

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)



Audit Number: AO-001189

### SITE DETAILS

Site: **Haleon - Lincoln, Nebraska**

Address: 10401 Hwy 6, NE / 68517, Lincoln, Nebraska, UNITED STATES

Contact Person: Brett Quinn

AWS Reference Number: AWS-000733

Site Structure: Single Site

### CERTIFICATION DETAILS

Certification status: Certified Core

Date of certification decision: 2024-Dec-12

Validity of certificate: 2027-Dec-11

### AUDIT DETAILS

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

Audit Type(s): Initial Audit

Audit Start Date: 2024-Jul-30

Lead Auditor: Kimberly Worsham

Audit team participants:

Kimberly Worsham, Lead Auditor

Site Participants:

Brett Quinn, Other

Tammy McFall, Other

Lisa Suilfs, Other

Marc Dinklance, Other

Chris Deil, Other

Carol Wisecarver, Other

Steve Halloway, Other

Greg Sominski, Other

Mike Armstrong, Factory Director

Jodi Runnels, Senior Quality Manager

Scott Gray, Other

Marion Polivra, Other

Doug Williams, Engineering Manager

Dan Basile, Operations Finance Controller

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### ADDITIONAL INFO

**Summary of Audit Findings:** During the certification audit, 37 findings were raised: 0 major non-conformity, 25 minor non-conformities, and 12 observations.

The Client is requested to perform a root cause analysis, define corrective actions for each non-conformity, and submit these to WSAS within 30 days of receipt of the audit report by 24/10/2024.

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

The audit team recommends certification of Haleon Lincoln at Core level pending approval of the corrective actions plan and closure of the major non-conformity.

#### CLOSURE OF FINDINGS AND CORRECTIVE ACTION PLAN:

The Client has successfully resolved the major non-conformity and submitted the corrective action plan addressing all findings.

Proof of implementation has been requested for the Minors and this will be evaluated during the Surveillance Audit. The client is requested to upload evidence of implementation prior to the Surveillance Audit.

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**Scope of Assessment:** The scope of services covers the initial certification audit for assessing the conformity of Haleon Lincoln against the AWS International Water Stewardship Standard Version 2.

Haleon owned and managed the 400-acre site at 10401 Cornhusker Hwy, Lincoln, NE 68517 (40.888041, -96.577551). Glaxo Smith Kline owned the site until 2022, when Haleon spun off as an independent company. The manufacturing facility produced consumer healthcare products such as Theraflu, Excedrin, Gas-X, and Polident. The site's property included a large building with offices and production facilities, green landscaping, and a large stormwater retention pond with an aeration fountain. The site also has an area of property where it allows employees to manage gardens, and contracts out some of its land to a local farmer for haybaling and corn growing.

The site had one well, a retention pond, cooling towers, and an on-site wastewater treatment facility. Lincoln Water System provided the water source, which received water from wells in Ashland, NE, that is hydrologically connected to the Platte River. The site also owns an on-site groundwater well that provides irrigation water.

The site's discharge went to the Lincoln Northeast Wastewater Treatment Plant (NE WTP) after passing through the site's on-site wastewater treatment plant for pre-treatment. The NE WTP discharges into Salt Creek, ultimately running to the Missouri River. The site's stormwater is collected in the detention pond before being discharged to a tributary of Salt Creek.

The site is in the Salt Creek Watershed within the Lower Platte River Basin. While outside of the primary catchment, upstream areas of the Platte River watershed and downstream areas of the Missouri River watershed are hydrologically connected to the site.

While the site does not source water from the High Plains Aquifer, it is within the boundaries of the Lower Platte River Basin and is extremely important to the state of Nebraska and the region. Each state overlying the High Plains Aquifer is entitled to separate groundwater laws. Within Nebraska, the Nebraska Groundwater Management and Protection Act establishes that groundwater is a local rather than state responsibility. Nebraska is divided into 23 Natural Resource Districts (NRDs), which manage surface and groundwater resources within their boundaries. NRDs develop management plans, which need to be approved by the Nebraska Department of Natural Resources (NeDNR), to protect water quality and quantity and to prevent conflicts between surface and groundwater users.

Within the Lower Platte River Basin are the Lower Platte North NRD and the Lower Platte South NRD, each with separate groundwater management plans tailored to the district's challenges and priorities. These NRDs and others collaborated on the Lower Platte River Drought Contingency Plan to respond to the increased severity of droughts. NRDs jointly manage surface water in the catchment. Still, the Nebraska Department of Energy and Environment (NDEE) is primarily responsible for surface water quality, while the NeDNR is primarily responsible for surface water quantity. The NDEE has developed TMDLs for the Lower Platte River [Lower Platte Basin E. coli TMDL.pdf] and Wagon Train [Wagon Train TMDL.pdf] and Yankee Hill [Yankee Hill TMDL.pdf] lakes within the catchment and the Lower Platte River Corridor Alliance has developed the Water Quality Management Plan for the Lower Platte River Corridor.

In addition to the plans above, the Platte River Recovery Implementation Program (PRRIP) was developed as a collaboration between the states of Colorado, Wyoming, and Nebraska and the Department of the Interior. The goal is to improve river management for the ecosystem's health and those who depend on it.

The audit was conducted onsite from 30 July to 1 August 2024.

The onsite site visit included the assessment of incoming and outgoing water infrastructure, WASH facilities, cooling towers, wastewater treatment systems, fuel storage, fire water tanks, the well, and steam generators onsite as part of the audit.

## FINDINGS

**WSAS**

2 Quality Street North Berwick, EH39 4HW, UNITED KINGDOM

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**NUMBER OF FINDINGS PER LEVEL**

Observation	12
Minor	25

# CERTIFICATION REPORT

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### FINDING DETAILS

Finding No:	TNR-011037
Checklist Item No:	1.1.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Aug-01
Checklist item:	The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including: <ul style="list-style-type: none"><li>- Site boundaries;</li><li>- Water-related infrastructure, including piping network, owned or managed by the site or its parent organization;</li><li>- Any water sources providing water to the site that are owned or managed by the site or its parent organization;</li><li>- Water service provider (if applicable) and its ultimate water source;</li><li>- Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies;</li><li>- Catchment(s) that the site affect(s) and is reliant upon for water.</li></ul>
Findings:	The site did not map Ashland or compare it to its own location to show where the water source is.
Corrective action:	Update and upload High Level map that identifies the location of the site and the water source (Ashland).
Finding No:	TNR-011039
Checklist Item No:	1.3.3
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Aug-01
Checklist item:	Site water balance, inflows, losses, storage, and outflows, including indication of annual variance in water usage rates, shall be quantified. Where there is a water-related challenge that would be a threat to good water balance for people or environment, an indication of annual high and low variances shall be quantified.
Findings:	The site did not provide data from 2023. The site also did not quantify high or low annual variances.
Corrective action:	Collect data that is available and update water usage spreadsheet to include additional parameters, e.g., losses and variances.

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## Alliance for Water Stewardship (AWS)

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Finding No: TNR-012481  
Checklist Item No: 1.3.4  
Status: In Progress - CA plan approved  
Finding level: Minor  
Due date: 2025-Aug-01  
Checklist item: Water quality of the site's water source(s), provided waters, effluent and receiving water bodies shall be quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be quantified.  
Findings: The site did not provide 2023 data for Salt Creek's water quality. The site did not provide the water quality annual variances  
Corrective action: Collect available data and create spreadsheet for tracking water quality and variances. Review available records with the NDEE and Lincoln Transportation Utilities.

Finding No: TNR-011043  
Checklist Item No: 1.3.7  
Status: In Progress - CA plan approved  
Finding level: Minor  
Due date: 2025-Aug-01  
Checklist item: Annual water-related costs, revenues, and a description or quantification of the social, cultural, environmental, or economic water-related value generated by the site shall be identified and used to inform the evaluation of the plan in 4.1.2.  
Findings: The site did not include costs unrelated to water or sewer bills - the site shall quantify other water-related costs.  
Corrective action: The site also did not identify water-related cost generated by the site.  
" The site will update the water-related cost template to include a section for revenue generation costs. The site will assess where possible water-saving interventions improvements against ROI against water bill.

