

Alliance for Water Stewardship (AWS)

Audit Number: AO-001653

SITE DETAILS

Site: Coca-Cola Japan - Moriyama, Shiga

Address: Amura-cho 49, Moriyama-city, 5420035, Shiga, JAPAN

Contact Person: Kizuku Tsubouchi
AWS Reference Number: AWS-000466

Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Core

Date of certification decision: 2025-Jul-25

Validity of certificate: 2028-Jul-24

AUDIT DETAILS

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

Audit Type(s): Initial Audit Audit Start Date: 2025-Jun-24 Audit End Date: 2025-Jun-26 Lead Auditor: Naoya Ogawa

Audit team participants: Naoya Ogawa, Lead Auditor

Site Participants:

Kizuku Tsubouchi, Sustainability Specialist Hiroshi Nakagawa, General Manager Tetsuya Monji, QSE Manager Akihiro Takahashi, Manufacturing Director Seiki Shibahara, Facility Service Specialist Megumu Mori, Engineering Director Takumi Konishi, Consultant Momoko Higuchi, Consultant



Alliance for Water Stewardship (AWS)

Audit Number: AO-001653

ADDITIONAL INFO

Summary of Audit Findings: During the certification audit, 3 observations were raised.

The audit team recommends certification of Coca-Cola Japan - Moriyama, Shiga at Core level. Scope of Assessment: The scope of services covers the Initial certification audit for assessing conformity of Coca-Cola Japan - Moriyama, Shiga against the AWS International Water Stewardship Standard Version 2.

The Coca-Cola Japan Moriyama Plant is located in Moriyama City, Shiga Prefecture, Japan. The Moriyama Plant produces concentrates for Coca-Cola and other products and sells them to bottling plants of bottlers nationwide. The plant mainly uses industrial water sourced from Lake Biwa, supplied by the Shiga Prefectural Enterprise Bureau, which is purified on-site and used in the manufacture of products. Wastewater from the manufacturing facilities is biologically treated at the plant's wastewater treatment facility before being discharged into the public sewer system. Sewage is treated at the Shiga Prefectural Sewage Treatment Plant before being discharged into Lake Biwa.

The facility is located in the industrial area in Moriyama city.

The audit was conducted onsite on 24-26 June 2025.

The onsite site visit included the assessment of on-site water purification plant, manufacturing facilities, wastewater treatment plant, WASH facilities, storm water drainage points, chemical storage areas, as well as off-site public water purification plant, sewage treatment plant, and IWRAs.

FINDINGS

NUMBER OF FINDINGS PER LEVEL Observation 3



Alliance for Water Stewardship (AWS)

Audit Number: AO-001653

FINDING DETAILS

Finding No: TNR-018726

Checklist Item No: 3.7.2 Status: Open

Finding level: Observation

Checklist item: 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.

Findings: Outsourcing of car wash services to a new company has just started, so

the site is not yet in a position to fully engage with them. The site plans

to move forward with the engagement in the future.

Finding No: TNR-018727

Checklist Item No: 4.4.1
Status: Open

Finding level: Observation

Checklist item: The site's water stewardship plan shall be modified and adapted to

incorporate any relevant information and lessons learned from the evaluations in this step and these changes shall be identified.

Findings: Some of the 2025 water stewardship plan plans are still under

consideration and have not been finalised, so they need to be finalised.

Finding No: TNR-018728

Checklist Item No: 5.2.1 Status: Open

Finding level: Observation

Checklist item: The water stewardship plan, including how the water stewardship plan

contributes to AWS Standard outcomes, shall be communicated to

relevant stakeholders.

Findings: The site plans to consult on the site's water stewardship plan with other

major stakeholders.



Alliance for Water Stewardship (AWS)

Audit Number: AO-001653

Report Details	
Report	Value
Report prepared by	Naoya Ogawa
Report approved by	Ozge GOKMEN
Report approved on (Date)	23/07/2025
Surveillance	

Proposed date for next audit

2026-Jun-24

Stakeholder Announcements

Date of publi	olication Location	
27/05/2025	The company's webs https://www.coca-col m/onexp/jp/ja/enviror 000466_cps-japan-m older-announcement	a.com/content/da nment/water/aws- noriyama_stakeh
15/04/2025	Email to related stak	eholders
Comment	The Stakeholder Announcement Form was made public on the compato major stakeholders by email.	iny's website, and sent



Alliance for Water Stewardship (AWS)

Audit Number: AO-001653

Catchment Information

Catchment Information

The Catchment Name is Yasu River Catchment. Within this catchment, site activities for stakeholder engagement and IWRAs are conducted.

Water Supply & Discharge Catchment is Lake Biwa Catchment.

Groundwater is not used.

The plant mainly uses industrial water sourced from Lake Biwa, supplied by the Shiga Prefectural Enterprise Bureau, treated at the Yoshikawa Water Purification Plant. When the on-site water purification facility is under maintenance, city water purified at the Yoshikawa Water Purification Plant is used. Wastewater is discharged into the public sewer system, and sewage is treated at the Shiga Prefecture Konan Chubu Purification Centre (Wastewater treatment plant) before being discharged into Lake Biwa. The stormwater is discharged from several drainage points into local gutters and small rivers, and eventually into Lake Biwa.

