CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-001300

WSAS WATER STEWARDSHIP ASSURANCE SERVICES

SITE DETAILS

Site: **Haleon - Guayama, Puerto Rico**
Address: State Road #3 KM 141.3, 00785, Guayama, Puerto Rico, UNITED STATES
Contact Person: Francisco Morales-Gonzalez
AWS Reference Number: AWS-000730
Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Core
Date of certification decision: 2025-Jan-27
Validity of certificate: 2028-Jan-26

AUDIT DETAILS

Audited Service(s): AWS Standard v2.0 (2019)
Audit Type(s): Initial Audit
Audit Start Date: 2024-Oct-29
Lead Auditor: Kimberly Worsham

Audit team participants:
Kimberly Worsham, Lead Auditor

Site Participants:
Franisco Morales-Gonzalez, Energy Manager
Juan Garcia De Thomas, Utilities Manager
Scott Orom, Corporate Sustainability
Kristia Chaparro, Sr. EHS Specialist
Lymari Aponte-Hernandez, Factory EHS Manager
Sixto Negron, Production Supervisor

AUDIT TIMES

Dates	Audit from	Duration	Auditor	Description
2024-Oct-29	09:00:00 - 17:30:00	08:30	Kimberly Worsham	
2024-Oct-30	09:00:00 - 17:00:00	08:00	Kimberly Worsham	
2024-Oct-31	12:00:00 - 16:00:00	04:00	Kimberly Worsham	

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ADDITIONAL INFO

Summary of Audit Findings: During the certification audit, 17 findings were raised: 0 major non-conformities, 10 minor non-conformities, and 7 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 09/01/2025.

The major non-conformities must be closed within 90 days of receipt of the report. To meet this timeline, evidence must be submitted to WSAS (within 75 days) by 24/02/2025.

Minor non-conformities must be closed out by the time of the next annual audit by 29/10/2025.

The audit team recommends certification of Haleon Guayama at Core level pending approval of the corrective actions plan.

CLOSURE OF FINDINGS AND CORRECTIVE ACTION PLAN:

The Client has successfully submitted the corrective action plans 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.

Scope of Assessment: The scope of services covers the Initial Certification Audit to assess Haleon Guayama's conformity to the AWS International Water Stewardship Standard Version 2.

Haleon owns and manages the site at State Road #3 KM 141.3, Guayama, Puerto Rico, 00785 (17.963443, -66.148375). Glaxo Smith Kline owned the site until 2022, when Haleon spun off as an independent company. The manufacturing facility produces consumer healthcare products such as Advil, Nexium, Emergen-C, Centrum, and Caltrate. The facility spans 176 acres with 883,000 square feet of building space. The site employs 852 regular employees and 108 contingent workers. Key infrastructure includes three on-site water wells, a wastewater treatment plant with a reverse osmosis system, cooling towers, fire tanks, and storage tanks. The facility generates annual intercompany sales revenue of $453 million through its manufacturing operations.

The facility is situated in the Southern Puerto Rico watershed region, drawing water primarily from the South Coast Aquifer and secondarily from the Eastern Puerto Rico watershed via the Puerto Rico Aqueduct and Sewer Agency (PRASA). The site's treated wastewater discharges to PRASA's Guayama Regional Wastewater Treatment Plant, which ultimately flows to the Caribbean Sea. The facility's stormwater also drains southward toward the Caribbean Sea. The site faces several hydrological challenges, including outdated infrastructure, vulnerability to extreme weather like hurricanes, saltwater intrusion into groundwater, increasing water demand, aquifer depletion, extended drought periods, point source pollution, reservoir sedimentation, flooding risks, and soil erosion issues.

The audit was conducted onsite on 29-31 October 2024. The onsite site visit included the assessment of the site's WASH facilities, utility area including its cooling towers and boilers, water storage tanks (including potable and fire management tanks), chemical stores and satellite chemical areas, onsite wells, stormwater/drainage ponds, a small water treatment area, the wastewater treatment plant (WWTP) with RO system included, incoming water, and outgoing wastewater.

FINDINGS

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-001300

NUMBER OF FINDINGS PER LEVEL

Observation	7
Minor	10

WSAS
2 Quality StreetNorth Berwick, EH39 4HW, UNITED KINGDOM

FINDING DETAILS

Finding No:	TNR-014750
Checklist Item No:	1.2.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Oct-30
Checklist item:	Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall: - Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people; - Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies; - Provide evidence of stakeholder consultation on water-related interests and challenges; - Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups; - Identify the degree of stakeholder engagement based on their level of interest and influence.
Findings:	Stakeholders representative of the site's ultimate water source and ultimate receiving water body were unclear but eventually need to be identified.
Corrective action:	Stakeholders representative of the site's ultimate water source and ultimate receiving water body will be identified

Finding No:	TNR-013683
Checklist Item No:	1.3.4
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Oct-30
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 also did not indicate quantified annual high and low variances, even though it had identified a shared water challenge around water quality.
Corrective action:	Perform an analysis of high & low annual variances of water quality at Haleon Guayama.

Finding No:	TNR-013686
Checklist Item No:	1.3.7
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Oct-30
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 other water-related costs, such as stakeholder engagement activities, AWS certification, water projects, etc. It also did not consider environmental water-related value generated by the site.
Corrective action:	The Site will review its existing water costs list for including all those associated with stakeholders engagement activities, AWS certification, water projects & the environmental value created by the Site.

Finding No:	TNR-014210
Checklist Item No:	1.5.3
Status:	Open
Finding level:	Observation
Checklist item:	The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.
Findings:	Some of the catchment water-balance information was from old sources. The site has not considered more recent/current data for the catchment, either through research or self-estimates.
Corrective action:	Perform a catchment water-balance analysis utilizing most updated available information.

Finding No:	TNR-013715
Checklist Item No:	1.5.4
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Oct-30
Checklist item:	Water quality, including physical, chemical, and biological status, of the catchment shall be identified, and where possible, quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be identified.
Findings:	The site did not quantify catchment water quality high and low variances.
Corrective action:	Provide catchment's Water Quality data with Highs and Lows variances.

