst Channel, Haskell Channel and Bull Creek. Source: DCTWRP NPDES Permit No: CA0056277. All this bodies of water are mapped in figure 21(Wastewater, Stormwater, and IWRA Map) of the main document.

Catchment(s) that the site affect(s):

The site's wastewater discharges affect its own local catchment Bull Creek (180701050204), the LA River Regional Catchment (HUC 8: 18070105) and the Carrara Canyon Watershed #180902020602. All mapped in figures 3, 4 and 20 of the Abbott's Manual.

Catchment(s) that the site is reliant upon for water:

The Site relies upon water from two catchments: Oregon Gulch-Feather River (180201590202) via The State Aqueduct and Carroll Creek-Owens Lake (180901030407) via the Owens River Aqueduct located 233 miles northerly of Los Angeles which taps into the snow of the eastern side of the Sierra Nevada. Mapped in figures 18 and 15 of the main document.

See evidence: 1.1.1 Diagram Water source and ultimate receiving bodies of water Abbott.pptx for better understanding of the Abbott's water service providers.

The Site has presented sufficient evidence to satisfy this indicator.

Observation: Although The Site identified and mapped the catchments of its ultimate water source, the information should be integrated in a single map indicating the name and number of the catchment and the Site's location. Figure 14 could be modified to fill this gap.

1.2

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

CERTIFICATION REPORT

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- 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.*


Obs.

CERTIFICATION REPORT

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Audit Number: AO-000778

Comment	Evidence
	<p>1.2.1_Stakeholder Map_final_27June2023.pdf 1.2.1_5.4.2_RE Alliance for Water Stewardship - Stakeholder Engagement LASAN.msg 5.4.2_RE Alliance for Water Stewardship - Stakeholder Engagement - FTBML_ 5.4.2_RE Alliance for Water Stewardship - Stakeholder Engagement - LARWQCB_ 5.4.2_RE Alliance for Water Stewardship - Stakeholder Engagement - LAW_ 5.4.2_RE Alliance for Water Stewardship - Stakeholder Engagement - SBW_ 5.4.2_RE Alliance for Water Stewardship - Stakeholder Engagement_SNC_ 5.4.2_Stakeholder Engagement_Council District 7.msg 5.4.2_Thank You for attending Water Supply and Conservation Measures Event.msg 5.4.2_ULAR - SCWP Steering Committee Meeting.msg</p>
	<p>Comment:</p> <ul style="list-style-type: none">- Stakeholders and their water-related challenges, including a brief description of some of the challenges, were identified being the most common:<ul style="list-style-type: none">Water quantity (50%)Governance (100%), specially coordination and policy coherence, also mentioned by two of the four stakeholders interviewed.Extreme weather events (33%)WASH was not mentioned by any stakeholder.See Table 2a in Abbott's Manual.- stakeholder identification A confidential stakeholder identification manual developed for Abbott Corporation guided Abbott Sylmar in the development of this indicator. This document was presented and explained during the audit. It informs The Site how to identify, describe, approach, engage and identify water related challenges to elaborate the influence/interest and power/interest matrices. As can be observed in the stakeholder matrix, it covered all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people; considering the physical scope identified. However, it did not included representatives of the site's ultimate water source: Oregon Gulch-Feather River (180201590202), Indian Spring-Frontal Mono Lake (180901010204) and North Fork Bishop Creek-Owens River (180901020705).-Evidence of stakeholder consultation The Site identified and reached to 13 stakeholders but only six were interested in participating. See attached evidence of emails and participation in several activities.-Degree of stakeholder engagement A Stakeholder matrix of current degree of influence/power vs interest of the stakeholder is provided next to the stakeholder matrix. The Key players that need to be managed closely are The Department of Water and Power (DWP), the company that authorized the turf removal on Abbott's front lawn (KBC) and Sylmar Neighborhood Council (SNC). None of the stakeholders fell in the two bottom quadrants. <p>Observation: Abbott has made a substantial effort to identify and engage with stakeholders but the list is missing representatives of the site's ultimate water source which is common for a Site that is starting the AWS journey and whose water source is far away. Note that La Aqueduct water source is 233 miles away and State aqueduct source is approximately 477 miles away.</p> <p>A more detailed description of each water challenge could inform The Site of more opportunities to collaborate.</p> <p>Finding: Abbott has presented enough evidence to comply with this indicator.</p>

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000778

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.* 🔍
Obs.

Comment Evidence:
Abbott's Manual - Table 2a column "Site's Potential to Influence Water Stewardship in the Catchment"

Comment:
Abbott has identified the proper mean to engage with stakeholders:
Partner with 3 stakeholders - Los Angeles Department of Water and Power, Los Angeles Bureau of Sanitation – Watershed Protection and KBC

Consult - Fernandefio Tataviam Band of Mission Indians

Involve - Others

Current and potential degree of influence between site and identified stakeholders within the catchment and ultimate receiving water body for wastewater has been identified. However, only one representative from the site's ultimate water sources was identified.

Observation:

a) Abbott has made a substantial effort to identify and engage with stakeholders but the list is missing representatives of the site's ultimate water source which is common for a Site that is starting the AWS journey and whose water source is far away. Note that La Aqueduct water source is 233 miles away and State aqueduct source is approximately 477 miles away.

b) A more detailed description of each water challenge could inform The Site of more opportunities to collaborate.

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-000778

Comment	Evidence:
	<p>1.3.1_2023 HMBP_Valley View_28Feb2023.pdf 1.3.1_2023 HMBP_Telfair_28Feb2023.pdf 1.3.1_SPCC Tier 1 template updated_2019 1.3.1_2022-11-09 Emergency Response Plan.pdf</p> <p>Comment: A detailed emergency response plan that includes situations such as severe weather, flood, earthquake and chemical spills among others was presented. A valid Spill Prevention and Counter measure control Plan was identified.</p> <p>The Site has the capacity to store 2,620 gallons of diesel above ground, making it a Tier 1 facility according to the Environmental Protection Agency (EPA). Tier 1 facilities are allowed to self-certify their Spill Prevention Control and Countermeasure Plan by following the template provided by EPA. Evidence attached shows that The Site has complied with this requirement.</p> <p>Besides diesel, The Site stores hazardous substances such as alumina powder, argon gas and isopropyl alcohol. This requires a Chemical/Bio-Hazard Contingency Plan that must be submitted annually to California EPA. This plan is part of Hazardous Material Business Plan which must be presented annually and includes:</p> <ul style="list-style-type: none"> -Inventory of hazardous materials at a facility. -Emergency response plans and procedures to be followed in the event of a reportable release or threatened release of a hazardous material. -Requirements to train employees in safety procedures in the event of a release or threatened release of a hazardous material, including onboarding for new employees and annual refresher courses for existing employees. -A site map that depicts north orientation, loading areas, internal roads, adjacent streets, storm and sewer drains, access and exit points, emergency shutoffs, evacuation staging areas, hazardous material handling and storage areas, and emergency response equipment was identified. Abbott has complied with this requirement. Evidence attached.
1.3.2	<p><i>Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped</i></p>
	<p> Yes</p>

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000778

Comment Evidence:
1.3.2 Site water balance map_T12 Sylmar - Documentation_3.2.1_updated 27Sept2023.docx

Comment:

A water balance diagram including total intake, irrigation, kitchen, industrial process, sanitary and cooling towers and losses was presented for Valley View building. The biggest water consumption is sanitary (8.76MMgal/yr.) and irrigation (2.4MMgal/yr.). The Site is working on eliminating the grass to address this consumption.

As explained in 1.1.1 a portion of the waste water generated is considered categorical water and may not be discharge in the sewage system. This categorical waste water is collected at the source point, stored in 55 gallon drums and later send to the state of Nevada for proper treatment. This new procedure was established in November 2022. To date, The Site has only collected 2,575 gallons, volume that was deemed nonsignificant for the water balance, but it will be included in the balance for 2024.

This categorical water is indicated in purple on page 1 of the evidence attached.

Telfair's water balance is simpler because no manufacturing activities take place here. As in Valley View, sanitary represents the biggest water consumption (1.05MMgal/yr.)