Finding No: TNR-011044  
Checklist Item No: 1.3.8  
Status: In Progress - CA plan approved  
Finding level: Minor  
Due date: 2025-Aug-01  
Checklist item: Levels of access and adequacy of WASH at the site shall be identified.  
Findings: The site did not identify whether it complies with any local law or regulation for WASH. The site shall identify its adequacy of WASH facilities through regulations.  
Corrective action: Identify local regulations for WASH, ensure compliance, and document.

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## Alliance for Water Stewardship (AWS)

Audit Number: AO-001189

Finding No:	TNR-011045
Checklist Item No:	1.4.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Aug-01
Checklist item:	The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be identified.
Findings:	The site identified embedded water use but did not identify water-related risks associated with its electricity input.
Corrective action:	Identify the level of risk within the catchment and update conformity deck.
Finding No:	TNR-011047
Checklist Item No:	1.5.3
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Aug-01
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 did not provide more recent data for the catchment water balance. It was unclear why water scarcity was identified in the catchment if the balance was positive.
Corrective action:	Research and request more current data to be provided. Also, utilize current data to determine if scarcity is appropriate, or not.
Finding No:	TNR-011136
Checklist Item No:	1.5.4
Status:	Open
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:	It would be good for the site's data for chemical and physical quality variances to include 2024 data.
Corrective action:	Updated data will be requested and recorded.

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## Alliance for Water Stewardship (AWS)

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Finding No:	TNR-011048
Checklist Item No:	1.5.6
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Aug-01
Checklist item:	Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.
Findings:	The site had not identified infrastructure's conditions and potential exposure to extreme events.
Corrective action:	Update deck to include infrastructure condition and exposure.
Finding No:	TNR-011049
Checklist Item No:	1.5.7
Status:	Open
Finding level:	Observation
Checklist item:	The adequacy of available WASH services within the catchment shall be identified.
Findings:	The site did not review if everyone had access to the catchment's good washing and toilet facilities - particularly the urban areas. The site could do this to better conform.
Corrective action:	The team will do more to investigate and understand the available WASH services in the catchment.
Finding No:	TNR-011092
Checklist Item No:	1.6.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Aug-01
Checklist item:	Shared water challenges shall be identified and prioritized from the information gathered.
Findings:	It was unclear why some shared water challenges had different priority levels. It was also unclear whether the stakeholders participated in identifying the shared challenges.
Corrective action:	Link to workshop document will be verified from the conformity deck. Stakeholders will be shown workshop results and asked to provide input with the next meeting.



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Finding No:	TNR-012434
Checklist Item No:	1.7.2
Status:	Open
Finding level:	Observation
Checklist item:	Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.
Findings:	A comprehensive basis for the level of prioritization was not identified. Also, the business opportunities were unclear. The site shall identify each opportunity's business opportunities and prioritization.
Corrective action:	Water-related opportunities will be discussed with the Facility Team and updated with the WSP
Finding No:	TNR-011438
Checklist Item No:	1.8.1
Status:	Open
Finding level:	Observation
Checklist item:	Relevant catchment best practice for water governance shall be identified.
Findings:	The site did not identify regional, state, or national best practices. It could do more here to identify other practices beyond what it currently does.
Corrective action:	More research will be conducted to identify best practices at the site and with a wider scope.
Finding No:	TNR-011095
Checklist Item No:	1.8.2
Status:	Open
Finding level:	Observation
Checklist item:	Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.
Findings:	The site did not identify regional, state, or national best practices. It could do more here to identify other practices beyond what it currently does.
Corrective action:	More research will be conducted to identify best practices at the site and with a wider scope.

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## Alliance for Water Stewardship (AWS)

Audit Number: AO-001189

Finding No: TNR-011051  
Checklist Item No: 1.8.3  
Status: In Progress - CA plan approved  
Finding level: Minor  
Due date: 2025-Aug-01  
Checklist item: Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.  
Findings: The site provided a list of best practices for water quality. Some best practices looked like general management practice and regulations, which were not best practices. The site also did not identify regional, state, or national best practices.  
Corrective action: The team will realign the existing templates to include site best practices specific to water quality.

Finding No: TNR-011052  
Checklist Item No: 1.8.4  
Status: In Progress - CA plan approved  
Finding level: Minor  
Due date: 2025-Aug-01  
Checklist item: Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.  
Findings: It was unclear how the identified actions were specific best practices for these IWRAs - onsite and within the catchment.  
Corrective action: The team will realign the existing templates to include site best practices specific to IWRAs.

Finding No: TNR-011053  
Checklist Item No: 1.8.5  
Status: In Progress - CA plan approved  
Finding level: Minor  
Due date: 2025-Aug-01  
Checklist item: Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.  
Findings: The site identified some WASH best practices, though the best practices list looked like it was missing information. The site also did not identify regional, state, or national best practices.  
Corrective action: Team will reassess WASH best practices with guidance of the standard and update the WASH template with feasible adoptive regional, state or national best practices.

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Finding No: TNR-011439  
Checklist Item No: 2.3.1  
Status: Open  
Finding level: Observation  
Checklist item: A water stewardship strategy shall be identified that defines the overarching mission, vision, and goals of the organization towards good water stewardship in line with this AWS Standard.  
Findings: The file Water-Stewardship-Policy-Position.pdf was unavailable. The document was not presented for review.  
Corrective action: Document and link will be verified.

Finding No: TNR-011056  
Checklist Item No: 2.3.2  
Status: In Progress - CA plan approved  
Finding level: Minor  
Due date: 2025-Aug-01  
Checklist item: A water stewardship plan shall be identified, including for each target:  
- How it will be measured and monitored  
- Actions to achieve and maintain (or exceed) it  
- Planned timeframes to achieve it  
- Financial budgets allocated for actions  
- Positions of persons responsible for actions and achieving targets  
- Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.  
Findings: The site's WSP is still incomplete and lacks details regarding the monitoring and measurements for some targets or specific timeframes. Mostly one action per target has been defined.  
Corrective action: WSP will be updated and more detail will be added for clarification.

Finding No: TNR-011059  
Checklist Item No: 3.1.2  
Status: In Progress - CA plan approved  
Finding level: Minor  
Due date: 2025-Aug-01  
Checklist item: Measures identified to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be implemented.  
Findings: The site did not provide clear evidence of implementation of respecting the water rights of others.  
Corrective action: The team will engage with surrounding stakeholders to understand stakeholder with water right impact. If evident the site will update the stakeholder plan with impact assessment.

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## Alliance for Water Stewardship (AWS)

Audit Number: AO-001189

Finding No:	TNR-011061
Checklist Item No:	3.2.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Aug-01
Checklist item:	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.
Findings:	The site did not provide clear evidence of implementation, including verifying full and regulatory compliance with respecting the rights of others.
Corrective action:	The team will engage with surrounding stakeholders to understand if there is any such water right regulation documented.
Finding No:	TNR-011062
Checklist Item No:	3.3.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Aug-01
Checklist item:	Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.
Findings:	The site did not provide evidence of implementation for all water balance targets or actions.
Corrective action:	These metrics will be added to the WSP with SMART Targets.
Finding No:	TNR-011065
Checklist Item No:	3.4.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Aug-01
Checklist item:	Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.
Findings:	The site did not provide evidence of implementation for all water quality activities.
Corrective action:	These metrics will be added to the WSP with SMART Targets.