Catchment Features

- 1. The water balance of the Yasu River Catchment over the past five years was calculated and it was confirmed that there is no water shortage in the Catchment (water use in the basin < water resource volume in the basin). Shiga Prefecture has also calculated the water balance of Lake Biwa, into which the Yasu River flows, and it shows a positive balance. Meanwhile, in stakeholder interview, it was found that there are years when the water level of Lake Biwa drops, but no problems have occurred with water intake.
- 2. The Yasu River was originally a raised bed river (the riverbed was higher than the surrounding land) in the downstream area, including Moriyama City, and the area was prone to flooding. The Yasu River Floodway Project, which began in 1958, opened up the river channel and renovated the river into a more linear flow path, and as a result, there have been no major floods in recent years.
- 3. Before the Yasu River renovation, the area was known by local residents as an area rich in water, with springs and fireflies living near the waters of spring water. After that, the groundwater recharge from the river source decreased due to the renovation of the Yasu River, and many springs in Moriyama City dried up. Currently, firefly colonies are maintained by artificially pumping water from the former springs into the city's rivers. Parts of the firefly colonies are designated as firefly protection areas under the Moriyama City Firefly Ordinance. Akanoi Bay, one of the shores of Lake Biwa, was originally a scenic waterfront, but changes to the surrounding watercourse and infrastructure have made the waterfront more closed off, causing the water quality to deteriorate. Currently, cleaning activities are being carried out mainly by the government and NPOs.

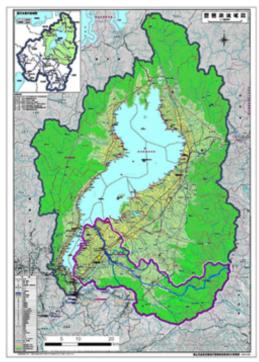
Lake Biwa is protected as a quasi-national park and is registered as a wetland of international importance under the Ramsar Convention.

- 4. The Yoshikawa Water Purification Plant, which receives water for the Moriyama Plant, takes water from the area where the Yasu River flows into Lake Biwa. When looking at the Lake Biwa Catchment, which is a very large basin, there is no transfer of water resources between basins
- 5. It does not fall into the category of arid/semi-arid/tropical climate.
- 6. There are multiple water users in the downstream area, such as residential areas, agricultural areas, industrial areas, and forests, but no user is dominant in terms of water usage.



Alliance for Water Stewardship (AWS)

Audit Number: AO-001653



Lake Biwa Catchment.png



Yasu River Catchment.png



Alliance for Water Stewardship (AWS)

Audit Number: AO-001653

Client Description and Site Details

Client/Site Background

The site is located in Moriyama City, Shiga Prefecture, Japan.

The site is located in an industrial area.

The site manufactures concentrates for Coca-Cola products. Water is used as a raw material for products, in the production process (cleaning, sterilisation, etc.), for daily use, boiler water, and cooling towers.

Water-related infrastructure

- 1. The site purchases industrial water from Yoshikawa Water Purification Plant
- 2. The site adds sodium hypochlorite and coagulant, and process with two sand filters (potable water). Further filter with activated carbon and sterilise with UV light before use as treated water for product manufacturing
- 3. Same as above
- 4. Steam boiler, hot water boiler
- 5. The site discharges water into public sewer after microbial treatment and neutralisation
- 6. The site uses cooling water for cooling tower for absorption chiller
- 7. None
- 8. The site discharges stormwater from some stormwater catchments on factory premises
- 9. Firefighting water tanks are installed in three locations on factory premises
- 10. The site provides potable water to pilot plant of Coca-Cola Tokyo Research and Development Center Co., Ltd. located on the same premises. Wastewater is also treated in the wastewater treatment plant of Moriyama Factory.

Wastewater is treated at the plant's wastewater treatment facility, then discharged into the public sewer system and further treated at the Shiga Prefecture Konan Chubu Purification Center, and finally discharged into Lake Biwa.

Rainwater is discharged into local rivers through several storm water tanks on the plant's premises.

Number of employees: 116 full-time employees and 99 temporary/contract employees

Site area: 42339.17m2 Building area: 3872.17m2



Site boundary.png



Alliance for Water Stewardship (AWS)

Audit Number: AO-001653

Summary of Shared Water Challenges

Summary of Shared Water Challenges

Shared water challenges are identified as follows:

- 1. Earthquake resistance of public water purification facilities, pipelines, and pumping stations
- 2. Flood prevention measures for public industrial water facilities and urban areas
- 3. Measures to prevent deterioration of public pipelines
- 4. Deterioration of Lake Biwa's water quality
- 5. Maintenance of IWRAs (prevention of garbage from entering rivers and Lake Biwa, maintenance of flow rate of small rivers in the city)
- 6. Maintenance of water resource volume (water level of Lake Biwa has dropped in the past)



Alliance for Water Stewardship (AWS)

Audit Number: AO-001653

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.

Comment

The physical scope of the site is mapped.

The site's boundaries and water-related infrastructure (water intake point, industrial water treatment facility, treated water production facility, piping network, factory building, wastewater treatment facility, storm water drainage channel, wastewater discharging point, etc.) are mapped.

The plant mainly uses industrial water sourced from Lake Biwa, supplied by the Shiga Prefectural Enterprise Bureau, treated at the Yoshikawa Water Purification Plant. When the on-site water purification facility is under maintenance, city water purified at the Yoshikawa Water Purification Plant is used. Wastewater is discharged into the public sewer system, and sewage is treated at the Shiga Prefecture Konan Chubu Purification Centre (Wastewater treatment plant) before being discharged into Lake Biwa. These are mapped. Water Supply & Discharge Catchment is Lake Biwa Catchment. As the Lake Biwa Catchment is too large, a smaller catchment where site activities for stakeholder engagement and IWRAs are conducted is defined as Yasu River Catchment. These catchments are mapped.