Site water balance, including inflows, losses, storage, and outflows was identified and 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-000778

Comment Evidence:
Abbott's Manual - Abbott CRM Sylmar_AWS Plan_V2.docx
Environmental Data - Water (AWS Site Water Balance).xlsx

The Site Water Inflow (WI) in 2022 consisted of:

- 19,548,232 gallons of water from LADWP (DWP); and
- 4,113,589 gallons of water from precipitation (P)

The Site does not have any water storage on-site, therefore 0.0 gallons (S)

The Site Water Outflow (WO) in 2022 consisted of:

- 3,513,263 gallons of water lost through evaporation from the Site's cooling towers for HVAC (E);
- 13,036,719 gallons discharged to the sanitary sewer (SD);
- 2,918,250 gallons used for irrigation (I);
- 3,493,244 gallons discharged to the storm drain from rain contacting impervious surfaces (SW);
- 620,345 gallons infiltrating to groundwater from rain contacting pervious surfaces (GI);

and

- Estimated 80,000 gallons discharged to storm drain from October 22, 2022 fire hydrant incident (FI)

Based on this information, the Site's Water Balance equation in gallons for 2022 is:

Water Inflow = Water outflow - storage
23,661,821 gallons = 23,661,821 gallons - 0.0 storage

Abbott reports that its water usage increases during the summer months. However it has not experienced any water-related impact and understands that providers have sufficient water and system flexibility to meet the facility's peak water demands.

Even though the Site has no water restrictions, and the reservoirs are at its highest due to the abnormal rains, it's catchment as well as the catchments that The Site is reliant upon for water source, are experiencing drought, and consequently, there is a water-related challenge that would be a threat to good water balance for people or environment. Therefore, being aware of the water availability in the area in general and water level in the reservoir it is important.

A graph indicating quarterly water usage from 2019 to date reflects an increase in water consumption between the second and the third quarter of every year coinciding with the summer season in California. Evidence attached.

Finding
The Site presented enough evidence to satisfy this indicator.

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.*


No

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000778

Comment Evidence:
1.3.4_LADWP 2022_Drinking_Water_Quality_Report.pdf
1.3.4_Cooling Tower Water Quality Data.pdf
1.3.4_US Ecology ECHO Database.pdf - Detailed Facility Report for US Ecology Nevada
190172_NEC.pdf - Valley View building
Telfair NEC 2023-2024.pdf - Telfair building
1.3.4_Donald Tillman effluent report.pdf

Comment:

Water source:
Site does not have any on-site water source.

Quality of Provided waters:
According to the 2022 Water Quality Report published by LA Department of Water and Power, Tables 1, 2 and 3, the water complies with drinking standards. The reservoir at the Joseph Jensen Plant is covered to prevent the formation of bromate which is a byproduct of ozone disinfection, formed under the sunlight for chlorinated water. Evidence attached 1.3.4_LADWP 2022_Drinking_Water_Quality_Report.pdf page 14.

QUALITY OF SITE'S EFFLUENT:

-Storm water: The Site maintains a Non Exposure Certification (NEC). This is a certification issued by State of California Water Board for those light industry facilities where all industrial activities are conducted inside buildings and where all materials stored and handled are not exposed to storm water, therefore the water is not polluted. An NEC certified site is exempt from storm water monitoring. Source: no_exposure_certification_form_06.doc (live.com)

-Process water cooling tower: water analysis performed by a third party, indicate that all parameters (physical and biological) are within limits. Evidence attached.

-Process water clarifier:
Effluent parameters within the established limits. Evidence attached.

- Process water categorical:
Sent for appropriate handling to the company US Ecology Nevada in the State of Nevada. Based on The Detailed Facility Report record from 2018 to date published by EPA, this company is in compliance and has not presented any violation. See evidence attached. Manifesto of shipping effluent off site was observed by the audit team, but it is confidential.

RECEIVING WATER BODIES:

As stated in indicator 1.1.1, The Site's effluent is treated in Donald Tillman WWTP, whose final receiving body of water is the LA River via Bulls Creek, Wild Life Lake, Sepulveda Basin and Balboa Lake. At the moment, water quality is monitored in three locations: Bulls Creek, LA River and Balboa Lake.

-LA River
The impact of Donald Tillman WWTP on the LA River is monitored in two stations, one upstream and one downstream. The Los Angeles River Watershed Monitoring Program 2021 Annual Report indicates that:
a) The statistical threshold value (STV) water quality objective of 320 MPN/100mL for REC-1 beneficial use was attained for approximately 95% of upstream samples and 75% of the downstream samples (at Balboa Lake) during the 2021 sampling year.
b) There were five exceedances upstream of DCTWRP effluent and three exceedances of the NH3-nitrogen WQO downstream.
c) Downstream concentrations of arsenic, zinc, lead, copper, and cadmium were below both chronic and acute CTR criteria.

-Bull Creek

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000778

Bulls Creek, one of the bodies of water where Abbott discharges its storm water, is declared impaired for ammonia, low oxygen, and Total Toxic Chemicals. It can be presumed that the Site does not contribute to the impairment of this creek because its activities are conducted inside buildings and the supplies, final product and waste don't have contact with storm water. This was evidence during the site visit and by a NEC (Non Exposure Certificate) issued by State of California Water Board to Abbott. Evidence attached.

-Balboa Lake - See comment on LA River.

-Wildlife Lake

Information regarding the water quality of this lake is not accessible however, The WWTP treats its water up to tertiary treatment so, it can be presume that its effluent is not deteriorating the water quality of Wildlife Lake.

Finding

Obs. - Even though The Site is not required to sample its stormwater, doing so will be a good practice since it is released to Bull Creek which has been declared impaired.

Minor - Regarding the site's receiving bodies of water, since 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.

Water quality of the site's water source(s), provided waters, effluent and receiving water bodies was partially quantified.

Finding No: TNR-007302

Finding No: TNR-007303

1.3.5	<i>Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.</i>	 Yes
Comment	<p>Evidence</p> <p>1.3.5\SPCC Tier 1 template updated_2019 Revision.pdf</p> <p>1.3.5\2023 HMBP_Valley View_28Feb2023.pdf</p> <p>1.3.5\2023 HMBP_Telfair_28Feb2023.pdf</p> <p>2022-11-09 Emergency Response Plan.pdf</p> <p>Comment:</p> <p>Sources of pollution were identified and mapped in the attached documents.</p> <p>Note: The owner of the documents appears to be St. Jude Medical. This was the original owner of the facility, Abbott is in the process of changing the permit name however, the date of the documents is 2023.</p> <p>Site has provided enough evidence to satisfy this indicator.</p>	
1.3.6	<i>On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.</i>	 Yes
Comment	No on-site important water related areas were identified.	
1.3.7	<i>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.</i>	 Yes

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000778

Comment Evidence: Abbott's AWS Manual.

Comments:
 The total water related cost for 2022 was 3,715,437.26 dollars, the biggest expense is energy (2,944,215.98) required for chillers, cooling towers, etc. followed by water supply and wastewater services (269,360.78). Table 4 of Abbott's Manual presents detailed water cost for 2022.

The Site does not directly generate any water-related revenue. However, it does contribute value through the following work:

- a) Social value: Increasing awareness of importance of water stewardship and motivating stakeholders in the water basin to seek similar accreditation
- b) Cultural Value: The Site's volunteer work for habitat cleanup of the Sepulveda Basin Wildlife Reserve helps ensure residents can continue to enjoy the many benefits of the Sepulveda Basin.
- c) Economic Value:
 - i. Discharging wastewater to LASAN and indirectly participating in their beneficial use of reclaimed water, and thereby preserving catchment quantity
 - ii. Providing a stable revenue source to water and wastewater utilities.

The Site has identified its annual related water cost for 2022 and presented a description of the social, cultural and environmental value generated.

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

Comment The Site received 100% in all categories of the WASH self assessment. See evidence attached.

An impeccable cafeteria with several food stations, subsidized by Abbott to keep the cost accessible for employees, was also identified by the audit team during the Site's visit.

Levels of access and adequacy of WASH at the site were identified.

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 Evidence: Abbott's Manual - Abbott CRM Sylmar_AWS Plan_V2.docx page 69

Comment:
 Evidence presented indicates that suppliers are located outside the Site's catchment.

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 Laundry service for reusable lab coats and gowns for laboratories and cleanrooms are outsourced from a company located outside the Site's catchment.

1.5 *Gather water-related data for the catchment, including water governance, water balance, water quality, Important Water-Related Areas, infrastructure, and WASH*

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000778

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 Evidence:
Abbott's Manual - Abbott CRM Sylmar_AWS Plan_V2.docx page 30

Comment:
The Site identified and described 11 water governance initiatives such as: The City of Los Angeles OneWater LA 2040 Plan; Los Angeles County Public Works – LA River Master Plan; MWD Integrated Water Resources Plan (IRP); LA County Safe Clean Water Program (SCWP); LADWP Technical Assistance Program (TAP) and LADWP Turf Replacement Program.