Finding No:	TNR-013718
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:	An estimate of potential savings has been identified for some high-priority opportunities, but not all.
Corrective action:	Review Water Stewardship Plan (WSP) for including potential savings Estimates for all identified opportunities

Finding No:	TNR-013719
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 could have identified more good water governance best practices beyond the fence line.
Corrective action:	Identify Water Governance Best Practices in the Catchment

Finding No:	TNR-013817
Checklist Item No:	1.8.3
Status:	Open
Finding level:	Observation
Checklist item:	Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.
Findings:	The site did not identify best practices relevant for the local, regional, and national context for the catchment that went beyond its activities on the site.
Corrective action:	Identify Water Quality Best Practices in the Catchment

Finding No:	TNR-013816
Checklist Item No:	1.8.4
Status:	Open
Finding level:	Observation
Checklist item:	Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.
Findings:	It was unclear if the site had reviewed best practices of IWRAs in the local, regional, and national context.
Corrective action:	Identify IWRAs Best Practices in the Catchment

Finding No:	TNR-013697
Checklist Item No:	2.3.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Oct-30
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 did not identify actions to clearly measure and monitor for all targets. Also, the planned timeframes were unclear for some, particularly regularly occurring targets.
Corrective action:	Review Water Stewardship Plan (WSP) to clarify planned timeframes for initiatives and regularly occurring targets, including the evaluation of progress of these targets

Finding No:	TNR-013734
Checklist Item No:	3.1.2
Status:	Open
Finding level:	Observation
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:	Evidence from DRNA as to how the site respects the water rights of others would have further strengthened conformity.
Corrective action:	Provide evidence from DRNA as to how the site respects the water rights of others

Finding No:	TNR-013701
Checklist Item No:	3.3.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Oct-30
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 for the review of the list of site providers, and the evidence for the flow meters was unclear.
Corrective action:	Review Water Stewardship Plan (WSP) to reflect most updated information on Site's Water Balance Targets

Finding No:	TNR-014909
Checklist Item No:	3.4.1
Status:	Open
Finding level:	Observation
Checklist item:	Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.
Findings:	The site shared the following in its conformity deck and other evidence, but these weren't included in the WSP: -Local water wells testing results -Potable Water monthly testing -Copper testing results.
Corrective action:	Review Water Stewardship Plan (WSP) to include the following activities: -Local water wells testing results -Potable Water monthly testing -Copper testing results

Finding No:	TNR-013710
Checklist Item No:	3.9.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Oct-30
Checklist item:	Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.
Findings:	The evidence was not consistently clear on how it related to the site implementing water governance best practices.
Corrective action:	The Site to identify Water Governance actions that will lead to the identification of Best Practices

Finding No:	TNR-013740
Checklist Item No:	4.1.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Oct-30
Checklist item:	Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.
Findings:	Progress against targets was evaluated for some but not all actions. Also, some metrics in the WSP were unclear (refer to comments in indicator 2.3.2). Clear targets and metrics are required to evaluate the performance of the implemented actions.
Corrective action:	Update Water Stewardship Plan (WSP) with clear targets and metrics, including the evaluation of progress against these targets for all actions.

Finding No:	TNR-014214
Checklist Item No:	4.1.3
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Oct-30
Checklist item:	The shared value benefits in the catchment shall be identified and where applicable, quantified.
Findings:	Not all value creation for the catchment was clear or quantified.
Corrective action:	Quantify (with Data or Estimates) all water value creation by the Site in the Water Stewardship Plan (WSP)

Finding No:	TNR-013746
Checklist Item No:	5.1.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Oct-30
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:	Where and how the site publicly disclosed its water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations currently, was not demonstrated.
Corrective action:	The Site to define a methodology where water-related information could be readily accessible & disclosed to the Public.

Report Details

Report	Value
Report prepared by	Kimberly Worsham
Report approved by	Warrick Stewart
Report approved on (Date)	10 December 2024

Surveillance

Proposed date for next audit
2025-Oct-29

Comment This was the initial certification audit of the site.

Stakeholder Announcements

Date of publication	Location
07/08/2024	https://a4ws.org/wp-content/uploads/2023/11/AWS-000640-Stakeholder-Announcement-23-07-31_.pdf
10/02/2024	Entrance of site gatehouse
08/01/2024	https://www.haleon.com/content/dam/haleon/corporate/documents/our-impact/environment/integrating-water-stewardship/aws-guayama-stakeholder-announcement.pdf

Comment The site shared the stakeholder announcement through posting it on the gatehouse as well as on their global website with other stakeholder announcements. The announcement was also published on the AWS website.

Catchment Information

1.1.1_Catchment_Map.jpg

Catchment Information

The site's catchment is the Southern Puerto Rico Basin. The South Coast Aquifer is the site's main source of water. Groundwater level monitoring in the aquifer shows how water storage volumes change yearly. Freshwater recharge to the aquifer takes place primarily through rainfall and secondarily through streamflow infiltration. Groundwater withdrawal to meet water demands is the primary source of aquifer depletion. Groundwater levels can, therefore, act as a proxy for the water balance in the catchment.

The site also receives a secondary water supply from PRASA, which sources its water primarily from two surface-water reservoirs (Lago Carite and Lago Patillas). Water levels in these two reservoirs can act as proxies for the water balance of PRASA supplies.

Client Description and Site Details

site map.png

Client/Site Background

Haleon (legally registered as PF Consumer Healthcare) owns and manages the site at State Road #3 KM 141.3, in Guayama, Puerto Rico, 00785 (17.963443, -66.148375). 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 Advil, Nexium, Emergen-C, Centrum, and Caltrate. The facility spans 176 acres with 883,000 square feet of building space. The site employs 852 regular employees and 108 contingent workers. Key infrastructure includes three on-site water wells, a wastewater treatment plant with reverse osmosis system, cooling towers, fire tanks, and storage tanks. The facility generates annual intercompany sales revenue of $453 million through its manufacturing operations.

Note for readers - VMS = Vitamins, Minerals, and Supplements.

	Summary of Shared Water Challenges

Summary of Shared Water Challenges
The site indicated many shared water challenges. These included outdated/poorly maintained infrastructure, extreme weather (hurricanes and wind), saltwater intrusion, increasing water demand, groundwater depletion, extended drought, point source pollution, sedimentation of supply reservoirs, flooding, poor tap water quality, inequality in water access and sanitation, destruction of aquatic habitat, soil loss, and erosion.

0.1	General Requirements for Single Sites, Multi-Sites and Groups	
0.1.1	*Eligibility Criteria*	
0.1.2		
0.1.2.1	*Have any water source locations and water-related discharge locations been visited during the audit, if so, which and where? If none were visited please provide justification.*	No
Comment	The auditor did not visit the water source locations or ultimate discharge locations due to time availability and weather.	
0.1.1.1	*The site(s) occupy one catchment OR an exception has been granted.*	Yes
Comment	The site occupied one catchment.	
0.1.1.2	*The scope of the proposed certification shall be under the control of a single management system.*	Yes
Comment	The site was managed under a single management system.	
0.1.1.3	*The scope of the proposed certification shall be homogeneous with respect to primary production system, water management, product or service range, and the main market structures.*	Yes
Comment	The site's scope was homogeneous with respect to primary production system, water management, product or service range, and the main market structures.	