- 1.2 Understand relevant stakeholders, their water related challenges, and the site's ability to influence beyond its boundaries.
- **1.2.1** Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall:



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



Alliance for Water Stewardship (AWS)

Audit Number: AO-001653

Comment

Stakeholders and their water-related challenges are identified.

The stakeholder identification process began with an internal discussion, and made a list of as many possible stakeholders as possible. Next, the level of interest and influence for each stakeholder was identified. The levels of interest and influence were then mapped, and stakeholders with both a high level of interest and influence were classified as "important stakeholders," and identified as stakeholders to be prioritised for communication.

All relevant stakeholder groups are covered. Government, fisheries, agriculture, local residents (local neighborhood associations), surrounding companies (member companies of the Shiga Prefecture Southern Industrial Water Liaison Council), academics (museums). For the stakeholders interviewed, a list is provided outlining the challenges they consider to be important (deterioration of water quality in Akanoi Bay, PFAS, pumping up groundwater to maintain the aquatic environment, reduced fish catches, garbage, increased invasive plants, increased torrential rains, the need for environmental water, reduced water levels in rivers within the city, foul odors, muddy water during rice planting season, etc.). Stakeholders with a low level of influence have not yet been interviewed.

The degree of stakeholder engagement is identified based on their level of interest and influence.

1.2.2

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



Comment

Current and potential degree of influence between site and stakeholders are identified within the catchment. Ultimate water source and ultimate receiving water body for wastewater is Lake Biwa, and included in the catchment.

The impact of stakeholders on the site and the impact of the site on the stakeholders were considered, and the overall degree of influence was ranked in three stages. The impact of the government (including water supplier, wastewater treatment plant) and the Southern Industrial Water Liaison Council on the site, and the impact of the site are large. The NPO Biwako Hojo-no-sato is also evaluated as having a large impact on the site. The impact of fisheries, agriculture, and local residents is evaluated as medium, and the museum as small.

- 1.3 Gather water-related data for the site, including: water balance; water quality, Important Water-Related Areas, water governance, WASH; water-related costs, revenues, and shared value creation.
- **1.3.1** Existing water-related incident response plans shall be identified.



Comment

There are water-related incident response plans (Crisis management regulations, Controlled Document CPS#DOC-19996). They cover all types of emergencies, including fires, leaks, contamination, and natural disasters. There are risk classifications and emergency response flow charts. If necessary, a crisis management committee will be convened to respond. When an incident affects business continuity, the Business Continuity Plan will be activated.

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



Comment

Site water balance, including inflows, storage, and outflows are identified and mapped. From the industrial water and city water receiving point to the discharge point to the sewerage system, each flow and tank, flow rate measurement points, and water quality measurement points are mapped. Based on the water volume measurement data and the monitoring results so far, it has been assessed that there is no significant loss.

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



WSAS



Alliance for Water Stewardship (AWS)

Audit Number: AO-001653

Comment

The amount of industrial water intake, city water intake, wastewater discharge, water used in manufacturing, return water, product volume, and other consumption are recorded. City water is only used when cleaning the industrial water tank. Data is available up to 2024. Monthly usage is graphed. Water usage is mainly proportional to the number of days of production, but water usage increases even before beverage sales increase in the summer because production volume increases.

Wastewater includes treated wastewater and wastewater for domestic use.

The amount of water used for domestic use, the amount shipped as a product from the pilot plant, steam generated by the steam boiler, evaporation from the cooling tower, and increases and decreases in the water tank are considered to be "other consumption." There are points where rainwater may be mixed in the wastewater treatment process, but overall the water balance is consistent and there is no unknown water.

1.3.4 Water quality of the site's water source(s), provided waters, effluent and receiving water bodies shall be quantified. Where there is a water-related challenge that would be a threat to good water quality

Yes

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.

Comment

Water quality of the site's water source, provided waters, effluent and receiving water bodies is quantified.

Water quality is analysed at the time of receiving water. Industrial water is tested once a week for three items. Treated water (water used in manufacturing) is analyzed once every four hours according to the company's internal standard KORE. In addition, once a year, 179 items are analysed for industrial water, treated water, and city water.

Water quality data for industrial water and city water measured at the Yoshikawa Water Purification Plant is also made public.

Water quality such as pH and T-P at each point in the treatment tank is constantly monitored for wastewater. In addition, nine items are analysed once a week by an external party. Final discharged water data from the Shiga Prefecture Konan Chubu Purification Centre (Wastewater treatment plant) is made public, and data for the past five years is obtained.

There are small daily fluctuations in the quality of wastewater from the site, but this depends on the products manufactured on that day and there are no seasonal or annual fluctuations. The quality of treated water finally discharged from Shiga Prefecture Konan Chubu Purification Centre is also stable and does not fluctuate.

The water quality of Lake Biwa, the water source and receiving water body, also varies slightly depending on the day of measurement, but overall it is stable with no seasonal or annual fluctuations.

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



Comment

Potential sources of pollution are identified and mapped, including chemicals used and stored on site. Chemical storage locations have been mapped. There is a list of chemicals. They are used for cleaning in the manufacturing process, wastewater treatment, experiments, etc. No liquid fuel is used. Hazardous liquid waste (waste liquid, waste oil, etc.) is stored in a waste liquid storage facility. All wastewater from the factory building flows into a wastewater treatment facility, so even if a leak occurs, it can be treated. Rainwater is usually discharged as is, but in an emergency, the leakage team closes the emergency valve to prevent it from being discharged outside and treats it with absorbent mats, etc.