Abbott has chosen to participate in 3 of these 11 initiatives:
Los Angeles County Public Works – LA River Master Plan: Participate in at least one cleanup event for the Sepulveda Basin Wildlife Reserve by end of 2023

LA County Safe Clean Water Program (SCWP): Attend two (2) Steering Committee (WASC) meetings to identify and support water projects in the catchment.

LADWP Turf Replacement Program: Engage with the administrator of the industrial park (KBC) where Abbott is located to present water savings potential from exterior turf replacement and get its approval.

Water governance initiatives have been identified to inform the Site of possible opportunities for water stewardship collective action.

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

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000778

Comment Water-related legal and regulatory requirements applicable to Site's discharges are given in:

- a) Los Angeles Charter and Administrative Code, Section 671-673
States that the City of Los Angeles has free and exclusive right to all the water flowing in the river and beneath the surface in the bed of the river.
Source: https://codelibrary.amlegal.com/codes/los_angeles/latest/laac/0-0-0-3320
- b) Site's Industrial Wastewater Permit Number W-576880 and W-475489
Permit to discharge in the sewer system including monitoring frequency, requirements, characteristics, penalties, etc.
- c) Code of Federal Regulation, Chap 1, part 112.
Presents general requirements for the Spill Prevention Control and Countermeasure (SPCC), including specific discharge prevention and containment procedures.
Source: <https://www.ecfr.gov/current/title-40/chapter-I/subchapter-D/part-112?toc=1>
- d) California State Water Resources Control Board (SWRCB) - Industrial Storm Water Program.
Regulates industrial storm water discharges and authorized non-storm water discharges from industrial facilities in California.
- e) Building, City, and Fire codes (includes potable water and sewer construction standards)
- f) Los Angeles Department of water and Power (LADWP) legal requirements are governed by the SWRCB's Drinking Water Program.
- g) LADWP's Urban Water Management Plan, May 29, 2021 covers:
 - Water supply and resiliency in Chapter 11
 - Water quality in Sections 4.5, 5.6, 6.2, and 7.2
 - Water pricing in Section 3.2
 - Water rights in Sections 4.2, 5.1-5.6, and 9.1
- h) Wastewater treatment service provider's (LASAN) discharges (primarily related to water quality) are governed by their National Pollutant Discharge Elimination System (NPDES) permit and the federal regulations given in 40 CFR, Part 503.
- i) Sewer service rates are regulated under Los Angeles Municipal Code Section 64.41. They are based on metered water use and are dependent on the user's categorization as a residential or commercial user.
- j) Chapter 8 California Code of Regulations § 8397.4, requires employers with over 150 employees to have at least 1 toilet per 40 employees.
- k) EBEWE (Energy and Water Efficiency Ordinance) - The Ordinance requires buildings to achieve certain efficiency targets or perform audits and retro-commissioning on a 5 year cycle determined by the property's Building ID.

Applicable water-related legal and regulatory requirements, including legally-defined have been identified. The Site uses water from the public provider, therefore does not have any water rights.

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


Obs.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000778

Comment Evidence:
Abbott's Manual

Comment:

Due to the lack of available information on all water process within the Regional LA River catchment, the Site is only able to provide a limited catchment water balance based on 2020 information obtained from LADWP's 2020 Urban Water Management Plan (UWMP), Metropolitan Water District's (MWD) 2020 UWMP, MWD's historical water deliveries, and the ModelMyWatershed webpage.

The following assumptions and limitations exist:

- No information was available for the local watershed.
- This is a balance for the regional watershed. Therefore includes all the supply needed for the 9 million habitants, not just Bull Creek Watershed.
- Information from LADWP does not divide water usage by catchment level as LADWP's service area covers areas beyond the ULAR (Upper Los Angeles River) catchment.
- Water supplies from other water districts (besides LADWP) within the catchment have not been included within this calculation.
- Not all data used in the calculation pretrain to 2020. If recent data was not available, older data was used.

AF: Acre feet of water, a column of water of 1 foot high with a surface of one acre.

WATER INFLOW

Supply from the Department of Water and Power (497,386 AF) + Supply from the Metropolitan Water District (95,227.9 AF) + Precipitation (258,822.63 AF). Stormwater capture/storage (S) = 64,000 AF (2020) included in precipitation

Water In = 497,386 AF + 95,227.9 AF + 258,822.63 AF = 851,436.53 AF

WATER OUTFLOW

Treated water from WWTP discharged to LA River (47,708.56 AF) + Stormwater runoff to LA River (32,165 AF) + Evapotranspiration (193,463.75 AF) + Outdoor Water Use (189,636.45 AF) + other uses

WO = 47,708.56 AF + 32,165 AF + 193,463.75 AF + 189,636.45 AF + Other Uses

Water Out = 462,973.76 AF + Other Uses

Catchment water balance: Water In + Storage = Water Out + other uses
851,436.53 AF + 64,000 AF = 462,973.76 AF + other uses missing data
452,462.77 AF = Other Uses

Published information does not account for water loss through pipe leaks. This loss could be included in the "other uses" since more than 30% of LADWP's mainlines are older than 80 years, but it will be speculation.

See evidence Abbott CRM Sylmar_AWS Plan_V2.

Finding:

Obs:

The Site demonstrated a great effort to determine the catchment water balance but the information in Southern California is very fragmented, this was corroborated during the stakeholder interviews. Also, a clearly positive balance appears to be in contrast to the high water stress indicated in public tools like Aqueduct water risk atlas, or the publicized draughts. Understanding of the source catchments is also relevant. Therefore the site should continue the effort to address the data gaps and to improve the understanding of the catchment's water balance.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000778

1.5.4	<i>Water quality, including physical, chemical, and biological status, of the catchment shall be identified, and where possible, quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be identified.</i>	 Obs.
Comment	<p>Evidence 1.1.1_Bull Creek Subwatershed.pdf 1.5.4_2021 Annual Report - Los Angeles River Watershed Monitoring Program.pdf</p> <p>Comment:</p> <p>EPA's How's My Waterway provided data on 3 Monitoring stations inside Bull Creek Subwatershed. The results indicate that it is deemed impaired for swimming and aquatic life due to Total Toxic Chemicals, ammonia, low oxygen, bacteria and other microbes. The source did not provide any quantification.</p> <p>Regarding the status of the section of the LA River that runs inside the Bull Creek Subwatershed, monitoring stations located above and below the discharge of WWTP indicates that</p> <ul style="list-style-type: none">• The statistical threshold value (STV) water quality objective of 320 MPN/100mL for REC-1 beneficial use was attained for approximately 95% of upstream samples and 75% of the downstream samples during the 2021 sampling year.• There were five exceedances upstream of WWTP effluent and three exceedances of the NH3-nitrogen downstream.• Downstream concentrations of arsenic, zinc, lead, copper, and cadmium were below both chronic and acute CTR criteria. The source did not provide any quantification. <p>Information regarding Bulls Creek water quality was not found, nonetheless, The Site will keep on working to obtain more details for the next audit. Regarding LA River, records from many monitoring stations exist and will be presented in the next audit. In this document only the closer stations were presented.</p> <p>The site also looked for information on seasonal variances and so far faced difficulties but will continue the effort.</p> <p>Water quality, including physical, chemical, and biological status, of the catchment was identified.</p>	
1.5.5	<i>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.</i>	 Yes

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000778

Comment Evidence:
1.1.1_Abbott CRM Sylmar Wastewater, Stormwater, and IWRA Map.pdf
1.5.5_Los Angeles River Quality.pdf

Comment:

Abbott identified 5 IWRAS in the catchment:

- a) Japanese garden
An artificial lake that is technically water infrastructure because is the tertiary treatment for the public WWTP, it is also a sanctuary for birds and the public. Reservations are required for security reasons, the audit team got a last minute permit to visit this lake for 15 min.
- b) Los Angeles River -
See description in indicator 1.5.4
- c) Sepulveda Basin Wildlife Reserve and Wildlife Lake
The Basin is currently facing issues of illegal dumping, excessive trash, wildfire risk, homeless encampments, and loss of natural vegetation.
- d) Bull Creek
Impaired with issues of Total Toxic Chemicals, ammonia, bacteria, and low oxygen.
- e) Balboa Lake
Between May and July 2023, the lake was listed as “Open” and suitable for recreational activities. Test results indicated that bacteria levels were lower than 320 MPN, which is the limit for recreational activities (REC-1)

Important Water-Related Areas were identified, mapped, and their status assessed including any threats to people or the natural environment, using official scientific information and with the input of Sepulveda Basin Wildlife Areas Steering Committee.