1	STEP 1: GATHER AND UNDERSTAND	
1.1	*Gather information to define the site's physical scope for water stewardship purposes, including: its operational boundaries; the water sources from which the site draws; the locations to which the site returns its discharges; and the catchment(s) that the site affect(s) and upon which it is reliant.*	
1.1.1	*The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including:* *- Site boundaries;* *- Water-related infrastructure, including piping network, owned or managed by the site or its parent organization;* *- Any water sources providing water to the site that are owned or managed by the site or its parent organization;* *- Water service provider (if applicable) and its ultimate water source;* *- Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies;* *- Catchment(s) that the site affect(s) and is reliant upon for water.*	Yes
Comment	The site mapped its physical scope, considering the regulatory landscape and zone of stakeholder interests, including: - Its boundaries and division between Baxter and the correctional facilities; - Water-related infrastructure, including 3 wells, storage tanks, cooling towers, WASH facilities (sinks, water fountains, sewers, maintenance holes, cooling towers, boilers, chillers, chlorination system, water heater, and water storage tanks), drainage/stormwater ponds; - An onsite wastewater treatment plant with aeration lagoons; - Its ultimate water sources (Carite & Patillas lakes, South Puerto Rico Basin) and basins; - Its water service provider (PRASA) and the site's location comparatively; - Discharge ponds and sewer discharge points to the PRASA WWTP (and the site's location in comparison to the WWTP); - Its location within the Southern Puerto Rico Basin, including the Caribbean Sea (the ultimate receiving water body); and, -The input and output water points for the site. NB: The attachments in Step 1 are for the entire standard.	
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.*	No

Comment

The site identified 21 stakeholders and some dates of consultation, identifying their levels of interest and engagement and water-related challenges. It included NGOs working on addressing some vulnerable and unrepresented groups ("less vocal"). The site indicated no tribal or Indigenous groups in the catchment.

The site shared evidence of stakeholder engagement emails for Cadillac Uniform (October 2023 & February 2024), Baxter (September 2023), and Cooper Vision (January 2024). The site also shared meeting notes from the correctional complex (October 2024), PRASA Guayama (June 2024), Baxter (February 2024), and Cooper Vision (January 2024).

Stakeholders representative of the site's ultimate water source and ultimate receiving water body were unclear - the site shared that it didn't originally consider these as part of stakeholders.

Based on the stakeholder interviews, a few stakeholders noted infrequent communications - particularly around water stewardship. This indicated that the site's engagement could have been stronger, though it is noted that this is the initial stage of the water stewardship process for the site.

Finding No: TNR-014750

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

Yes

Comment

The site identified the degree of influence between it and stakeholders and developed a comprehensive basis for ranking the level of influence.

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

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

Yes

Comment

The site identified 9 water incident response plans:
-Business Continuity Plan FY 2024 (July 2023), which prioritizes its water infrastructure and systems and their impact on the business
-Crisis Continuity Management Plan FY 2024 (July 2023), which has a more general list of steps and procedures for emergencies but no specific water-related details
-SG 2.01 Risk Assessment and Management Plan (March 2024), which includes reviewing local waterways, groundwater, and utility systems and infrastructure with water in its risk assessments
-SG 2.05 Emergency Response (June 2023), which includes water contamination and water service cuts in emergency types
-Immediate Environmental Reporting Plan (July 2023), which details water contamination events
-Spill Control Program (October 2023), which describes using water in spill events and testing water quality of rainwater drainage systems
-Site Risk Based Inspection Program (February 2023), which included water system failure prevention in its inspection
-D1.7 Assessing Site Conditions for Risk to Soil or Groundwater TSD (May 2024)
-Spill Prevention, Control, and Countermeasure Plan (August 2020): This plan includes the WWTP and contamination of water systems. The site also shared that it was starting to update the 2020 version for next year and provided the TOR for that.

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

Yes

Comment

The site identified and mapped its inflows from wells and municipal supply, losses from cooling tower evaporation, storage (including potable and fire tanks), wastewater treatment and reclamation, and outflows to the PRASA WWTP, as of YTD 2024. The site indicated that operations included many different water-related infrastructures, such as storage and cafeteria activities.

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

Yes

Comment

The site quantified its water balance until June 2024 and provided variances from input and output systems. It shared that its annual variances (moderate input growth per annum) were due to the increased cleaning from Emergen-C and increased humidity/steam to produce for it. The site also shared that it increased overall cleanings due to FDA guidance and best practices over the past few years. The site quantified its net water balance (2020 to July 2024), noting a small increase over the last four years due to increased operations.

The chart provided displayed monthly inflow volumes from on-site wells and PRASA and monthly effluent to PRASA via the on-site wastewater treatment plant from January 2020 up to July 2024.

The site indicated a relevant water-related challenge that would threaten good water balance for people or the environment: extended drought and groundwater depletion. The site indicated its annual high and low variances for municipal water supply consumed, well consumption, and wastewater output. The site shared that it didn't have calculations for losses—only estimates.

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

No

Comment

The effluent water quality was quantified up to September 2024. The site also shared the well water quality tests (including for drinking water) from December 2023 to June 2024, which included pH, chemical, and biological results. The site also shared PRASA water quality annual reports - the most recent was from 2023 (for provided waters/sources).

The site shared that it had had no quality violations since 2019 (also considered 2023), which included the parameters shared with PRASA monthly (see WWTP SAMPLING ACCORDING PRASA PERMIT).

The Guayama Water Treatment Plant (PRASA), which discharges to the Guamaní River, has had Clean Water Act (CWA) water quality violations reported for turbidity, BOD, and copper in its effluent in the last three years (EPA). This facility discharges to the Caribbean Sea, the ultimate receiving water body for the site (and all of Puerto Rico) (information was provided in indicator 1.5.4).

The site stated that it did not have to test its stormwater because it remained in the retention ponds onsite.

The site quantified COD (Chemical Oxygen Demand) variances between 2019 and 2023. It noted that PRASA had not reported the upward trend of COD as a challenge. The site provided a rapid analysis of this and confirmed that it had remained compliant and that increased COD may be from reuse water.

The site identified a water-related challenge that would threaten good water quality status for people or the environment - particularly, saltwater intrusion, erosion, and soil degradation. However, the site did not indicate quantified annual high and low variances.

