

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)



Audit Number: AO-001457

SITE DETAILS

Site: **Haleon - Richmond, US**

Address: 1211 Sherwood Avenue, 23220, Richmond, Virginia, UNITED STATES

Contact Person: Wilfredo Santiago

AWS Reference Number: AWS-000720

Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Core

Date of certification decision: 2025-Sep-11

Validity of certificate: 2028-Sep-10

AUDIT DETAILS

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

Audit Type(s): Initial Audit

Audit Start Date: 2025-Mar-17

Audit End Date: 2025-Mar-19

Lead Auditor: Rupa Bidap

Audit team participants:

Monserath Zamora

Rupa Bidap, Lead Auditor

Site Participants:

Wilfredo Santiago, Technical Operations Manager

Jardiel Marrero, Site Operations Director

Nicholas Huppert, Maintenance Supervisor

David Gillespie, EHS Site Lead

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ADDITIONAL INFO

Summary of Audit Findings: During the certification audit, 2 major non-conformities, 31 minor non-conformities, and 11 observations were raised.

The Client is requested to perform a root cause analysis and define corrective actions for each of the non-conformities and to submit these to WSAS within 30 days of receipt of the audit report by 13 June 2025.

The major non-conformities must be closed within 90 days of receipt of the report. In order to meet this timeline, evidence is to be submitted to WSAS within 75 days by 28 July 2025.

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

The audit team recommends certification of Haleon Richmond Site at 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-conformities and submitted the corrective action plans addressing all findings.

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

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

The Haleon Richmond facility, located at 1211 Sherwood Ave, Richmond, VA 23220, spans 31 acres and comprises six buildings totaling 324,405 square feet, accommodating approximately 350 employees. The facility specializes in research and development (R&D) of consumer healthcare products, including well-known brands such as Advil, Emergen-C, and Robitussin. Geographically, the facility is situated within the James River watershed, Virginia's largest river system, which flows across the entire state and drains a watershed of over 10,000 square miles. Richmond lies along the Fall Line, a geologic boundary between the Piedmont and Coastal Plain regions, characterized by rapids and waterfalls where rivers, including the James River, descend from harder crystalline rocks to softer sedimentary formations. This location offers unique hydrological features, providing both challenges and opportunities for water management and conservation efforts. The James River serves as the facility's primary water source, treated and supplied by the City of Richmond Department of Public Utilities. Wastewater is pre-treated on-site for pH adjustments before being discharged to the City of Richmond Wastewater Treatment Plant via two designated points on Sherwood Ave and Brook Rd. The facility's reliance on and impact upon the James River and the downstream Chesapeake Bay watershed necessitate stringent environmental stewardship and compliance with regional water management policies. The Richmond facility is one of Haleon's three R&D centers of excellence, alongside locations in Weybridge, UK, and Suzhou, China.

The audit was conducted onsite on March 17th to March 19th 2025

The onsite site visit included the assessment of water systems, sanitation, spill preparedness, stormwater management, and utility infrastructure facilities and activities that were visited onsite as part of the audit.

Water Supply and Quality Infrastructure

- ☐ Verified functional tap water systems with soap and hand sanitizer availability at hygiene stations.
- ☐ Observed the USB purified water system and use of deionized water in laboratory settings.
- ☐ Inspected the pH neutralization system, confirmed to be monitored daily.
- ☐ Assessed laboratory water infrastructure, noting the configuration and operations.

Emergency Response and Spill Management Systems

- ☐ Reviewed emergency response equipment, including eye wash stations and emergency showers, with weekly inspection routines in place.
- ☐ Assessed spill response measures, including readily available spill kits, spillage guard bins, and a central spill response room designed for larger incidents.
- ☐ Evaluated wastewater collection mechanisms integrated with emergency wash stations.

Laboratory and Chemical Waste Management

- ☐ Visited the South Analytical Lab to observe drainage infrastructure, including acid waste drains.
- ☐ Reviewed chemical segregation and storage protocols with secondary containment practices.

Stormwater and Rainwater Management

- ☐ Observed rain garden features and surface water drainage elements.
- ☐ Reviewed the main stormwater pit, confirming operational pumping and compliance with discharge testing.

Utilities and Mechanical Systems

- ☐ Conducted a walkthrough of the chiller and boiler rooms; confirmed boiler water is treated before use.
- ☐ Inspected the sanitary sump pit, mechanical rooms, and sewage infrastructure including pumps

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- and drainage networks.
- ☐ Reviewed emergency boiler backup systems and annual fuel containment testing. Noted the use of natural gas as the primary fuel.
 - ☐ Verified the main water inlet on Sherwood Avenue, connected to an acid neutralization unit.
 - ☐ Confirmed the presence of a fire hydrant system on-site.

- Hygiene and Sanitation Facilities
- ☐ Reviewed hygiene facilities, including showers and restrooms near the gym, equipped with feminine hygiene products.
 - ☐ Observed laundry services provided by external vendor

FINDINGS

NUMBER OF FINDINGS PER LEVEL	
Observation	11
Minor	31
Major	2

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FINDING DETAILS

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Finding No:	TNR-017196
Checklist Item No:	1.2.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2026-Mar-17
Checklist item:	<p>Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall:</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.
Findings:	<p>Incomplete and insufficient stakeholder engagement process:</p> <ul style="list-style-type: none">- Stakeholder engagement processes are not clearly defined, which may affect the effectiveness of engagement activities.- The site has not identified the water-related challenges of its stakeholders.- A stakeholder announcement was not made 8 weeks in advance, and stakeholder interviews were not scheduled during the audit.- Although the site made an effort by sending an outreach email on the first day of the audit, this was not sufficient to meet engagement expectations.

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Corrective action:

Update communication with actions completed and summary of our plan. It should include items such as evidence of activities participated in partnership with external stakeholder as well as internal to show commitment and progress against our plan.

Onboard new hire and new service partners on the AWS program for the Richmond site. New hire is already on site. New service partners employee starting on the 01-Aug-2025.

Revised CAP: The original list and prioritization of stakeholders was informed by input from site staff and consultants (LimnoTech), desktop research, and a virtual internal workshop. Over 40 potential stakeholders were included to ensure that vulnerable, minority, and indigenous groups were considered. Once a new hire has been onboarded, the Stakeholder-Prioritization sheet (in the Deliverables workbook) will be re-assessed by the Site to document engagement with current stakeholders, determine if any new stakeholders should be added, and select 2-3 new stakeholders to engage with. The handout will be shared with these new stakeholders and a meeting will be scheduled to discuss their water-related challenges, concerns, and opportunities (with notes from these meetings being documented).

Considering that the audit has already occurred, it is not possible to share the stakeholder announcement. For any future engagement, the Site will offer to connect the stakeholder with WSAS in the event that they have any feedback to provide.

Evidence of implementation:

The following actions have been taken and can be seen on the new Deliverable files (Version 3).

- Contact with 2 stakeholders and site visit were documented (CBF and ITAC). See attachment 'Next Step from ITAC Meeting' and 'Site Visit Follow Ups' for the minutes.
- ITAC have been added to the stakeholder matrix.
- Column K was added to document Stakeholder's Water related challenges, interest and concerns. This include desktop research and is updated as meetings occur.
- Site is now using existing connection to establish direct contact with other stakeholder as a practice to improve stakeholder engagement. See attachment 'Next Step from ITAC Meeting'.

Lastly, new hire was onboarded (Technical Compliance Engineer Kerrie Watkins) into the program to support implementation and documentation. She will be participating in the short course on the AWS Standard (see attached invoice for confirmation of registration and date).

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Finding No: TNR-017930
Checklist Item No: 1.2.2
Status: Open
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 has developed a Stakeholder Prioritization Matrix, effectively categorizing stakeholders into Key Player, Involve, Consult, and Monitor groups based on their influence and engagement needs. However, specific justifications for stakeholder placement are not provided, reducing transparency in the prioritization process. Additionally, while stakeholders have been identified, actual outreach and engagement efforts remain limited.

Finding No: TNR-017189
Checklist Item No: 1.3.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2026-Mar-17
Checklist item: Existing water-related incident response plans shall be identified.
Findings: The site has not provided the updated versions of the following water-related response plans:

Spill Prevention, Control, and Countermeasure (SPCC) Plan
RCRA Hazardous Waste Categorization Plan
Oil Spill Contingency Plan

The site does not have designated rainwater harvesting systems or channels; except, a community garden, which contributes to rainwater capture through natural infiltration.

