

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)



Audit Number: AO-001375

SITE DETAILS

Site: **Reyes Coca-Cola Bottling, Downey**
Address: 8709 Cleta Street, 90241, Downey, California, UNITED STATES
AWS Reference Number: AWS-000722
Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: **Certified Core**
Date of certification decision: 2025-Apr-15
Validity of certificate: 2028-Apr-14

AUDIT DETAILS

Audited Service(s): AWS Standard v2.0 (2019)
Audit Type(s): Initial Audit
Audit Start Date: 2024-Dec-10
Audit End Date: 2024-Dec-12
Lead Auditor: Kimberly Worsham
Audit team participants:
Kimberly Worsham, Lead Auditor
Site Participants:

AUDIT TIMES

Dates	Audit from	Duration	Auditor	Description
2024-Dec-11	08:00:00 - 17:00:00	09:00	Kimberly Worsham	
2024-Dec-10	08:00:00 - 17:00:00	09:00	Kimberly Worsham	
2024-Dec-12	08:00:00 - 13:00:00	05:00	Kimberly Worsham	

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ADDITIONAL INFO

Summary of Audit Findings: During the certification audit, 3 major non-conformities, 27 minor non-conformities, and 9 observations were raised.

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 23/February/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) 9/April/2025.

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

The audit team recommends certification of Reyes Coca-Cola Bottling, Downey at the Core level pending approval of the corrective actions plan for all non-conformities and closure of the major non-conformities.

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 to assess the conformity of Reyes Coca-Cola Bottling, Downey, against the AWS International Water Stewardship Standard Version 2.

Reyes Coca-Cola Bottling (RCCB) is a partner bottler and distributor for The Coca-Cola Company (TCCC), servicing the West Coast and Midwest. The site is 8709 Cleto Street, Downey, Los Angeles County, California 90241. It is an area that is generally commercial/industrial to the west, north, and northeast and residential to the southwest, south, and southeast. It receives its water directly from the City of Downey, Department of Public Works, Utilities Division (DPWUD), where it extracts groundwater from 20 water supply wells and provides its customers with largely untreated groundwater. Additionally, the City maintains three connections to the Metropolitan Water District's (MWD's) main trunk line for use during an emergency or if the City's supply pressure falls below area-specific thresholds.

The area's topography slopes gently toward the south towards the Pacific Ocean. The Plant is in a subtropical steppe/low-latitude semi-arid hot climate. According to the Holdridge life zones system of bioclimatic classification, Downey is in or near the warm temperate thorn steppe biome. The World Resources Institute's (WRI's) Aqueduct Tool indicates that the current Baseline water stress is classified as high, while the Future is classified as extremely high. The Downey facility resides in what TCCC considers a high-water stress region and carries a higher relative water risk.

The Plant resides in the Central Basin of the Los Angeles Coastal Plain (LACP) and is situated in Southern California within the Peninsular Ranges. Elongated low ridges and hills along the periphery of the Pacific Plate distinguish this coastal lowland area. Aligned with the Santa Barbara Channel, Ventura Basin, San Fernando Valley, and San Gabriel Basin, it is part of the broader Southern California region, with a significant portion of the City falling within its jurisdictional land area. Various geological and hydrological factors influence the hydrogeology of the LACP. The coastal plain extends along the western edge of Los Angeles County and is characterized by a complex interplay of sedimentary deposits, faulting, and proximity to the Pacific Ocean. Groundwater that the City withdraws from the underlying aquifers is generally good quality and is untreated except for chlorine disinfection throughout its distribution system. Wastewater from the plant is treated at the Los Coyotes Water Reclamation Plant (LCWRP), one of 11 Los Angeles County wastewater treatment plants. The wastewater that exits the plant flows under gravity to the LCWRP in Cerritos, California, where it is treated by conventional technology and discharged to the adjacent San Gabriel River channel. In turn, improved and concrete-lined San Gabriel River channel water flows into the Pacific Ocean. The water from the San Gabriel River downflow of the LCWRP is not used for any purpose.

The audit was conducted onsite on 10-12 December 2024.

The onsite site visit included assessing the facilities on-site, including the incoming and outgoing water, the pretreatment area, the wastewater treatment plant, WASH facilities, and production areas that included using water for cleaning, processing, and mixing.

FINDINGS

NUMBER OF FINDINGS PER LEVEL

Table with 2 columns: Observation, Count. Rows: Observation (9), Minor (27), Major (3).

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FINDING DETAILS

Finding No:	TNR-014819
Checklist Item No:	1.1.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Dec-10
Checklist item:	<p>The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including:</p> <ul style="list-style-type: none">- Site boundaries;- Water-related infrastructure, including piping network, owned or managed by the site or its parent organization;- Any water sources providing water to the site that are owned or managed by the site or its parent organization;- Water service provider (if applicable) and its ultimate water source;- Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies;- Catchment(s) that the site affect(s) and is reliant upon for water.
Findings:	<p>The site did not map where the wastewater leaves the site.</p>
Corrective action:	<p>Site map will be updated showing physical location of wastewater discharge. Plant engineering team is making this change. Revised drawings will be uploaded when available.</p>

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Finding No:	TNR-014820
Checklist Item No:	1.2.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Dec-10
Checklist item:	Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall: <ul style="list-style-type: none">- Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people;- Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies;- Provide evidence of stakeholder consultation on water-related interests and challenges;- Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups;- Identify the degree of stakeholder engagement based on their level of interest and influence.
Findings:	Whether the site identified vulnerable or indigenous groups or stakeholders in the ultimate water sources was unclear. Additionally, information was not included for all identified stakeholders - several had incomplete information.
Corrective action:	Identify the City of Downey's legal standing to pump water from the aquifer. Submit a copy of their permit. Update stakeholder list with additional information and contacts. Identify and connect with indigenous groups that may be stakeholders in the site's water supply or wastewater discharge.
Finding No:	TNR-015966
Checklist Item No:	1.2.2
Status:	In Progress - CA plan approved
Finding level:	Observation
Checklist item:	Current and potential degree of influence between site and stakeholder shall be identified, within the catchment and considering the site's ultimate water source and ultimate receiving water body for wastewater.
Findings:	The site did not identify the potential degree of influence for all of its stakeholders.
Corrective action:	Include a qualitative measure of stakeholders' influence on the stakeholder relationship tracker document.

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Finding No:	TNR-014823
Checklist Item No:	1.3.4
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Dec-10
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:	An indication of seasonal, high, and low variances was not quantified for the groundwater sources in the site's watershed/catchment.
Corrective action:	As the groundwater is pumped from a deep aquifer, there is very little seasonal variance. The City of Downey has 19 high-capacity wells, of which 10-12 are in service at any given time. As the City rotates through which wells are in service, there is some slight variation in water chemistry and groundwater levels. We will work with the City to provide documentation of this.
Finding No:	TNR-015180
Checklist Item No:	1.5.2
Status:	In Progress - CA plan approved
Finding level:	Observation
Checklist item:	Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.
Findings:	The site did not identify the California Water Rights that the state's Water Board approved within the last decade.
Corrective action:	Contact the City of Downey water utility to obtain their documentation of water rights.

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Finding No:	TNR-014923
Checklist Item No:	1.5.3
Status:	In Progress - CA plan approved
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:	<p>The site indicated imported water as a shared water challenge. However, it did not provide annual/seasonal variance.</p> <p>The site did not identify surface water in its catchment balance, which was relevant since the city's ultimately treated wastewater was discharged into the San Gabriel River.</p>
Corrective action:	<p>Work with the City of Downey water utility to quantify volume of imported water. Per recent conversations with them, it's zero, with a cross connection available in case of emergency.</p> <p>TR Comment, 10/March/2025: the site provided general information on the water balance of the San Gabriel River Basin. The observation will remain open to review the implementation of the corrective action plan: Work with the City of Downey water utility to quantify volume of imported water. Per recent conversations with them, it's zero, with a cross connection available in case of emergency.</p>
Finding No:	TNR-014831
Checklist Item No:	1.5.4
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Dec-10
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:	While the site had identified a shared water-related challenge about water quality, there was no indication of annual and seasonal high and low variances.
Corrective action:	As the groundwater is pumped from a deep aquifer, there is very little seasonal variance. The City of Downey has 19 high-capacity wells, of which 10-12 are in service at any given time. As the City rotates through which wells are in service, there is some slight variation in water chemistry and groundwater levels. We will work with the City to provide documentation of this.