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## Alliance for Water Stewardship (AWS)

Audit Number: AO-001189

Finding No:	TNR-012435
Checklist Item No:	3.6.1
Status:	Open
Finding level:	Observation
Checklist item:	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.
Findings:	The WASH target in the WSP was unclear in the WSP. The site did not present clear WASH actions with SMART targets in their WSP nor they clearly presented what was achieved
Corrective action:	More evidence will be collected along with updates the WSP and targets.
Finding No:	TNR-012436
Checklist Item No:	3.7.1
Status:	Open
Finding level:	Observation
Checklist item:	Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.
Findings:	The site did not quantify its indirect water use targets, or provide evidence of implementation through following up on information beyond the initial email.
Corrective action:	Additional requests and research will be conducted.
Finding No:	TNR-011072
Checklist Item No:	3.8.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Dec-23
Checklist item:	Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.
Findings:	The site has shared water-related infrastructure, therefore the engagement with infrastructure's owners is important, but only a screenshot showing a call was held with the wastewater inspector from the City of Lincoln was provided as evidence for this requirement. It is not clear what was the topic of the call or messages relayed.
Corrective action:	Stakeholder meetings will be held by the end of the year with proper documentation including WSP review and Site risks review with input from stakeholders.

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## Alliance for Water Stewardship (AWS)

Audit Number: AO-001189

Finding No:	TNR-011074
Checklist Item No:	3.9.2
Status:	Open
Finding level:	Observation
Checklist item:	Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.
Findings:	It is unclear how some best practices were linked to indicator 1.8.2, and evidence of implementing these actions toward achieving best practices related to water balance was not completely available. The site shall show evidence of implementing best practices for water balance.
Corrective action:	More detail will be added with best practices and how they relate to indicators.
Finding No:	TNR-011076
Checklist Item No:	3.9.4
Status:	Open
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:	Evidence of implementing the best practices identified by the site in Step 1 was unclear - the site shall identify more specific best practices for IWRA's.
Corrective action:	More detail will be added with best practices and how they relate to indicators.
Finding No:	TNR-012437
Checklist Item No:	4.1.1
Status:	Open
Finding level:	Observation
Checklist item:	Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.
Findings:	The site evaluated some targets in the WSP, but not all in terms of performance and progress.
Corrective action:	The WSP will be updated to satisfy this indicator.

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## Alliance for Water Stewardship (AWS)

Audit Number: AO-001189

Finding No: TNR-011079  
Checklist Item No: 4.1.2  
Status: In Progress - CA plan approved  
Finding level: Minor  
Due date: 2025-Aug-01  
Checklist item: Value creation resulting from the water stewardship plan shall be evaluated.  
Findings: The site evaluated value creation from the WSP for some but not all targets. Also, it was unclear how this value creation for the site is linked to implementing targets/actions set in the WSP.  
Corrective action: Review the WSP and ensure that targets and actions are evaluated for value creation.

Finding No: TNR-011081  
Checklist Item No: 4.1.3  
Status: Open  
Finding level: Observation  
Checklist item: The shared value benefits in the catchment shall be identified and where applicable, quantified.  
Findings: The site identified shared value benefits for some targets but not for all/overall WSP  
Corrective action: The WSP will be updated to satisfy this indicator.

Finding No: TNR-011080  
Checklist Item No: 4.2.1  
Status: In Progress - CA plan approved  
Finding level: Minor  
Due date: 2025-Aug-01  
Checklist item: A written annual review and (where appropriate) root-cause analysis of the year's emergency incident(s) shall be prepared and the site's response to the incident(s) shall be evaluated and proposed preventative and corrective actions and mitigations against future incidents shall be identified.  
Findings: The site has not provided evidence of preventative or corrective actions. The site shall evaluate the incidents' preventative and corrective action plans.  
Corrective action: EHS annual reviews will be updated to include water-related incidents.

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## Alliance for Water Stewardship (AWS)

Audit Number: AO-001189

Finding No: TNR-011082  
Checklist Item No: 4.3.1  
Status: In Progress - CA plan approved  
Finding level: Minor  
Due date: 2025-Aug-01  
Checklist item: Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.  
Findings: The site did not provide evidence of consultation efforts about its performance against its water stewardship targets with stakeholders.  
Corrective action: Stakeholder meetings will be held by the end of the year with proper documentation including WSP review and Site risks review with input from stakeholders.

Finding No: TNR-011084  
Checklist Item No: 5.1.1  
Status: In Progress - CA plan approved  
Finding level: Minor  
Due date: 2025-Aug-01  
Checklist item: The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.  
Findings: The site did not clearly disclose the internal governance for its water-related work.  
Corrective action: Water-related governance details will be updated and disclosed with local laws and regulations.

Finding No: TNR-011085  
Checklist Item No: 5.2.1  
Status: In Progress - CA plan approved  
Finding level: Minor  
Due date: 2025-Aug-01  
Checklist item: The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.  
Findings: There is no evidence that the WSP was communicated to relevant stakeholders. The site shall find a way to communicate its WSP to stakeholders.  
Corrective action: Stakeholder meetings will be held by the end of the year with proper documentation including WSP review and Site risks review with input from stakeholders.



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## Alliance for Water Stewardship (AWS)

Audit Number: AO-001189

Finding No: TNR-011086

Checklist Item No: 5.3.1

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2025-Aug-01

Checklist item: A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.

Findings: The site did not provide evidence to disclose its water stewardship performance annually. The site shall find a way to disclose this information annually at a minimum.

Corrective action: Stakeholder meetings will be held by the end of the year with proper documentation including WSP review and Site risks review with input from stakeholders.

Finding No: TNR-011088

Checklist Item No: 5.4.2

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2025-Aug-01

Checklist item: Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.

Findings: There is no relevant evidence for this indicator. The site shall identify efforts to engage stakeholders and support public-sector agencies.

Corrective action: Stakeholder meetings will be held by the end of the year with proper documentation including WSP review and Site risks review with input from stakeholders.

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### Report Details

Report	Value
Report prepared by	Kimberly Worsham
Report approved by	Nathalie Karam
Report approved on (Date)	23/9/2024

### Surveillance

**Proposed date for next audit**  
2025-Sep-01

Comment      This was the initial audit of the site.

NB: The attachments above are for the entire audit - all indicators.

### Stakeholder Announcements

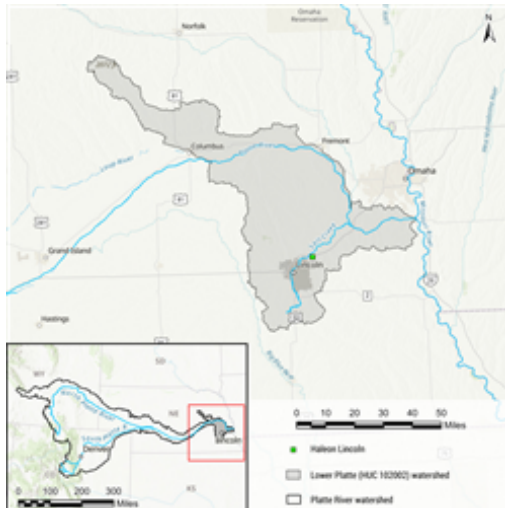
Date of publication	Location
01/05/2024	<a href="https://www.haleon.com/content/dam/haleon/corporate/documents/our-impact/environment/integrating-water-stewardship/stakeholder-announcement-lincoln.pdf">https://www.haleon.com/content/dam/haleon/corporate/documents/our-impact/environment/integrating-water-stewardship/stakeholder-announcement-lincoln.pdf</a>
01/05/2024	<a href="https://a4ws.org/wp-content/uploads/2024/05/Stakeholder-Announcement-Haleon-Lincoln-AWS-000733.pdf">https://a4ws.org/wp-content/uploads/2024/05/Stakeholder-Announcement-Haleon-Lincoln-AWS-000733.pdf</a>
Comment	The site provided its stakeholder announcement on its corporate site under its Environment>Water section.
Comment	The auditor had 3 phonecalls with stakeholders.

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## Alliance for Water Stewardship (AWS)

Audit Number: AO-001189

### Catchment Information



1.1.1\_Catchment\_Map.jpg

#### Catchment Information

The site is in the Salt Creek Watershed within the Lower Platte River Basin. While outside of the primary catchment, upstream areas of the Platte River watershed and downstream areas of the Missouri River watershed are hydrologically connected to the site.