Corrective action: Update SPCC and route it through the site Quality Managements System (Veeva Docs). Provide updated version.

Revised CAP: The SPCC plan, RCRA Hazardous Waste Categorization Plan, and Oil Spill Contingency plan will all be reviewed, updated (as needed), routed through the Site's Quality Management System (Veeva Docs), and added to the Conformity Deck.

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Finding No:	TNR-017279
Checklist Item No:	1.3.2
Status:	Open
Finding level:	Observation
Checklist item:	Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped
Findings:	<p>Rainwater Capture Not Mapped The site does not have designated rainwater harvesting systems or channels; however, a community garden has been established, which contributes to rainwater capture through natural infiltration.</p> <p>Boiler Water Losses Are Mapped Boiler-related water losses have been mapped; however, further clarification may be needed to ensure alignment with other process flows.</p> <p>Wastewater Streams Not Fully Differentiated Although total wastewater discharge is tracked, individual wastewater streams—such as process water, cooling tower blowdown, and sanitary discharge—are not distinctly mapped. These are currently grouped under broad categories like treated water, utilities, and irrigation. Differentiating these streams would improve clarity and support compliance tracking.</p> <p>Additional Water Losses Not Fully Mapped Some minor or unaccounted losses, such as evaporation or small leaks, have not been mapped. These should be visually identified on the water map to ensure a complete representation of site water flows.</p>
Finding No:	TNR-017931
Checklist Item No:	1.3.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2026-Mar-17
Checklist item:	Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped
Findings:	The site has not identified and mapped fire-fighting water flows, water used for domestic purposes (such as offices, WASH facilities and the canteen) and not updated any on-site water recycling or reuse activities.
Corrective action:	Update site water balance map to include the fire water and the domestic water flow. Calculate water recycling/reuse and incorporate into the water balance map.

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Finding No:	TNR-017281
Checklist Item No:	1.3.3
Status:	Open
Finding level:	Observation
Checklist item:	Site water balance, inflows, losses, storage, and outflows, including indication of annual variance in water usage rates, shall be quantified. Where there is a water-related challenge that would be a threat to good water balance for people or environment, an indication of annual high and low variances shall be quantified.
Findings:	Other Water Losses Not Accounted For - The current water balance captures only total water losses and does not separately account for specific loss sources such as boiler blowdown, evaporation, or leaks and unmeasured process losses. It is recommended that the site conducts a comprehensive water audit to identify and quantify these unaccounted losses, ensuring a more accurate and complete water balance.
Finding No:	TNR-017192
Checklist Item No:	1.3.4
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2026-Mar-17
Checklist item:	Water quality of the site's water source(s), provided waters, effluent and receiving water bodies shall be quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be quantified.
Findings:	The phosphorus chart for the water quality of the James River has not been updated (Request to update if available, at the catchment level). Additionally, the Chemical Oxygen Demand (COD) chart for the site includes data only up to October 2022. Updated records for 2023 and early 2024 have not been provided.
Corrective action:	Add action plan item to include as part of annual review to monitor release of information. Ensure recent data is gathered/available regarding Water Quality and COD. Revised CAP: As part of the annual surveillance audit process, the AWS-lead for the Site will review the information documented for this indicator and conduct a web-search to understand whether more recent and applicable data is available. If more updated information is available, the Conformity Deck will be updated. This is expected to include the City of Richmond Consumer Confidence Report, the State of the James River report, COD in the site's wastewater discharge , and City of Richmond wastewater effluent data.

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Finding No:	TNR-017193
Checklist Item No:	1.3.5
Status:	Open
Finding level:	Observation
Checklist item:	Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.
Findings:	<p>The site has not mapped chemical storage locations by floor within the West Wing Building.</p> <p>The locations of flammable storage areas have not been mapped. It is recommended that the site develops a specific map indicating all flammable storage points to support fire safety compliance and emergency preparedness.</p>
Finding No:	TNR-017194
Checklist Item No:	1.3.6
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2026-Mar-17
Checklist item:	On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.
Findings:	<p>The current status of the Rain Garden has not been identified. The WHC certification and conservation status require verification, as supporting evidence has not been provided.</p>
Corrective action:	<p>Create list of IWRA on site that includes location, description and status. This shall go along with the IWRA site map.</p>

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Finding No:	TNR-017180
Checklist Item No:	1.4.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2026-Mar-17
Checklist item:	The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be identified.
Findings:	<p>The water risks associated with the facility's electricity and natural gas suppliers are not documented.</p> <p>The embedded water use was quantified for 2022, but data for 2023 and 2024 has not been provided.</p>
Corrective action:	<p>Update information to include the most recent data available. Add action plan item to include as part of annual review to monitor release of public information.</p> <p>Revised CAP: As part of the annual surveillance audit process, the AWS-lead for the Site will update the Conformity Deck with the most recent electricity and natural gas data for the site .</p> <p>Additionally, the AWS-lead will utilize relevant indicators from the WRI Aqueduct Water Risk Atlas to summarize the level of water risk in the catchments where the primary inputs are sourced.</p>
Finding No:	TNR-017218
Checklist Item No:	1.4.2
Status:	Open
Finding level:	Observation
Checklist item:	The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.
Findings:	Updated data on the embedded water use of the laundry service provider was not provided.

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Finding No:	TNR-017199
Checklist Item No:	1.5.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2026-Mar-17
Checklist item:	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.
Findings:	While governance initiatives are recognized, there is no structured approach for considering them for the site's water stewardship plan. The Chesapeake Bay Foundation initiatives are not identified.
Corrective action:	Update action plan to include details related to the established site goals for involvement with external initiatives. Revised CAP: As part of the annual surveillance audit process, the AWS-lead for the Site will review the information documented for this indicator and conduct a web-search to understand whether more recent and applicable initiatives should be added. Communications with stakeholders, like the Chesapeake Bay Foundation, will also inform this process. If more updated information is available, the Conformity Deck will be updated.

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Finding No:	TNR-017201
Checklist Item No:	1.5.3
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2026-Mar-17
Checklist item:	The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.
Findings:	While streamflow data is provided, a clear catchment water balance quantification is missing. Additionally, catchment-wide mapping of groundwater and surface water flows is not provided.
Corrective action:	Verify what is publicly available related to water balance to account for catchment water quantification. This must include groundwater and surface water flows. Additionally, consult with Stakeholders to see if they have the data available. Revised CAP: As part of the annual surveillance audit process, the AWS-lead for the Site (with potential support from an external consultant) will review the information documented for this indicator and conduct a web-search to understand whether a more recent, large-scale, detailed water balance has been documented for the watershed (including surface water, groundwater, precipitation, ET, withdrawals, and changes in storage; in alignment with the AWS Standard Guidance report). Communication with stakeholders may also inform this process. If a full water balance is not available, the Site will utilize the baseline water stress indicator from the WRI Aqueduct Water Risk Atlas, which measures the ratio of total water demand to available renewable surface and groundwater supplies. The Conformity Deck will then be updated.

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Finding No: TNR-017202
Checklist Item No: 1.5.4
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2026-Mar-17
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 existing data provides an overview of water quality parameters and pollution sources, it does not clearly map or quantify the key water quality challenges in a structured and actionable manner.
Corrective action: Update and reformat information gathered and map against the actions established in the Action Plan.
Evaluate if further action is required once updated.

Revised CAP: As part of the annual surveillance audit process, the AWS-lead for the Site (with potential support from an external consultant) will review the information documented for this indicator and conduct a web-search to understand more recent water quality data for the catchment. Communication with stakeholders may also inform this process. The Site will also utilize water quality indicators from the WRI Aqueduct Water Risk Atlas. The Conformity Deck will then be updated, including a clear description of the key water quality challenges and seasonal variability (utilizing time series plots).

Finding No: TNR-017567
Checklist Item No: 1.5.4
Status: Open
Finding level: Observation
Checklist item: Water quality, including physical, chemical, and biological status, of the catchment shall be identified, and where possible, quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be identified.
Findings: The findings discuss various water quality issues, but they do not classify them in terms of severity (e.g., high, medium, low) or potential impact areas (e.g., ecosystem health, human health, industrial water use). Additionally, there is no prioritization of challenges to determine which threats are most critical to site operations and compliance.