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Finding No:	TNR-014832
Checklist Item No:	1.5.5
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Dec-10
Checklist item:	Important Water-Related Areas shall be identified, and where appropriate, mapped, and their status assessed including any threats to people or the natural environment, using scientific information and through stakeholder engagement.
Findings:	It was unclear which IWRAs the site had identified in the catchment as some were too big and vast. IWSRA status including threats was not assessed.
Corrective action:	<p>Identified and prioritized smaller IWRAs that are in the source watershed and that we can impact. Plans to reach out to WRD in 2Q (already a stakeholder) to understand actions RCCB can take to improve water quality, such as litter cleanups.</p> <p>RCCB's Community Champions look for local partners to support through donations and volunteer service. The IWRAs listed as A-priority will be contacted and consulted about how we can best support water quality goals they have. Update on progress will be publicly shared as part of our annual disclosure.</p> <p>Updated the status of all IWRAs to "tbd (to be determined)", as our assessment of the sites is incomplete compared to that of the site contacts. As part of our engagement with the site owners, we will defer to their expertise about the sites and the current and future status. We will then collaborate with them on best ways for RCCB to support any existing remediation/improvement plans. The goal in the WSP is to have engagement meetings and subsequent collaboration plans with for at least three (3) IWRAs by the end of 2025.</p>

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Finding No:	TNR-014833
Checklist Item No:	1.5.6
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Dec-10
Checklist item:	Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.
Findings:	The site did not identify the condition of water related infrastructure in the catchment, nor the potential exposure to extreme events. Also, it was unclear how to find all of the water-related infrastructure.

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Corrective action:

Provide the City's capital plan for water and wastewater infrastructure projects, its general age and condition, and portion of catchment population served. Per the Downey Water Utility, system loss of water is ~4%. We will provide documentation of that, along with a map of water and wastewater mains adjacent to the site. (The City does not provide maps of key water infrastructure due to security concerns.) Make this information available during the annual AWS surveillance audit.

Excerpt from the City's 2025 priority list that deal with major new water infrastructure priorities:

Water Well Remediation - The City of Downey has identified all twenty (20) existing groundwater wells in their system that contain Per- and Polyfluoroalkyl Substances (PFAS) that are currently higher than the recommended limits set out by the State of California. The City has started a Well Remediation Project that would enable the City to treat four of the five wells (as a pilot program) to meet the current State of California Response Level limits for PFOS and PFOA using Ion Exchange Treatment technology. After the completion of the pilot program, the City will extend the project and continue to seek funding for the other 15 water wells. Additionally, the City worked with Congresswoman Roybal-Allard's office to include language in the federal Water Development Resources Act for monies for the City of Downey to be used towards PFAS. The City is currently working with its federal lobbyist to begin the process for drawing down funds from the Army Corps of Engineer, with updates expected in late 2024 through early 2025. The City submitted its project—the acquisition of two vacant lots for the construction of a water treatment facility in north Downey, as part of the overall water infrastructure project—to the FY 2025 Community Projects Program through the congressional office of Congresswoman Linda Sánchez. Results are expected in late 2024, with a funding request of \$1 million.

Lower Los Angeles River Watershed Infiltration Basin - Is a stormwater management project located at Furman Park in Downey, designed to capture and treat urban runoff to improve water quality and reduce flooding. This project is necessary to comply with the MS4 Permit, which mandates reducing pollutants entering the Lower Los Angeles River watershed, while also recharging groundwater supplies and enhancing the park's recreational facilities. The total project cost is estimated at \$23 million, with \$14.3 million already secured, leaving \$8.7 million needed to complete the construction.

The City has a risk mitigation plan that includes water and wastewater infrastructure. The document is too large to upload, but can be found at this site: <https://lf.downeyca.org/WebLink/DocView.aspx?id=314913&dbid=0&repo=Downey&cr=1>

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Evidence of implementation: RZ comment, 11/March: Discussion of water infrastructure and plans for ongoing maintenance were discussed during our meeting with the City of Downey in late January. City claims water loss is very low (~4% systemwide). They prioritize water and wastewater lines for repair each year based on available funds. The City has detailed maps of water, fire hydrants, storage tanks, and wastewater lines. A sample showing the area around the RCCB Downey plant is attached. We requested a wider view with less details and will share that when provided.

RZ comment, 12/March: updated corrective action

Finding No: TNR-015847
Checklist Item No: 1.6.1
Status: Closed
Finding level: Minor
Due date: 2025-Dec-10
Checklist item: Shared water challenges shall be identified and prioritized from the information gathered.
Findings: The identified shared water challenges were not prioritized.
Corrective action: They are prioritized as follows:
1. Water quantity. Ensure sufficient water supply is available and that the source aquifer is sustainable.
2. Emerging contaminants. Understand risks of PFAS and other contaminants in the source aquifer and if/when they will be present in the plant's water supply.
3. Water efficiency. Reduce WUR each year to achieve 2030 target of 1.43.
4. Water and wastewater infrastructure and costs.

Finding No: TNR-014963
Checklist Item No: 1.6.2
Status: In Progress - CA plan approved
Finding level: Observation
Checklist item: Initiatives to address shared water challenges shall be identified.
Findings: The site did not identify many public initiatives addressing shared water challenges, but it could to strengthen conformance.
Corrective action: Identify key challenges during public stakeholder meeting in late March.

The shared water challenges will be reviewed at the stakeholder meeting, now scheduled for April 8th. The key issues that have been identified by the City of Downey and Los Angeles County Water Reclamation District (WRD) are sustainability of supply through increasingly variable rainfall (which we address through our water efficiency plans and goals), and emerging contaminants in the aquifer (which we also support by reducing our water use and through investments in injection wells such as was done in partnership with WRD in 2024.)

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Finding No: TNR-015845
Checklist Item No: 1.7.2
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2025-Dec-10
Checklist item: Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.
Findings: The potential savings of water-related opportunities were not assessed.
Corrective action: Water savings are part of all major capital project evaluations. Documentation of this for key capital projects occurring in 2025 will be added to the WSP.

Finding No: TNR-014839
Checklist Item No: 1.8.3
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2025-Dec-10
Checklist item: Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.
Findings: The site shared legal requirements that do not constitute best practices. It also showed storm drains outside that may be considered best practice but did not identify it.
Corrective action: Provide documentation of existing best practices, which include wastewater assay showing chloride levels well below permit limits, "mixing tank" to hold wastewater in case of pH being out of limits, and site procedures to eliminate litter and other solids from entering storm drains.

1. Site will improve receiving water quality beyond compliance but treating chloride levels below the regulatory limits (225 ppm)
2. Site will inspect and maintain facility perimeters including stormwater screens to reduce solids enter receiving watershed. These practices are beyond stormwater compliance requirements.
3. Site will maintain wastewater emergency storage capacity to prevent errant discharges to the receiving watershed. These actions are beyond compliance requirements.