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

Audit Number: AO-000778

Comment	<p>Evidence: Abbotts manual - shows status of each dam 1.5.6_CA00076_MD_Scenario1.pdf 1.5.6_California Dams.pdf 1.5.6 Shutting Down a Giant - Helix Electric</p> <p>At the REGIONAL WATERSHED LEVEL, the information on existing and planned water-related infrastructure is provided in LADWP's 2022-23 Water Infrastructure Plan (WIP). The Water System consists of 6,800 miles of distribution mainlines; 544 miles of transmission pipelines or trunk lines; 2,800 large valves; 86 pump stations; 358 regulator and relief stations; 7,300 large meters; 700,000 small meters; eight active reservoirs; 108 smaller storage facilities; and 300 miles of LAA tunnels, channels, and pipes. Over 30% of LADWP's mainlines are more than 80 years old, and 6% were identified as high priority for replacement based on factors of leak history, pipe age, soil conditions, risk of service.</p> <p>According to LA City Controller, LADWP's Water System is facing challenges related to long-term water supply, storage, and infrastructure. LADWP is planning to install 10 miles of Earthquake Resistant Pipes for mainlines in the next 10 years. However, these mainline replacements represent less than 10% of the total mainline replacement and seismic vulnerability exposure will remain until replacement objectives are met, which may take up to a hundred years.</p> <p>At the LOCAL WATERSHED level, Abbott identified and mapped three important water related infrastructure: The Van Norman Complex (VNC), The Jensen Treatment Plant and the Donald Tillman Reclamation Plant.</p> <p>a) The Van Norman Complex (VNC). Is a large industrial complex that covers 1,340 acres. It hosts various facilities for water management, such as reservoirs, basins, channels, and a UV treatment point. These facilities collect, store, treat, and distribute water to the City of Los Angeles. Also provides other services, such as power generation and flood control. Is the endpoint of the Los Angeles Aqueduct, and holds the Los Angeles Reservoir (LAR), the biggest reservoir in the City.</p> <p>The VNC maintains six state regulated dams, two of which were identified as "High" hazard potential, meaning that failure or mis-operation will probably cause loss of human life. The remaining four state regulated dams are categorized as a "Low" hazard potential, meaning failure or mis-operation results in no probable loss of human life and low economic and/or environmental losses; principally limited to property. Abbott's Manual provides a map indicating the status of each dam. Evidence attached.</p> <p>Even though, the dams are "High" hazard potential, if they fail. All the identified dams were identified as "Satisfactory" in 2017, meaning no existing or potential dam safety deficiencies were recognized and acceptable performance is expected under all loading conditions (static, hydrologic, seismic) in accordance with the minimum applicable state or federal regulatory criteria or tolerable risk guidelines. Based on this information, the Site does not have any immediate concerns for the water-related infrastructure of the VNC. Conclusion: The vulnerability is high and the probability is low.</p> <p>b) The Jensen Treatment Plant The Joseph Jensen Water Treatment Plant started operation in 1972 and treats water from the State Water Project. It distributes water to the San Fernando Valley, Ventura County and central Los Angeles. Jensen is Metropolitan's largest treatment plant and the largest west of the Mississippi River, with a capacity of 750 million gallons a day. The old electrical equipment of the plant was replaced in January 2022. See evidence: Shutting Down a Giant - Helix Electric</p> <p>c) Donald Tillman Reclamation Plant The Donald C. Tillman Water Reclamation Plant (DCT) is a facility that treats wastewater from the San Fernando Valley and produces recycled water for irrigation and environmental purposes. The plant uses advanced technologies such as nitrification/denitrification, tertiary</p>
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CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000778

filtration, disinfection, and de-chlorination. In March 2023, LA Sanitation awarded design and build contract for the Advanced Water Purification Facility (AWPF) in the same site, which is estimated to cost \$500 million. The AWPF seeks to purify more than 15 million gallons per day and provide a new supply source for up to 200,000 customers, helping to increase the city's resiliency to drought and reduce its reliance on imported water.

At The Site's level, Abbott confirmed that the pipes that deliver water to and from the site were replaced in 1988.

Abbott has presented sufficient information to satisfy this indicator.

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

Comment The Site used WRI's Water Risk Atlas for Unimproved/No Sanitation indicator to determine that WASH services are adequately available in the catchment. The result using "Southern California" for catchment address indicated "Low or < 2.5%". Higher values indicate areas where people have less access to safe drinking water supplies and improved sanitation services."

According to a California state audit of the State Water Resources Control Board (SWRCB) in July 2022, LA County has 206 water systems and 8 to 14 are failing, affecting between 10,001 and 20,000 people. This failing water systems are found outside of the Site's governance catchment of the Upper Los Angeles River.

Between 2016 to 2021, LA County dedicated between \$125 – 250 million towards funding drinking water projects.

California State has a homeless crisis, that touches every city. It is a floating population that moves from city to city, depending on the city's specific ordinances. Although number of homeless people is not accurate, The state budget provided a total of \$7.2 billion (\$3.3 billion General Fund) in 2021-22 to about 30 homelessness-related programs across various state departments. <https://lao.ca.gov/Publications/Report/4521>

The WASH problem in the Regional catchment is access to good quality water due to emerging contaminants and old failing systems, this was also mentioned by one stakeholder during the interviews.

The adequacy of available WASH services within the catchment was identified.

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.* 
No

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000778

Comment	<p>Evidence: Abbott's Manual - Abbott CRM Sylmar_AWS Plan_V2.1 (2).docx 1.2.1_Stakeholder Map_final_27June2023.pdf 1.2.2_Stakeholder List_v2.xlsx</p> <p>Comment: The Site shares the following water challenges with at least one of its stakeholders: - Water quality - Water quantity - Extreme weather events WASH was not identified as a water challenge by any stakeholder.</p> <p>All were prioritize as low regarding urgency and significance, except water quality whose urgency is medium. A rationale for this classification was also presented. See tables 1, 2a and 2b of Abbott's Manual. Table 2b is located at the bottom of table 2a.</p> <p>Missing explanation or description about the shared water challenges identified (water quality, water quantity and extreme weather events). The Site should make an effort to describe each challenge to better inform the targets and activities in the Water Stewardship Plan.</p> <p style="text-align: right;">Finding No: TNR-006515</p>
1.6.2	<p><i>Initiatives to address shared water challenges shall be identified.</i></p> <p style="text-align: right;"> Yes</p>
Comment	<p>The Site has presented the following Initiatives to address shared water challenges:</p> <p>Water quality - The Site will maintain its Non Exposure Certification to avoid contamination of run off water that drains into Bull Creek and remove remaining turf to eliminate the need of fertilizer.</p> <p>Water quantity - The Site plans to reduce its water usage by 3% in 2023, base line 2022. Some of the proposed actions are: a) replace toilets with units that are more efficient, b) remove remaining turf, c) keep the water recycling cycles of the cooling tower above 40 times, d) Some of the old HVAC system, cold towers and chillers have been replaced for more efficient ones.</p> <p>Extreme weather events - Sepulveda Basin Wildlife Reserve serves as a water retention pond that protects Los Angeles from flooding during heavy rains however, weeds and trash have taken over, decreasing its holding capacity and making it more vulnerable to fires. The Site plans to support other stakeholders by participating in annual voluntary cleanups of Sepulveda Basin.</p> <p>Initiatives to address shared water challenges were identified.</p>
1.7	<p><i>Understand the site's water risks and opportunities: Assess and prioritize the water risks and opportunities affecting the site based upon the status of the site, existing risk management plans and/or the issues and future risk trends identified in 1.6.</i></p>
1.7.1	<p><i>Water risks faced by the site shall be identified, and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.</i></p> <p style="text-align: right;"> Yes</p>

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000778

Comment Evidence:
Abbott's Manual - Table 8 and Table 9a of the document Abbott CRM Sylmar_AWS Plan_V2.docx

The Site identifies the following water risks, all high priority with a potential cost to business between 10,000>100,000 US dollars:

Source water quantity - low likelihood / medium severity
Current storm water discharge impacts on receiving water body - low likelihood / low severity
Perception of Site's disproportionate consumption of water - medium likelihood / high severity

A rationale for this classification is given in Table 8 and the water risks are clearly identified in Table 9a.

Water risks faced by the site were identified, prioritized, including likelihood and severity of impact on an annual bases, potential costs and business impact were also identified.

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

Comment Evidence:
Abbott's Manual -Table 8, 9b and table 10 of the Abbott CRM Sylmar_AWS Plan_V2.docx

Comment:

The Site presented, assessed and prioritized 9 opportunities, among those:

- a) Attend two (2) Safe Clean Water Program (SCWP) – Watershed Area Steering Committee (WASC) meetings by Q4 2023, to identify and support water projects in the catchment.
- b) Engage with Fernardeno Tataviam Band of Mission Indians (FTBMI) through at least one (1) meeting on how the Site can support their water rights, by end of Q1 2024.
- c) Improve Site water balance by reducing total water intake by 3% baseline 2022 water intake, by end of 2023.
- d) Engage with KBC through at least two (2) meetings to present water savings potential from removing turf.