Finding No: TNR-013683

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 shared that it had many chemicals and mapped the Drum Storage building (260B) where they are stored, as well as the satellite storage areas. The site also mapped diesel on the property.	
1.3.6	*On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.*	Yes
Comment	The site had identified no on-site IWRAs.	
1.3.7	*Annual water-related costs, revenues, and a description or quantification of the social, cultural, environmental, or economic water-related value generated by the site shall be identified and used to inform the evaluation of the plan in 4.1.2.*	No
Comment	The site identified its annual-related costs, including incoming water from PRASA, well extraction, preventive maintenance services, chemical use, and WWTP discharges. It does not have any water-related revenues. The site has identified and quantified annual average costs for incoming water from PRASA, on-site water well extraction, and outgoing water to the wastewater treatment plant (average up to YTD 2024). However, the site had not included other water-related costs, such as stakeholder engagement activities, AWS certification, water projects, etc. The site generated a description or quantification of social and cultural water-related value, but not environmental. ***Finding No: TNR-013686***	
1.3.8	*Levels of access and adequacy of WASH at the site shall be identified.*	Yes
Comment	The site identified the level of access and adequacy of WASH within the fence line. This was verified during the on-site audit. During the site tour, the auditor noted hygiene education signage in bathrooms across the site to combat the spread of water-related illnesses and diseases. The site mentioned its PRBC-2018 regulation (PR-specific regulations based on natOSHA regulations) includes bathroom sizes and water access, and the site complies with these regulations.	
1.4	*Gather data on the site's indirect water use, including: its primary inputs; the water use embedded in the production of those primary inputs the status of the waters at the origin of the inputs (where they can be identified); and water used in out-sourced water-related services.*	
1.4.1	*The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be identified.*	Yes
Comment	The site listed its top 10 raw materials, all sourced outside its catchment. It also included its electricity, which included solar panels, and was supplied by a local utility for heat and power (LUMA). The site formally requested LUMA for its water consumption and quality, but the details provided on the LUMA site were complicated for the site to interpret, indicating low water risks. The site uses a solar panel system; it does not have embedded water for operations. The supplies used to create the solar panel were created outside of the catchment.	

1.4.2 *The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.* Yes

Comment: The site identified one outsourced service in the catchment: Cadillac Uniform (laundry service). It quantified the number of garments cleaned but not the water used (Cadillac Uniform hadn't gotten back to them yet). The site did provide an estimate based on assumptions. The site also mentioned that this provider was outside the catchment but on the same island.

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

1.5.1 *Water governance initiatives shall be identified, including catchment plan(s), water-related public policies, major publicly-led initiatives under way, and relevant goals to help inform site of possible opportunities for water stewardship collective action.* Yes

Comment: The site identified mater governance initiatives:
-The Puerto Rico Comprehensive Water Resources Plan (2016): This was the most recent, and the site believed it was still being used.
Jobos Bay National Estuarine Research Reserve Management Plan (2017-2022): This plan is the most recent and still active.
-The Guayama Natural Hazard Mitigation Plan (2020)
-Protocol for Drought Management in Puerto Rico (March 2015): According to the Drought.gov website, this was the most recent plan.
-The Government of Puerto Rico's FAASt Workplan with PRASA (July 2024) addressed water infrastructure damage from the 2017 hurricane with a list of projects and priorities.

The site indicated that through stakeholder engagements (in June 2024), the initiatives in this list are comprehensive.

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

Comment: The site listed water-related legal/regulatory requirements (federal and territory regulations).

Federal regulations identified: the EPA CWA, 202d Impaired Waters, Total Maximum Daily Loads, EPA SDWA, EPA Puerto Rico NPDES Permit.

Territory Regulations: Law for the Conservation, Development, and Use of Water Resources, Regulation for the Exploitation, Use, Conservation, and Administration of Water in Puerto Rico , Regulation for the Use of Aqueduct and Sanitary Sewer Services in Puerto Rico, Water extraction permits (Department of Natural Resources - Well Water Franchise Permit), Wastewater management and discharge permits (PRASA - HLN GY Discharge Permit - GDA-02-507-040 & HLN GY WWTP Operation Permit C-AG-84-30-0016 Renewal)

These permits were provided as evidence in indicator 1.3.4:
-Water extraction permit (Department of Natural Resources): issued August 2022, valid for 3 years (Well Water Franchise Permit R-FA-FAID6-GU-00015-07032022.pdf).
-Its discharge permit (PRASA) expires in 2027.

Water extraction permits (Department of Natural Resources): Well Water Franchise Permit R-FA-FAID6-GU-00015-07032022.pdf
Wastewater management and discharge permits (PRASA): HLN GY Discharge Permit - GDA-02-507-040 (update).pdf & HLN GY WWTP Operation Permit C-AG-84-30-0016 Renewal.pdf

The site also provided a Potable Water Permit issued by the Department of Health to ensure residual chlorine in extracted water is maintained within acceptable levels (active since May 2012), and a stormwater permit notice of intent (as of January 2019).

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

Obs.

Comment

The site quantified some of the catchment's water balance.

Indications of annual and seasonal water flow variances have been identified/quantified. The South Coast Aquifer is the site's main source of water. Groundwater level monitoring in the aquifer shows how water storage volumes change yearly. Freshwater recharge to the aquifer takes place primarily through rainfall and secondarily through streamflow infiltration. Groundwater withdrawal to meet water demands is the primary source of aquifer depletion. Groundwater levels can, therefore, act as a proxy for the water balance in the catchment.

The Jua Well 5 in Guayama shows large fluctuations in groundwater levels (>30 ft) (https://waterdata.usgs.gov/monitoring-location/175858066100200/#parameterCode=72019&period=P7D&showMedian=true).

Precipitation data shows that the increases in groundwater levels are closely tied to heavy precipitation events. For example, heavy precipitation during Hurricane Maria in September 2017 significantly increased groundwater levels.

In nearby Salinas, water demand increases as the population grows, and groundwater levels have decreased for a long time. Droughts exacerbate this issue, drawing down groundwater levels even further. The decreasing trend in groundwater availability in Salinas does not currently appear to impact groundwater levels in Guayama.

The site also receives a secondary water supply from PRASA, which sources its water primarily from two surface-water reservoirs (Lago Carite and Lago Patillas). Water levels in these two reservoirs have been identified. Since 2019, there is a potential increasing trend in reservoir levels at Lago Patillas and a potential decreasing trend in reservoir levels at Lago Carite.

Based on the evidence provided in indicator 1.2.1 (Haleon_AWS_Worskhops_Guayama.pptx), the site has used the WRI Aqueduct Risk tool. It has been identified that the Guayama area has a physical risk quantity of 1.22 (low risk).

The site quantified the catchment water balance as 1.7 BGY. However, some of the information was from old sources (for example USGS 2015).

The site identified water outflows in the catchment were from withdrawals and evapotranspiration.

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

No

Comment

The site identified the water quality data for the catchment, including physical, chemical, and biological status (some evidence was provided in indicator 1.3.4). It identified that its groundwater was impaired. It also identified that its surface water from three sources (Guamani River, Patillas & Carite Lakes) were both impaired and not impaired.

However, seasonal high and low variances were not identified.

Finding No: TNR-013715

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

Yes

Comment

The site identified and mapped 7 IWRAs inside its catchment.