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Finding No:	TNR-014840
Checklist Item No:	1.8.4
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Dec-10
Checklist item:	Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.
Findings:	The site shared legal requirements that do not constitute best practices but rather standard practice.
Corrective action:	<p>Identify and prioritize IWRA's.</p> <ol style="list-style-type: none">1. Implement RCCB's/TCCC's replenishment strategy within the catchment and report impact annually.2. Connect with stakeholders who have administrative control of IWRA's near the site to develop an engagement plan on how RCCB Downey can best support goals for improved water quality. This is separate from the replenishment work that RCCB is already funding within our catchment. Report implementation and benefit status of IWRA engagement annually.3. Disclose progress and benefits to other stakeholders at least annually.4. Update water stewardship plan to reflect annual progress. <p>Engagement with IWRA stakeholders is not required by any applicable regulations in our area. This would be considered best practice.</p>
Finding No:	TNR-014927
Checklist Item No:	1.8.5
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Dec-10
Checklist item:	Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.
Findings:	The site shared legal requirements that do not constitute best practices but rather standard practice.
Corrective action:	<p>Add free feminine hygiene products to women's restrooms at the plant.</p> <p>Corrective action will be to work with our janitorial services to install dispensers for feminine products in women's restrooms. The WASH needs of our employees are addressed through course of our normal operations. Restroom facilities, ability to freely use the restroom when necessary, provision of soap, water, and hand sanitizers, and access to drinking water for everyone in the plant is standard operating procedure.</p>

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Finding No:	TNR-014841
Checklist Item No:	2.1.1
Status:	Closed
Finding level:	Major
Due date:	2025-Apr-24
Checklist item:	<p>A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:</p> <ul style="list-style-type: none">- That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes- That the site implementation will be aligned to and in support of existing catchment sustainability plans- That the site's stakeholders will be engaged in an open and transparent way- That the site will allocate resources to implement the Standard.
Findings:	<p>The site has not publicly disclosed the commitment, and the concept of disclosure was not included in the statement.</p>
Corrective action:	<p>Public announcement of the site's pursuit of AWS certification is now on the public website: https://panel.reyescocacola.com/assets/pages/our_community/aws-standard-2025.pdf</p> <p>Public commitment: https://panel.reyescocacola.com/assets/pages/our_community/aws-commitment-letter-20250324.pdf</p>
Finding No:	TNR-014842
Checklist Item No:	2.2.1
Status:	Closed
Finding level:	Minor
Due date:	2025-Dec-10
Checklist item:	<p>The system to maintain compliance obligations for water and wastewater management shall be identified, including:</p> <ul style="list-style-type: none">- Identification of responsible persons/positions within facility organizational structure- Process for submissions to regulatory agencies.
Findings:	<p>The site did not clearly state the persons responsible for maintaining water-related compliance obligations.</p>
Corrective action:	<p>Plant leadership team is responsible for maintaining water-related compliance obligations. Plant Director Operations Manager EHS Manager</p>

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Finding No:	TNR-014844
Checklist Item No:	2.3.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Dec-10
Checklist item:	A water stewardship strategy shall be identified that defines the overarching mission, vision, and goals of the organization towards good water stewardship in line with this AWS Standard.
Findings:	The site did not provide its overarching mission and vision.
Corrective action:	<p>Reyes Coca-Cola's Purpose and Vision apply to all locations, including the Downey production center. Water use and greenhouse gas reduction goals are parts of the "Community" strategic pillar, as are offsite water replenishment projects. As such, RCCB invests each year to advance these goals at all locations. Plant leadership is held accountable for achieving annual goals that support continuing progress toward the company's 2030 goals. Documentation of those results are provided elsewhere in the AWS submittal.</p> <p>TR Comment, 12/March/2025: the site provided its vision and mission in its Water Management Plan (WMP) and the site will be updating its policy to include the following points upon certification: In 2025, the Plant is furthering its commitment by adopting the Alliance for Water Stewardship's framework and outcomes of: (1) good water governance; (2) sustainable water balance; (3) good water quality status; (4) important water-related areas; and (5) safe water, sanitation, and hygiene for all.</p>

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Finding No:	TNR-014843
Checklist Item No:	2.3.2
Status:	Closed
Finding level:	Major
Due date:	2025-Apr-24
Checklist item:	<p>A water stewardship plan shall be identified, including for each target:</p> <ul style="list-style-type: none">- How it will be measured and monitored- Actions to achieve and maintain (or exceed) it- Planned timeframes to achieve it- Financial budgets allocated for actions- Positions of persons responsible for actions and achieving targets- Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.
Findings:	<ul style="list-style-type: none">- Many of the site's targets were not clear for evaluation.- How it will be monitored for some but not all, but not how it will be measured.- Actions to achieve and maintain (or exceed) it for all, though some are unclear and are just names of agencies.- Planned timeframes to achieve it for some, but not all are clear or put under "comments".- Financial budgets allocated for actions for some but not all.- The link between each target and the achievement of best practices to help address shared water challenges were not shared, where available.-The links included AWS outcomes for all, though some links were unclear.-The site did not identify a target in the WSP for indirect/embedded water.
Corrective action:	Updated water stewardship plan with 2025 goals and responsible parties. Budgets allocated for all items that need funding.

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Finding No: TNR-014845
Checklist Item No: 3.1.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2025-Dec-10
Checklist item: Evidence that the site has supported good catchment governance shall be identified.
Findings: The site did not provide evidence of implementing several water governance targets, such as meeting with regulators and elected officials. It was also unclear how some of the targets were relevant to water governance.
Corrective action: Targets under development in consultation with regulators and elected officials. This will be completed by 3Q, 2025.

Finding No: TNR-014849
Checklist Item No: 3.3.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2025-Dec-10
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 some of its water balance targets, including the stormwater regulations. It was also unclear how one of the targets was related to water balance.
Corrective action: Site water balance that includes stormwater is being developed. This will be available for review by 4Q, 2025.

RCCB has evidence of stormwater compliance through inspections by the local stormwater authority. These reports will be provided as evidence during the annual AWS surveillance audit.

TR Comment: The site has updated its Water Stewardship Plan and how the targets are linked to each AWS outcome.

Finding No: TNR-015219
Checklist Item No: 3.4.1
Status: In Progress - CA plan approved
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 may want to update its WSP to include stormwater permits and testing of incoming water for water quality.
Corrective action: Plan will be updated to include these items in 2025.

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Audit Number: AO-001375

Finding No:	TNR-014853
Checklist Item No:	3.4.2
Status:	Closed
Finding level:	Major
Due date:	2025-Apr-07
Checklist item:	Where water quality is a shared water challenge, continual improvement to achieve best practice for the site's effluent shall be identified and where applicable, quantified.
Findings:	The site did not provide evidence or quantify its effluent best practices efforts.
Corrective action:	Provide plant drawings, photos, and effluent analysis that show the plant's best practices. These include maintaining chloride levels well below what the permit allows, a "mixing tank" that receives wastewater if it goes out of pH range, and site procedures to minimize solid materials going to storm drains.
Evidence of implementation:	`This section has been redacted for confidentiality purposes`

Finding No:	TNR-014852
Checklist Item No:	3.5.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Dec-10
Checklist item:	Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.
Findings:	The site did not provide evidence of implementation for all IWRA targets. It was also unclear what catchment IWRAs were to be targeted.
Corrective action:	There are no IWRAs on the site. We have identified and prioritized IWRAs near the site that affect water resources and are developing plans to engage with their stakeholders.

TR Comment, 10/March/2025: the site has clarified the following: This effort is just getting started. We have identified IWRAs that are relevant to the site and small enough that we can have meaningful and measurable impacts. RCCB staff are connecting with these third parties to gauge interest and opportunities for partnership. The updated list of IWRAs is attached.

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Audit Number: AO-001375

Finding No: TNR-014964
Checklist Item No: 3.6.1
Status: In Progress - CA plan approved
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 site did not provide evidence of providing an annual report of its supplier WASH statuses.
Corrective action: Work with The Coca-Cola Company and our purchasing group (Coca-Cola Bottlers Supply System, or CCBSS) to survey key suppliers on their WaSH status and include results in WSP by 12/31/25.

Finding No: TNR-014855
Checklist Item No: 3.7.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2025-Dec-10
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 have indirect water use targets in the WSP. Refer to finding in indicator 2.3.2.
Corrective action: Work with The Coca-Cola Company (TCCC) to quantify embedded water in raw materials and understand what leverage we have to impact this. As a franchise bottler, RCCB is required to purchase from approved suppliers, including TCCC.

This work may be grouped with the system-wide efforts on Scope 3 carbon emissions, which also are difficult for bottlers to impact.

RCCB will engage with the laundry service to understand their water conservation plans by no later than 6/30. We feel this is a relatively minor water use compared to our direct use but will explore it as required.

Finding No: TNR-015220
Checklist Item No: 3.9.1
Status: In Progress - CA plan approved
Finding level: Observation
Checklist item: Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.
Findings: Evidence of governance efforts going beyond its corporation would better conform for this indicator.