Table 9b assess water opportunities and Table 8 presents a rationales for the rating criteria. In Table 10 – Water Stewardship Plan, this the opportunities were converted to targets.

Water-related opportunities were identified, including how the site may participate, assessment and prioritization of potential savings were also identified.

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.* 🔍
Obs.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000778

Comment Evidence:
Presented in Step 3 and Abbott's Manual

Comment:

The Site identified the following best practice on water governance:

- a) Participating in the LA River Watershed Symposium. The objective is to encourage collaboration amongst government agencies, NGOs, businesses and community members. The event had hundreds of participants from all the various water-related agencies like the Los Angeles Regional Water Quality Control Board, LA Flood Control District, NGOs, indigenous groups, etc.
- b) Participating in the meetings of the Upper Los Angeles River Watershed Area Steering Committee, established by the Safe Clean Water Program. This group is composed of local stakeholders from agencies, municipalities, and community groups who meet regularly to develop funding plans and recommendations for regional projects and programs that provide water quality, water supply, and community enhancement benefits to the region.

More details are presented in the document: Abbott CRM Sylmar_AWS Plan_V2.docx (Abbott's Manual)

Relevant catchment best practice for water governance have been identified however new practices should be included to demonstrate continual improvement.

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.* 🔍
Obs.

Comment Evidence
Abbott's Manual - Abbott CRM Sylmar_AWS Plan_V2.docx Table 10.

Comment:
Abbott has identified the following best practices:

- Implement recommendations from 2022 EBEWE (Energy and Water Efficiency Ordinance) audit. This audit is mandatory, however the implementation of the recommended measures is voluntary. This recommendations led to the goal of reducing water intake by 3% by the end of 2023 baseline 2022.
- LADWP turf replacement.
- Participate in the SoCal Water Smart program to replace old toilets and fixtures.
- Installing a new and more efficient HVAC system with new cooling towers, water-cooled chillers, and air-cooled chillers.
- According to EPA (<https://www.epa.gov/watersense>) submetering in commercial kitchens. This could be applied in Abbott's cafeteria in the future.

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

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

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000778

Comment Evidence:
In Step 3

Comment:
Abbott identified the following best practices based on its internal procedures and catchment opportunities offered by public agencies:

- Maintenance of a No Exposure Certification (NEC). This assures that all operations are done inside and storm water flows from Abbott to the creek free of contaminants.
- The Site complies with Abbott Technical Standards T8 for Spill Prevention and T12 for Water. These are internal standards which go above and beyond the local, state, and federal requirements such as having lower thresholds for annually assessing risks of hazardous chemical spills.
- Preparing an internal Water Management Plan.

Relevant sector and/or catchment best practice for water quality have been identified, including rationale for data source.

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

Comment Evidence:

Comment:

There are no on-site IWRAs. However, the catchment has several best practices for maintaining IWRAs including:

- Attend cleanups of various sections along the upper, middle, and lower Los Angeles River cleanups, including the Sepulveda Basin and Bull Creek, organized by the NGO, Friends of the Los Angeles River (FOLAR).
- The Site complies with Abbott Technical Standards T8 for Spill Prevention and T12 for Water. These are internal standards which go above and beyond the local, state, and federal requirements such as having lower thresholds for annually assessing risks of hazardous chemical spills.

Relevant catchment best practice for site and catchment maintenance of Important Water-Related Areas have been identified.

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

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000778

Comment Evidence:

Comment:

Abbott identified the following best practices:

- Providing more sanitary options of dispensing drinking water by using a touchless station.
- Providing hygienic facilities for nursing mothers.
- Participate in the SoCal Water Smart program to replace old toilets and fixtures.
- Provide sharp disposal containers for regulated medical waste in bathrooms.
- Provide hygienic feminine product in the bathrooms.

Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services were identified.

Audit Number: AO-000778

2	STEP 2: COMMIT & PLAN - Commit to be a responsible water steward and develop a Water Stewardship Plan	
2.1	<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>	
2.1.1	<i>A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:</i> <ul style="list-style-type: none"> - That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes - That the site implementation will be aligned to and in support of existing catchment sustainability plans - That the site's stakeholders will be engaged in an open and transparent way - That the site will allocate resources to implement the Standard. 	 Yes
Comment	Evidence attached A signed and publicly disclosed site statement document that fulfills all the requirements of the indicator was published in Abbott's website: https://www.abbott.com/content/dam/corp/abbott/en-us/documents/pdfs/transparency/Abbott-Sylma-CA-Commitment-to-Water-Stewardship.pdf	
2.2	<i>Develop and document a process to achieve and maintain legal and regulatory compliance.</i>	
2.2.1	<i>The system to maintain compliance obligations for water and wastewater management shall be identified, including:</i> <ul style="list-style-type: none"> - Identification of responsible persons/positions within facility organizational structure - Process for submissions to regulatory agencies. 	 Yes

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000778

Comment	<p>Evidence: 86710 Environmental Management System Rev H Clean (1).docx - General Responsible positions 86713 Rev C_Clean.docx - Specific Responsible positions</p> <p>Comment:</p> <p>Compliance obligations for water and wastewater management are fulfilled by implementing regulatory self-assessment using Young and Global Partners EHS Audit Protocol at https://ynpglobal.com/global-ehs-audit-protocol/. Abbott access this internal system via https://www.ehslex.com/CL/C293627/. Section 4 of the document relates to all regulatory/compliance regulations water.</p> <p>General responsible positions in the organization are: -Global Environmental Management Representative (GEMR) -Site Environmental Management Representative (SEMR) -All Employees</p> <p>Specific responsible positions in the organization are: -Senior Leadership -Legal -Environmental Manager, SEMR, or appropriate site/location representative -Site Environmental Coordinator -Executive and Senior Management -Department Management</p> <p>Process for submissions to regulatory agencies entails: a.) Submission reminders from regulatory agencies b.) Maintaining an Excel-based compliance calendar c.) Collecting required data/information, preparing submission, obtaining required signature/fees and submitting required reports. The governing regulatory agency specifies information required. d.) Information on regulatory compliance inspections/reports, written non-compliance notifications, corrective actions, Notices of Violations and fines/penalties are uploaded in Action Management – an internal Web-based computer system maintained by the parent organization. Abbott Sites most report, manage, and document closure of EHS actions. All Abbott facilities are required to use this system and the Site Environmental Management Representative (SEMR) manages this task for the site.</p> <p>The system to maintain compliance obligations for water and wastewater management was identified, including identification of responsible persons/positions within facility organizational structure and the process for submissions to regulatory agencies.</p>
2.3	<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>
2.3.1	<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>
	 Yes

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000778

Comment Comment:

Mission: The Site Water Strategy seeks to advance water sustainability through ongoing compliance, implementing best practices, and collaborating with stakeholders to safeguard the community, cultural, environmental, and economic value of water.

Vision: The Site envisions a sustainable water-secure catchment now and in the future.

Goals: To accomplish this strategy, the Site will engage relevant stakeholders and lead or facilitate stewardship projects to alleviate water challenges identified in the catchment.

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

2.3.2 *A water stewardship plan shall be identified, including for each target:* Q
Obs.

- 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.

Comment Evidence:

Abbott CRM Sylmar_AWS Plan_V2.docx Table 10

Comment:

A WSP that complies with all requirements is presented in Table 10 of Abbott's main document. It includes 9 targets divided in AWS outcomes, measurement and monitoring metrics, actions to achieve and maintain, baseline and performance metric, planned timeframe until Q1 2024, allocated budget, responsible positions, link to initiative and link to best practices identified in 1.3. Financial budget is missing from some targets but it was not deemed relevant since is time allocated for meetings.

Target for water reduction by 3% - OK but too low.

Water quality. The standard requires continual improvement, consequently, The Site must propose additional targets for water quality.

In general, targets presented represent actions not objectives. Ex. Engage with KBC through at least two (2) meetings to present water savings potential from exterior turf replacement. The target is to remove the turf and the action is to engage in at least two meetings.

Obs. A target related to closing the gap on the information available about the catchment water balance could be useful for The Site.