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



Comment

There are no on-site Important Water-Related Areas. Existence of on-site IWRA was checked and not observed during the site visit.



Alliance for Water Stewardship (AWS)

Audit Number: AO-001653

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



Comment

The costs required for water intake include purchase costs, maintenance costs, and water treatment costs. This also includes the cost of commissioning a specialist to create a water management plan once every five years.

The company also lists the capital investment costs and their effects when implementing water-saving measures. The treated water recovery system has reduced water usage.

Water-related revenues have not been disclosed even within the company.

As a social, cultural, environmental, or economic water-related value generated by the site. the company recorded a cleanup activity held at Akanoi Fishing Port on 27 June 2019. Every year, volunteers participate in Moriyama City's cleanup activities at the end of May. They plan to continue participating in waterside cleanup activities every year. As for forests, the company signed an agreement with the Production Forestry Association in October 2024 and

began forest conservation activities in 2025.

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



Comment

The locations and numbers of toilets, as well as locations providing drinks (products) other than tap water, are mapped. Water and oral rehydration solutions are provided within the factory in summer as a measure against heat stroke.

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

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



Comment

There are no suppliers of primary inputs within the site's catchment. After examining the distribution of suppliers around the Kansai region from which the Moriyama Plant procures supplies, they found that there was only one supplier within the site's catchment, a cardboard manufacturer. However, cardboard is a packaging material and is not a primary input.

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



Comment

The embedded water use of outsourced services is identified and quantified. Laundry and car washing are outsourced service providers outside the site. Water usage was calculated from interviews with outsourced service providers and general data. Car washing is done once a year per vehicle.

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

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





Alliance for Water Stewardship (AWS)

Audit Number: AO-001653

Comment

Water governance initiatives are identified, including catchment plans, water-related public policies, major publicly-led initiatives under way, and relevant goals. Shiga Prefecture has created the "Shiga Prefecture Waterworks Vision," "Shiga Prefecture Enterprise Bureau Management Strategy," and "Shiga Prefecture Sewerage 2nd Mid-term Vision." For the city water, the issues are water quality, earthquake resistance of facilities, and flood prevention measures for facilities, while for the sewerage, the aging of facilities, flood prevention measures, and water quality, and initiatives for each issue are also listed. Moriyama City has created the "2nd Moriyama City Waterworks Vision," "3rd Moriyama City Basic Environmental Plan," and "Moriyama City Public Sewerage Business 9th Term Management Plan." The issues are water source water quality, earthquake resistance of facilities, and securing funds, and initiatives are also being created. Industrial water is supplied by the Shiga Prefecture Enterprise Bureau. The Shiga Prefecture Enterprise Bureau supplies the city water to Moriyama City, and Moriyama City supplies it to the site. The sewerage system is managed by Moriyama City up to the main pipeline, and by Shiga Prefecture from the main pipeline to the wastewater treatment plant. The standards for wastewater discharged into the sewerage system are set by Moriyama City ordinance. Shiga Prefecture and Moriyama City manage the facilities and pipelines within their respective jurisdictions.

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



Comment

Applicable water-related legal and regulatory requirements are identified. There are no legally-defined or stakeholder-verified customary water rights related to the site. The maximum amount of industrial water that can be withdrawn is determined by an agreement with the Shiga Prefecture Enterprise Bureau. For use of city water, a fee for the amount used is paid to Moriyama City once every two months. There are no particular restrictions on the amount of city water used. The quality of wastewater is determined by Moriyama City's Sewerage Ordinance. A wastewater discharge amount declaration form is submitted to Moriyama City, and once approval is received, a notice of approval of wastewater discharge amount is received. In addition, in accordance with the Water Supply Low and Food Sanitation Low, water quality tests for water used within the factory and regular inspections of the water tanks are conducted.

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



Comment

The catchment water-balance is quantified, including annual and seasonal variance. For each of the Yasu River Catchment and Lake Biwa Catchment, the average precipitation for the entire catchment was calculated from the precipitation data within the catchment. Evapotranspiration was then calculated using the Thornthwaite method. For water usage, the land use status within the catchment was first identified from the National Land Digital Information. Next, industrial water usage was calculated from water usage data per unit of sales, agricultural water usage from water usage data per unit area, and domestic water usage from actual water supply data.

Calculation of the water balance for the entire catchment showed that the annual water balance was positive every year. It is thought that the surplus water flows downstream.

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.





Alliance for Water Stewardship (AWS)

Audit Number: AO-001653

Comment

1.5.5

Water quality, including physical, chemical, and biological status of the catchment, is

quantified. Annual variance is identified.

Shiga Prefecture conducts water quality surveys in public water areas, and they obtained the publicly available data. They obtained water quality data for Lake Biwa near the Yoshikawa Water Purification Plant, near the Shiga Prefecture Konan Chubu Purification Centre (Wastewater treatment plant), and intermediate points between them, as well as water quality data for the unstream and desure treatment of the Vacu Biver from the site.

data for the upstream and downstream parts of the Yasu River from the site.

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.

Comment Important Water-Related Areas are identified and mapped.

Candidate sites for IWRA were listed based on existing information and literature surveys,

and IWRA were identified through stakeholder consultation.

Lake Biwa, Akanoi Bay, the firefly conservation area, and springs were identified as IWRA. Each site was mapped, and the type of value (environmental, cultural, social, economic),

current status, and risks were described.

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



Yes

Comment

Existing and planned water-related infrastructure is identified, including condition and potential exposure to extreme events.