-Punta Pozuelo Protected Natural Area
-Aguirre Commonwealth Forest
-Jobos Bay National Estuarine Research Reserve
The site's groundwater source was the South Coast Aquifer. Over-extraction, degraded groundwater quality from industrial and agricultural sources, total dissolved solids, and saltwater intrusion threaten it.
-Patillas Lake: sedimentation is an issue for these reservoirs; reservoir capacity has decreased over time.
-Carite Lake: sedimentation is an issue for these reservoirs; reservoir capacity has decreased over time.
-The Guamaní River: after hurricanes or heavy precipitation, the Guamaní River can flood, damaging infrastructure and local communities. The Guayama Water Treatment Plant (PRASA), which discharges into the Guamaní River, has exceeded effluent limits for the Clean Water Act.

Their status had been assessed for all, including any threats to people or the natural environment.

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

Yes

Comment

The site developed a spreadsheet of the existing infrastructure plans based on the PRASA FAASt report from 2024. The site also called out specifically the PRASA WWTP and water treatment plant.

Condition of the existing water-related infrastructure was identified. Potential exposure to extreme events had also been identified for both infrastructures.

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

Yes

Comment

The site identified that WASH services are available to most residents in the catchment but suffer from outdated and underfunded infrastructure and disruptions due to natural disasters.

Over 250,000 people in Puerto Rico lack basic access to safe drinking water and sanitation. PRASA provides drinking water to 97% of Puerto Ricans and wastewater services to approximately 50%. Still, Puerto Rico's economic challenges have led to reduced funding for PRASA and the deterioration of WASH services in both urban and rural areas. PRASA received fines for failing to test tap water supplies for contaminants adequately. Puerto Rico had also been identified as having the worst record in the U.S. on drinking water safety, leading to a lack of public trust in the quality of water supplies.

High bacteria concentrations in surface waters in the catchment indicate a widespread lack of access to proper wastewater treatment.

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

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

Yes

Comment

Shared water challenges have been identified and prioritized:
-Poor tap water quality
-Point source pollution
-Sedimentation in PRASA supply reservoirs
-Flooding of Guamani River
-Ongoing cleanup at nearby EPA Superfund site
-Increasing water demand
-Destruction of aquatic habitat including coastal wetlands
-Soil loss and erosion
-Saltwater intrusion from sea level rise
-Extended drought
-Inequality in water access and sanitation
-Outdated/poorly maintained water and electrical infrastructure
-Extreme weather events including hurricanes and extreme wind
-Groundwater depletion

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

Comment

Initiatives to address shared water challenges had been identified. The site shared that while most initiatives were identified for most challenges, some challenges had no known initiatives at the time of the audit.

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

18 water risks have been identified and prioritized, including 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

12 Water-related opportunities have been identified and prioritized. The Water Stewardship Plan contains a column that links an action back to an identified opportunity, including the value creation and assessment. Estimates of potential savings had been identified for high-priority opportunities but not all opportunities.

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 with 7 best practices for water governance, including: A designated plant water stewardship owner; A comprehensive water stewardship plan that is routinely reviewed and updated; Water Stewardship program is sponsored by a member of the plant leadership team; Provide Water Conservation and Management Awareness to all Site Employees; Each plant understands the key basin stakeholders, has a system in place to monitor water stewardship policies, and engages as appropriate; Engaging with peer plants and stakeholders to promote water stewardship; Communicating plant's water stewardship commitment to set a leading example to others.

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

Comment

The site provided a list with 14 best practices for water balance: Site has established an End to End water management team with key technology and consumption owners; Detailed water map exists and is updated whenever changes are implemented to site water system; Meters installed at water sources, discharges, and major water user locations; Site tracks its water costs & use; A system is in-place to maintain Utility and Process systems at Base Condition; Site annually assesses current best available technologies and reapplication projects for utility and cleaning and sanitization systems; Water-related changes are incorporated into site Change Management program and followed for changes impacting any plant water system; Sustainability Project Impact Assessments are completed for all major projects; Sustainability Water Project Action Plan is written and updated annually; Annual Target Setting meetings are held to establish water conservation strategies for the Site; Evaluate installation / expansion of rainwater capture and reuse; Employee education program is established and deployed annually; Basin Water Replenishment

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

Obs.

Comment

-The site provided a list with 3 best practices for water quality: Any Haleon site involved in the production or formulation of APIs (including antibiotics) need to be able assess their operations relating to the management of their API discharges to the environment and conduct necessary remediation of identified issues; Redundant and/or more frequent Water Quality measurements to ensure conformance to specifications (PH criterion for sewer water discharges); and, Redundant and/or more frequent Water Quality measurements to ensure conformance to specifications (residual chlorine criterion for drinking water)

The site did not identify best practices that were relevant for the local, regional, and national context for the catchment that went beyond its activities in the site.

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

Obs.

Comment

The site provided a list of 2 best practices for IWRAs: Support maintenance of off-site IWRAs; and Support restoration of off-site IWRAs. In column F of its best practices list on the Deliverables spreadsheet, the site specified more details of activities to support these best practices. However, it was unclear if the site had reviewed best practices of IWRAs in the local, regional, and national context.

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

Yes

Comment

-The site has identified 10 best practices for WASH (under Best Practices tab for the Deliverables spreadsheet, Column F):
-Water distribution to Jail personnel during emergency situations
-Availability of Feminine Hygiene towels (free) for colleagues using restrooms. Disposal canisters are also provided at each restroom location.
-Filtered water at water fountain
-Water bottles fillers at water fountains
-Restroom cleaning logbook
-ADA compliance showers
-Plastic curtain in chemical showers to allow privacy with safety hygiene
-Hygiene promotion
-Ice machines
-Cones for water accessibility (water fountains)

2	STEP 2: COMMIT & PLAN - Commit to be a responsible water steward and develop a Water Stewardship Plan	
2.1	*Commit to water stewardship by having the senior-most manager in charge of water at the site, or if necessary, a suitable individual within the organization head office, sign and publicly disclose a commitment to water stewardship, the implementation of the AWS Standard and achieving its five outcomes, and the allocation of required resources.*	
2.1.1	*A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:* *- That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes* *- That the site implementation will be aligned to and in support of existing catchment sustainability plans* *- That the site's stakeholders will be engaged in an open and transparent way* *- That the site will allocate resources to implement the Standard.*	Yes
Comment	The site identified a signed site commitment to water stewardship. The Managing Director signed it in January 2024. It was posted at the main gatehouse, where it was publicly available.	
2.2	*Develop and document a process to achieve and maintain legal and regulatory compliance.*	
2.2.1	*The system to maintain compliance obligations for water and wastewater management shall be identified, including:* *- Identification of responsible persons/positions within facility organizational structure* *- Process for submissions to regulatory agencies.*	Yes
Comment	The site shared that it had many water-related permits to manage: Stormwater Permits (issued by EPA), Water Extraction Permits for Wells (issued by the Department of Natural Resources), Potable Water Permits (issued by the Department of Health. This was to ensure residual chlorine in extracted water at the Site is maintained within acceptable levels), and Wastewater management & discharge Permits (issued by PRASA. This includes an Operations Permit for the WWTP and a Discharge Permit to PRASA sewer lines). The "PF CONSUMER HEALTHCARE ENVIRONMENTAL PERMITS REGISTRATIONS LICENSES (Rev. AUGUST 2024).xlsx" spreadsheet lists any water-related compliance obligations, responsible people, expiration, and renewal dates. The site showed the current water and pollution prevention permits, including some that do not expire. The site shared evidence of a submission process and responsible positions for its compliance management, specifically for water quality testing. The site indicated that it followed the registration spreadsheet for dates and followed the permits to indicate what needed to be submitted for compliance reporting. The site shared its water testing SOP for the site, which included the process for compliance reporting for drinking water. The site shared its compliance procedures through a slide deck and included example evidence of those actions. The deck showed a suite of different systems used to manage compliance, including an EHS One System for permit requirements and a compliance calendar.	
2.3	*Create a water stewardship strategy and plan including addressing risks (to and from the site), shared catchment water challenges, and opportunities.*	