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-000778

Comment

Evidence:

2.4.1_LAFD CUPA_ ABBOTT_ST JUDE MEDICAL_ 15900 VALLEY VIEW CT.msg
2.4.1_15900 VALLEY VIEW_CUPA Inspection Report.pdf
2.4.1_LAFD CUPA Inspection_Telfair June 2022.JPG
2.4.1_HMBP Approval by CUPA - Valley View.JPG
2.4.1_HMBP Approval by CUPA - Telfair.JPG

Comment:

The Site is obligated to prepare and annually certify a Hazardous Material Business Plan (HMBP). This plan must contain:

- An inventory of hazardous materials at a facility.
- Emergency response plans and procedures to be followed in the event of a reportable release or threatened release of a hazardous material.
- Requirements to train employees in safety procedures in the event of a release or threatened release of a hazardous material, including onboarding for new employees and annual refresher courses for existing employees.
- A site map that depicts north orientation, loading areas, internal roads, adjacent streets, storm and sewer drains, access and exit points, emergency shutoffs, evacuation staging areas, hazardous material handling and storage areas, and emergency response equipment.

The plan must be submitted to the Fire Department who evaluates the information and determines if they have the resources to respond in case of accident, spill, fire, etc. As part of the certification the site is inspected by the Fire Department who also performs unannounced visits to verify that Abbott is in compliance. Both parties must participate in the amendments of the plan to guarantee cooperation in case of emergency. Attached evidence of certification and unannounced inspections.

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

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000778

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>	 Yes
Comment	<p>Evidence: 5.4.2_RE__EXTERNAL_ Alliance for Water Stewardship - Stakeholder Engagement_DWP.msg 5.4.2_Confirmation for 2023 State of the Watershed - Sponsors.msg Symposium 5.4.2_August SCWP Meeting_ULAR-WASC-Watershed-Coordinators-Presentation-20230802.pdf Upper LA River presentation by watershed coordinator 3.1.1_5.4.2_Abbott Presentation_Sylmar Neighborhood Council.JPG</p> <p>Comment:</p> <p>Efforts to engage with stakeholders, coordinate and support public-sector agencies are evidenced through emails, presentations, calendar invites, calendar meetings, photos, and meeting minutes. These efforts include:</p> <ul style="list-style-type: none"> - Attending the 2023 State of the LA River Watershed Symposium; - Sponsoring the Council for Watershed Health, which is responsible for organizing the Symposium to bring public-sector agencies and the public together to discuss water stewardship issues; - Providing a presentation on the Site's water stewardship efforts to the Sylmar Neighborhood Council. <p>Evidence that the site has supported good catchment governance were identified.</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>Comment: No water rights were identified.</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-000778

Comment	<p>Evidence: 3.2.1_EHS Global Audit Protocol - Abbott (Water).pdf</p> <p>Comment: Abbott’s EHS Management Standard M03 (Risk Assessment/Self Assessment) requires annual performance of a documented self-assessment. The standard defines “self-assessment” as a “review performed by the organization that identifies and evaluates compliance with APLICABLE REGULATORY requirements and Global EHS Management/Technical Standards.”</p> <p>This Management Standard include items such as: discharge permits, record keeping, effluent monitoring, reporting, lab test providers. etc. along with the legal requirement and legal citation for each question. This questions guide The Site through all aspects of regulatory compliance. Evidence attached shows the chapter related to water.</p> <p>Other evidence of compliance and inspections related to spill prevention and risk are presented in indicator 2.4.1.</p> <p>A process to verify full legal and regulatory compliance has been implemented.</p>	
3.2.2	<p><i>Where water rights are part of legal and regulatory requirements, measures identified to respect the water rights of others including Indigenous peoples, shall be implemented.</i></p>	 Yes
Comment	No legal or regulatory requirements regarding water rights were identified.	
3.3	<p><i>Implement plan to achieve site water balance targets.</i></p>	
3.3.1	<p><i>Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.</i></p>	 Yes

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000778

Comment Evidence:
 Abbott CRM Sylmar_AWS Plan_V2.docx - Table 11: Water Stewardship Plan Evaluation 1.3.3 Environmental Data - Water (AWS Site Water Balance).xlsx - See sheet "Summary Monthly"
 3 BP water quantity Turf removal on premises.jpeg

Comment:

Abbott selected three actions contribute to water balance:

a) Improve Site water balance by reducing total water intake by 3% from 2022 water intake, by end of 2023. 75% completed.
 The Site has reduced its water intake by 33.8% comparing January – August 2023 (9,248,272 gallons) to January -August 2022(13,915,044 gallons).
 This was evidenced by the water meter intake data presented in the sheet "Summary Monthly" doc 1.3.3 Environmental Data.

b) Engage with KBC through at least two (2) meetings to present water savings potential from exterior turf replacement. 50% completed.
 The Site Still need to remove other turf sections, but it needs the approval of KBC, the company that manages the industrial complex. The Site has reduced its irrigation water intake by 31%% comparing January – August 2023 (2,184,164 gallons) to January -August 2022(1,305,509 gallons).
 This was evidence by the water meter intake data presented in the sheet "Summary Monthly" doc 1.3.3 Environmental Data.

c) Upgrade toilets and water fixtures in two (2) in Telfair Building . 25% completed.
 Bathrooms selected and budget allocated.

Note: Irrigation and sanitation were the biggest water consumption items indicated in 1.3.2

Status of progress towards meeting water balance targets set in the water stewardship have been identified.

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

Comment Evidence:
 1.1.1 water relat infrast chillers.jpeg
 1.1.1 water relat infrast cooling tower.jpeg
 3 BP water quantity Turf removal on premises.jpeg

Comment:

Both Metropolitan Water District and LA Department of water and Power offer financial incentives for improving water balance through increasing water use efficiency. The Site can and has taken advantage of those incentives by:

a) Replacing its turf with drought-resistant plants and installing drip irrigation;
 b) Replacing higher flow flush toilet valves with low flow flush valves; and
 c) Installing a new and more efficient HVAC system with new cooling towers, water-cooled chillers, and air-cooled chillers. Additionally, the cooling towers have an automatic blowdowns. This helps to increase recycling of chilled water and reduce input of makeup water.

Annual targets to reduce water use are evidenced in indicator 3.3.1

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 does not have any water rights and consequently does not have a legal obligation for re-allocation of water. That said, water conservation measures implemented at the Site will result in corresponding surplus for others in the community.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000778

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.* 
Yes

Comment Evidence:
190172_NEC.pdf 3.1.2 Valley View building renewed in April 2023

Telfair NEC 2023-2024.pdf renewed in July 2023

Comment:
Abbott does all its activities under roof, this means that runoff water is not contaminated by oils, grease, waste, etc. therefore, the water that falls into Bull Creek is clean. This is certified by its No Exposure Certification (NEC) emitted by Environmental Protection Agency. No exposure means all industrial materials and activities are protected by a storm resistant shelter to prevent exposure to rain, snow, snowmelt and/or runoff.

Abbotts target is to preserve quality of the storm water discharge by annually recertifying the Site's No Exposure Certification (NEC) by end of 2023 - 100% by September 2023.

Evidence attached

Status of progress towards meeting water quality targets set in the water stewardship were identified.

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.* 
Yes

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000778

Comment	<p>Evidence: 1.3.4_2022_60042020 Wastewater_09Dec2022.pdf 1.8.3_2022-11-29_Storage Area Spill Risk Assmt Tool, Ver 1_AD.pdf 1.8.3_2022-11-29_Tank Load - Unload Area Spill Risk Assmt Tool Ver 1_ad.pdf 5.5.1_Detailed Facility Report _ ECHO _ US EPA.pdf</p> <p>Water quality was identified as a shared water challenge regarding the receiving body of water, Bulls Creek, which has been declared impaired. Evidence that The Site has gone beyond compliance to avoid contamination from its stormwater was presented in indicator 3.4.1.</p> <p>Continual improvement to achieve best practice for the Site's effluent is also maintained by complying with:</p> <p>a) Abbott's Spill Prevention (T08) and Water Management (T12) Technical Standards - evidence attached This tools are annual risk assessment procedures for a hazardous substance or oil storage area that does not have secondary containment. These documents are required by Abbott, therefore are considered best practices. In both cases, the risk level was quantified as 10, which means low risk. Some of the questions in this T08 and T13 forms relate to visual inspection, volume stored, distance between the container and the closest spill equipment, etc.</p> <p>The Site's effluent is also in compliance with legal regulations. See evidence regarding the clarifier's and cooling tower's effluent. Abbott's records published by the Environmental Protection Agency show no violations in the last five years. This does not mean that Abbott have or have not have violations before, just that the reported period of time chosen was 5yrs. Evidence attached.</p> <p>Continual improvement to achieve best practice for the site's effluent have been identified and when possible quantified.</p>
3.5	<p><i>Implement plan to maintain or improve the site's and/or catchment's Important Water-Related Areas.</i></p>
3.5.1	<p><i>Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.</i></p>
Comment	<p>Evidence: 5.4.2_Habitat Restoration Day Post Event Survey (23Sep2023).msg 5.4.2_Internal Viva Engage Post - Habitat Cleanup Sepulveda Basin Wildlife Reserve.JPG</p> <p>Comment:</p> <p>The Site identified one activity to enhance the catchment's IWRA:</p> <p>- Participate in at least one cleanup event for the Sepulveda Basin Wildlife Reserve by end of 2023.</p> <p>This was already implemented. See evidence attached</p> <p>Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas have been implemented.</p>
3.6	<p><i>Implement plan to provide access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers at all premises under the site's control.</i></p>