Addressing these gaps would result in a more actionable and comprehensive understanding of key water quality challenges, supporting improved decision-making and strategic water stewardship planning.

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Finding No:	TNR-017203
Checklist Item No:	1.5.5
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2026-Mar-17
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:	There was a lack of evidence on engagement with stakeholders in the IWRA identification and assessment process. There is no evidence of collaboration with local communities, conservation organizations, or regulatory agencies to validate or refine the IWRA assessment
Corrective action:	<p>Update identified IWRA based on the existing feedback from the Stakeholders that have responded.</p> <p>Revised CAP: Once a new hire has been onboarded, the Stakeholder-Prioritization sheet (in the Deliverables workbook) will be re-assessed by the Site to document engagement with current stakeholders, determine if any new stakeholders should be added, and select 2-3 new stakeholders to engage with. The handout will be shared with these new stakeholders and a meeting will be scheduled to discuss their water-related challenges, concerns, and opportunities (with notes from these meetings being documented). The Site will include local communities, conservation organizations, and regulatory agencies in the discussion of which stakeholders to engage with and will ask about key IWRAs (already included in the handout). The notes from these meetings will be used by the AWS-lead to update this indicator as part of the annual surveillance audit process.</p>

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Finding No:	TNR-017204
Checklist Item No:	1.5.6
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2026-Mar-17
Checklist item:	Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.
Findings:	The site has not identified any other potential exposure to extreme events beyond flooding. The current status of the water-related infrastructure in the catchment has not been provided, taking into consideration the water cut-off incident in January 2025.
Corrective action:	<p>Update risk assessment with the new information and review action plan to establish what action should be taken to mitigate similar incidents.</p> <p>Revised CAP: As part of the annual surveillance audit process, the AWS-lead for the Site (with potential support from an external consultant) will review the information documented for this indicator and conduct a web-search to understand more recent water-related infrastructure initiatives. Communication with stakeholders may also inform this process. The Conformity Deck will then be updated, including a clear description of the condition of existing infrastructure, potential exposure beyond flooding (e.g., water quality, drought, water cut-offs), and an update of planned infrastructure. This will include documentation of the January 2025 water cut-off incident.</p>

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Finding No: TNR-017206
Checklist Item No: 1.6.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2026-Mar-17
Checklist item: Shared water challenges shall be identified and prioritized from the information gathered.
Findings: The shared water challenges were identified through research and scientific data. However, the link between the water challenges identified by stakeholders and the site's specific challenges is unclear due to a lack of stakeholder engagement.
Corrective action: Update action plan to include details related to the established site goals for involvement with external initiatives.

Revised CAP: Once a new hire has been onboarded, 2-3 new stakeholders will be engaged with. A meeting will be scheduled to discuss their water-related challenges, concerns, and opportunities (with notes from these meetings being documented). In reaching out to stakeholders, the site will ensure that it discusses any possible shared water challenges the stakeholders are aware of (already included in the stakeholder handout that has been developed) and will discuss validating the shared water challenges that the site has already identified. Site staff will ensure this is mentioned in any emails with stakeholders or is an agenda item in any meetings, will document shared water challenges as a point of discussion, and will record any shared water challenges suggested by stakeholders.

Finding No: TNR-017207
Checklist Item No: 1.6.2
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2026-Mar-17
Checklist item: Initiatives to address shared water challenges shall be identified.
Findings: The site has identified various initiatives to address the shared water challenges through research and scientific information, but not through stakeholder engagement.
Corrective action: Update action plan to include details related to the established site goals for involvement with external initiatives.

Revised CAP: Once a new hire has been onboarded, 2-3 new stakeholders will be engaged with. A meeting will be scheduled to discuss their water-related challenges, concerns, and opportunities (with notes from these meetings being documented). In reaching out to stakeholders, the site will ensure that it discusses any possible initiatives the stakeholders are aware of related to shared water challenges. Site staff will ensure this is mentioned in any emails with stakeholders or is an agenda item in any meetings, will document initiatives as a point of discussion, and will record any initiatives suggested by stakeholders.

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Finding No:	TNR-017932
Checklist Item No:	1.7.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2026-Mar-17
Checklist item:	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.
Findings:	<p>The site has not assessed its water risks, taking into consideration stakeholder meetings to ensure alignment with external concerns and potential future regulatory shifts. Additionally, the January water cut-off incident and potential risk have not been included in the water risk map.</p> <p>Additionally, the shared risk analysis document is missing key elements, specifically the inclusion of a defined time frame and potential cost estimates.</p>
Corrective action:	<p>Update risk assessment with the new information and review action plan to establish what action should be taken to mitigate similar incidents.</p> <p>Update action plan to include details related to the established site goals for involvement with external initiatives.</p> <p>Revised CAP: As part of the annual surveillance audit process, the site will provide an updated water risk identification deliverable, which will include the risks related to the January water cut-off incident and any risks associated with the incident. The updated water risk identification deliverable will also include any stakeholder-informed risks, business risk impacts related to all identified water risks, severity related to all water risks, and time frame related to all water risks.</p>
Finding No:	TNR-017217
Checklist Item No:	1.7.2
Status:	Open
Finding level:	Observation
Checklist item:	Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.
Findings:	While site-level opportunities are well-documented, there is limited focus on broader watershed-scale collaboration and external stakeholder engagement. Additional efforts are needed to align site initiatives with regional water conservation goals and shared water challenges.

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Finding No:	TNR-017224
Checklist Item No:	2.1.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2026-Mar-17
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 commitment is posted internally at the site, but not publicly disclosed.</p>
Corrective action:	<p>Publish letter on the public Haleon Page.</p> <p>Revised CAP: The site will sign and publicly display a physical copy of the commitment statement so it is available to be viewed by all site staff. This will be posted at a publicly-accessible location of the site, as well as the public Haleon webpage.</p>
Evidence of implementation:	<p>Letter has now been published on the public Haleon page - https://www.haleon.com/content/dam/haleon/corporate/documents/our-impact/environment/integrating-water-stewardship/AWS-stakeholder-announcement-Richmond.pdf</p>

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Finding No:	TNR-017283
Checklist Item No:	2.3.2
Status:	Closed
Finding level:	Major
Due date:	2025-Aug-12
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:	<p>The site has not established clear overall targets/objectives and measurable criteria to guide the implementation of its action plan, i.e. what it wants to achieve with the planned actions. While some targets are defined, others are unclear or missing. The plan lists actions, but does not clearly link them to specific, outcome-oriented goals. In many cases, what is presented as a target does not meet the definition of a measurable objective.</p>
Corrective action:	<p>Rework plan to ensure all actions have clear targets, objectives and measurable criteria to track progression of each action.</p> <p>Upon the rework/review of the plan, add new actions to the plan and ensure any new action also has clear targets, objective and measurable criteria.</p>
Evidence of implementation:	<p>All actions in the WSP reviewed by the Site (See file Deliverable in the attached documents). The following columns were updated to reflect clearer objectives, status, dates and owners:</p> <ul style="list-style-type: none">-Smart Target-Timeline to Implement-Actions to Achieve and Maintain-Responsible and Accountable Person-Cost/Resources-Metric(s): How will action be monitored or measured-Current Performance Status-Evaluation of Progress Against Target

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)



Audit Number: AO-001457

Finding No:	TNR-017230
Checklist Item No:	2.4.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2026-Mar-17
Checklist item:	A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.
Findings:	A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies has not been identified, or engagement with relevant public sector and infrastructure agencies has not been provided about discussing the plans to mitigate or adapt to identified water risks.
Corrective action:	<p>Investigate establishing connection via already engaged NGOs to help support the identification of water risk and the plan development for such.</p> <p>Addition to CAP: The site will designate a responsible staff person to continue to reach out to NGOs in order develop a plan to mitigate and/or adapt to water risk within the next year.</p>