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

Comment: The site presented a water stewardship strategy in line with the AWS Standard. More details here:
https://www.haleon.com/who-we-are/our-policy-positions#accordion-43234a8d7e-item-dc8c8dcccb

The site provided the following for mission, vision, and goals:
Haleon recognizes the vital role water plays across their value chain, from manufacturing process, to cleaning and sanitation, which ensures products are in full compliance with regulatory requirements. Haleon is committed to the sustainable and equitable management of water resources, recognizing their impact on the resource, and is integrating water stewardship and waste circularity into their operations to meet targets to achieve AWS standard certification at all manufacturing sites by 2025 and to achieve water neutrality at manufacturing plants in water-stressed basins by 2030.

The Guayama Manufacturing Plant plans to apply this larger strategy by implementing a water stewardship system that includes:
-Metering for improving water consumption trending and patterns
-Explore options for Rain water harvesting
-Increase water reuse output of existing Reverse Osmosis System at WWTP
-Reduce water quantities utilized for cleaning MFG equipment & MFG Suites
-Compliance with new PRASA Sewer Discharge requirements
-Characterize the longevity of wells on site
-Stakeholders engagements

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 presented its Water Stewardship Plan, which included 16 targets linked to all AWS outcomes. It includes:
-How actions will be measured and monitored for some but not all
-Actions and descriptions to achieve and maintain it for all
-The link between each action and the achievement of best practice for all
-Persons responsible for each target
-Financial budget allocations for all (if identified as necessary)

Planned timeframes were unclear for some - particularly the regularly occurring targets.

The WSP included an indirect water target, as well.

Finding No: TNR-013697

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: Based on the evidence provided in indicator 1.3.1 and the actions in the water stewardship plan to address the identified risks (indicator 1.7.1). The sire shared that it shared its most recent SPCC and Hazardous Waste Contingency Plans in 2021 with the Natural Resources Department (JCA) - via email and in-person.

3	**STEP 3: IMPLEMENT - Implement the site's stewardship plan and improve impacts**

3.1 *Implement plan to participate positively in catchment governance.*

3.1.1 *Evidence that the site has supported good catchment governance shall be identified.* — Yes

Comment: 5 objectives linked to water governance were identified in the Water Stewardship Plan with the following evidence:

-Identify at least 2 opportunities for reducing water in cleaning (e.g., evaluate the potential for reducing MFG cleaning periods): ECD MAY 31,2025 - The site provided a list of opportunities from 2024 as evidence of evaluating opportunities. The site also provided a well pump maintenance inspection report from 2013 & 2015, which is too late for this audit.
-Review WSP twice per year: JUN 30, 2025 & DEC 31,2025 - Evidence was too early to provide
-Meet twice in 2025 with at least 2 stakeholders: one by JUL 31, 2025; other by DEC 31, 2025 - Evidence of 3 stakeholder meetings provided with Cooper Vision, Baxter, and the correctional facility in 2024.
-Perform a Quarterly water conservation Safety Talk activity - Evidence of a flyer from October 2024 provided.
-Calculate efficiency target and track its performance monthly - Evidence of its monthly water use tracker from 2024 was provided

3.1.2 *Measures identified to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be implemented.* — Obs.

Comment: The site stated that it used water from wells and PRASA. Local wells had a daily limit of extraction (350,000 US Gallons per day) as directed by Puerto Rico's Department of Natural Resources (DRNA). The site provided evidence of its well extraction permits with DRNA as evidence.

3.2 *Implement system to comply with water-related legal and regulatory requirements and respect water rights.*

3.2.1 *A process to verify full legal and regulatory compliance shall be implemented.* — Yes

Comment: The site shared evidence of a scheduled Legal Register based on the new D1 Environmental Compliance Standard D1 Environmental Compliance Standard (1).pdf. The EHS Specialist supported this process during the year.

The site shared the site's compliance procedures through a slide deck and included example evidence of those actions from 2024. The site also shared an "excellence in compliance" letter from the Government of Puerto Rico (on behalf of PRASA) from October 2023. The site also shared evidence for its good extraction to DRNA from September 2024. All documents were in Spanish.

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

Comment

The site shared that its water use was based on local wells and PRASA municipal water supply and followed all legal requirements in its permits. This was provided in 1.3.3 with the water balance, with a limit of 300,000 daily gallons (109.5M) annually). The site's average daily water use was 200,938 gallons from the wells (January 2020 - August 2024).

The site was in PR and did not have water rights as part of legal and regulatory requirements. The site also shared an "excellence in compliance" letter from the Government of Puerto Rico (on behalf of PRASA) from October 2023.

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

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

No

Comment

5 objectives linked to water balance were identified in the Water Stewardship Plan. Evidence of implementation was provided for the following:

-Implementation of continuous measuring flowmeters at water wells and production locations: ECD JUN 30,2025 - The site provided a slide deck from 2022 showing images of flow meters in its manufacturing area. The site also shared a spreadsheet of water conservation ideas from 2024, but it's unclear how this was relevant.

-Inspection and PMs in place for the wells. As of 2024, Wells were in Good capacity and condition. Last major upgrade: 2015 (Outside Contractor); Perform an analysis of wells performance & longevity: SEP 30,2025 - It seemed that these actions mentioned above are in progress or implemented, and the site hadn't started the new phase yet, so it had no evidence of implementation to share.

-Investigate options to harvest rainwater on site (cooling waters at OTC & LC locations): JUN 30,2025 - The site hadn't started yet, so it had no evidence of implementation to share.

-Reduce by 11.5MM gallons Site water consumption (2024 vs 2023 full year) - The site provided evidence of a purchase order from April 2024 of hydraulics to replace RO membranes to improve system performance, but the site will share the monitored trends instead.