Yes

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000778

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:
3.8.1_Lease-Loan Agreement for ABBOTT LABORATORIES (1078580-001).pdf
3 BP water station detail2.jpeg
1.3.8_Sylmar Bathroom List (VV TF)_AWS certification.xlsx
3 BP wash record for bathroom cleaning.jpeg
3 BP wash mother's room.jpeg

Comments:

- The Site has 1,300 employees; 166 toilets, 103 sinks, and 7 showers. California requires employers with over 150 employees to have at least 1 toilet per 40 employees. Based in this numbers, the site provides 7 toilets/employee. Currently has enough toilets for 6,640 employees.

- With respect to safe drinking water, besides providing potable water from the municipality, it also provides traditional water fountains and state of the art water fountains thought the buildings. See picture and leasing agreement attached.

- Expand and improve the service of mother's room.

Evidence of the site's provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers onsite have been identified and quantified.

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 Evidence:
1.3.4_US Ecology ECHO Database.pdf
3.2.2_01-26-23_HAZARDOUS WASTE MANIFEST_017423507FLE.pdf

Comment:

The Site has never received any concerns or complaints from internal or external sources that their operations are impinging on the human right to safe water and sanitation of communities, or that traditional access rights for Indigenous and local communities are not being respected.

In addition, Abbott receives water from a public agency, like everybody else in the community. So far, no restrictions in water use have been implemented, except outdoor irrigation.

The Site respects the water rights of others to enjoy a clean environment by taking action to avoid pollution such as:

- Maintaining a No Exposure Certification to avoid contamination of runoff water;
- Replacing turf areas with drought-resistant plants and drip irrigation to reduce water demand and reduce the need for fertilizers;
- Sending its categorical water to a third-party facility for proper treatment and disposal. Evidence attached.

- Returning approx. 55% of its water intake back to the WWTP. See water balance in indicator 1.3.3 (water in: 23,661,821 - water return to the sewer system: 13,036,719).

Abbott has presented enough evidence to comply with this indicator.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000778

- 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: Abbott did not set any targets regarding indirect water use in the water stewardship plan. All its suppliers are located outside the 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: Not applicable.

The Site does not have suppliers or service providers in the 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.* ✔
Yes

Comment: Evidence:
 3.8.1_FW__FloWater_ Re_ IMPORTANT - For Abbott Laboratories - Annual Filter Change Required (Please Read and Reply).msg BP WASH maintenance of water stations on site

 3.8.1_Lease-Loan Agreement for ABBOTT LABORATORIES (1078580-001).pdf BP WASH lease for water stations on site

 Comment:

 Abbott leases 7 water fountains from the company FloWater. Leasing agreement includes maintenance and water filter change every two years. Attached evidence of communication with provider regarding the later activity. Besides this water fountains, there is no other shared water infrastructure.

 Site has provided enough evidence to comply with the indicator.
- 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

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000778

Comment **Evidence**
 1.8.3_CN Sylmar_Water Management Plan_15Dec2022.xlsb.xlsm Risk evaluation for water
 1.8.1_Alameda Facilities Ideation Workshop - May 2023.pdf

Abbott CRM Sylmar implements the following Internal Water Governance BP:
 - Every Abbott Site must comply with the internal management and technical standards through the Corporate Audit Program.
 - The Site has successfully maintained ISO 14001 certification since 2010.
 - Sylmar water management plan - This is a tool dedicated to identify and measure business, reputational, regulatory water quantity, water quality, etc. The biggest risk identified is reputational to the Site be seen as a big water user.
 - The Site's Facility Engineer attended a workshop at the Abbott Diabetes Care site in Alameda, CA on May 31, 2023. to discuss and share best practices for facilities management including best practices on water management. Attendance included Abbott facilities staff from all over California. The Staff Facilities Engineer shared best practices on cooling tower optimization at Sylmar which allows for more than 50 cycles of cooling water recycling. Attached evidence meeting plans.

Stakeholder Collaboration and Transparency:
 - On September 18, 2023, the Senior Environmental Specialist conducted a water stewardship presentation to Sylmar Neighborhood Council on the Site's water stewardship activities, to identify shared water challenges, and identify potential areas of collaboration
 - Attend the 2023 State of the Los Angeles River Watershed Symposium on 19 September 2023, hosted by the Council for Watershed Health to further understand water challenges in the region and meet water stakeholders.
 - Attend the regular Watershed Area Steering Committee Meeting for the Safe Clean Water Program to learn about potential opportunities for water project collaboration
 - Annual publication of Abbott's Global Sustainability Report. It includes water usage data for the entire company.

Evidence for these Stakeholder Collaboration are included in indicator 5.4.2

Actions towards achieving best practice, related to water governance, as applicable, have been implemented.

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

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000778

Comment Evidence:
3.9.2 BP water quantity Turf removal on premises.jpeg

Comment:
Several best practices related to water balance identified in references cited in Section 1.8.2. have been implemented at the Site including:

- Minimize water use in Site restrooms by converting all high-flow flush toilet valves (>1 gallon) to low-flow flush valves (< 1 gallon) and using motion sensor faucets in sinks.
- Use of recirculating water systems in cooling towers. Use of single-pass systems is discouraged in the above referenced EPA WaterSense source.
- Replacing old equipment such as chillers and cooling towers for more efficient ones.
- Repairing leaks and tuning equipment.

Included in the WSP:
- Replacing interior property turfed areas with drought-resistant plants and drip irrigation under LADWP's Turf Replacement Program in the Commercial/Multi-Family Water Conservation Program

By implementing this actions, The Site has reduced its water intake by 33.8% comparing January – August 2023 (9,248,272 gallons) to January -August 2022 (13,915,044 gallons). This was evidence by the water meter intake data presented in the sheet "Summary Monthly" doc 1.3.3 Environmental Data.... see indicator 3.3.1

Actions towards achieving best practice, related to targets in terms of water balance have been implemented.

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

Comment Evidence:
1.8.3_2022-11-29_Storage Area Spill Risk Assmt Tool, Ver 1_AD.pdf

1.8.3_2022-11-29_Tank Load - Unload Area Spill Risk Assmt Tool Ver 1_ad.pdf Generator Room Risk

Comment:
Several best practices related to protect water quality identified in references cited Section 1.8.1 have been implemented at the Site including:

- Abbott EHS Management and Technical Standards: EHS management and technical standards including Spill Prevention (T08) and Water (T12). All Abbott sites globally are required to comply with these internal standards.
- 1.8.3_2022-11-29_Storage Area Spill Risk Assmt Tool, Ver 1_AD.pdf - Storage Area / annual risk assessment required for a hazardous substance or oil storage area that does not have secondary containment.
- 1.8.3_2022-11-29_Tank Load - Unload Area Spill Risk Assmt Tool Ver 1_ad.pdf - Generator Room Risk / annual risk assessment required for a hazardous substance or oil storage area that does not have secondary containment.
- Additional information in indicator 3.4.1 as part of the progress of the water stewardship plan.

Actions towards achieving best practice, related to targets in terms of water quality have been implemented.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000778

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 implemented this action:

- Participate in at least one cleanup event for the Sepulveda Basin Wildlife Reserve by end of 2023.

This action is included in the water stewardship plan. See indicator 3.5.1

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

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

Comment Evidence:
3 BP wash hand sanitizer.jpe
3 BP sharp disposal on bathrooms.jpeg

Comment:

The Site has implemented the following BP regarding WASH:

- Provide adequate sharp disposal containers in bathrooms.
- Providing hand sanitizers at high touch points like doorways.

Others included in the WSP:
-FloWater touchless water stations
-Upgrade Mother's room to include a sink.

Actions towards achieving best practice related to targets in terms of WASH have been implemented.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000778

4 STEP 4: EVALUATE - Evaluate the site's performance.

4.1 *Evaluate the site's performance in light of its actions and targets from its water stewardship plan and demonstrate its contribution to achieving water stewardship outcomes.*

4.1.1 *Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.* ✔ Yes

Comment Evidence:
Abbott's Manual - Table 11

Comment:
Performance to date on targets listed in the Site's Water Stewardship Plan, including their contribution to advancing the five intended AWS outcomes, are summarized in Table 11 – Water Stewardship Plan Evaluation in AWS Plan.