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-001457

Finding No:	TNR-017233
Checklist Item No:	3.1.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2026-Mar-17
Checklist item:	Evidence that the site has supported good catchment governance shall be identified.
Findings:	The site has not demonstrated any support for or contribution to catchment-level governance mechanisms, nor engagement with authorities or stakeholders on catchment governance. The submitted actions are important for site sustainability but fall outside the scope of this indicator - catchment-level governance.
Corrective action:	<p>Update action plan to include details related to the established site goals for involvement with external initiatives.</p> <p>Include documentation of event participation as part of Governance meetings established (pictures, receipt, comms, etc.).</p> <p>Onboard new hire and new service partners on the AWS program for the Richmond site. New hire is already on site. New service partners employee starting on the 01-Aug-2025.</p>
Evidence of implementation:	<p>WSP uploaded containing actions created based on the interactions with Stakeholders as seen in the Deliverables Version 3 file.</p> <p>Included email communications between CBF related to site visit and potential monetary donations to be evaluated by Haleon. Additionally, communication with ITAC open up a potential door to liaison with the city and the WSP has been updated to reflect such.</p> <p>Lastly, as documented in CAP for 1.2.1, the Technical Compliance Engineer has been onboarded and is set to receive the short course for the AWS Standard on the 15-Sep-2025.</p>

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-001457

Finding No:	TNR-017234
Checklist Item No:	3.3.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2026-Mar-17
Checklist item:	Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.
Findings:	<p>The site has not provided evidence of implementation for the following actions identified in the Water Stewardship Plan:</p> <ul style="list-style-type: none">- Flow metering across the site to support a data-driven approach to water balance.- Full-scale replacement of ornamental plants with native, drought-tolerant species, including tracking of irrigation savings.- Cooling tower replacement, which is still in early assessment with no schedule or impact monitoring in place.- Chiller replacement initiative has not yet begun, with no baseline data.- Reduction of water consumption per employee by 20% by 2029—no progress or accountability mechanisms have been demonstrated.
Corrective action:	<p>Review and update the action plan to align it to overall site project plan. Incorporate action plan review into governance related to AWS.</p> <p>Revised CAP: As part of the annual surveillance audit process, site staff will provide evidence for flow metering, replacement of ornamental plants, cooling tower replacement assessment, chiller replacement considerations, and any plans related to reduction of water consumption per employee by 20%. Any documentation or discussions of these actions' progress or lack thereof should be submitted as evidence.</p>

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-001457

Finding No:	TNR-017239
Checklist Item No:	3.5.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2026-Mar-17
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:	<p>The Wildlife Habitat Committee is responsible for overseeing IWRA management, but no evidence was provided to demonstrate the implementation of measures taken to maintain or enhance the IWRA. The site has not provided evidence of targets, actions, or implementation related to maintaining or improving the site's Important Water-Related Areas (IWRAs) within the catchment. There is no structured plan, monitoring system, or stakeholder engagement process documented to support IWRA stewardship.</p>
Corrective action:	<p>Establish support structure and records for activities related to IWRA on-site. This will be track using the Action Plan. Review action plan and establish action related to the support of IWRA stewardship including the plan, monitoring of the status and stakeholder engagement.</p> <p>Practices to enhance/maintain IWRAs will be identified with future consultation with stakeholders, such as the Chesapeake Bay Foundation, and prioritised in accordance with site strategy. Implementation of these practices will be governed via monthly governance and quarterly WSP review.</p> <p>Below Actions added to WSP: Step 1: Due - 30-Sep-2025 Set up calls with Key Critical Stakeholders in which best practices for IWRA maintenance and enhancement shall be discussed. Prioritize practices in accordance with site strategy. Step 2: Due - 30-Oct-2025 Plan implementation of practices and update WSP accordingly. Begin implementation in accordance with WSP.</p>

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Alliance for Water Stewardship (AWS)

Audit Number: AO-001457

Finding No: TNR-017240
Checklist Item No: 3.7.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2026-Mar-17
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 has not yet initiated indirect water use identification, vendor engagement, or action planning within the catchment
Corrective action: Review with the service partners on site a method to track the indirect water use.

Revised CAP: As part of the annual surveillance audit process, the site staff will determine indirect water use targets with consultation from service partners responsible for the indirect water usage. Targets will also be measured with the aid of service providers.

Finding No: TNR-017241
Checklist Item No: 3.7.2
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2026-Mar-17
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: While internal water stewardship efforts are underway, there is currently no program or documented outreach to encourage suppliers to assess or improve their water efficiency practices.
Corrective action: Review with the service partners on site a method to track the indirect water use. Provide evidence of agreement with suppliers related to water efficiency.

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Alliance for Water Stewardship (AWS)

Audit Number: AO-001457

Finding No:	TNR-017242
Checklist Item No:	3.8.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2026-Mar-17
Checklist item:	Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.
Findings:	There is no evidence of engagement with owners of shared water-related infrastructure despite the site being reliant on the municipal water supply and wastewater treatment.
Corrective action:	Engage City of Richmond in relation to the shared water-related infrastructure. Update action plan to account for shared water-related infrastructure based on feedback from the City of Richmond.
Evidence of implementation:	In an effort to better engage stakeholders, site has engaged a new party (ITAC). Multiple areas were covered with them and their future involvement with the site which includes their support to connect with the City as previous effort had been unsuccessful. They have expressed that they will aid us in making that connection and to help open up the possibility of the site becoming a Water sampling site for the city. The attached Deliverables file has the updated WSP including the actions discussed with ITAC. Additionally, the meeting minutes of this interaction were recorded.
Finding No:	TNR-018088
Checklist Item No:	3.9.1
Status:	Open
Finding level:	Observation
Checklist item:	Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.
Findings:	While the site has identified relevant best practices related to water governance (as documented under 1.8.1), including the designation of a water stewardship owner, evidence of effective implementation is limited. There is no documented description of the scope of responsibilities, decision-making authority, or how this role integrates with site governance systems. Without such details, it is unclear to what extent the site is actively progressing toward achieving best practices in water governance.
Finding No:	TNR-018089
Checklist Item No:	3.9.3
Status:	Open
Finding level:	Observation
Checklist item:	Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.
Findings:	Establishing or referencing clear performance targets could further enhance alignment with best practice expectations.

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Alliance for Water Stewardship (AWS)

Audit Number: AO-001457

Finding No:	TNR-017245
Checklist Item No:	3.9.4
Status:	Closed
Finding level:	Major
Due date:	2025-Aug-12
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 has not provided evidence of implementation of actions towards achieving best practice, related to targets in terms of the Important Water-Related Areas.
Corrective action:	<p>Train and spread awareness of the AWS efforts between internal members of the Haleon team.</p> <p>Review plan and incorporate the current and future site actions related to maintenance of the site IWRA.</p> <p>Following consultation with Chesapeake Bay Foundation, and consequent identification of IWRA best practices, determine actions that could be taken by Site to assist maintenance of such areas and generate a priority list based upon risk, impact and resource requirement.</p> <p>Step 1: Due - 30-Sep-2025</p> <p>Update of WSP based on the stakeholder engagement on step 1.5.1. , 1.5.5. , 1.8.4. and 3.5.1.</p>
Evidence of implementation:	<p>Actions completed for the maintenance of the onsite IWRA (Rain Garden) a documented in 3.5.1. Photo of renewed Rain Garden attached.</p> <p>During the CBF visit, multiple notes were made, including the presence of Invasive species across the site green areas (this includes the Rain Garden which has now been resolved). All suggestions are to be reviewed by the site per the actions incorporated in the WSP in 3.5.1.</p>

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Audit Number: AO-001457

Finding No:	TNR-017178
Checklist Item No:	4.1.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2026-Mar-17
Checklist item:	Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.
Findings:	The site has not evaluated the performance of implemented actions against the targets outlined in its Water Stewardship Plan, nor assessed their contribution to achieving water stewardship outcomes. Some targets and metrics in the plan are unclear (refer to comments in indicator 2.3.2), making it difficult to measure and track the effectiveness of these actions.
Corrective action:	Rework plan to ensure all actions have clear targets, objectives and measurable criteria to track progression of each action. Upon the rework/review of the plan, add new actions to the plan and ensure any new action also has clear targets, objective and measurable criteria.
Finding No:	TNR-017179
Checklist Item No:	4.1.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2026-Mar-17
Checklist item:	Value creation resulting from the water stewardship plan shall be evaluated.
Findings:	Value creation resulting from the Water Stewardship Plan has not been evaluated. While a procedure for evaluation exists, no evidence was provided during the audit to demonstrate how the site has assessed the economic, social, or environmental value generated through implementation.
Corrective action:	Rework plan to ensure all actions have clear targets, objectives and measurable criteria to track progression of each action. Upon the rework/review of the plan, add new actions to the plan and ensure any new action also has clear targets, objective and measurable criteria. This includes the quantification of benefits from a cost saving or reduced energy consumption basis.