While the site does not source water from the High Plains Aquifer, it is within the boundaries of the Lower Platte River Basin and is extremely important to the state of Nebraska and the region. Each state overlying the High Plains Aquifer is entitled to separate groundwater laws. Within Nebraska, the Nebraska Groundwater Management and Protection Act establishes that groundwater is a local rather than state responsibility. Nebraska is divided into 23 Natural Resource Districts (NRDs), which manage surface and groundwater resources within their boundaries. NRDs develop management plans, which need to be approved by the Nebraska Department of Natural Resources (NeDNR), to protect water quality and quantity and to prevent conflicts between surface and groundwater users.

Within the Lower Platte River Basin are the Lower Platte North NRD and the Lower Platte South NRD, each with separate groundwater management plans tailored to the district's challenges and priorities. These NRDs and others collaborated on the Lower Platte River Drought Contingency Plan to respond to the increased severity of droughts. Surface water in the catchment is jointly managed by NRDs. Still, the Nebraska Department of Energy and Environment (NDEE) is primarily responsible for surface water quality, while the NeDNR is primarily responsible for surface water quantity. The NDEE has developed TMDLs for the Lower Platte River [Lower Platte Basin E. coli TMDL.pdf] and Wagon Train [Wagon Train TMDL.pdf] and Yankee Hill [Yankee Hill TMDL.pdf] lakes within the catchment and the Lower Platte River Corridor Alliance has developed the Water Quality Management Plan for the Lower Platte River Corridor.

In addition to the plans above, the Platte River Recovery Implementation Program (PRRIP) was developed as a collaboration between the states of Colorado, Wyoming, and Nebraska and the Department of the Interior. The goal is to improve river management for the health of the ecosystem and those who depend on it.

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001189

### Client Description and Site Details



1.1.1\_Site\_Boundaries.png

#### Client/Site Background

Haleon owned and managed the 400-acre site at 10401 Cornhusker Hwy, Lincoln, NE 68517 (40.888041, -96.577551). Glaxo Smith Kline owned the site until 2022, when Haleon spun off as an independent company. The manufacturing facility produced consumer healthcare products such as Theraflu, Excedrin, Gas-X, and Politident. The site's property included a large building with offices and production facilities, green landscaping, and a large stormwater retention pond with an aeration fountain. The site also has an area of property where it allows employees to manage gardens, and contracts out some of its land to a local farmer for haybaling and corn growing.

The site had one well, a retention pond, cooling towers, and an on-site wastewater treatment facility. Lincoln Water System provided the water source, which received water from wells in Ashland, NE, that is hydrologically connected to the Platte River. The site also owns an on-site groundwater well that provides irrigation water.

The site's discharge went to the Lincoln Northeast Wastewater Treatment Plant (NE WTP) after passing through the site's on-site wastewater treatment plant for pre-treatment. The NE WTP discharges into Salt Creek, ultimately running to the Missouri River. The site's stormwater is collected in the detention pond before being discharged to a tributary of Salt Creek.

### Summary of Shared Water Challenges




#### Summary of Shared Water Challenges

The site identified the following shared water challenges: droughts and water quantity, flooding, climate change impacts, impaired surface water quality, and wildfire.

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

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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>
	Yes 
Comment	The site occupies one catchment.
0.1.1.2	<i>The scope of the proposed certification shall be under the control of a single management system.</i>
	Yes 
Comment	The scope of the certificate is under a single management system.
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>
	Yes 
Comment	The scope of the certification is homogeneous concerning the primary production system, water management, product or service range, and the main market structures.

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)


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### 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.

 in progress

**Comment** The site mapped its physical scope based on the indicator requirements, considering the regulatory landscape and zone of stakeholder interests, including:

- The piping, including the Lincoln Water Pumping Station and the NE Treatment Plant (in "1.1.1 Generalized Source Water and Discharge" PDF);
- The groundwater well used for irrigation (in the "water infrastructure" PDF);
- The catchment including the tributary of the Salt Creek (in the "site high-level water in and out" PDF); however, the wells in Ashland were not mapped because it was not publicly available, though they were within the town of Ashland;

The site also mapped water closets (WC), lavatories, showers, sinks, drinking fountains, emergency eye wash stations, and emergency showers. The site has also mapped the city water connection for emergency backup only; one water well is not used.

**Finding No: TNR-011037**

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

**1.2.1** *Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall:*





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

 Yes

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## Alliance for Water Stewardship (AWS)

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Comment	<p>The site identified stakeholders and their water-related challenges. In 2023, a team workshop was used to identify stakeholders. Stakeholders include the local Pawnee tribe and farmers, Lower Platte South NRD, which manages water sources, and the Audubon Society Great Plains Chapter.</p> <p>The site provided evidence of engagement in 2023 with these stakeholders to consult on water-related interests and challenges.</p> <p>Based on the stakeholder interviews, several stakeholders noted infrequent communications - particularly around water stewardship. This indicated that the site's engagement could have been stronger and expected to be improved throughout the AWS journey noting that the site are still in their first year of certification.</p>	
1.2.2	<p><i>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.</i></p>	 Yes
Comment	<p>The site identified each stakeholder's current and potential degree of influence and a comprehensive basis for the level of influence (ranking).</p>	
1.3	<p><i>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.</i></p>	
1.3.1	<p><i>Existing water-related incident response plans shall be identified.</i></p>	 Yes
Comment	<p>The site has identified 4 water incident response plans:            QD-SOP-009964 Water Management Plan: This plan describes how water on-site is managed, focusing on efficiency and minimizing adverse impacts.            -QD-SOP-009696 Chemical Spill Plan: This plan establishes the procedure for responding to and reporting the spill of liquids, solids, or release of gases or vapors, including hazardous material, at the site.            -Spill Prevention, Control, and Countermeasure (SPCC) Plan: This plan outlines the site's measures to prevent incidental to major oil discharges from the facility to nearby surface water bodies. The SPCC includes steps the site should take to respond to and report oil spills.            -Business Continuity Plan (BCP - not provided a soft copy due to confidentiality): This plan outlines the site's response to flooding and extreme heat. The site shared the BCP on its screen, including details on the site's likelihood of disasters. The site also shared a Crisis Continuity Management Plan (CCMP), which showed its teams' responsibilities and a list of actions and forms to follow during/after any incident.</p>	
1.3.2	<p><i>Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped</i></p>	 Yes
Comment	<p>The site identified and mapped its water balance, including water from the municipal water treatment plant, water use onsite, its wastewater treatment facility, and the outgoing water to the municipal wastewater treatment plant that gets put into Salt Creek. The site indicated that its losses included almost entirely evaporation.</p>	
1.3.3	<p><i>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.</i></p>	 in progress

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

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**Comment** A graph showing the total water consumed from 2018 to October 2023 has been identified. Data for 2023 was not provided, so updated data is required, at least for 2023.

The site stated that it planned to implement better metering as part of its WSP to understand better where water is used. This would be a phased plan over several years until 90% of its water is metered. This would include a well repair that would include a new meter (since its meter was not functional).

The site identified a water-related challenge of drought, however it did not quantify a high or low annual variance.

**Finding No: TNR-011039**

**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.*

 in progress

**Comment** The water quality of the provided waters was quantified for 2023 (City of Lincoln, Water Quality Report, 2023). No quality violations were reported during the reporting period. The site had a No Exposure Certificate from (September 2022) for conditional exclusion from NPDES Industrial Stormwater Permitting.

The site's wastewater is pre-treated at the on-site wastewater treatment plant. The site has provided the Industrial Wastewater Facility Permit (Nebraska Dept. Environment and Energy). The site's wastewater treatment plant has not experienced water quality exceedances or violations in the last five years. Effluent parameter data was provided for 2022-2023. The site also provided a third-party wastewater quality test from January 2024.

The water quality of Salt Creek (receiving water body) remained relatively stable over the last five years, but elevated counts of bacteria (total coliforms and E. coli) are common. Water quality parameters were provided for 2017-October 2022, however the site did not provide data from the last year.

An on-site water well supplied a small portion of the site's water to irrigate lawn areas. The water quality was considered as good.