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Finding No: TNR-014859
Checklist Item No: 3.9.3
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2025-Dec-10
Checklist item: Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.
Findings: The site identified best water quality practices through the Coca-Cola Water Efficiency Maturity Tool but did not show evidence of implementation. The site showed evidence of a storm cover system outside during the audit tour that could be a best practice.
Corrective action: Provide photos and records that demonstrate implementation of best practices as identified in the Water Efficiency Maturity Tool by 6/30/2025.

Finding No: TNR-015222
Checklist Item No: 3.9.4
Status: In Progress - CA plan approved
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: The site provided evidence of groundwater replenishment, though it could be added to the best practices list for IWRAs.
Corrective action: Add the WRD LVL injection well project to IWRA list. Our prioritized IWRAs are managed by WRD.

Finding No: TNR-015223
Checklist Item No: 3.9.5
Status: In Progress - CA plan approved
Finding level: Observation
Checklist item: Actions towards achieving best practice related to targets in terms of WASH shall be implemented.
Findings: The site provided evidence of a toilet lead assessment in 2022, though it was not included in the best practices list. Also, other best practices identified, such as shower facilities and hygiene behavior programs, did not have evidence provided.
Corrective action: Provide evidence of WaSH best practices, including documentation of the toilet replacement project in Los Angeles in 2022.

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Audit Number: AO-001375

Finding No:

Checklist Item No:

Status:

Finding level:

Due date:

Checklist item:

Findings:

Corrective action:

TNR-014863

4.1.1

In Progress - CA plan approved

Minor

2025-Dec-10

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

The site did not provide evidence of evaluating its performance against targets in its WSP.

RCCB tracks and reports performance against targets for all sites regularly.

The site has provided this clarification: WUR was the primary target that RCCB used at Downey (and all other locations) in 2024. Other targets, such as sourcewater testing frequency, wastewater testing, maintenance of EHS procedures were all achieved, but are just now being integrated into an overall water stewardship scorecard. Stakeholder engagement goals will also be included and shared as part of RCCB's commitment to disclosure.

Finding No:

Checklist Item No:

Status:

Finding level:

Due date:

Checklist item:

Findings:

Corrective action:

TNR-014864

4.1.2

In Progress - CA plan approved

Minor

2025-Dec-10

Value creation resulting from the water stewardship plan shall be evaluated.

The site provided no evidence of evaluating the value creation from the site's WSP.

Plant leaders will develop a methodology for this by 6/30/25. The Water Stewardship Plan is one of many aspects of how the plant operates. It's difficult to parse out the value creation from the plan itself, other than water is an essential aspect of the products. No water, no products, no value.

We will explore use of Ecolab's True Cost of Water model in this work.

For RCCB, the "value creation" of water stewardship at Downey and other bottling plants is improvement in our reputation, both within the Coca-Cola system and in our communities. It is the company's Mission to be the best bottler in the system, and attention to water stewardship is just one part of that. It's difficult to financially quantify this benefit, but RCCB is committed to developing a methodology to estimate it by 6/30/2025. Ecolab's True Cost of Water tool will help with parts of it including water, embedded energy, treatment processes and products, etc.

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Finding No: TNR-014865
Checklist Item No: 4.1.3
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2025-Dec-10
Checklist item: The shared value benefits in the catchment shall be identified and where applicable, quantified.
Findings: No evidence was provided of the identified and quantified shared value benefits for the catchment resulting from implementing the site's WSP/WMP.
Corrective action: Quantify benefits to the catchment of the WSP by 9/30/25.

Finding No: TNR-014866
Checklist Item No: 4.3.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2025-Dec-10
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 with stakeholders on its WSP performance.
Corrective action: WSP includes a high-level overview of stakeholder engagement. RCCB plant leadership is in regular contact with stakeholders including the City of Downey water utility, LA County Water Reclamation District, Ecolab (supplier and consultant on water efficiency), and local and state elected officials. Downey team met with the water utility most recently on 1/28/25, and with the water reclamation district on 1/29/25.

We have a public stakeholder meeting set for Tuesday, April 8, 2025 at the RCCB Downey plant. The agenda is still in development, but will include discussion of RCCB Downey's WSP, disclosure of results to date, solicitation of feedback, identification of shared issues of concern, and expression of our willingness to collaborate on solutions. Stakeholders will include the City of Downey, LA County Water Reclamation District, Ecolab, community groups, and a variety of environmental NGOs that we currently work with and with groups associated with IWRAs we've identified. We will provide WSAS with the agenda, attendee list, and outcomes once the meeting is held.

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Audit Number: AO-001375

Finding No: TNR-014867
Checklist Item No: 5.1.1
Status: Closed
Finding level: Minor
Due date: 2025-Dec-10
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 provided a list of its water-related internal governance, including positions of those. However, no evidence was provided of it having been disclosed.
Corrective action: Leadership team and roles will be shared during the upcoming public stakeholder meeting in late March.

The site disclosed its internal water governance during a meeting with stakeholders, held on April, 8, 2025 (evidence provided in indicator 2.1.1).

Finding No: TNR-014868
Checklist Item No: 5.2.1
Status: Closed
Finding level: Minor
Due date: 2025-Dec-10
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 was no evidence that the site's water stewardship plan, including how it contributes to the AWS Standard outcomes, was communicated to relevant stakeholders beyond one.
Corrective action: WSP was shared with the City of Downey and LA County Water Reclamation District during meetings in late January. It will also be shared during the public stakeholder meeting in late March.

Finding No: TNR-015224
Checklist Item No: 5.3.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2025-Dec-10
Checklist item: A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.
Findings: No evidence was provided of the site's having disclosed a summary of its WSP, including quantified performance against targets, at least annually.
Corrective action: Summary of the WSP and performance against targets will be shared in the public stakeholder meeting in late March.

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Audit Number: AO-001375

Finding No: TNR-014869
Checklist Item No: 5.4.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2025-Dec-10
Checklist item: The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.
Findings: No evidence was provided of the site having disclosed its shared water-related challenges and efforts to address them.
Corrective action: Shared water challenges and efforts to address them will be part of the public stakeholder meeting in late March.

Finding No: TNR-014870
Checklist Item No: 5.4.2
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2025-Dec-10
Checklist item: Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.
Findings: It was unclear how the groundwater replenishment project was communicated to stakeholders.
Corrective action: Groundwater replenishment project at the LVL Advanced Water Treatment Plant was publicly shared in RCCB's Corporate Social Responsibility Report. The grant recipient is one of our key stakeholders. It will be included in the public stakeholder meeting in late March.

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Audit Number: AO-001375

Report Details

Report	Value
Report prepared by	Kimberly Worsham
Report approved by	Monserath Zamora
Report approved on (Date)	24 January 2025

Surveillance

Proposed date for next audit
2025-Dec-10

Comment This was the initial audit for the site.

Stakeholder Announcements

Date of publication	Location
10/01/2024	https://a4ws.org/wp-content/uploads/2024/10/AWS-000722_Reyes-Coca-Cola-Bottling-Downey_StakeholderAnnouncement_December2024_V3.0.pdf
10/01/2024	https://watersas.org/wp-content/uploads/2024/10/AWS-000722_Reyes-Coca-Cola-Bottling-Downey.pdf
Comment	Aside from the AWS and WSAS websites, the site did not publish the stakeholder announcement 8 weeks before the audit. As a result the site was requested to publish the Stakeholder Announcement for a period of 8 weeks after the audit to allow for possible comments.
Comment	The auditor had 2 interviews with 3 stakeholders. The interviews were remote.

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Catchment Information



catchment.png

Catchment Information

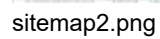
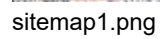
The Downey facility is located near the boundary of the Los Angeles River and San Gabriel River watersheds, in the Los Angeles Coastal Plain (LACP). These watersheds comprise the primary catchments for the Plant. It overlies the Central Groundwater Basin and is in the Los Angeles Coastal Plain. The Central Basin comprises several stratified aquifers arranged one atop the other. The aquifers are confined throughout most of the Central Basin, but areas with semi-permeable aquicludes allow some interaction between the aquifers. Groundwater is recharged naturally in the forebay areas and artificially at spreading grounds. Water is also introduced back into the basin's aquifers through injection well fields that replace the extracted water and counter the effects of seawater intrusion. Several agencies are responsible for managing their water resources, with global oversight by the California Department of Water Resources.