The set goal of reducing its water intake by 3% baseline 2022 was achieved. Based on half year results, its water intake has decreased by 33% , irrigation being the highest performance (28% less compared to 2022).

Other activities to preserve IWRAs, such as volunteering and maintaining their NEC have been implemented 100%. 20 of Abbott's employees removed 100 bags of invasive species within the Sepulveda Basin.

The Site has achieved its goals with the measures implemented.

Performance to date on targets listed in the Site's Water Stewardship Plan, including their contribution to advancing the five intended AWS outcomes have been identified.

4.1.2 *Value creation resulting from the water stewardship plan shall be evaluated.* ✔ Yes

Comment Abbott reports the following value creation:

- Continued cost savings for no monitoring and reporting requirements; reduce reputational risks
- Drinking water quality improvement for employees; reputational improvements.
- Increase access to more hygienic and comfortable space for nursing mothers
- Reductions in water bills will be determined at the end of the year.

Value creation resulting from the water stewardship plan has been evaluated.

4.1.3 *The shared value benefits in the catchment shall be identified and where applicable, quantified.* ✔ Yes

Comment The most important shared value benefit for the community in general is the improvement in natural capital by removing invasive species and trash from Sepulveda Basin. This will allow the basin to provide the service of flood control that is critical to protect homes, lives and public infrastructure in Los Angeles.

At the same time, this cleaning initiatives allowed the re-introduction of native plant species, improving the biodiversity in the Reserve.

The shared value benefits in the catchment have been described.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000778

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	<p>Evidence: 5_Hydrant repair and preventive measure.jpeg</p> <p>Comment:</p> <p>The Site's internal EHS Compliance Calendar requires an annual review of water-related Incidents however, an interim review was performed to document a water-related incident occurred in October 2022.</p> <p>Table 12 of Abbott's Manual present the review of the incident, along with cause analysis, preventative and corrective actions. A contractor hit a hydrant and resulted in aprox. 80,000 gallons of water lost. Evidence attached shows the preventive measure implemented to protect the hydrant from future accidents.</p> <p>The template is included as Table 12 in AWS Plan Tables will be completed by the end of the first quarter for the previous calendar year.</p> <p>A written annual review and root-cause analysis of the 2023 emergency incident was prepared and the site's response to the incident was evaluated. The evaluation led to changes in the emergency response plan regarding water infrastructure accidents that will be incorporated next year.</p> <p>The Site has presented sufficient information to comply with this indicator.</p>	
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>	 No
Comment	<p>Comment:</p> <p>Site will consult and seek feedback from stakeholders on the Site's performance, including the effectiveness of its engagement process by end of the first quarter for the previous calendar year. The activity will be documented and will seek input on water challenges and recommended updates to the Water Stewardship Plan.</p> <p>Consultation efforts with stakeholders on the site's water stewardship performance are planned but have not been executed.</p> <p style="text-align: right;">Finding No: TNR-007305</p>	
4.4	<i>Evaluate and update the site's water stewardship plan, incorporating the information obtained from the evaluation process in the context of continual improvement.</i>	
4.4.1	<i>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.</i>	 Yes

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)



Audit Number: AO-000778

Comment Evidence:
2.3.2_-_Water_Stewardship_Plan before audit.JPG
Abbott's Manual - Table 10

Comment:
A version of the Water Stewardship Plan was prepared prior to September 25, 2023. This version was deemed as insufficient to meet the intent of the AWS Standard as it lacked specific metrics, goals, and timelines obtain meaningful changes at the Site or the catchment. The Water Stewardship Plan was updated during the week of September 25, 2023, with new targets and appropriate Specific, Measurable, Achievable, Relevant, and Time-bound (SMART) goals which align closer to the shared water challenges and AWS outcomes.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000778

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	<p>The Site conforms to the International Organization for Standardization (ISO) 14001 Environmental Management System (EMS) and identifies specific positions that are responsible for ensuring environmental (including water-related) compliance under its work instruction – 86173 (Compliance Obligations Evaluation). Including:</p> <ul style="list-style-type: none"> - The Site Director, (Director, Production or Director, Operations) serves as the Site Environmental Coordinator (SEC) and is ultimately accountable for compliance with the water-related laws and regulations and is the authorized signature authority for water-related regulatory permits. - The Site Environmental Management Representative (SEMR) or Environmental Manager is responsible for identifying environmental legal and regulatory requirements, ensuring compliance, and communicating updates to the SEC. Currently, the Senior Environmental Specialist is designated as the SEMR for the Site. This includes all water regulations. <p>An email disclosing this positions was sent to all Abbott Sylmar employees and observed by the audit team.</p>
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	<p>Evidence: 5.4.1 5.4.2_AWS WSP and Evaluation Update.msg</p> <p>Comment: The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, was communicated via email to relevant stakeholders. Evidence attached.</p>
5.3	<i>Disclose annual site water stewardship summary, including: the relevant information about the site's annual water stewardship performance and results against the site's targets.</i>
5.3.1	<i>A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.</i>
Comment	<p>A draft Annual Site Water Stewardship Summary presentation is prepared with information available to date. It will be updated/populated and disclosed by the end of the first quarter for the previous calendar year. Method of disclosure is tentatively planned as on-site meeting with stakeholders. Completion will be tracked via the above referenced EHS Compliance Calendar.</p> <p>A summary of the site's water stewardship performance, including quantified performance against targets, has not been disclosed.</p>

Yes

Yes

in progress

Finding No: TNR-007306

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000778

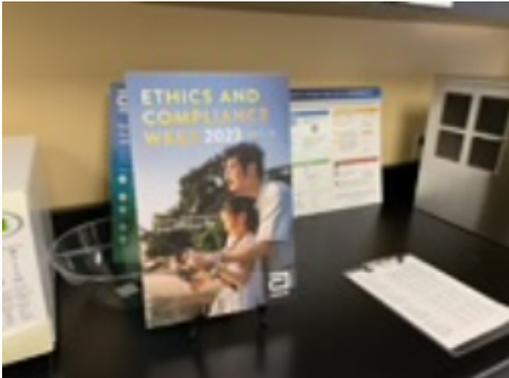
5.4	<i>Disclose efforts to collectively address shared water challenges, including: associated efforts to address the challenges; engagement with stakeholders; and co-ordination with public-sector agencies.</i>	
5.4.1	<i>The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.</i>	 Yes
Comment	<p>Evidence: 5.4.1 5.4.2_AWS WSP and Evaluation Update.msg</p> <p>Comment: Shared water related challenges were disclosed to all relevant stakeholders via email.</p>	
5.4.2	<i>Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.</i>	 Yes
Comment	<p>Evidence:</p> <p>Email sent to stakeholders in indicator 5.4.1 include public sector agencies such as California Water Boards, LA Department of Water and Power and Metropolitan Water District . Evidence attached in 5.4.1</p> <p>Efforts to engage with stakeholders and coordinate and support public-sector agencies are evidence through emails, presentations, calendar invites, calendar meetings, photos, and meeting minutes. These efforts include attending the 2023 State of the LA River Watershed Symposium; sponsoring the Council for Watershed Health, which is responsible for organizing the Symposium to bring public-sector agencies and the public together to discuss water stewardship issues; providing a presentation on the Site's water stewardship efforts to the Sylmar Neighborhood Council; participating in habitat cleanup of the Sepulveda Basin Wildlife Reserve; and stakeholder outreach. Evidence has been presented throughout this document.</p> <p>Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies have been identified.</p>	
5.5	<i>Communicate transparency in water-related compliance: make any site water-related compliance violations available upon request as well as any corrective actions the site has taken to prevent future occurrences.</i>	
5.5.1	<i>Any site water-related compliance violations and associated corrections shall be disclosed.</i>	 Yes
Comment	<p>Evidence: 5.5.1_Detailed Facility Report _ ECHO _ US EPA.pdf</p> <p>Comment: Abbott has not incurred in any violations. Evidence attached.</p>	
5.5.2	<i>Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.</i>	 Yes
Comment	<p>No corrective action require since no violations were reported.</p>	
5.5.3	<i>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.</i>	 Yes
Comment	<p>Nothing to report</p>	

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000778

Photographic Evidence from Audit



BP ethics and compliance week.jpeg



3 BP water station detail2.jpeg

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000778



3 BP governability on site.jpeg

✔
Yes

Comment Relevant pictures included in each indicator.