The site had a shared water-related challenge around impaired surface water quality. However, the site did not receive water from any surface water. Thus, it would not impair its water quality from provided waters and receiving water bodies other than Salt Creek.

**Finding No: TNR-012481**

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

 Yes

**Comment** The site identified a list of potential sources of pollution in a color-coordinated list of where the chemicals were stored onsite.

The site also mapped potential sources of pollution locations (boiler house, combustible storage building, east warehouse, wastewater treatment plant).

Warehouses have containment areas with valves that close automatically in the event of a fire to contain sprinkler water.

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





 Yes



# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)





Audit Number: AO-001189

Comment	<p>The site identified and mapped one Important Water-Related Area: a small pond north of the property. The pond was used for stormwater retention and as an additional water source for the fire suppression system. It has been recently renovated and was in very good condition.</p> <p>The site also identified and mapped a popular employee community garden in very good condition as another IWRA.</p>	
1.3.7	<p><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></p>	 in progress
Comment	<p>The site calculated its water and wastewater costs. The site had no water-related revenue as it was a solid-producing facility for dry products with no water-related revenues.</p> <p>However, the site did not quantify other water-related costs, such as water meter operations/maintenance, water consultants, stakeholder engagement activities, AWS certification, and water-related projects. The site also did not identify any social, cultural, environmental, or economic water-related value it generated.</p>	<p><b>Finding No: TNR-011043</b></p>
1.3.8	<p><i>Levels of access and adequacy of WASH at the site shall be identified.</i></p>	 in progress
Comment	<p>The site identified the number of employees and the WASH facilities onsite.</p> <p>However, the site did not identify whether it complies with any local law or regulation regarding WASH, such as OSHA.</p>	<p><b>Finding No: TNR-011044</b></p>
1.4	<p><i>Gather data on the site's indirect water use, including: its primary inputs; the water use embedded in the production of those primary inputs the status of the waters at the origin of the inputs (where they can be identified); and water used in out-sourced water-related services.</i></p>	
1.4.1	<p><i>The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be identified.</i></p>	 in progress
Comment	<p>The site provided a list of primary inputs, identifying that electricity was its only primary input within the catchment. However, it did not identify the water quality of its electricity input or associated water risks.</p>	<p><b>Finding No: TNR-011045</b></p>
1.4.2	<p><i>The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.</i></p>	 Yes
Comment	<p>The site identified one outsourced service in the catchment: Cintas (laundry service). Cintas indicated that the site used about 450-800 gallons of indirect water with them weekly.</p> <p>The site indicated that Cintas recycled approximately 90% of its withdrawals to the local municipality and reduced total withdrawals by nearly 10% since 2019.</p> <p>The site indicates that the embedded water use quantification has been requested a few times (the last effort was in February 2024). Cintas has directed the site to their website with links to their sustainability practices.</p>	
1.5	<p><i>Gather water-related data for the catchment, including water governance, water balance, water quality, Important Water-Related Areas, infrastructure, and WASH</i></p>	

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)





Audit Number: AO-001189

<b>1.5.1</b>	<i>Water governance initiatives shall be identified, including catchment plan(s), water-related public policies, major publicly-led initiatives under way, and relevant goals to help inform site of possible opportunities for water stewardship collective action.</i>	 Yes
Comment	The site identified water governance initiatives, including the Nebraska Groundwater Management and Protection Act (April 2021), Lower Platte River Basin Coalition Basin Water Management Plan (October 2017), Lower Platte River Drought Contingency Plan (October 2019), Lower Platte River Corridor Alliance Water Quality Management Plan (April 2019), and Platte River Recovery Implementation Program (since 1997). The site also identified other initiatives beyond governments, including the University of Nebraska.	
<b>1.5.2</b>	<i>Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.</i>	 Yes
Comment	The site listed water-related legal/regulatory requirements (state, federal, and local regulations). This included the EPA Clean Water Act, Safe Drinking Water Act, Nebraska Groundwater Management and Protection Act, statewide Surface Water Rules, and the Lower Platte South regulations (including well use). The site provided information around the municipal codes and legal requirements for water through its Environmental Registry.	
<b>1.5.3</b>	<i>The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.</i>	 in progress
Comment	<p>The site identified the catchment water balance as being up to either 2012 or 2018, indicating a net positive water supply. However, the site did not provide more recent data for the catchment water balance - data before 2020 is outdated. It was unclear why water scarcity was identified in the catchment if the balance was positive.</p> <p>The site identified water scarcity, acknowledging that peak summer demands can exacerbate water shortages during droughts. The City of Lincoln began searching for a secondary drinking water source following the 2002 and 2012 droughts, though it was not clear what had happened since the droughts.</p> <p>A graph identified/quantified the annual variance in water supply and catchment water balance; however, for the scope of this data, all of the data was outdated (up to 2012).</p> <p>Was the balance for the right catchment boundary? Which period did the data cover? Did it include all reasonable flows? What is the outcome of the balance the site presented? Is it in line with what the tools like Aqueduct shows about the water stress, or what is public knowledge or perception about the balance in the area? If any variances were analysed, then what kind of variances?</p>	
	<b>Finding No: TNR-011047</b>	
<b>1.5.4</b>	<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.

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

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Comment	<p>The site identified the catchment's water quality, including physical, chemical, and biological status. The E.coli variances were quantified up to April 2023.</p> <p>Groundwater quality within the basin was better than surface water, with only slightly elevated levels of iron and manganese, which could be removed during water treatment.</p> <p>The 2021 Nebraska Groundwater Quality Monitoring Report showed that there were still areas in the state and the basin where groundwater was near or greater than the drinking water MCL of 10 mg/L for nitrate. The 2022 Nebraska Water Quality Integrated Report also identified the Lower Platte River as impaired by excessive E. coli and atrazine. Segments of the Lower Platte River were also impaired for high pH, selenium, and fish consumption advisories.</p> <p>The water quality of the Lower Platte River was generally considered fair, but agricultural and urban discharge have heavily impacted surface water quality.</p> <p>Salt Creek was identified as impaired by E. coli and aluminum. Other streams in the basin were also identified as impaired by E. coli, metals (arsenic, aluminum, iron), and Atrazine. Lakes were impaired by nutrients (total nitrogen, total phosphorus) and mercury.</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
Comment	The site identified and mapped 4 Important Water-Related Areas inside the site's catchment: Warner Wetlands Conservation Area, Salt Creek, Branched Oak Lake, and Lower Platte River. Their statuses had also been assessed.	
1.5.6	<i>Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.</i>	 in progress
Comment	<p>The site identified planned and existing water-related infrastructure, including the Lincoln Water System Well Field, Lincoln Water Treatment Facilities, Lincoln Water Resource Recovery Facilities, Salt Creek Levee, future Deadmans Run, and future Water 2.0 infrastructure.</p> <p>However, the site had not identified their conditions and potential exposure to extreme events.</p>	<b>Finding No: TNR-011048</b>
1.5.7	<i>The adequacy of available WASH services within the catchment shall be identified.</i>	 Obs.
Comment	<p>The site identified that WASH was not a concern in urban areas of the state, but rural areas had concerns with safe drinking water access. It also mentioned that the tribal communities lack access to WASH services.</p> <p>The site did not review whether everyone, particularly those in urban areas, had access to the catchment's good washing and toilet facilities.</p>	
1.6	<i>Understand current and future shared water challenges in the catchment, by linking the water challenges identified by stakeholders with the site's water challenges.</i>	
1.6.1	<i>Shared water challenges shall be identified and prioritized from the information gathered.</i>	 in progress

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

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**Comment** The site identified shared water challenges, including droughts and shortages, flooding, climate change impacts, impaired surface water quality, and wildfires. The site prioritized these challenges. However, it was unclear why some shared water challenges had different priority levels.

It was also unclear whether the stakeholders identified the shared challenges.

**Finding No: TNR-011092**

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



Yes

**Comment** Initiatives to address shared water challenges have been identified, including the City of Lincoln's Drought Contingency Plan (2019), Low Platte River's Water Quality Management Plan (2019), planned new infrastructure, and the Nebraska Wildfire Control Act (2013).