Shiga Prefecture has created the "Shiga Prefecture Waterworks Vision," "Shiga Prefecture Enterprise Bureau Management Strategy," and "Shiga Prefecture Sewerage 2nd Mid-term Vision." For the city water, the issues are water quality, earthquake resistance of facilities, and flood prevention measures for facilities, while for the sewerage, the aging of facilities, flood prevention measures, and water quality, and initiatives for each issue are also listed. Moriyama City has created the "2nd Moriyama City Waterworks Vision," "3rd Moriyama City Basic Environmental Plan," and "Moriyama City Public Sewerage Business 9th Term Management Plan." The issues are water source water quality, earthquake resistance of facilities, and securing funds, and initiatives are also being created.

Each plan lists risks from earthquakes, heavy rain, etc., and future measures.

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



Comment

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

The coverage rate of water supply and sewerage in Moriyama City, Shiga Prefecture is shown. Almost everyone uses water supply and sewerage. The coverage rate is higher than the national average. Information on WASH-related facilities (water intake facilities, sewage treatment plants, water supply areas) is also summarized.

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.





Alliance for Water Stewardship (AWS)

Audit Number: AO-001653

Comment

Shared water challenges are identified and prioritised.

The water challenges collected in 1.2.1 were organised and six shared water challenges were identified based on their importance, urgency and relevance to the site. They were then prioritised based on their importance and urgency.

Shared water challenges are identified as follows:

- 1. Earthquake resistance of public water purification facilities, pipelines, and pumping stations
- 2. Flood prevention measures for public industrial water facilities and urban areas
- 3. Measures to prevent deterioration of public pipelines
- 4. Deterioration of Lake Biwa's water quality
- 5. Maintenance of IWRAs (prevention of garbage from entering rivers and Lake Biwa, maintenance of flow rate of small rivers in the city)
- 6. Maintenance of water resource volume (water level of Lake Biwa has dropped in the past) Of these, 4, 5 and 6 were set as shared water challenges with high priority.
- 1.6.2 Initiatives to address shared water challenges shall be identified.



Yes

Comment

Initiatives to address shared water challenges are identified.

Shiga Prefecture has created the "Shiga Prefecture Waterworks Vision," "Shiga Prefecture Enterprise Bureau Management Strategy," and "Shiga Prefecture Sewerage 2nd Mid-term Vision."

Moriyama City has created the "2nd Moriyama City Waterworks Vision," "3rd Moriyama City Basic Environmental Plan," and "Moriyama City Public Sewerage Business 9th Term Management Plan."

Initiatives to address shared water challenges are described in these visions and plans.

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.



Comment

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

Every five years, Moriyama Plant reviews the site's water usage and wastewater situation and local activities, and conducts a Source Vulnerability Assessment (SVA). This allows the site to identify water-related risks and opportunities.

The risks identified are: 1. leakage of hazardous substances and governance system, 2. rising water rates for industrial water, 3. issues with raw water volume and quality, and 4. flood damage. Prioritisation was determined by evaluating the importance and urgency, taking into account the timeframe, potential costs and business impact. 1 and 3 are considered high priority risks.

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



Comment

Water-related opportunities are identified, including how the site participates, and business

Opportunities include 1. replenishment activities and 2. community contribution activities. Both are considered to be high priority opportunities and will be addressed.

1.8 Understand best practice towards achieving AWS outcomes:

Determining sectoral best practices having a local/catchment, regional,

or national relevance.

1.8.1 Relevant catchment best practice for water governance shall be identified



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Alliance for Water Stewardship (AWS)

Audit Number: AO-001653

Comment	Relevant catchment best practices for water governance were identified. Best practices were identified, focusing in particular on the shared water challenges in 1.6.1 and the risks in 1.7.1. The efforts of other companies were cited as catchment best practices.	
1.8.2	Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.	⊘ Yes
Comment	Relevant sector and catchment best practices for water balance were identified. The efforts of other companies were cited as sector and catchment best practices.	
1.8.3	Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.	⊘ Yes
Comment	Relevant sector best practice for water quality was identified. The efforts of other companies were cited as site best practice.	
1.8.4	Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.	⊘ Yes
Comment	Relevant catchment best practice for site maintenance of Important Water-Related Areas is identified. The efforts of other companies were cited as site best practice.	
1.8.5	Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.	⊘ Yes
Comment	Relevant sector and catchment best practice for site provision of equitable and adequate WASH services was identified. The efforts of other companies were cited as sector and catchment best practice.	



Alliance for Water Stewardship (AWS)

Audit Number: AO-001653

2	STEP 2: COMMIT & PLAN - Commit to be a responsible water steward and develop a Water Stewardship Plan	
2.1	Commit to water stewardship by having the senior-most manager in charge of water at the site, or if necessary, a suitable individual within the organization head office, sign and publicly disclose a commitment to water stewardship, the implementation of the AWS Standard and achieving its five outcomes, and the allocation of required resources.	
2.1.1	A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments: - That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes - That the site implementation will be aligned to and in support of existing catchment sustainability plans - That the site's stakeholders will be engaged in an open and transparent way - That the site will allocate resources to implement the Standard.	Yes
Comment	The site statement including the four commitments was made. It was signed by the plant manager on 6 June 2025. It is publicly disclosed on the company's website. https://www.coca-cola.com/jp/ja/environment/water	
2.2	Develop and document a process to achieve and maintain legal and regulatory compliance.	
2.2.1	The system to maintain compliance obligations for water and wastewater management shall be identified, including: - Identification of responsible persons/positions within facility organizational structure - Process for submissions to regulatory agencies.	⊘ Yes
Comment	The system to maintain compliance obligations for water and wastewater management is identified. Compliance with the water-related legal and regulatory requirements listed in 1.5.2 is checked monthly and recorded in a compliance assessment table. Normally, there is no obligation to report to regulatory agencies. The responsible position for water-related legal compliance is clearly stated in the organisational chart as the Director of QSE.	ed
2.3	Create a water stewardship strategy and plan including addressing risks (to and from the site), shared catchment water challenges, and opportunities.	
2.3.1	A water stewardship strategy shall be identified that defines the overarching mission, vision, and goals of the organization towards good water stewardship in line with this AWS Standard.	⊘ Yes
Comment	A water stewardship strategy has been identified. It has been made public on the company's website. https://www.coca-cola.com/jp/ja/environment/water The company does not have a separate mission and vision, but has set the mission and vision as "Protecting water and Connecting the future." The goals based on this include "Replenishment activities," "Collaboration with the local community," "Reducing water usage in the manufacturing process."	3