-Review list of Site Providers by Mar 31,2025; Identify at least one (1) to create/integrate a water conservation program as part of their goals by Oct 31,2025 - No evidence was provided

Finding No: TNR-013701

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 shared its annual targets to improve water use efficiency. The connection between this target and the water stewardship plan was related to the following indicator: "Reduce by 11.5MM gallons Site water consumption (2024 vs 2023 full year)."

The site shared evidence of a sustainability presentation from August 2024 to 3 different Forums: the EHS Council, the ORM Meeting, and the NA Engineer Meeting. This should also be included in water governance.

The site shared evidence of slides with images from different projects, including the LC Potable Tank Water Recovery, AHU Water Recovery, Potable Water Sampling Points, low-flow faucets in bathrooms, a refrigerator for defrosting (rather than using water as they previously used) in the cafeteria, and a waterless urinal.

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 stated that water reallocation was not performed at the site because it was not legally obligated to reallocate water.

However, the site did mention that, during prolonged emergencies, water was offered to the Guayama Prison (nearby the site). The offered water is tested from local wells, complying with the necessary Quality requirements for consumption and hygienic purposes. The site provided evidence of implementation in June 2024, and the stakeholder from DCR PR confirmed this activity.

3.4 *Implement plan to achieve site water quality targets*

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

Comment Two objectives linked to water quality were identified in the site's Water Stewardship Plan. Evidence of implementation was provided as follows (refer to indicator 3.1.1):

-An implementation plan per phases was developed and issued to PRASA - The site provided a list of PRASA milestones and completion dates, but there was no evidence of these being implemented as the first of the planned actions is only due for completion at the end of February 2025. The site also provided the PRASA "Request for Closure of Consent Order and Establishment of a New Consent Order" from July 2024, and a slide deck on the WWTP upgrade (June 2024).

-Perform PH & Chlorine testing as per existing internal SOPs - The site shared a pH conformity test result report from May 2024.

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 shared continual improvements based on new PRASA WWTP Discharge Parameters being implemented within the next 2-3 years. Based on ongoing sampling and testing, conversations were being held with PRASA to update the plan.
The site provided the new consent order from PRASA (July 2024), the WWTP upgrade document (June 2024), and the Conceptual Design Report for the pH adjustment and dealing with piping corrosion.

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 WSP included 1 target related to IWRAs:
-Participate at least in one activity annually to support NGOs - The site provided evidence of providing drum donations for a mangrove project in 2 of its IWRAs in 2022.

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

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

Comment

The site identified and quantified its provision of WASH services to all workers on site, and during the site visit, WASH was adequate.

In the WSP, the site identified 3 WASH targets, including continuous towel availability at Women's restrooms (confirmed by the auditor on the site tour), daily cleaning of Restroom facilities as per QD-SOP-002213 "Logbook de Limpieza-Baños Pasillos Principal" (evidence provided of restroom cleaning logs), and water availability (Oasis) to nearby prisons and employees during droughts and emergency events (evidence provided).

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

Yes

Comment

The site shared that it complied with building design, including industrial buildings, the applicable code is the PRBC-2018 with the amendments of the IBC-2018. This code called for bathroom sizes that need to be designed according to the building population density. The site's priority is to use local water wells and minimize using PRASA city water. The extraction of water wells is daily monitored, with a daily target of 300,000 gallons per day. Using this strategy, the Site is providing local communities with more water availability from the PRASA water infrastructure.

During emergency periods, the Site has provided water to the nearby Guayama Prison Complex. The water can be used for human consumption or hygienic purposes. The site provided evidence of implementation in June 2024, and the stakeholder from DCR PR confirmed this activity. (in 3.3.3.).

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

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

Yes

Comment

The site's target on indirect water use in the WSP was as follows:
Review catchment Site Providers for raw materials or services for Indirect Water Usage Targets (3.7.1) Water Balance - Review list of Site Providers by Mar 31,2025; Identify at least one (1) to create/integrate a water conservation program as part of their goals by Oct 31,2025

The site has contacted Cadillac Uniforms, but no formal response had been received from them yet.

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

Yes

Comment

The site's target on embedded water use in the WSP was as follows:
Review catchment Site Providers for raw materials or services for Indirect Water Usage Targets (3.7.1) Water Balance - Review list of Site Providers by Mar 31,2025; Identify at least one (1) to create/integrate a water conservation program as part of their goals by Oct 31,2025

The site has contacted Cadillac Uniforms, but no formal response had been received from them yet.

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

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

Comment: A stakeholder meeting with PRASA was held on June 7, 2024, to discuss water infrastructure projects. The site provided evidence of the meeting minutes.

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

3.9.1 *Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.* — No

Comment: The site provided evidence of the implementation of these actions:

-Communicating the plant's water stewardship commitment to set a leading example to others: Water and Soil & Groundwater CoP Meeting Agenda – June 2024. However, it was unclear how this evidence was related to the site; the information was general.

-Engaging with peer plants and stakeholders to promote water stewardship: Cooper Vision and Baxter have established the main contacts. Formal discussions on stakeholders' needs and focus areas were still pending, which stakeholders confirmed during interviews.

-Each plant understands the key basin stakeholders, has a system to monitor water stewardship policies, and engages as appropriate: site communications are mainly with local agencies (i.e., municipality, PRASA). The site shared general information about water stewardship with the other stakeholders, as per the meeting notes. However, it was unclear if the information was relevant for governance beyond the fence line.

-Training of all employees on the principles of water stewardship and how they can incorporate them within their daily tasks and responsibilities: AWS Standard system training levels 1, 2 and 3 for at least one employee per site. The site provided evidence of water stewardship flyers for the site.

Finding No: TNR-013710

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

Comment: The site has provided evidence of the implementation of these actions:

-The site established an end-to-end water management team with key technology and consumption owners. The site provided evidence of a Tier 3 meeting, with an example from October 2024 that included a detail of water-related initiatives and the water efficiency impact of those activities.

-Local metering is being installed to improve granularity and monitoring. A new continuous monitoring system is being installed to improve overall data accuracy. Evidence was provided with the monitoring system details.

-Meters installed at water sources, discharges, and major water user locations. The site provided evidence that some metering was being implemented, but certain quantities were estimated.