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

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



Yes

**Comment** Water risks have been identified and prioritized, including the likelihood and severity of impact within a given timeframe, potential costs, and business impact.

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



Obs.

**Comment** -Water-related opportunities have been identified and prioritized, including how the site may participate. An estimate of potential savings/value creation was identified for high-priority opportunities. However, a comprehensive basis for the level of prioritization was not identified, and the business opportunities were unclear.

**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.

**Comment** The site provided a list of best practices for water governance, with most information focusing on what the site was doing.

The site did not identify regional, state, or national best practices.

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



Obs.

**Comment** The site provided a list of best practices for water balance, with most information about what the site was already doing.

The site did not identify regional, state, or national best practices.

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



in progress

**Comment** The site provided a list of best practices for water quality. Some best practices looked like general management practices and regulations, which were not best practices.

The site also did not identify regional, state, or national best practices.

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001189

**Finding No: TNR-011051**

1.8.4

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

in progress

Comment

The site identified 4 IWRAs in its catchment (refer to indicator 1.5.5), but it was unclear how the identified actions were best practices for these IWRAs - both onsite and within the catchment.

The site also did not identify regional, state, or national best practices.

**Finding No: TNR-011052**

1.8.5

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

in progress

Comment

The site identified some WASH best practices, but the list lacked information.




The site also did not identify regional, state, or national best practices.

**Finding No: TNR-011053**

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001189

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"> <li>- That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes</li> <li>- That the site implementation will be aligned to and in support of existing catchment sustainability plans</li> <li>- That the site's stakeholders will be engaged in an open and transparent way</li> <li>- That the site will allocate resources to implement the Standard.</li> </ul>	 Yes
Comment	The site identified a signed site agreement committing to the water stewardship journey. The site was also posted in its open lobby, which was publicly available.	
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"> <li>- Identification of responsible persons/positions within facility organizational structure</li> <li>- Process for submissions to regulatory agencies.</li> </ul>	 Yes
Comment	<p>The site described the system for maintaining legal compliance with the No Exposure Certificate for conditional exclusion from NPDES Industrial Stormwater Permitting and the Industrial Wastewater Permit. The person responsible for this was the EHS Lead.</p> <p>The site shared three documents demonstrating its system's compliance with legal water regulations: a compliance calendar, an environmental register that included all national, state-level, and municipal regulations and laws, and a duty holder matrix that listed the duty holder's name and role for regulatory systems.</p>	
2.3	<i>Create a water stewardship strategy and plan including addressing risks (to and from the site), shared catchment water challenges, and opportunities.</i>	
2.3.1	<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>	 Obs.

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001189

**Comment** The site presented a water stewardship strategy in line with the AWS Standard. Haleon's vision was the sustainable and equitable management of water resources, recognizing their impact on the resource, and integrating water stewardship and waste circularity into their operations to meet targets. Haleon's mission was to achieve AWS standard certification at all manufacturing sites by 2025 and water neutrality at manufacturing plants in water-stressed basins by 2030.

Organizational goals towards good water stewardship included:

- Increasing on-site efficiency
- Increasing monitoring, awareness, and controls on-site
- Working with stakeholders to ensure best practices are being implemented
- Championing off-site projects in the catchment to address shared water challenges and water stewardship outcomes

However, the file Water-Stewardship-Policy-Position.pdf was unavailable.

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

 in progress

**Comment** The site identified a water stewardship plan with 15 targets across the 5 AWS outcomes. Each target has the following:  
 -How actions will be measured and monitored for some but not all  
 -Planned timeframes to achieve it for some but not all  
 -Actions and description to achieve/maintain/exceed it for some but not all  
 -Financial budgets allocated for actions, including hours of salaried workers for some but not all  
 -Positions of persons responsible for actions and achieving targets for some but not all  
 -The link between each action and the achievement of best practice

Additionally, the WASH target was unclear and did not include any details about how achieve it.

**Finding No: TNR-011056**

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

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

 Yes

**Comment** The site provided 3 documents for showing mitigation plans coordinated with the local fire department, including a fire protection agreement with the City of Lincoln (July 2024), an emergency service organization that listed the action plans according to public agency protocols (May 2022), and its business continuity plan (January 2024).



# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001189

3 STEP 3: IMPLEMENT - Implement the site's stewardship plan and improve impacts
<b>3.1</b> <i>Implement plan to participate positively in catchment governance.</i>
<b>3.1.1</b> <i>Evidence that the site has supported good catchment governance shall be identified.</i> <span style="float: right;">✔ Yes</span>
<p>Comment The site identified 4 targets to support good catchment governance, including:</p> <ul style="list-style-type: none"> <li>-Work with farmers on Haleon-owned land to ensure the best farming practices are implemented - The site provided evidence from December 2023 with the farmer to extend its lease agreement, including best water and conservation practices.</li> <li>-Fund off-site water stewardship projects in the catchment (e.g., river restoration, habitat conservation, water quality improvement projects) - The site had not identified any projects for this yet.</li> <li>-Create a contingency plan for using an on-site well in case of water supply restrictions/interruptions. The site had determined that it did not plan on doing this.</li> <li>-Use on-site groundwater well for irrigation water instead of city-provided potable water - The site provided a screenshot SMS conversation from July 2024 about requesting a well repair bid.</li> </ul>
<b>3.1.2</b> <i>Measures identified to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be implemented.</i> <span style="float: right;">➤ in progress</span>
<p>Comment The site provided evidence of a 2022 template for change requests that indicates the evaluation of wastewater discharge improvements. The site shared that they used the checklist to verify site performance on environmental impact. This was done via impact assessments with local governments for permits, system design requirements with engineering firms, or contacts with local authorities to ensure effluents are captured correctly.</p> <p>However, the site did not provide clear evidence of implementation.</p> <p style="text-align: right;"><b>Finding No: TNR-011059</b></p>
<b>3.2</b> <i>Implement system to comply with water-related legal and regulatory requirements and respect water rights.</i>
<b>3.2.1</b> <i>A process to verify full legal and regulatory compliance shall be implemented.</i> <span style="float: right;">✔ Yes</span>
<p>Comment The site provided evidence of one of its semi-annual water quality tests to maintain compliance from April 2024 to show evidence of legal and regulatory compliance implementation.</p>
<b>3.2.2</b> <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> <span style="float: right;">➤ in progress</span>
<p>Comment The site provided evidence of a 2022 template for change requests that indicates the evaluation of wastewater discharge improvements. The site shared that they used the checklist to verify site performance on environmental impact. This was done via impact assessments with local governments for permits, system design requirements with engineering firms, or contacts with local authorities to ensure effluents are captured correctly.</p> <p>However, the site did not provide clear evidence of implementation.</p> <p style="text-align: right;"><b>Finding No: TNR-011061</b></p>
<b>3.3</b> <i>Implement plan to achieve site water balance targets.</i>




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## Alliance for Water Stewardship (AWS)

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**Finding No: TNR-011062**

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

**Comment** The site's WSP identified 12 targets for water balance:  
 -Increase monitoring, awareness, and controls. As of June 2024, the site provided meter readings after installation.  
 -Upgrade malfunctioning sprinkler heads—The site provided evidence of sprinkler upgrade invoices (September 2023) and an image of the upgraded sprinkler product.  
 -Increase on-site conservation/efficiency - The site did not provide evidence.  
 -Onsite native grass conversion - The site had determined to pause this work because of budget restrictions.  
 -Work with farmers on Haleon-owned land to ensure best farming practices are implemented - The site shared evidence from December 2023 with the farmer to extend its lease agreement, including best water and conservation practices.  
 -Create a contingency plan for using on-site well in case of water supply restrictions/interruptions - Evidence for this was unclear.  
 -Use on-site groundwater well for irrigation water instead of city-provided potable water - The site provided a screenshot of a conversation regarding an upgrade/fix request.  
 -Recapture condensate off cooling coils for reuse - The site shared that it had not yet designed a bid for this project.  
 -Increase on-site conservation/efficiency - The site provided a presentation about upgrading cooling towers from April 2022, wastewater treatment plant improvements from 2018 and 2023, and boiler work orders from January 2024.  
 -Indirect Water Use - maintain 90% recycle/reuse with Cintas. - The site had not started this yet.  
 -Volunteer for lake clean up day at Oak Lake. - The site provided evidence from August 2024 of its June/mid-July wins, including a site cleanup at Oak Lake.  
 -Fund off-site water stewardship projects in the catchment (e.g., river restoration, habitat conservation, water quality improvement projects) - The site had not started this year.