used in the manufacturing process."



Alliance for Water Stewardship (AWS)

Audit Number: AO-001653

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.

Comment

A water stewardship plan is identified.

The plan includes the following items: maintaining a water governance system, reducing water usage, evaluating the sustainability of source water, replenishment activities through forest management, complying with wastewater quality standards, participating in IWRAs cleaning activities, maintaining the WASH environment within the factory and establishing a system to provide drinking water to local residents in emergencies. For each item, annual and long-term goals, goal monitoring methods, planning period, position of person in charge, budget, the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes are listed.

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



Comment

Plans to mitigate or adapt to those water risks listed in 1.7.1 have been identified by relevant public-sector and infrastructure agencies, and the water stewardship plan describes how the site can cooperate with these plans.

Regarding risks to raw water volume and quality, the site plans to manage wastewater quality standards so as not to deviate from ordinance standards and to avoid increasing environmental burden, and to participate in the Lake Biwa Forestation Partnership Agreement promoted by Shiga Prefecture and promote forest management to enhance the forest's water source conservation function.



Alliance for Water Stewardship (AWS)

Audit Number: AO-001653

3	STEP 3: IMPLEMENT - Implement the site's stewardship plan and improve impacts
3.1	Implement plan to participate positively in catchment governance.
3.1.1	Evidence that the site has supported good catchment governance shall be identified.
Comment	The site has supported good catchment governance. For example, on 10 Sep 2024, they participated in the Southern Industrial Water Liaison Council (online conference). Industrial water users and the Shiga Prefecture Enterprise Bureau participated, and budgets, supply capacity and usage, infrastructure construction plans and implementation status, etc. were discussed. On 13 Jun 2024, they visited the Konan Chubu Purification Centre. They toured the treatment equipment, understood the quality of the treated water, and heard about the crisis management system. On 17 Oct 2024, they visited the Yoshikawa Water Purification Plant. They toured the equipment and confirmed the water quality management system and crisis management system. As planned in the future, they plan to continue discussions by visiting relevant public-sector and infrastructure agencies once a year and participating in the Southern Industrial Water Liaison Council.
3.1.2	Measures identified to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be implemented. Yes
Comment	Based on known facts and stakeholder interviews, water rights of others including Indigenous peoples, that are not part of 3.2 were not confirmed.
3.2	Implement system to comply with water-related legal and regulatory requirements and respect water rights.
3.2.1	A process to verify full legal and regulatory compliance shall be implemented. Yes
Comment	The system to maintain compliance obligations for water and wastewater management identified in 2.2.1 was implemented. Records of individual water quality tests and tank inspections and cleanings are kept. Regulatory values have never been exceeded, and legal inspections have never been omitted. The Shiga Prefectural Enterprise Bureau checks the integrated flow meter to measure the amount of industrial water taken every month. The upper limit is set high and will not be exceeded even with continuous use for one day, so there is no need to check this on the compliance evaluation sheet.
3.2.2	Where water rights are part of legal and regulatory requirements, measures identified to respect the water rights of others including Yes Indigenous peoples, shall be implemented.
Comment	Based on known facts and stakeholder interviews, no water rights that are part of legal and regulatory requirements were identified. The site is legally required to use a set amount of water and discharge a set amount and quality of wastewater, and there are no further requirements for consideration of others' water use.
3.3	Implement plan to achieve site water balance targets.

WSAS



Alliance for Water Stewardship (AWS)

Audit Number: AO-001653

3.3.1 Status of progress towards meeting water balance targets set in the

water stewardship plan shall be identified.

Yes

Comment Status of progress towards meeting water balance targets set in the water stewardship plan is

identified.

Meetings are held every month to check the progress of WUR.

3.3.2 Where water scarcity is a shared water challenge, annual targets to

improve the site's water use efficiency, or if practical and applicable,

reduce volumetric total use shall be implemented.

Yes

Comment Water scarcity is not a shared water challenge. This was confirmed through stakeholder

interviews and public documents.

3.3.3 Legally-binding documentation, if applicable, for the re-allocation of

water to social, cultural or environmental needs shall be identified.



Comment There is no legally-binding documentation for the re-allocation of water to social, cultural or

environmental needs.

3.4 Implement plan to achieve site water quality targets

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

Yes

stewardship plan shall be identified.

Comment

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

Water quality analysis is conducted at an in-house determined frequency to ensure that it is within the standard values.

Because sewage is discharged into the sewer system, it is checked to ensure that it meets the standard values set by ordinance. At least since the introduction of microbial treatment seven years ago, the standard values have never been exceeded.