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Alliance for Water Stewardship (AWS)

Audit Number: AO-001457

Finding No:	TNR-017270
Checklist Item No:	4.1.3
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2026-Mar-17
Checklist item:	The shared value benefits in the catchment shall be identified and where applicable, quantified.
Findings:	The shared value benefits in the catchment has not been identified or quantified.
Corrective action:	<p>Rework plan to ensure all actions have clear targets, objectives and measurable criteria to track progression of each action.</p> <p>Upon the rework/review of the plan, add new actions to the plan and ensure any new action also has clear targets, objective and measurable criteria.</p> <p>Revised CAP: As part of the annual surveillance audit process, the site will clearly explain value created outside of the site and its boundaries, detailing benefits within the site catchment and source catchment and explaining how such benefits can be assessed, monitored, and possibly quantified.</p>
Finding No:	TNR-017287
Checklist Item No:	4.2.1
Status:	Open
Finding level:	Observation
Checklist item:	A written annual review and (where appropriate) root-cause analysis of the year's emergency incident(s) shall be prepared and the site's response to the incident(s) shall be evaluated and proposed preventative and corrective actions and mitigations against future incidents shall be identified.
Findings:	The recent emergency event of January water cut off in Jan 2025 is not mapped

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Audit Number: AO-001457

Finding No:	TNR-017271
Checklist Item No:	4.3.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2026-Mar-17
Checklist item:	Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.
Findings:	Consultation efforts with stakeholders on the site's water stewardship performance have not been identified.
Corrective action:	Establish change history in the action plan to include feedback from consultation with stake holders and how it is being use to review our action plan. Revised CAP: As part of the annual surveillance audit process, the site will contact stakeholders in order to gather their input on the WSP performance. Communication with stakeholders will be documented, as will the topics discussed with stakeholders during any meetings, calls, or correspondence. This process will also address the lack of consultation from stakeholders during the initial development of the WSP.
Finding No:	TNR-017272
Checklist Item No:	4.4.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2026-Mar-17
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:	The site modified and updated some sections of the Water Stewardship Plan during the audit; however, the site's water stewardship plan has not been modified and adapted to incorporate any relevant information and lessons learned from the evaluations in this step and these changes have not been identified.
Corrective action:	Upload plan into our Quality Management System to track updates and revisions over time. Revised CAP: As part of the annual surveillance audit process, the Site will actively review the WSP and provide updates based a current evaluation of any progress made to the plan, any changes that are deemed relevant, or any input from stakeholders. In order to provide an updated review of the WSP, the WSP will be uploaded into the Quality Management System, which allows tracking and updates to the plan from site staff.

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Alliance for Water Stewardship (AWS)

Audit Number: AO-001457

Finding No:	TNR-017172
Checklist Item No:	5.1.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2026-Mar-17
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's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations is not disclosed.
Corrective action:	Create Roles and Responsibilities matrix for all parties involve with Water related laws and regulations.
Finding No:	TNR-017173
Checklist Item No:	5.2.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2026-Mar-17
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 handout communicated to relevant stakeholders did not outline the Water Stewardship Plan, including how it contributes to the AWS outcomes.
Corrective action:	Update communication with actions completed and summary of our plan. It should include items such as evidence of activities participated in partnership with external stakeholder as well as internal to show commitment and progress against our plan.
Finding No:	TNR-017174
Checklist Item No:	5.3.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2026-Mar-17
Checklist item:	A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.
Findings:	A summary of the site's water stewardship performance, including quantified performance against targets, was not disclosed by the Haleon Richmond team.
Corrective action:	Update communication with actions completed and summary of our plan. It should include items such as evidence of activities participated in partnership with external stakeholder as well as internal to show commitment and progress against our plan.

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Audit Number: AO-001457

Finding No:	TNR-017175
Checklist Item No:	5.4.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2026-Mar-17
Checklist item:	The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.
Findings:	The handout communicated to relevant stakeholders included some of the shared water challenges in a generic way, but not all of them. It did not include any efforts to address these challenges; hence, these have not been disclosed.
Corrective action:	Update communication with actions completed and summary of our plan. It should include items such as evidence of activities participated in partnership with external stakeholder as well as internal to show commitment and progress against our plan.
Finding No:	TNR-017960
Checklist Item No:	5.4.2
Status:	Open
Finding level:	Observation
Checklist item:	Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.
Findings:	There is currently no efforts to collectively address shared water challenges and no coordination with public sector agencies, as is already indicated in other findings.

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Alliance for Water Stewardship (AWS)

Audit Number: AO-001457

Report Details

Report	Value
Report prepared by	Rupa Bidap
Report approved by	Ozge Gokmen
Report approved on (Date)	13/05/2025

Surveillance

Proposed date for next audit
2026-Mar-17

Stakeholder Announcements

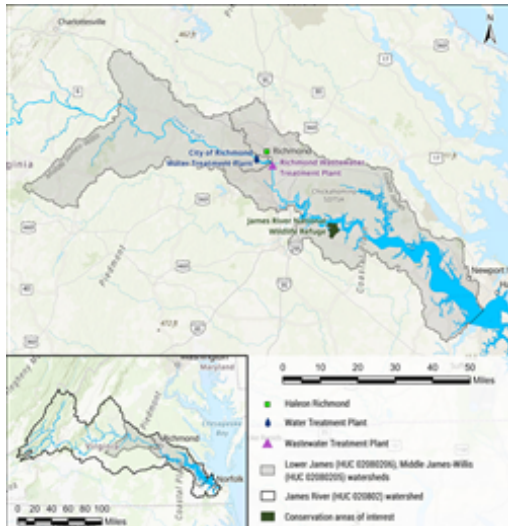
Date of publication	Location
17/01/2025	https://a4ws.org/wp-content/uploads/2025/01/AWS-000720-Haleon-Richmond-VA-USA-StakeholderAnnouncement-March-2025-V3.0.pdf
17/01/2025	https://watersas.org/wp-content/uploads/2025/01/AWS-000720-Haleon-Richmond-VA-USA-StakeholderAnnouncement-March-2025-V3.0.pdf
Comment	The site did not publish or make a stakeholder announcement at least 8 weeks in advance, as required under the AWS audit requirements. However, on the first day of the audit, the site made an effort to initiate communication with its listed stakeholders. This marks the first formal outreach action by the site toward its stakeholders.
Comment	The site arranged for only one stakeholder to be available for discussion for the audit.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-001457

Catchment Information



James river basin and Lower James and Middle James-Willis watersheds.png

Catchment Information

The Haleon Richmond facility is located within the James River Basin and is entirely reliant on water sourced from the James River. The water is treated and supplied by the City of Richmond Department of Public Utilities (DPU). The site does not own or control any water sources. Wastewater from the facility is discharged to the City of Richmond Wastewater Treatment Plant via two points: one on Sherwood Avenue and another on Brook Road, both of which are pre-treated on-site for pH adjustment. Final discharge from the treatment plant enters the James River.

The site is situated in an area of the city that is served by a Combined Sewer System (CSS), which carries both stormwater and wastewater. During heavy rainfall, this system may overflow, contributing to pollution in the James River. Other parts of the city are served by separated sewer systems where stormwater and wastewater are managed independently.

The facility lies within the broader James River watershed, which is part of the downstream Chesapeake Bay watershed. Several critical water-related areas (IWRAs) exist in this catchment, including the Chesapeake Bay, James River Estuary, Dutch Gap Conservation Area, James River National Wildlife Refuge, and Hog Island Wildlife Management Area. These areas face various degrees of ecological pressure due to pollution, habitat degradation, and runoff impacts. The Chesapeake Bay and Dutch Gap areas are particularly stressed, while the James River Estuary and the wildlife refuges are assessed as being in fair but vulnerable condition. The facility's location within this sensitive hydrological context underscores the importance of strong water stewardship and pollution prevention practices.