**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** The site identified water scarcity as a shared water challenge. It has several annual targets for reducing the volumetric total. The site shared waterfall documents that calculated water use conservation. The site provided evidence of the sustainability dashboard from June 2024 (slide 10), as well as its energy and water dashboard from April 2024 (in the conformity deck - slides 59-61).

**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 shared that this was not applicable within its catchment as there were no additional legal texts for the site to follow in its permits.

**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.*  in progress


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**Comment** The site's WSP identified 5 targets for water quality:  
 -On-site native grass conversion -The site provided no evidence of this.  
 -Work with farmers on Haleon-owned land to ensure best farming practices are implemented -  
 The site provided evidence from December 2023 with the farmer to extend its lease  
 agreement, which included best practices for water and conservation.  
 -Fund off-site water stewardship projects in the catchment (e.g., river restoration, habitat  
 conservation, and water quality improvement projects). The site has not identified any projects  
 for this yet.  
 -Track PFAS regulations - The site did not provide evidence of this.  
 -Volunteer for lake clean up day at Oak Lake. - The site provided evidence from August 2024  
 of its June/mid-July wins, including a site cleanup at Oak Lake.

**Finding No: TNR-011065**

**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**


**Comment** The site identified water quality in the catchment as a shared water challenge. The site shared evidence of its active pharmaceutical ingredients (API) losses up to July 2023 as evidence of continual improvement to achieve best practices for its effluent.

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

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

**Comment** The site's WSP identified 3 targets for IWRAs:  
 -Work with farmers on Haleon-owned land to ensure the best farming practices are implemented. The site provided evidence from December 2023 with the farmer to extend its lease agreement, which included best practices for water and conservation.  
 -Fund off-site water stewardship projects in the catchment (e.g., river restoration, habitat conservation, water quality improvement projects) - The site had determined not to pursue this.  
 -Volunteer for lake clean up day at Oak Lake. - The site provided evidence from August 2024 of its June/mid-July wins, including a site cleanup at Oak Lake.


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

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

**Comment** The site identified and quantified its WASH services onsite (in its best practice list).

The auditor observed WASH facilities while on the site tour - pictures included.

However, the WASH target in the WSP was unclear.

**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**

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Comment	The site provided evidence of a 2022 template for change requests that indicates the evaluation of wastewater discharge improvements. The site shared that they used the checklist to verify site performance on environmental impact. This was done via impact assessments with local governments for permits, system design requirements with engineering firms, or contacts with local authorities to ensure effluents are captured correctly.	
	The site's wastewater quality was within the limits, its water extraction was within the limits, it did not pollute water within the catchment, and it did not block water access.	
3.7	<i>Implement plan to maintain or improve indirect water use within the catchment:</i>	
3.7.1	<i>Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.</i>	Q Obs.
Comment	The site identified an indirect water use target in the WSP - Maintain 90% recycle/reuse via Cintas Uniforms. The site provided email evidence of its quantified use of water through Cintas. However, whether the site had met or quantified its target was unclear.	
3.7.2	<i>Evidence of engagement with suppliers and service providers, as well as, when applicable, actions they have taken in the catchment as a result of the site's engagement related to indirect water use, shall be identified.</i>	✓ Yes
Comment	The site provided evidence of engagement with Cintas regarding its water usage (July 2024), stating that Cintas used 400-800 gallons weekly for the site.	
3.8	<i>Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have.</i>	
3.8.1	<i>Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.</i>	✦ in progress
Comment	The site provided a screenshot of a call with the wastewater inspector from the City of Lincoln in August 2024. However, it was not clear what the site's conversation was about, or whether it was about water-related infrastructure of concern.	
<b>Finding No: TNR-011072</b>		
3.9	<i>Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.</i>	
3.9.1	<i>Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.</i>	✓ Yes
Comment	The site's evidence of water governance best practices included the WSP, the duty holder list (which included the water stewardship owner), the signed commitment, and the lease with farmer Ray Siekman, which included best practices.	
3.9.2	<i>Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.</i>	Q Obs.
Comment	The site shared that it connected 14 meters to the building management system for continuous monitoring and alarming for higher-than-typical use. It also repaired and upgraded sprinkler heads for island zones. It also completed changes to the automatic bin washing system to reduce USP Water usage. The project is 95% complete and waiting for the final sign-off in the Change Control. Evidence included the duty holder list, meter invoices and BMS screenshots, water balance maps, and sprinkler head evidence. However, the site did not provide clear evidence of the latter.	

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3.9.3	Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.	 Yes
Comment	The site implemented water quality best practices, including an on-site primary treatment plant and potential evidence for frequent testing, weekly chemical and micro analyses of the potable water supplied (per QD-SOP-009964 - See 1.3.8). The site also shared its API losses tracker.	
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 provided evidence of a clean-up at Oak Lake in August 2024 and pond seawall management/improvements from 2021. However, evidence of implementing actions to achieve best practices related to IWRA's was unclear because the list of best practices was not specific.	
3.9.5	Actions towards achieving best practice related to targets in terms of WASH shall be implemented.	 Yes
Comment	On the site tour, the auditor witnessed evidence of the implementation of best practices, including the free MHM products, nursing rooms, ice machines, and water bottle filling stations.  QD-SOP-009964 calls out access to clean drinking water and sanitation. SMB was contracted to maintain and clean restrooms daily.	

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4 STEP 4: EVALUATE - Evaluate the site's performance.	
4.1	<i>Evaluate the site's performance in light of its actions and targets from its water stewardship plan and demonstrate its contribution to achieving water stewardship outcomes.</i>
4.1.1	<i>Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.</i>
Comment	<p>The site evaluated some targets in the WSP, but not all.</p> <p>*Note that the plan is in its early stages of implementation (within year 1). Thus, a fuller evaluation of value creation is expected in future years.</p>
4.1.2	<i>Value creation resulting from the water stewardship plan shall be evaluated.</i>
Comment	<p>The site evaluated value creation from the WSP for some but not all targets. However, it was unclear how this value creation for the site is linked to implementing targets/actions set in the WSP.</p> <p>*Note that the plan is in its early stages of implementation (within year 1). Thus, a fuller evaluation of value creation is expected in future years.</p>
	<b>Finding No: TNR-011079</b>
4.1.3	<i>The shared value benefits in the catchment shall be identified and where applicable, quantified.</i>
Comment	<p>The site identified shared value benefits for some but not all targets in the WSP, and they had not been quantified.</p> <p>*Note that the plan is in its early stages of implementation (within year 1). Thus, a fuller evaluation of value creation is expected in future years.</p>
	<b>Finding No: TNR-011081</b>
4.2	<i>Evaluate the impacts of water-related emergency incidents (including extreme events), if any occurred, and determine the effectiveness of corrective and preventative measures.</i>
4.2.1	<i>A written annual review and (where appropriate) root-cause analysis of the year's emergency incident(s) shall be prepared and the site's response to the incident(s) shall be evaluated and proposed preventative and corrective actions and mitigations against future incidents shall be identified.</i>
Comment	<p>The site provided a water-related incident list for events from April 2022 to July 2024 and an incident report from February 2024 with a root cause analysis. However, the site had not provided evidence of preventative or corrective action plans.</p>
	<b>Finding No: TNR-011080</b>
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>


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Comment      The site identified 7 stakeholder consultation efforts, with 6 replies. Responses were 85% successful. None of the stakeholders had concerns about the site and/or the catchment, resulting in limited participation. It was unclear if the site had shared its performance.