Microbial treatment is not necessary if the only purpose is to comply with wastewater standards set by local ordinances, but the site maintains a microbial treatment device in order to discharge wastewater with a lower environmental impact.

Although the local ordinance does not require the site to reduce the amount of wastewater discharged into the sewer system, the site is working on this voluntarily.

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



Comment

Shared water challenge No. 4 is the deterioration of Lake Biwa's water quality, but stakeholder interviews revealed that discharged treated water from the Shiga Prefecture Konan Chubu Purification Centre (Wastewater treatment plant) is not thought to be affecting the water quality of Lake Biwa, and this is considered to be a larger issue for Lake Biwa as a whole. As a best practice, the site has listed an example of treating water with less environmental impact before discharging it, but the current situation is that the site's wastewater has almost no impact on the water quality of Lake Biwa, and further efforts by the site will not lead to improvements in the water quality of Lake Biwa, so this is not realistic. Therefore, as per 3.4.1, the plan is to reduce the burden on the sewage treatment plant by continuously complying with the wastewater discharge standards into the sewer system, maintaining the biological treatment system, and reducing the amount of wastewater itself. In addition, related to IWRA in 3.5.1, the site is considering raising the awareness of local people through participation in cleaning activities on the lakeshore and rivers, which will lead to improvement of water quality of Lake Biwa.

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

WSAS



Alliance for Water Stewardship (AWS)

Audit Number: AO-001653

3.5.1	Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.	⊘ Yes
Comment	Practices set in the water stewardship plan to maintain and enhance the Important Water-Related Areas are implemented. In 2024, two employees participated in a lakeside cleanup activity held around 30 May 202 In 2025, they plan to hold cleanup activities four times a year. Four employees participated a cleanup activity at the Metagawa River on 1 June 2025.	
3.6	Implement plan to provide access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers at all premises under the site's control.	
3.6.1	Evidence of the site's provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers onsite shall be identified and where applicable, quantified.	⊘ Yes
Comment	Evidence of the site's provision of adequate access to safe drinking water, effective sanitat and protective hygiene (WASH) for all workers onsite is identified and quantified. The number of toilets provided is more than the minimum number required by the Industria Health and Safety Regulations. All tap water is drinkable, but other drinks (products) are all provided throughout the factory so that anyone can use them at any time. Water and oral rehydration solutions are provided at the workplace in summer as a measure against heatstroke. The toilets are cleaned daily and cleanliness is maintained.	ıl
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 does not impinge on the human right to safe water and sanitation for communities through their operations. There are no traditional access rights for Indigenous and local communities in this region. This was confirmed through stakeholder interviews and public documents.	
3.7	Implement plan to maintain or improve indirect water use within the catchment:	
3.7.1	Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.	⊘ Yes
Comment	Since there are no primary inputs, indirect water use targets are not set in the water stewardship plan.	
3.7.2	Evidence of engagement with suppliers and service providers, as well as, when applicable, actions they have taken in the catchment as a result of the site's engagement related to indirect water use, shall be identified.	Q Obs.
Comment	The laundry company was just changed in May 2025, so they have only just started interviewing them about water usage. The interview was conducted on 20 June 2025. It has been decided that the car wash service will be outsourced to a new company, but the specific company has not yet been decided. They plan to start interviewing them as soon a the company is decided.	
3.8	Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have.	
3.8.1	Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.	⊘ Yes

WSAS



Alliance for Water Stewardship (AWS)

Audit Number: AO-001653

Comment	In accordance with the plan stated in 2.4.1, consultation with relevant public-sector and infrastructure agencies was started in 2024. On 10 Sep 2024, they participated in the Southern Industrial Water Liaison Council (online conference). On 13 Jun 2024, they visited the Konan Chubu Purification Center. On 17 Oct 2024, they visited the Yoshikawa Water Purification Plant. Minutes of each meeting and opinions from stakeholders were recorded.
3.9	Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.
3.9.1	Actions towards achieving best practice, related to water governance, as applicable, shall be implemented. Yes
Comment	The water stewardship plan describes the link between each target and the achievement of best practice. This makes it clear what actions have been taken to achieve each best practice. Discussions were held with Shiga Prefecture and Moriyama City regarding actions towards achieving best practice, related to water governance.
3.9.2	Actions towards achieving best practice, related to targets in terms of water balance shall be implemented. Yes
Comment	As part of the actions towards achieving best practice, related to targets in terms of water balance, they have been working to reduce WUR. In addition, they signed an agreement with the Production Forestry Association in October 2024 and have begun cooperating (providing contributions) in forest conservation activities to improve water source conservation functions.
3.9.3	Actions towards achieving best practice, related to targets in terms of water quality shall be implemented. Yes
Comment	Actions towards achieving best practice, related to targets in terms of water quality included maintaining wastewater levels below standard values and reducing the volume of wastewater.
3.9.4	Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented. Yes
Comment	As part of the Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas, they participated in a cleanup activity on the shores of Lake Biwa.
3.9.5	Actions towards achieving best practice related to targets in terms of WASH shall be implemented. Yes
_	

As part of actions towards achieving best practice related to targets in terms of WASH,

discussions have begun with Moriyama City to provide drinking water in emergencies.