Various geological and hydrological factors influence the hydrogeology of the LACP. The coastal plain extends along the western edge of Los Angeles County and is characterized by a complex interplay of sedimentary deposits, faulting, and proximity to the Pacific Ocean. Groundwater that the City withdraws from the underlying aquifers is generally good quality and is untreated except for chlorine disinfection throughout its distribution system. Wastewater from the plant is treated at the Los Coyotes Water Reclamation Plant (LCWRP), one of 11 Los Angeles County wastewater treatment plants. The wastewater that exits the plant flows under gravity to the LCWRP in Cerritos, California, where it is treated by conventional technology and discharged to the adjacent San Gabriel River channel. In turn, improved and concrete-lined San Gabriel River channel water flows into the Pacific Ocean. The water from the San Gabriel River downflow of the LCWRP is not used for any purpose.



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Client Description and Site Details



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Reyes Coca-Cola Bottling (RCCB) is a partner bottler and distributor for The Coca-Cola Company (TCCC), servicing the West Coast and Midwest. RCCB Downey Production (Plant) is located at 8709 Clela Street, Downey, Los Angeles County, California 90241. The land parcel designations with the Los Angeles County are Assessor's ID Numbers 6255-020-025, 6255-020-027, and 6255-020-028. The Downey plant is located in an area that is generally commercial/industrial to the west, north, and northeast and residential to the southwest, south, and southeast. The Plant receives its water directly from the City of Downey, Department of Public Works, Utilities Division (DPWUD). The DPWUD extracts groundwater from 20 water supply wells and provides its customers with largely untreated groundwater. Additionally, the City maintains three connections to the Metropolitan Water District's (MWD's) main trunk line for use during an emergency or if the City's supply pressure falls below area-specific thresholds.

The area's topography slopes gently toward the south towards the Pacific Ocean. The Plant is in a subtropical steppe/low-latitude semi-arid hot climate (Köppen-Geiger classification: Bsk). According to the Holdridge life zones system of bioclimatic classification, Downey is in or near the warm temperate thorn steppe biome. The World Resources Institute's (WRI's) Aqueduct Tool indicates that the current Baseline water stress is classified as high, while the Future is classified as extremely high. The Downey facility resides in what TCCC considers a high-water stress region and carries a higher relative water risk.

Summary of Shared Water Challenges

Summary of Shared Water Challenges

The site identified 5 shared water challenges that were identified with stakeholders: emerging water contaminants, saltwater intrusion, stormwater runoff, imported water quantity, and water equity.

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.* ✔
Yes

Comment The water-related discharge locations and incoming water pipes were audited on-site.

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

Comment The site occupied one catchment - Central Groundwater Basin.

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 under the control of a single management system.

0.1.1.3 *The scope of the proposed certification shall be homogeneous with respect to primary production system, water management, product or service range, and the main market structures.* ✔
Yes

Comment The site was homogenous concerning its primary production system, water management, product range, and the main market structures.

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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 identified its physical scope for the site's water service provider; its various water sources and the catchment/watershed that it is reliant upon for water; the hydrogeological context; the watershed context; the site's wastewater service provider, discharge point to the San Gabriel River channel, and ultimately to the Pacific Ocean. The document explains that the site has no water sources owned or managed by the site or its parent organization.

The site mapped its:

- boundaries and layout;
- water-related infrastructure, including its pipeline and where the water enters the site;
- the hydrogeology of the Central and West Coast basins;
- its water-based fire suppression system;
- the Town of Downey's groundwater wells and the Leo Vander Lans Injection Well Project;
- the RCCB production and replenishment projects in California;
- the groundwater basins of the LA Coastal Plains and catchment;
- the location of the site compared to the water utility;
- the WWTP receiving the site's wastewater, which goes into the LVL injection well as part of the watershed's groundwater replenishment; and
- the Los Angeles County Water Reclamation Plant Treatment Area, the Los Coyotes Water Reclamation Plant, and the San Gabriel River into which the Plant discharges its treated effluent.

However, the site did not map where the wastewater leaves the site.


Finding No: TNR-014819

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



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1.2.1	<p><i>Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall:</i></p> <ul style="list-style-type: none"> - Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people; - Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies; - Provide evidence of stakeholder consultation on water-related interests and challenges; - Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups; - Identify the degree of stakeholder engagement based on their level of interest and influence. 	 in progress
Comment	<p>The site identified its process used to identify and map water-related stakeholders and included the following information:</p> <ul style="list-style-type: none"> - Description/link to factory - Stakeholder type - Water-related concerns or challenges - Assessment of stakeholder engagement (influence & interest) - Potential for site to influence stakeholder water stewardship - Selected method of communication <p>However, this information was not included for all identified stakeholders - several had incomplete information.</p> <p>The site included details of the stakeholders, including environmental groups and some in the San Gabriel River, which was its ultimate receiving water body. However, whether it identified vulnerable or indigenous groups or stakeholders in the ultimate water sources was unclear.</p> <p>The site shared evidence of meeting notes from the City of Downey from February 2024, though more could have been shared.</p>	






Finding No: TNR-014820

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>	 Obs.
Comment	<p>The site identified stakeholders' potential degree of influence, categorized by sector, but not for all stakeholders. It also identified its process for identifying and mapping stakeholders.</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 provided its Emergency Response Plan, which included environmental releases, chemical spills, truck accidents with environmental impact, and other significant environmental incidents. This also included contaminated soil or surface water, regulatory inspections or contacts, serious injuries/illnesses, natural or man-made disasters, flooding and hail storms, water supply outages, and human threats.</p> <p>The site also shared a drought management document, indicating its response plan based on stages managed by the state and city governments.</p> <p>The site also has an SPCC Plan, a SWPPP, and a facility vulnerability assessment, including mitigation measures.</p>	

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1.3.2	<i>Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped</i>	 Yes
Comment	The site identified and mapped its water balance, including inflows, losses, water recovery, and outflows. The site shared that its water storage systems only contained water for a maximum of 30 minutes.	
1.3.3	<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>	 Yes
Comment	The site quantified its water balance, including inflows, losses, and outflows (in the Downey TPA document). The site shared that it did not have storage—its water storage systems only contained water for a maximum of 30 minutes. The site assumed about 1% of evaporative loss in its calculations.	
	The site also provided an annual variance between 2024 and 2023, showing a slight decrease in water use between the two years.	
1.3.4	<i>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.</i>	 in progress
Comment	<p>The site quantified its water quality through the following:</p> <ul style="list-style-type: none"> -Source through water treatment plant water quality tests (2024) and city water quality reports that include the groundwater sources and distribution network for biological, physical, and chemical parameters (2023) -Industrial wastewater discharge water quality reports up to July 2024 -- includes COD, pH, and solids -Stormwater discharge quality tests (2023-2024) that include BOD, oil and grease, and TSS -Water quality report for receiving water bodies, including the San Gabriel River. <p>An indication of seasonal, high, and low variances was not quantified for the groundwater sources in the site's watershed/catchment.</p>	
	Finding No: TNR-014823	
1.3.5	<i>Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.</i>	 Yes
Comment	<p>The site provided the following materials:</p> <ul style="list-style-type: none"> -A submission report of environmental reporting (June 2024), including emergency response and hazardous material inventory -A spill kit location map (May 2023) -SPCC (March 2024) that mapped oil storage locations <p>The site also mapped its hazardous materials' locations on-site.</p>	
1.3.6	<i>On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.</i>	 Yes
Comment	The site is all urban, with no important water-related area/s present on site. No grass onsite, no irrigation, etc.	