-Site tracks its water costs & use. Evidence was provided through the indicator 1.3.7

-A system is in place to maintain utility and process systems at base condition: PMs have been established to inspect the site to identify possible leaks above and below ground. Evidence provided included a Water Leak Inspection Report (August 2024)

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

Comment	The site shared evidence of the following activities for best practices: -Any Haleon site involved in the production or formulation of APIs (including antibiotics) needs to be able to assess its operations regarding the management of its API discharges to the environment and conduct necessary remediation of identified issues.: The site shared a pre-assessment spreadsheet of the API treatment elements from May 2024. -Redundant and/or more frequent Water Quality measurements to ensure conformance to specifications (PH criterion for sewer water discharges): The site shared its WWTP SOP from February 2022, indicating its operations procedures. The SOP stated that the pH was verified every 3 hours. The site also mentioned that a continuous pH sensor was installed. -Redundant and/or more frequent water quality measurements are needed to ensure conformance to specifications (residual chlorine criterion for drinking water). The site shared its Drinking Water Quality SOP from August 2022, indicating its operations procedures for its chlorination dosing. The SOP mentioned that the chlorination would happen daily for a residual of 0.3-0.5 ppm.
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.* — Yes
Comment	The site provided evidence of drum donations to support the movement and planting of mangroves from 2022 with a slideshow of images and email evidence. This supported the Punta Pozuelo Protected Natural Area and Jobos Bay National Estuarine Research Reserve IWRAs.
3.9.5	*Actions towards achieving best practice related to targets in terms of WASH shall be implemented.* — Yes
Comment	The site provided evidence of implementation of the hygienic feminine products and disposal locations, which the auditor saw during the site tour.

4	STEP 4: EVALUATE - Evaluate the site's performance.	
4.1	*Evaluate the site's performance in light of its actions and targets from its water stewardship plan and demonstrate its contribution to achieving water stewardship outcomes.*	
4.1.1	*Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.*	in progress
Comment	The site indicated, "Developed Water Stewardship Plan will be periodically reviewed to ensure identified actions are completed as planned. If delays are observed, these will be communicated to Management to determine possible mitigation steps and remediations." Progress against targets was evaluated for some but not all actions. Also, some metrics in the WSP were unclear (refer to comments in indicator 2.3.2). Clear targets and metrics are required to evaluate the performance of the implemented actions. ***Finding No: TNR-013740***	
4.1.2	*Value creation resulting from the water stewardship plan shall be evaluated.*	Yes
Comment	The site evaluated the value creation for the site in its WSP, Column L. Also, it quantified the expected value creation by implementing the actions, but not all.	
4.1.3	*The shared value benefits in the catchment shall be identified and where applicable, quantified.*	No
Comment	The site described the value creation for the catchment in its WSP, Column M. However, it wasn't quantified for all of them, and some were vague. ***Finding No: TNR-014214***	
4.2	*Evaluate the impacts of water-related emergency incidents (including extreme events), if any occurred, and determine the effectiveness of corrective and preventative measures.*	
4.2.1	*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.*	Yes
Comment	The site stated that it investigated and reviewed all water incidents as per SOP "Investigacion de Accidentes e Incidentes Ocupacionales (QD-SOP-002783). These are reported on an "as needed" basis, not annually." This was a guideline for investigating incidents on-site (September 2024). The site provided a comprehensive annual review of 2022's Hurricane Fiona. During 2023 & YTD 2024, the site reported no significant water-related events.	
4.3	*Evaluate stakeholders' consultation feedback regarding the site's water stewardship performance, including the effectiveness of the site's engagement process.*	
4.3.1	*Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.*	Yes

Comment	The site indicated stakeholder consultation was still in progress, though that was unclear for stakeholder consultations. The site had provided its water stewardship plan with the stakeholders in October 2024 and had not yet received feedback from stakeholders. Evidence was provided of this email. 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.	
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.	

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.*	✗ No
Comment	The site's water-related internal governance was identified and shared with the auditor. However, where and how the site publicly disclosed its water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations currently, was not demonstrated. ***Finding No: TNR-013746***	
5.2	*Communicate the water stewardship plan with relevant stakeholders.*	
5.2.1	*The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.*	✓ Yes
Comment	The site provided evidence of an email to 4 of its stakeholders in October 2024 about its shared water challenges, main WSP initiatives, and offering to engage with the stakeholders on water stewardship. The emails included a spreadsheet that included an external-facing version of the WSP, shared water challenges, and site opportunities	
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.*	✓ Yes
Comment	Evidence of disclosure of a summary of the site's water stewardship performance, including quantified performance against targets (annually at a minimum) 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.	
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.*	✓ Yes
Comment	The site provided evidence of an email to 4 of its stakeholders in October 2024 about its shared water challenges, main WSP initiatives, and offering to engage with the stakeholders on water stewardship. The emails included a spreadsheet that included an external-facing version of the WSP, shared water challenges, and site opportunities	
5.4.2	*Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.*	✓ Yes

Comment	The site provided evidence of an email to 4 of its stakeholders in October 2024 about its shared water challenges, main WSP initiatives, and offering to engage with the stakeholders on water stewardship. The emails included a spreadsheet that included an external-facing version of the WSP, shared water challenges, and site opportunities	
5.5	*Communicate transparency in water-related compliance: make any site water-related compliance violations available upon request as well as any corrective actions the site has taken to prevent future occurrences.*	
5.5.1	*Any site water-related compliance violations and associated corrections shall be disclosed.*	Yes
Comment	The site stated no compliance violations during the last five years.	
5.5.2	*Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.*	Yes
Comment	The site stated no water violations or non-conformances to disclose.	
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	The site had no water-related violations to disclose.	

Photographic Evidence from Audit

Yes

Comment

Due to timing, the auditor had 2 separate site tours. The auditor could not tour the manufacturing area due to approval complications, though the site provided images of water-related activities.

DRNA leased the site's wells, and the site regularly monitored daily usage limits with meters outside. The site had many drains—some were always open, while the ones in the chemical storage area or nearby were not. Storm retention ponds were across the site, and some were outside its perimeter. The site showed a forested area outside of its fencing, indicating that DRNA was holding the property in case the site wanted to apply for expansion permits.

The site had diesel stores for its generators, which included spill kits and hazard signage. It also has many eyewash stations and showers.

There were 2 sets of tanks on the site, including a potable tank and a fire water tank. These sets also had eyewash showers. The potable tanks had small water treatment stations with chlorination. The fire pump had a diesel storage with bunding around it. The fire tank was getting seismic protections retrofitted during the audit.

The utilities included outside water heaters and solar thermal water heating. Inside, there were softeners and boiler filters. No leaks were seen in this area. The chillers were being replaced with newer versions.

The site had 9 cooling towers.

The WWTP had a toilet with signage and a fountain. It also had a lab inside its facility. Carbon filters were in its RO system, which treated wastewater. The water reuse pool had chlorination pucks to treat before sending it back to the cooling towers. The aeration lagoon had pink water due to the dyes in Advil wastewater.

The site's chemical stores had spill kits, and chemicals were well organized and stored safely. Drains there were tested before emptying them. Corrosive chemicals were in a separate room of the storage area, as were oils and gasoline. The drains were tested before being emptied.

Upgrade or Downgrade of Certification

Justification for Upgrade or Downgrade
N/A

Summary of Evidence which led to change
N/A

Previous Findings

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

N/A