Comment



Alliance for Water Stewardship (AWS)

Audit Number: AO-001653

4	STEP 4: EVALUATE - Evaluate the site's performance.
4.1	Evaluate the site's performance in light of its actions and targets from its water stewardship plan and demonstrate its contribution to achieving water stewardship outcomes.
4.1.1	Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be Yes evaluated.
Comment	Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes is evaluated. For each plan item in the water stewardship plan, annual and long-term goals, target monitoring methods, and the link between each target and the AWS outcomes are described, and the degree of achievement of the targets in 2024 is evaluated accordingly.
4.1.2	Value creation resulting from the water stewardship plan shall be evaluated.
Comment	Value creation resulting from the water stewardship plan is evaluated. According to the AWS Standard Guidance, financial water cost-benefit was evaluated. The cost-effectiveness of the 2024 water usage reduction project was evaluated. Water usage was reduced by improving the CIP (Cleaning In Place) method. The investment costs and the reduction (benefit) in water purchase costs and water treatment costs due to the reduction in water usage were calculated.
4.1.3	The shared value benefits in the catchment shall be identified and where applicable, quantified. Yes
Comment	The shared value benefits in the catchment were identified. In 2024, an agreement was signed with the Production Forestry Association to cooperate in forest conservation activities (by providing contributions). Sharing this information on the company's social media helped to raise awareness within the company. In 2024, the company began visiting the Shiga Prefectural Enterprise Bureau. By sharing the results of a corporate survey conducted by Coca-Cola, the Enterprise Bureau was able to understand the opinions of companies that use industrial water for the first time.
4.2	Evaluate the impacts of water-related emergency incidents (including extreme events), if any occurred, and determine the effectiveness of corrective and preventative measures.
4.2.1	A written annual review and (where appropriate) root-cause analysis of the year's emergency incident(s) shall be prepared and the site's Yes response to the incident(s) shall be evaluated and proposed preventative and corrective actions and mitigations against future incidents shall be identified.
Comment	There were no emergency incidents in 2024. If an emergency incident does occur, it will be recorded in an "Environmental Accident Report" and measures will be taken.
4.3	Evaluate stakeholders' consultation feedback regarding the site's water stewardship performance, including the effectiveness of the site's engagement process.
4.3.1	Consultation efforts with stakeholders on the site's water stewardship performance shall be identified. Yes



Alliance for Water Stewardship (AWS)

Audit Number: AO-001653

Comment

The site's water stewardship performance was consulted with some stakeholders. The 2024 water stewardship plan performance was shared with the Shiga Prefecture Sewerage Division and opinions were received.

Opinions received included strengthening wastewater measures, spreading government efforts to the local community, and a desire to conduct cleanup activities in the area around the treatment plant.

The 2024 water stewardship plan performance was also shared with the NPO Biwako Hojo-no-sato and opinions were received.

Suggestions received included the possibility of discharging factory wastewater into local rivers, participating in other cleanup activities, participating in and sponsoring events other than cleanup activities, holding on-site lectures for employees, and providing environmental education for employees' children.

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.

Q Obs.

Comment

The 2025 water stewardship plan is being prepared by reflecting an evaluation of the performance of the 2024 water stewardship plan and comments from stakeholders on that evaluation.

Due to the initial audit this time, the timing of the company fiscal year update and the timing of the water stewardship plan update were different, but going forward, the company plans to evaluate the previous year's water stewardship plan, receive feedback from stakeholders, and update the water stewardship plan at the beginning of the fiscal year.



Alliance for Water Stewardship (AWS)

Audit Number: AO-001653

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.
Comment	WSAS approved a standard PPT template of Coca-Cola Commercial Products Supply (CPS) for meeting the disclosure requirements in Step 5. The Coca-Cola Japan Moriyama Plant uses this template and discloses information with the site's most relevant stakeholders. The CPS stipulates that this document is not provided to stakeholders, but is shown and explained during stakeholder consultations. As stated in 1.2.2, the main stakeholders are the government (including water suppliers, wastewater treatment plants), the Southern Industrial Water Liaison Council, and the NPO Biwako Hojo-no-sato. The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations, is included in the presentation materials.
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. Q Obs.
Comment	The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, is included in the presentation materials, and communicated to relevant stakeholders. So far, explanations have been given to the Shiga Prefecture Sewerage Division and NPO Biwako Hojo-no-sato. They plan to explain the plan to other most relevant stakeholders in accordance with the plan.
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.
Comment	A summary of the site's water stewardship performance, including quantified performance against targets, is included in the presentation materials, and communicated to relevant stakeholders.
5.4	Disclose efforts to collectively address shared water challenges, including: associated efforts to address the challenges; engagement with stakeholders; and co-ordination with public-sector agencies.
5.4.1	The site's shared water-related challenges and efforts made to address these challenges shall be disclosed. Yes
Comment	The site's shared water-related challenges and efforts made to address these challenges are included in the presentation materials, and communicated to relevant stakeholders.
5.4.2	Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified. Yes



Alliance for Water Stewardship (AWS)

Audit Number: AO-001653

closed.

Comment	Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies are included in the presentation materials, and communicated to relevant stakeholders.
5.5	Communicate transparency in water-related compliance: make any site water-related compliance violations available upon request as well as any corrective actions the site has taken to prevent future occurrences.
5.5.1	Any site water-related compliance violations and associated corrections shall be disclosed. Yes
Comment	There was no site water-related compliance violations. Confirmed by interview with staff and stakeholders.
5.5.2	Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.
Comment	There was no site water-related compliance violations. Confirmed by interview with staff and stakeholders.
5.5.3	Any site water-related violation that may pose significant risk and threat to human or ecosystem health shall be immediately communicated to Yes relevant public agencies and disclosed.
Comment	There was no site water-related compliance violations. Confirmed by interview with staff and stakeholders.
	Previous Findings
	All non-conformities raised in the previous audit have been satisfactorily

N/A