However, it is recognized that the site has not yet reached a year of implementation since finalizing the WSP. At that time, more comprehensive consultation with stakeholders on the site's water stewardship performance would be expected.

**Finding No: TNR-011082**

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

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

Comment      The site provided evidence of modifications to the WSP during the audit.

It is recognized that the site has not reached a year of implementation since the WSP's finalization. At that time, the site's water stewardship plan should be modified and adapted to incorporate any relevant information and lessons learned from the evaluations in Step 4 and identified changes.

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5 STEP 5: COMMUNICATE & DISCLOSE - Communicate about water stewardship and disclose the site's stewardship efforts	
5.1	Disclose water-related internal governance of the site's management, including the positions of those accountable for legal compliance with water-related local laws and regulations.
5.1.1	The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed. <span style="float: right;">in progress</span>
Comment	The site disclosed its internal governance in the SOP attached, though it was unclear how it disclosed this information. <b>Finding No: TNR-011084</b>
5.2	Communicate the water stewardship plan with relevant stakeholders.
5.2.1	The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders. <span style="float: right;">in progress</span>
Comment	There is no evidence that the WSP was communicated to relevant stakeholders, including how the water stewardship plan contributes to AWS Standard outcomes. Additionally, stakeholder interviews indicated they were unaware of the site's water stewardship journey.  It is recognized that the site has not yet reached a year of implementation. A high-level summary of actions undertaken by the site was shared with key stakeholders, but this did not include quantified performance against targets. Going forward, the site should disclose greater detail of its water stewardship performance, including quantified performance against targets, at least annually. <b>Finding No: TNR-011085</b>
5.3	Disclose annual site water stewardship summary, including: the relevant information about the site's annual water stewardship performance and results against the site's targets.
5.3.1	A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum. <span style="float: right;">in progress</span>
Comment	No evidence of disclosure of a summary of the site's water stewardship performance, including quantified performance against targets (at minimum annually), was provided.  It is recognized that the site has not yet reached a year of implementation. A high-level summary of actions undertaken by the site was shared with key stakeholders, but this did not include quantified performance against targets. Going forward, the site should disclose greater detail of its water stewardship performance, including quantified performance against targets, at least annually. <b>Finding No: TNR-011086</b>
5.4	Disclose efforts to collectively address shared water challenges, including: associated efforts to address the challenges; engagement with stakeholders; and co-ordination with public-sector agencies.
5.4.1	The site's shared water-related challenges and efforts made to address these challenges shall be disclosed. <span style="float: right;">Yes</span>
Comment	The site shared evidence of emailing its water-related challenges to stakeholders in August 2023.

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5.4.2	Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.		in progress
Comment	No documents/evidence for this indicator, other than a screenshot of a call with the wastewater inspector in August 2024.		
Finding No: TNR-011088			
5.5	Communicate transparency in water-related compliance: make any site water-related compliance violations available upon request as well as any corrective actions the site has taken to prevent future occurrences.		
5.5.1	Any site water-related compliance violations and associated corrections shall be disclosed.		Yes
Comment	No compliance violations to report. No violations have been reported in the last 5 years. The site verified this during the audit and shared its no-exposure permit from September 2022.		
5.5.2	Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.		Yes
Comment	No compliance violations to report. No violations have been reported in the last 5 years. See 1.3.4. Auditor's comment: -This will be verified during the on-site audit.		
5.5.3	Any site water-related violation that may pose significant risk and threat to human or ecosystem health shall be immediately communicated to relevant public agencies and disclosed.		Yes
Comment	No compliance violations to report. No violations have been reported in the last 5 years. The site verified this during the audit and shared its no-exposure permit from 2022.		



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## Alliance for Water Stewardship (AWS)

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### Photographic Evidence from Audit



20240730\_095735 Well in Pump House.jpg

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## Alliance for Water Stewardship (AWS)

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20240730\_101901 Spill Kit USP.jpg



20240730\_100538 Moms Room.jpg



# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

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20240730\_094820 Aeration Tank.jpg



20240730\_101732 Chemicals for USP.jpg



20240730\_093752 Eye Wash Central Plant.jpg

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## Alliance for Water Stewardship (AWS)

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20240730\_100732 Showers in Men's Locker Room.jpg



20240730 City Water Meter Pit.jpg



20240730\_100501 Dish Washing area for Cafe.jpg



20240730\_100742 Shower area in Men's Locker Room.jpg

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20240730\_101110 Drinking Fountain Bottle Filler Example.jpg



20240730\_093222 High Temp Hot Water Pumps Boiler Plant.jpg



**WSAS**

2 Quality StreetNorth Berwick, EH39 4HW, UNITED KINGDOM



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## Alliance for Water Stewardship (AWS)

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20240730\_094655 Clarifier WWTP.jpg



20240730\_092406 Cooling Towers.jpg



20240730\_095740 Back-up Booster Pumps in Well House.jpg



20240730\_100415 Ice Machines in Cafe.jpg



20240730 Double Wall Fuel Oil Tank.jpg



20240730\_100717 Men's Locker room.jpg

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## Alliance for Water Stewardship (AWS)

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20240730\_102431 SDF Heat Exchangers and Steam Generator.jpg



20240730\_093343 Condensing Water Pumps Central Plant.jpg



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## Alliance for Water Stewardship (AWS)

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20240730\_092910 Piping Labeling 2 Chilled Water.jpg



20240730\_093018 Water Softeners Central Plant.jpg



20240730\_100328 Cafe Serving Area.jpg



Yes

### Comment

The auditor went on a site tour via car to see the site's boundaries. The site's meter and intake pipe were next to the city's pump house, and it leased 168 acres of property out to farmers for corn production and to manage grass and hay. The employees have community gardens at the end of the boundary to tend. The site had a creek running on it, with outlets from culverts far above. There was no irrigation on the acreage—it was considered dry land.

The site had a double-walled and alarmed fuel storage tank near the cooling tower area, and the spill kit was next to it. There were five cooling towers, mostly updated within five years for water efficiency. A 250,000-gallon fire water tank was also next to the cooling tower.

The chiller room had lots of piping with clear labeling, and the site was recovering condensate from chillers in the fire room. Softeners in the chiller room were for fire water. Next to the chiller was a boiler room with an eyewash station. Chemical stores in the boiler room had a containment pit with a closed drain - the site would soak up the pit should there be a leak. All drains on-site go directly to its primary treatment facility.

Truck drivers had toilet access inside the site, and construction workers used porta-potties outside. Nursing rooms were located near the bathrooms. The bathrooms included a locker room with an ADA shower, sinks, toilet, fountains, and free menstrual hygiene products.

The site had a small wastewater treatment facility for primary treatment. It had 1 settling tank. The facility treated all domestic and industrial water onsite. The resulting solids were sent to the city for its municipal plant. The site also had a small well that was not productive enough to be used. The USP room received recovered water from other areas to water storage for purification. The USP area had an eyewash station and a mounted spill kit.

The site had many drains and underground piping to manage flooding. The sprinklers were noted to be running during the day. The stormwater retention pond included an aerator fountain, though some algae encroached because of the extreme head. The

The site had a cafeteria that made food onsite - all water used was included in its water balance.



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## Alliance for Water Stewardship (AWS)

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20240730\_093445 Chemicals above Containment Pit Central Plan.jpg



20240730\_092924 Chiller Plant.jpg



20240730\_100857 Toilet example Men's Locker Room.jpg

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## Alliance for Water Stewardship (AWS)

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20240730\_092854 Piping Labeling Central Plant.jpg



20240730 Creek SE of Plant.jpg



**WSAS**

2 Quality Street North Berwick, EH39 4HW, UNITED KINGDOM

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

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20240730\_100431 Drinks area in Cafe.jpg



20240730\_101635 Water Recovery Pump from USP.jpg



20240730\_100906 Sinks Men's Bathroom.jpg



20240730\_095926 Pond.jpg



20240730\_101749 Filters and Softeners USP.jpg



20240730\_101758 Eye Wash and Shower USP.jpg