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1.3.7	<i>Annual water-related costs, revenues, and a description or quantification of the social, cultural, environmental, or economic water-related value generated by the site shall be identified and used to inform the evaluation of the plan in 4.1.2.</i>	✓ Yes
Comment	<p>The site identified its annual water-related costs, including water and sewer charges, energy costs for water systems, water treatment services, boiler/cooling water treatment, cleaning & sanitation, water quality testing, consultants, and the AWS certification. The site estimated its annual water-related revenue, as well.</p> <p>The site also provided a description and/or financial quantification of some of the site's social, environmental, and economic water-related value.</p>	
1.3.8	<i>Levels of access and adequacy of WASH at the site shall be identified.</i>	✓ Yes
Comment	<p>The site identified an overview of its WASH facilities and acknowledged that they complied with OSHA regulations. It also shared its general management practices, including the requirement for on-site handwashing facilities and sanitation systems (June 2024).</p> <p>The site also shared its results from the WASH Self-Assessment, which indicated compliance with access and adequacy of the WASH facilities.</p>	
1.4	<i>Gather data on the site's indirect water use, including: its primary inputs; the water use embedded in the production of those primary inputs the status of the waters at the origin of the inputs (where they can be identified); and water used in out-sourced water-related services.</i>	
1.4.1	<i>The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be identified.</i>	✓ Yes
Comment	The site identified no primary inputs with embedded water greater than five percent of the total weight of the goods generated or the costs of a site within the site catchment.	
1.4.2	<i>The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.</i>	✓ Yes
Comment	The site identified a laundry service provider within the catchment. Based on an email from the service provider the weekly water usage by the site was quantified.	
1.5	<i>Gather water-related data for the catchment, including water governance, water balance, water quality, Important Water-Related Areas, infrastructure, and WASH</i>	
1.5.1	<i>Water governance initiatives shall be identified, including catchment plan(s), water-related public policies, major publicly-led initiatives under way, and relevant goals to help inform site of possible opportunities for water stewardship collective action.</i>	✓ Yes
Comment	The site identified its own governance initiatives, including the removal of the invasive donax, (aka, giant reed) in the catchment, water replenishment project with the Water Replenishment District of Southern California (WRD). It also identified stakeholders in its WMP (2024), including details of policies and initiatives underway by the public sector - from the city to the national level - relevant to the site. It also included the Water Replenishment District's 2024-26 Strategy, which included some additional publicly-led initiatives in the catchment.	
1.5.2	<i>Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.</i>	Q Obs.

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Alliance for Water Stewardship (AWS)

Audit Number: AO-001375

Comment The site shared its industrial wastewater treatment permit, stormwater discharge permit, water monitoring requirements, SPCC, SWPP, and pre-treatment permit. The site indicated in its WMP that it does not require a wastewater discharge or water use/extraction permit. The site also provided a screenshot (December 2024) of its compliance calendar events related to water for these requirements.

The site did not identify the California Water Rights that the state's Water Board approved within the last decade.

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 provided a catchment water balance for the central basin from 2024, including stormflow, imported water, recycled water, area recharge, barrier injection, and outflow.

While the site indicated that its catchment included groundwater that did not have water scarcity, it identified imported water as a challenge. It did not provide annual/seasonal variances.

The site also identified the catchment/basin groundwater balance, but not for surface water, which was relevant in light of the site's ultimately treated wastewater being discharged into the San Gabriel River.

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.*


 in progress

Comment The site shared the City of Downey Water Quality Report 2022 and 2023, indicating the water quality of the aquifers from which the city abstracts water for delivery to its customers and the water quality of its distribution system. The site also shared the groundwater contamination within the watershed.

It shared the water quality of the San Gabriel River in 1.3. However, while the site identified a shared water-related challenge about water quality, there was no indication of annual and seasonal high and low variances.

Finding No: TNR-014831

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.*

 in progress

Comment The site identified and mapped 5 IWRAs, including the Los Angeles County Spreading Grounds, Los Angeles County Barrier Wells, Los Angeles River Watershed, San Gabriel River Watershed, and the Pacific Ocean. The site identified their status.

The site also provided a list of more locally appropriate 16 IWRAs, including Independence Park, Rio San Gabriel Park, San Gabriel River, Furman Park, Wilderness Park, Apollo Park, Lakeside Park, Los Amigos Golf Course, Rio Hondo River Trail, Bell Gardens JA Ford Park, Rio Hondo River, Los Angeles River, Hollydale Regional Park, Liberty Park & Fitness Center, El Dorado East Regional Park, and Seal Beach NWR. However, it did not identify their status.

Finding No: TNR-014832

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

 in progress


Comment The site shared reports detailing existing and planned water-related infrastructure in the catchment but not the condition and potential exposure to extreme events of each. Also, it was unclear how to find all of the water-related infrastructure.

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Finding No: TNR-014833

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


Comment The site identified the adequacy and availability of WASH within the catchment. The site may want to keep track of its sources, though.

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.*  **closed**

Comment The site identified 5 shared water challenges based on conversations with the City of Downey: emerging water contaminants, saltwater intrusion, stormwater runoff, imported water quantity, and water equity. These shared water challenges were not prioritized.


Finding No: TNR-015847

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

Comment The site provided details of initiatives it pursued to address shared water challenges, such as a contingency plan for emergencies and water quality issues, collaborating with the LA Water Reclamation District on a well replenishing project, and an invasive species project.

The site did not identify many public initiatives addressing shared water challenges.


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 The site identified 6 risks:

- Supply Shortage: Quantity or Quality;
- Water quality impacts;
- Public Perception: Sociopolitical pressure, media pressure or perception;
- Regulatory or environmental policy changes;
- Unforeseen Disasters: Natural - Earthquakes, wildfires, mudslides, or flooding & Anthropogenic;
- Municipality's Infrastructure Failure; Lack of Backup Supply.

The site identified the prioritization through its Risk Ranking.

1.7.2 *Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.*  **No**

Comment The site identified water-related opportunities in its WMP, including prioritization and business opportunities. The potential savings were not calculated.






Finding No: TNR-015845

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

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1.8.1	<i>Relevant catchment best practice for water governance shall be identified.</i>	 Yes
Comment	The site identified best practices for the catchment, including groundwater replenishment, water recovery collaborations, corporate CSR leadership groups, participating in Coca-Cola Global water-related efforts in the US, participating in ABA trade group, and community cleanups.	
1.8.2	<i>Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.</i>	 Yes
Comment	The site identified best practices, including groundwater replenishment, invasive species eradication (e.g., donax), and technical projects listed under the Coca-Cola Water Efficiency Maturity Tool.	
1.8.3	<i>Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.</i>	 in progress
Comment	<p>The site identified best water quality practices through the Coca-Cola Water Efficiency Maturity Tool. It also showed storm drains outside that may be considered best practice.</p> <p>The site also shared legal requirements that constitute not best practices but standard practice.</p> <p>Finding No: TNR-014839</p>	
1.8.4	<i>Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.</i>	 in progress
Comment	<p>The site identified best IWRA practices through the Coca-Cola Water Efficiency Maturity Tool and the water replenishment efforts. Work with partners to help improve the health of 60 watersheds</p> <p>The site also shared legal requirements that constitute invasive species eradication (e.g., donax) standard practice.</p> <p>Finding No: TNR-014840</p>	
1.8.5	<i>Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.</i>	 in progress
Comment	<p>The site identified best practices for WASH, including shower facilities for workers and hygiene behavior programs.</p> <p>The site also shared legal requirements that constitute not best practices but standard practice.</p> <p>Finding No: TNR-014927</p>	

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2 STEP 2: COMMIT & PLAN - Commit to be a responsible water steward and develop a Water Stewardship Plan	
2.1	Commit to water stewardship by having the senior-most manager in charge of water at the site, or if necessary, a suitable individual within the organization head office, sign and publicly disclose a commitment to water stewardship, the implementation of the AWS Standard and achieving its five outcomes, and the allocation of required resources.
2.1.1	<p>A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:</p> <ul style="list-style-type: none"> - That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes - That the site implementation will be aligned to and in support of existing catchment sustainability plans - That the site's stakeholders will be engaged in an open and transparent way - That the site will allocate resources to implement the Standard.
Comment	<p>The site identified a signed water commitment from November 2024 that included commitments relevant to the indicator as required. However, the site has not publicly disclosed this yet, and the concept of disclosure was not included. The site indicated that disclosure was a challenge because of its corporate policies and practices.</p> <p>Finding No: TNR-014841</p>
2.2	Develop and document a process to achieve and maintain legal and regulatory compliance.
2.2.1	<p>The system to maintain compliance obligations for water and wastewater management shall be identified, including:</p> <ul style="list-style-type: none"> - Identification of responsible persons/positions within facility organizational structure - Process for submissions to regulatory agencies.
Comment	<p>The site shared some information about the process for compliance with the SPCC Plan and the SWPPP, but did not include the persons responsible. Conversely, the site shared a list of persons responsible but unrelated to compliance obligations.</p> <p>The site provided a screenshot (December 2024) of its compliance calendar events related to water. The calendar included the process for submission under "tasks" and the frequency of tasks. However, the persons responsible for compliance were unclear.</p> <p>Finding No: TNR-014842</p>
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.
Comment	<p>The site shared its water-related goals in the Coca-Cola Water Efficiency Maturity Tool. According to the CSR Report, the corporation's goal was to replenish at least 100% of the water we use at each location by 2030. The corporation also had a water mission and vision that were not specific to the site.</p> <p>The site did not provide its overarching mission and vision.</p> <p>Finding No: TNR-014844</p>