Comment Catchment IWRAs information was provided.

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Alliance for Water Stewardship (AWS)

Audit Number: AO-001457

Client Description and Site Details



Site Details 2.png



Site Details - Haleon Richmond Site.png

Client/Site Background

The Haleon Richmond facility, located at 1211 Sherwood Ave, Richmond, VA 23220, spans 31 acres and comprises six buildings totaling 324,405 square feet, accommodating approximately 350 employees. The facility specializes in research and development (R&D) of consumer healthcare products, including well-known brands such as Advil, Emergen-C, and Robitussin.

Geographically, the facility is situated within the James River watershed, Virginia's largest river system, which flows across the entire state and drains a watershed of over 10,000 square miles. Richmond lies along the Fall Line, a geologic boundary between the Piedmont and Coastal Plain regions, characterized by rapids and waterfalls where rivers, including the James River, descend from harder crystalline rocks to softer sedimentary formations. This location offers unique hydrological features, providing both challenges and opportunities for water management and conservation efforts.

The James River serves as the facility's primary water source, treated and supplied by the City of Richmond Department of Public Utilities. Wastewater is pre-treated on-site for pH adjustments before being discharged to the City of Richmond Wastewater Treatment Plant via two designated points on Sherwood Ave and Brook Rd. The facility's reliance on and impact upon the James River and the downstream Chesapeake Bay watershed necessitate stringent environmental stewardship and compliance with regional water management policies. The Richmond facility is one of Haleon's three R&D centers of excellence, alongside locations in Weybridge, UK, and Suzhou, China.

Summary of Shared Water Challenges





Summary of Shared Water Challenges

- Combined Sewer Overflows (CSOs) - Frequent overflow events discharge untreated sewage into the James River during periods of heavy rainfall, resulting in serious public health risks and significant ecological degradation.
- Agricultural Pollution - Runoff containing fertilizers, pesticides, and sediments from agricultural activities contributes heavily to nutrient loading in waterways, leading to water quality deterioration and adverse impacts on aquatic ecosystems.
- Eutrophication in the Chesapeake Bay - Persistent nutrient enrichment has led to hypoxic conditions, large-scale fish mortality events, and long-term disruption of marine ecosystems, with cascading social and economic consequences.
- Coal Ash Pollution - Leachate and discharge from aging coal ash ponds introduce toxic substances such as arsenic, mercury, and lead into surface waters, threatening both environmental and human health.
- Flooding - Recurrent flooding events cause major infrastructure damage, economic losses, and increased community vulnerability, particularly as climate change amplifies the intensity and frequency of storms.
- Groundwater Depletion - Unsustainable groundwater extraction in Eastern Virginia has led to declining aquifer levels, jeopardizing long-term water availability for municipal, agricultural, and industrial uses.
- Land Subsidence - Subsidence due to aquifer compaction is increasing the risk of surface instability and exacerbating the effects of sea level rise, particularly in Virginia's coastal plain.
- Saltwater Intrusion - Declining groundwater levels are enabling the migration of saline water into freshwater aquifers, posing risks to drinking water supplies and irrigation viability.
- New Regulations on Groundwater Use - Anticipated regulatory reforms to address aquifer overuse may impose future restrictions on water withdrawals, potentially impacting large-scale water users across sectors.
- Drought - Although currently a lower concern, periodic droughts have the potential to impact water supply reliability, particularly under shifting climate patterns and increasing demand.
- Outdated Dams - A few legacy dams within the catchment impede aquatic species movement and pose safety hazards. While their impact is moderate, dam removal initiatives may offer ecological restoration benefits.

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Alliance for Water Stewardship (AWS)

Audit Number: AO-001457

0.1 General Requirements for Single Sites, Multi-Sites and Groups	
0.1.1	<i>Eligibility Criteria</i>
0.1.2	
0.1.2.1	<p><i>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.</i></p> <p>Comment Yes </p> <p>Yes</p> <p>Yes, during the audit, both the water inlet and discharge locations were visited as part of the site assessment process.</p> <ul style="list-style-type: none"> • Water Inlet Location: The audit team visited the facility's water intake point, which is connected to the municipal water distribution system operated by the City of Richmond. • Discharge Location: The audit also included an on-site visit to the primary discharge point, where treated effluent is released into the city wastewater treatment plant before discharging into James River.
0.1.1.1	<p><i>The site(s) occupy one catchment OR an exception has been granted.</i></p> <p>Comment Yes </p> <p>Yes</p> <p>James River Basin</p>
0.1.1.2	<p><i>The scope of the proposed certification shall be under the control of a single management system.</i></p> <p>Comment Yes </p> <p>Yes</p> <p>Yes, the scope of the proposed certification is managed under a single, unified management system that oversees all relevant water stewardship activities, responsibilities, and documentation across the site.</p>
0.1.1.3	<p><i>The scope of the proposed certification shall be homogeneous with respect to primary production system, water management, product or service range, and the main market structures.</i></p> <p>Comment Yes </p> <p>Yes</p> <p>system, water management approach, product and service range, and the main market structures.</p>

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Audit Number: AO-001457

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.



Comment

- Site Boundaries - The site boundaries are clearly defined, with a property area of 31 acres, containing six buildings totaling 324,405 square feet. The exact location and coordinates were provided.
- Water Sources (Owned or Managed by the Site or Parent Organization) - The James River is identified as the primary water source. The City of Richmond Department of Public Utilities (DPU) treats and supplies water to the site. The site does not own or manage any direct water sources, which is clearly stated.
- Water Service Provider and Ultimate Water Source - Water service is provided by City of Richmond DPU, which sources from the James River. This aligns with the requirement to identify the provider and ultimate source.
- Discharge Points and Wastewater Service Provider - The City of Richmond Wastewater Treatment Plant receives wastewater from the site. There has two discharge points: one on Sherwood Ave. and one on Brook Rd.
The site implements wastewater pre-treatment for pH adjustment before discharge, ensuring compliance with discharge limits. Additionally, the site operates within a Combined Sewer System (CSS), which has a significant impact during storm events. While the CSS and its effects on stormwater management are acknowledged, there is limited proactive monitoring or mitigation strategies in place to address overflow risks during heavy rainfall events.
- Catchments Impacted and Relied Upon - The site relies on and impacts the James River watershed. Additionally, its discharges affect the Chesapeake Bay watershed downstream, which is well noted. This meets the requirement to define the hydrological and environmental impact zones.

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** *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.
- in progress

Comment

- Stakeholder Identification Process - A stakeholder mapping exercise was conducted in a workshop setting, using input from site staff, corporate staff, consultants and desktop research. A comprehensive list of potential stakeholders was compiled, and care was taken to consider tribal groups, less vocal organizations, and under-represented people.
- Inclusivity of Stakeholder Groups - Stakeholders were prioritized based on interest and influence (as required). The documentation acknowledges the need to include tribal and under-represented groups, but evidence of direct consultation with these groups is not provided.
- Physical Scope Consideration - The stakeholder list includes those connected to the site's ultimate water source (James River) and the receiving water body (Chesapeake Bay watershed).
- Stakeholder Engagement Based on Interest and Influence - Stakeholders were prioritized using an interest-influence matrix and stakeholder Outreach Plan was developed for high-priority stakeholders.

The site has well-documented stakeholder mapping, prioritization, and planning for engagement. However, actual outreach and engagement efforts remain limited.

Finding No: TNR-017196

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

Comment

The site has developed a Stakeholder Prioritization Matrix, effectively categorizing stakeholders into Key Player, Involve, Consult, and Monitor groups based on their influence and engagement needs. However, specific justifications for stakeholder placement are not provided, reducing transparency in the prioritization process. Additionally, while stakeholders have been identified, actual outreach and engagement efforts remain limited.

- 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.*
- in progress

Comment

The site has an existing water-related incident response plan, which is reviewed every three years and was last re-certified on May 26, 2023. The site provided documentation through the Intelx portal (EHS ONE), which tracks responses to incidents, including a chemical spill event. Additionally, an event log for water-related and weather-related incidents is also maintained.