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

Comment The site identified 24 targets (labeled as Goals), though some were not clear for evaluation. For each target, the site identified the following:


- How it will be monitored for some but not all, but not how it will be measured
- Actions to achieve and maintain (or exceed) it for all, though some are unclear and are just names of agencies
- Planned timeframes to achieve it for some, but not all are clear or put under "comments"
- Financial budgets allocated for actions for some but not all
- Positions of persons responsible for actions and achieving targets for all
- The link between each target and the achievement of best practices to help address shared water challenges was not shared
- The links included AWS outcomes for all, though some links were unclear. The site included a few outcomes that were beyond the AWS outcomes, as well.

The site shared that it incorporated its time-constrained projects (such as watershed replenishment projects, Dry Conveyor Lubricant, and Cooling Tower Efficiencies) under progress and results, as it wanted the plan to focus on larger goals.

The site did not identify a target in the WSP for indirect/embedded water.

Finding No: TNR-014843

- 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 Water risks and proposed actions to address these have been identified in the site's Emergency Response Plan, SPCC Plan, and SWPPP.

It was noted that the USA regulations limit the opportunity for coordination with relevant public-sector and infrastructure agencies on these plans. Still, the site formally submitted these plans to the relevant regulators for approval.

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3	STEP 3: IMPLEMENT - Implement the site's stewardship plan and improve impacts	
3.1	<i>Implement plan to participate positively in catchment governance.</i>	
3.1.1	<i>Evidence that the site has supported good catchment governance shall be identified.</i>	 in progress
Comment	<p>The site identified 5 targets under good water governance and provided the following evidence of implementation:</p> <ul style="list-style-type: none"> -The site showed its global CSR report for evidence, a WUR plan update from October 2024, and slides from November 2024, though it's unclear who received the slides -Meet with water suppliers annually: Meeting notes from Downey in February 2024 were evidence of this happening -Annual targets achieved for all metrics: It was unclear how this is related to governance, it was focused on reporting compliance. -Regular meetings with regulators: No evidence was provided. -Regular meetings with elected officials: No evidence was provided. <p>Finding No: TNR-014845</p>	
3.1.2	<i>Measures identified to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be implemented.</i>	 Yes
Comment	<p>The site documented that it does not hold water rights for its supply in California. The city, county, and state are responsible for water rights and respect for indigenous peoples.</p> <p>The site documented an SPCC Plan and SWPPP in place, which are being implemented. Still, it has not provided these as evidence for this indicator of how it is avoiding water-related impacts on others. In the stakeholder meetings, the City of Downey confirmed that the city had no limit to its water consumption. The site shared that its permit allowed it to supply more water than needed or is expected to need for the foreseeable future and planned to reduce water use by ~5% by 2030 despite forecasted growth in production.</p>	
3.2	<i>Implement system to comply with water-related legal and regulatory requirements and respect water rights.</i>	
3.2.1	<i>A process to verify full legal and regulatory compliance shall be implemented.</i>	 Yes
Comment	<p>The site provided evidence of stormwater compliance monitoring submitted in June 2024, updated SPCC Plan from March 2024, and industrial wastewater compliance monitoring from up to July 2024.</p>	
3.2.2	<i>Where water rights are part of legal and regulatory requirements, measures identified to respect the water rights of others including Indigenous peoples, shall be implemented.</i>	 Yes
Comment	<p>The site documented that it does not hold water rights for its supply in California. The city, county, and state are responsible for water rights and respect for indigenous peoples. The City of Downey confirmed in an interview that there were no regulatory requirements for the site's water use.</p>	
3.3	<i>Implement plan to achieve site water balance targets.</i>	
3.3.1	<i>Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.</i>	 in progress

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Comment	<p>The site identified 5 targets for water balance and provided the following evidence of implementation:</p> <ul style="list-style-type: none"> -Annual report of drought status to senior leaders at RCCB: Evidence of an emailed drought report from June 2024 was provided. -Shared evidence of its water use ratio calculator (up to 2023); the site provided details about its water efficiency projects such as dry lubricant efforts and cooling tower optimizations. The site also provided its water and wastewater monthly volumes. -Active stakeholder engagement starting in 2025: Meeting notes from Downey in February 2024 were provided for 2023 and YTD 2024 -Maintain daily testing of incoming water: It was unclear how this was a water balance target, but evidence was provided through its water analysis log (December 2024). -100% compliance with stormwater regulations: No evidence of implementation was provided. <p>Finding No: TNR-014849</p>	
3.3.2	<p><i>Where water scarcity is a shared water challenge, annual targets to improve the site's water use efficiency, or if practical and applicable, reduce volumetric total use shall be implemented.</i></p>	 Yes
Comment	<p>The site shared details about its water efficiency projects, such as dry lubricant efforts and cooling tower optimizations during the tour. It also provided its monthly water use volumes for 2023 and YTD 2024.</p>	
3.3.3	<p><i>Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.</i></p>	 Yes
Comment	<p>The site documented that California does not have legally binding water reallocation rules. Most rely on water conservation to alleviate drought, and California does not provide guidance on reallocation.</p>	
3.4	<p><i>Implement plan to achieve site water quality targets</i></p>	
3.4.1	<p><i>Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.</i></p>	 Obs.
Comment	<p>The site identified 2 water quality targets and provided the following evidence of implementation:</p> <ul style="list-style-type: none"> -100% compliance with TCCC KORE requirements: The site shared evidence of city monitoring data from May 2024 -100% compliance with permit: The site shared evidence of effluent testing up to July 2024, and provided evidence of water quality assurance log (December 2024) <p>The site may want to update its WSP to include stormwater permits and testing of incoming water for water quality.</p>	
3.4.2	<p><i>Where water quality is a shared water challenge, continual improvement to achieve best practice for the site's effluent shall be identified and where applicable, quantified.</i></p>	 closed
Comment	<p>The site provided evidence of regulatory monitoring reports for its industrial wastewater, but did not provide evidence or quantify its effluent best practices efforts.</p> <p>Finding No: TNR-014853</p>	
3.5	<p><i>Implement plan to maintain or improve the site's and/or catchment's Important Water-Related Areas.</i></p>	
3.5.1	<p><i>Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.</i></p>	 in progress

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Comment There were no IWRAs present at the site. The site provided evidence details of its injection well project, thought it was unclear its catchment IWRAs included from 1.5.7.

The site identified 3 targets for IWRAs and included the following evidence:

-Annual review for changes to site plan: Evidence provided was unclear to its relationship for this target

-Maintain a comprehensive list of IWRAs within five miles of the Downey plant: The site provided a list of IWRAs within 5 miles in indicator 1.5.7.

-Make contact with oversight bodies for IWRAs that are open to engagement: No evidence was provided

Finding No: TNR-014852

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 quantified its access to WASH services for workers on-site per the OSHA report in 2020 and indicated that the number of facilities had not changed since the report.

The site provided photographic evidence of the WASH facilities, including toilets, water points, eyewash stations, handwashing stations, and hygiene signage.

The site identified 3 WASH targets in its WSP, as well:

-All employees have unfettered access to clean water and safe sanitation facilities: Evidence was provided through observations on the audit tour

-Annual reporting of WaSH indicators in the community: The evidence provided included a completed WASH Survey Tool

-Annual report from CCBSS on supplier WaSH status: The site did not provide evidence of this

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 documented that it does not influence communities' human right to safe water and sanitation. The site sources water from the City of Downey, which is responsible for its inhabitants' access to water and sanitation. The site has water use ratio targets to improve the amount of water used per liter of product produced. The plant also continues to meet or exceed all water quality discharge criteria for its wastewater, thereby not impacting local communities with its wastewater discharge. The plant does not impinge on the rights of Indigenous people to freely access their traditional water resources.

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.*

 in progress

Comment The site did not have indirect water use targets in the WSP. It provided evidence in indicator 1.4 about communications with its laundry services to quantify its indirect water use.

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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 its laundry service provider and water usage from December 2024 to start its indirect water actions.	
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>	✓ Yes
Comment	The site provided evidence of communicating with the City of Downey in February 2024, including details of water treatment plant repairs and PFAS efforts.	
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>	🔍 Obs.
Comment	<p>The site identified best practices for the catchment, including groundwater replenishment, water recovery collaborations, corporate CSR leadership groups, participation in Coca-Cola Global water-related US efforts, the ABA trade group, and community cleanups.</p> <p>The site provided evidence of a presentation from December 2024 for its Global Executive Committee. The site also provided evidence of its membership in the Alliance for Water Efficiency. Evidence of governance efforts going beyond its corporation would better conform for this indicator.</p>	
3.9.2	<i>Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.</i>	✓ Yes
Comment	<p>The site identified best practices, including groundwater replenishment, invasive species eradication (e.g., donax), and technical projects listed under the Coca-Cola Water Efficiency Maturity Tool.</p> <p>The site provided evidence of the donax eradication and groundwater replenishment.</p>	
3.9.3	<i>Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.</i>	➡ in progress
Comment	<p>The site identified best water quality practices through the Coca-Cola Water Efficiency Maturity Tool but did not show evidence of implementation. The site showed evidence of a storm cover system outside during the audit tour that could be a best practice.</p> <p>Finding No: TNR-014859</p>	
3.9.4	<i>Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.</i>	🔍 Obs.
Comment	<p>The site identified best practices for IWRA through the Coca-Cola Water Efficiency Maturity Tool and the water replenishment efforts. It worked with partners to help improve the health of 60 watersheds.</p> <p>The site provided evidence of groundwater replenishment, though it could be added to the best practices list for IWRA.</p>	

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3.9.5	Actions towards achieving best practice related to targets in terms of WASH shall be implemented.	Q Obs.
Comment	The site provided evidence of a toilet lead assessment in 2022, though it was not included in the best practices list. Other best practices identified, such as shower facilities and hygiene behavior programs, did not have evidence provided.	

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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> in progress 
Comment	<p>Evidence was not provided of the site evaluating its performance against targets in its WMP/WSP and its contribution to achieving water stewardship outcomes.</p> <p>*Note that the plan is in its early stages of implementation (within year 1). Thus, a fuller evaluation of performance against targets is expected in future years.</p> <p style="text-align: right;">Finding No: TNR-014863</p>
4.1.2	<i>Value creation resulting from the water stewardship plan shall be evaluated.</i> in progress 
Comment	<p>No evidence was provided of evaluation of the value creation for the site from the implementation of its WSP/WMP.</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> <p style="text-align: right;">Finding No: TNR-014864</p>
4.1.3	<i>The shared value benefits in the catchment shall be identified and where applicable, quantified.</i> in progress 
Comment	<p>No evidence was provided of the identified and quantified shared value benefits for the catchment resulting from implementing the site's WSP/WMP.</p> <p>*Note that the plan is in its early stages of implementation (within year 1). Thus, a fuller evaluation of shared value benefits is expected in future years.</p> <p style="text-align: right;">Finding No: TNR-014865</p>
4.2	<i>Evaluate the impacts of water-related emergency incidents (including extreme events), if any occurred, and determine the effectiveness of corrective and preventative measures.</i>
4.2.1	<i>A written annual review and (where appropriate) root-cause analysis of the year's emergency incident(s) shall be prepared and the site's response to the incident(s) shall be evaluated and proposed preventative and corrective actions and mitigations against future incidents shall be identified.</i> Yes 
Comment	The site documented that it did not experience any water-related incidents during the last year and that any incidents that did occur in the future would be captured in a management review. It provided the EPA ECHO report (November 2024) to confirm this.
4.3	<i>Evaluate stakeholders' consultation feedback regarding the site's water stewardship performance, including the effectiveness of the site's engagement process.</i>
4.3.1	<i>Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.</i> in progress 

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Comment No evidence was provided. Through stakeholder interviews, one confirmed that it had seen the site's WSP but not performance.

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

Finding No: TNR-014866

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 This is the first version of the site's WSP. Consequently, no modification would be appropriate until after a full year of implementation. However, the site did modify the WSP during the audit. The site did not explain how they would modify the plan or track the 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.	 closed
Comment	The site provided a list of its water-related internal governance, including positions of those. However, no evidence was provided of it having been disclosed. <p>Finding No: TNR-014867</p>	
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.	 closed
Comment	No evidence of the site's WSP, including how it contributes to the AWS Standard outcomes, has been communicated to relevant stakeholders. However, during the stakeholder interviews, one stakeholder reported having seen the site's WSP and consulted on it. <p>Finding No: TNR-014868</p>	
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.	 in progress
Comment	No evidence was provided of the site's having disclosed a summary of its WSP, including quantified performance against targets, at least annually. <p>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.</p> <p>Finding No: TNR-015224</p>	
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.	 in progress
Comment	No evidence was provided of the site having disclosed its shared water-related challenges and efforts to address them. <p>Finding No: TNR-014869</p>	
5.4.2	Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.	 in progress
Comment	The site provided evidence of its work on replenishing the groundwater, supporting the City of Downey. However, it was unclear how this was communicated to stakeholders. <p>Finding No: TNR-014870</p>	

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5.5	<i>Communicate transparency in water-related compliance: make any site water-related compliance violations available upon request as well as any corrective actions the site has taken to prevent future occurrences.</i>	
5.5.1	<i>Any site water-related compliance violations and associated corrections shall be disclosed.</i>	<div><div></div><div>Yes</div></div>
Comment	The site documented that it has not had any compliance violations.	
5.5.2	<i>Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.</i>	<div><div></div><div>Yes</div></div>
Comment	The site documented that it has not had any compliance violations.	
5.5.3	<i>Any site water-related violation that may pose significant risk and threat to human or ecosystem health shall be immediately communicated to relevant public agencies and disclosed.</i>	<div><div></div><div>Yes</div></div>
Comment	The site documented that it has not had any compliance violations.	

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Photographic Evidence from Audit

Yes

Comment The facility tour highlighted its extensive focus on water management, usage, and safety. Dasani water stations have replaced traditional water fountains for convenient access. The site uses two distinct water sources: a domestic supply line and a raw water pipeline. Raw water undergoes RO treatment, with an 80% reuse rate, while rejected water is redirected to drains or repurposed in processing. Additional UV treatment ensures extra purification. Recycled water is used for outside drip irrigation.

In contrast, the underground WWTP employs clarifiers and pH dosing to treat wastewater, with domestic wastewater directed to sanitary systems unless sourced from sinks. Production lines currently use wet lubrication, with plans to transition to dry lubrication by 2025.

Cleaning processes contribute to this water presence, supported by a sanitary tank for floor cleaning and numerous cleaning supplies near production lines and eyewash stations. Cooling towers recirculate water with softeners, and automated boilers enhance energy efficiency while reducing water consumption. Safety measures include well-labeled spill kits, securely stored anti-scalant chemicals, and strategically placed eyewash stations. Infrastructure features like closed storm drains, banded silos for product ingredients, and outdoor drain covers further ensure safe and efficient operations.

While the facility demonstrates robust water management, ongoing efforts to address leaks and improve processes underscore its commitment to sustainability.



28 - city irrigation of recycled water.jpg

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26 - underground WWTTP.jpg



25 - storm drain covers near truck area.jpg

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27 - outgoing water meter.jpg

Upgrade or Downgrade of Certification


Justification for Upgrade or Downgrade

N/A - this is an initial audit.

Summary of Evidence which led to change

N/A - This is an initial audit.

Previous Findings

	<i>All non-conformities raised in the previous audit have been satisfactorily closed.</i>	 N/A
Comment	As an initial audit, this audit did not have any previous audits to review.	