The response plan includes detailed procedures for:





- ☐ Fire/explosion response.
- ☐ Hazardous material/biological spills or leaks.
- ☐ Severe weather events and natural disasters (earthquakes, floods, storms).
- ☐ Other emergency scenarios specific to the site.

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1.3.2	<i>Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped</i>	
		in progress
Comment	<p>The site has identified and mapped key inflows, losses, and outflows as part of its water balance assessment. Municipal supply, wastewater discharge, and cooling losses are documented, and on-site storage is noted as minimal. The site assumes storage volume remains consistent and has incorporated wastewater flow to the City of Richmond Wastewater Treatment Plant.</p> <p>Water Balance Reflects 2022 Data to 2024 - The most recent available data is from 2022 to 2024, meaning changes in consumption, loss trends, or efficiency improvements.</p> <p>The site has mapped stormwater flows.</p>	
		<p>Finding No: TNR-017931</p> <p>Finding No: TNR-017279</p>
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>	
		Obs.
Comment	<p>The site has quantified its water balance, identifying inflows, outflows, and losses, as well as the assumed stable storage volume.</p> <p>Additionally, the site has included a historical water use chart tracking monthly inflows and outflows over time, demonstrating seasonal variations.</p>	
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 sources its water from the Richmond Department of Public Utilities (DPU), which draws from the James River. Water quality reports for 2022 and 2023 confirm no exceedances in provided water quality standards. Effluent from the site is pre-treated for pH adjustment before discharge into the City of Richmond's sewer system, which ultimately releases treated water into the James River.</p> <p>The site operates under an Industrial User Pretreatment Permit, valid until April 26, 2026. However, large-scale discharge water quality monitoring is not conducted on-site, as regulatory requirements do not mandate it for this facility. The site does conduct targeted water quality testing in sample areas, including comparisons between effluent and stormwater before discharge. The most recent available data extends to October 2022, and records for the last two years (2023 and 2024) are to be reviewed.</p> <p>The site conducts additional testing to assess effluent characteristics beyond pH (e.g., nutrient levels, heavy metals, COD/BOD).</p>	
		<p>Finding No: TNR-017192</p>
1.3.5	<i>Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.</i>	
		No
Comment	<p>The site has provided a map identifying potential pollution sources, including the solvent storage room and the fuel oil tank (referenced under Indicator 1.1.1). A list of chemicals used or stored on-site has also been documented.</p> <p>However, additional mapping of specific storage areas is required for completeness and compliance, particularly for the West Wing Building and flammable storage points.</p>	
		<p>Finding No: TNR-017193</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>	
		in progress

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Comment The site has identified and mapped a single on-site Important Water-Related Area (IWRA): a system of rain gardens engineered to capture and treat stormwater runoff from the parking lot. These features serve as key elements of the site's stormwater management strategy, contributing to improved water quality and runoff control.

The rain gardens are also reported to be certified by the Wildlife Habitat Council (WHC) and designated as conservation areas in good ecological standing. Supporting documentation and evidence were not provided.

Finding No: TNR-017194

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.* ✔
Yes

Comment The site has reported annual water-related costs and recognized economic, environmental, and social value generated through water stewardship efforts. However, the data provided is outdated (2022), and the term "water-related revenue" should be replaced with "economic value" to better reflect site contributions beyond direct financial revenue.

The site has identified and quantified annual water related costs, but not detailed out.

Economic savings have been quantified, reflecting the economic value and cultural value of water-related activities. Additionally, the site has provided a description of the social, cultural, and environmental water-related value generated by the site.

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

Comment The Haleon Richmond facility has adequate WASH provisions and is in compliance with local, state, and federal regulations, including OSHA standards for sanitation.

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

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

Comment The site has identified the embedded water use associated with its primary inputs—electricity and natural gas—and calculated the water footprint related to these energy sources, in terms of both quantity and not on water quality.

Finding No: TNR-017180

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

Comment Laundry for the Richmond facility is managed by third party vendor who is responsible for includes the washing of lab coats and uniforms. No concrete data is currently available on the embedded water use of this service.

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

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

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Comment At present, the site has identified several key Water Governance Initiatives, including: Virginia's Phase III Watershed Implementation Plan (WIP), James River Action Plan (2018) and American Shad Recovery Plan (2023). However, the current list does not fully reflect all relevant water governance efforts at regional and national levels. The site should update and expand this list to ensure alignment with Haleon's sustainability priorities.

The site has not actively participated in or contributed to any of the listed governance initiatives. There is no recorded engagement with governance bodies, nonprofits, or regulatory agencies leading these initiatives.

Finding No: TNR-017199

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


Yes

Comment The site has identified key federal, state, and local water-related regulatory requirements. Example Ground Water Act of 1992: Establishes groundwater withdrawal regulations for Groundwater Management Areas, including the Eastern Virginia Groundwater Management Area, where the Haleon Richmond facility is located. But doesn't elaborate the co relation if the site main source of water is not groundwater.

The site holds a wastewater permit valid until April 30, 2026 (referenced in Indicator 2.2.1).

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


in progress

Comment The site provides strong observational data on streamflow and groundwater, fulfilling part of the intent of Indicator 1.5.3. However, it does not yet constitute a full water balance

- Missing quantification of inflows (e.g., precipitation),
- Missing abstraction volumes or other outflows,
- No explicit use of the water balance equation.

Please refer the Richmond_Haleon_Standard_Conformity presentation (PPT) to check relevant physical evidence.

Finding No: TNR-017201

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


No

Comment The site does not explicitly quantify seasonal variations in water quality risks related to these challenges.
More granular seasonal water quality data should be incorporated, especially for E. Coli, nutrient pollution, and sediment loads—all of which are likely to fluctuate with weather patterns and storm events.

Finding No: TNR-017567
Finding No: TNR-017202

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 has mapped several key IWRAs, including the Chesapeake Bay, James River Estuary, Dutch Gap Conservation Area, James River National Wildlife Refuge, and Hog Island Wildlife Management Area. These areas are recognized for their ecological significance and are impacted by pollution sources such as coal ash storage, wastewater discharges, and industrial activities.

Finding No: TNR-017203

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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's water infrastructure relies on the James River for supply and effluent discharge, making it vulnerable to flooding. However the listed planned projects aim to enhance water storage, reduce CSOs, and improve potable water supply. But there is no assessment of extreme events beyond flooding, such as tornadoes, snowstorms, or earthquakes.


Site risk assessments should include multiple extreme weather scenarios (e.g., droughts, severe storms, water supply interruptions) to ensure infrastructure resilience and emergency preparedness.

Finding No: TNR-017204

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

Comment There are adequate WASH services available in the catchment area.


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.*  in progress

Comment The provided information meets the requirements of Indicator 1.6.1, which calls for identifying and prioritizing shared water challenges in the catchment. Challenges Identified - A list of water-related challenges affecting the catchment has been documented, covering both environmental and economic impacts. Like land subsidence, saltwater intrusion, drought risk and outdated dams restricting aquatic ecosystems and recreational use.

Prioritization Assigned - Each challenge is ranked on a priority scale from 1 (high) to 4 (low) based on its severity, urgency, and impact on water security. The most critical concerns include groundwater depletion and climate-related risks.


Finding No: TNR-017206

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

Comment The Richmond site has not yet engaged in any water-related initiatives within the James River or Chesapeake Bay watersheds. Strengthening compliance and alignment with regional water stewardship efforts would require active participation in relevant programs.

Finding No: TNR-017207

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.*  in progress

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Comment The assessment confirms that water risks have been identified and prioritized based on likelihood, severity, costs, and business impact. The analysis includes both site-specific risks and broader catchment risks linked to the James River watershed. A structured risk framework, including a risk heat map, has been utilized to assess potential impacts.

The site has assessed a range of water risks, including flooding, drought, groundwater depletion, and regulatory changes affecting water use. but does not capture the recent water cut off incident in January 2025.

The site has stated that flooding is not considered a material risk in the Richmond area. This assessment is supported by FEMA floodplain maps, which confirm that the site is located outside of designated flood risk zones.


Finding No: TNR-017932

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

Comment A range of water-related opportunities has been identified, primarily targeting groundwater depletion, saltwater intrusion, drought, and water pollution. These include infrastructure upgrades, conservation efforts, and efficiency improvements at the site and catchment levels.

Each opportunity is ranked from 1 (high priority) to 4 (low priority) based on potential impact and feasibility. High-priority actions include replacing chillers and cooling towers, employee education programs, and water efficiency projects.

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.*  **Yes**

Comment The site has listed sector-relevant best practices under the "Good Water Governance" heading in the "Best Practices" tab of the Excel document shared as evidence:"A designated plant water stewardship owner"

In the Guidance column, the duties of this person and the reasons for their assignment are explained.

In the Related Site Best Practice column, The site has described how this practice is implemented on-site. For example: "Wilfredo Santiago – designated owner of the Program"

Additionally, other governance-related practices (such as role and responsibility definitions, alignment with internal procedures, etc.) have also been listed and explained.

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**

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Comment	<p>The site has identified the following best practices: "Have a site-wide water balance", "Reassess and update the water balance regularly", "Integrate into metering system with SCADA", "Evaluate opportunities for water reuse or reduction", "Have equipment with low water consumption" and "Communicate performance internally".</p> <p>In the Related Site Best Practice column, the site has indicated which of these practices have been implemented, for example:</p> <p>"Monthly tracking of use through SCADA"</p> <p>"Completed water balance for the site"</p> <p>"Improved process water reuse"</p> <p>"New equipment requires EH&S approval for water efficiency"</p> <p>As a result, the site has met the requirements of indicator 1.8.2.</p> <p>It has documented good practices aligned with the sector regarding water balance and has linked and explained its internal practices related to these best practices.</p>	
1.8.3	<i>Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.</i>	 Yes
Comment	<p>The site has identified Best Practice and site-related best practices, such as given below:</p> <p>"Measure water quality data over time for trends."</p> <p>"Understand how discharges affect quality in the catchment."</p> <p>"Ensure compliance with regulatory discharge limits."</p> <p>"Apply international or company-specific standards where relevant."</p> <p>Related Site Best Practice:</p> <p>"Effluent quality is monitored and reported externally."</p> <p>"Data is reviewed by EHS team and submitted to the Environment Agency"</p> <p>"Internal audits are conducted for compliance."</p> <p>The site has fulfilled the requirements of this indicator. Water quality practices aligned with the sector have been identified (e.g., monitoring, regulatory compliance, adherence to standards, etc.).</p>	
1.8.4	<i>Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.</i>	 Yes
Comment	<p>The site has identified the best practice for IWRAs given below:</p> <p>Maintenance of on-site IWRAs in good condition</p> <p>Restoration of impaired on-site IWRAs</p> <p>Support maintenance of off-site IWRAs in good condition</p> <p>Support restoration of off-site IWRAs</p> <p>Also, the site has identified related site best practices in relation to them.</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>	 Yes
Comment	<p>WASH services are compliant with best practices. Employees Resources Groups donations (hygiene kit) to shelters. The details on donations to comply with WASH Indicator was verified.</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	<i>Commit to water stewardship by having the senior-most manager in charge of water at the site, or if necessary, a suitable individual within the organization head office, sign and publicly disclose a commitment to water stewardship, the implementation of the AWS Standard and achieving its five outcomes, and the allocation of required resources.</i>	
2.1.1	<i>A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:</i> <ul style="list-style-type: none"> - That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes - That the site implementation will be aligned to and in support of existing catchment sustainability plans - That the site's stakeholders will be engaged in an open and transparent way - That the site will allocate resources to implement the Standard. 	 in progress
Comment	-The auditor was able to find a signed site commitment to water stewardship, signed by the site leadership -The site indicates that the commitment is posted internally at the site as well as in a publicly accessible location. This was verified during the on-site audit and the commitment is not public disclosed.	
Finding No: TNR-017224		
2.2	<i>Develop and document a process to achieve and maintain legal and regulatory compliance.</i>	
2.2.1	<i>The system to maintain compliance obligations for water and wastewater management shall be identified, including:</i> <ul style="list-style-type: none"> - Identification of responsible persons/positions within facility organizational structure - Process for submissions to regulatory agencies. 	 Yes

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Comment	<ol style="list-style-type: none"> 1. Identification of Responsible Persons/Positions <ul style="list-style-type: none"> • The EHS & Risk Manager (David Gillespie, as per the permit) is the designated point of contact for wastewater compliance. • The Environmental, Health & Safety (EHS) Department at Haleon Richmond serves as the primary coordinator for wastewater and stormwater management. • Wilfredo Santiago is the designated owner of the Water Stewardship Program. • Jardiel Marrero represents the Plant Leadership Team in the Water Stewardship program. • The Site EHS Council, Laboratory Operations Committee, Health & Safety Inspection Committee, and Emergency Response Team contribute to compliance oversight. • Veolia Environmental Services (VES) is contracted for hazardous material spill response and environmental compliance services. 2. Wastewater and Stormwater Compliance Measures <ul style="list-style-type: none"> • Wastewater Permit Compliance: Compliances as per City of Richmond Department of Public Utilities. • Stormwater Management: The site does not hold a separate stormwater permit due to the combined stormwater-wastewater system in Richmond. Nonetheless, it implements best practices to prevent stormwater contamination. 3. Compliance Monitoring & Audits <ul style="list-style-type: none"> • Internal Inspections: The Health & Safety Inspection Team and Leadership Gembas conduct regular compliance checks. 4. Corrective Actions & Training: <ul style="list-style-type: none"> • Employees are routinely trained on wastewater management, hazardous waste disposal, and spill response. • Violations or repeated non-compliance trigger additional training or corrective measures. 	
2.3	<i>Create a water stewardship strategy and plan including addressing risks (to and from the site), shared catchment water challenges, and opportunities.</i>	
2.3.1	<i>A water stewardship strategy shall be identified that defines the overarching mission, vision, and goals of the organization towards good water stewardship in line with this AWS Standard.</i>	 Yes
Comment	The site presented a water stewardship strategy in line with the AWS Standard.	
2.3.2	<i>A water stewardship plan shall be identified, including for each target:</i> <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. 	 closed

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Comment The site has presented its Water Stewardship Plan including targets linked with the 5 AWS outcomes. The plan includes for each target:

- How actions will be measured and monitored
- Actions and description
- Planned timeframes to achieve actions/targets
- Financial budgets allocated for actions to be updated and this is not comprehensive
- Positions of persons responsible for action
- The link between each action and the achievement of best practice to help address shared water challenges is very vague and this require clarification with definite action


However, following gaps were found.

- The plan has several elements missing namely, SMART targets, baseline evaluation and monitoring matrixes.
- No direct reference to external stakeholder engagement or collaboration with regulators, conservation groups, or catchment authorities.
- IWRA target needs to be update on the WSP.
- Add a WASH stewardship plan to support continued support to provide WASH to their employees.
- The current plan does not have in indirect water indirect water use targets set in the water stewardship plan.

Finding No: TNR-017283

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.*

 in progress

Comment The absence of a stakeholder engagement plan and the failure to acknowledge shared water risks and challenges in collaboration with stakeholders hinder the site's ability to identify a comprehensive set of site and catchment-related risks. Consequently, the site is unable to develop a robust risk response plan.

To address this, the site will engage with key public sector and infrastructure agencies, including the Richmond Department of Public Utilities and the Virginia Department of Environmental Quality. Insights from these discussions will inform the development of a well-rounded stakeholder engagement plan and risk plan.

Finding No: TNR-017230

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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. in progress
Comment	<p>The site has submitted a range of actions from its Water Stewardship Plan; however, all of these are focused on internal, facility-level water efficiency measures. These include initiatives such as implementing flow metering to improve internal water balance tracking, replacing ornamental plants with native, drought-tolerant species, and planned upgrades to cooling towers and chillers. Additionally, the site has set a target to reduce water consumption per employee by 20% by 2029 and is in the process of installing a new USP/DI water system.</p> <p>While these efforts are commendable from an operational sustainability standpoint, they do not demonstrate any support for or contribution to good catchment-level water governance.</p> <p style="text-align: right;">Finding No: TNR-017233</p>
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	The site ensures compliance with human rights by complying all the water related laws/regulations.
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	<ul style="list-style-type: none"> Monitoring & Reporting: The site provided evidence of monitoring for all required wastewater parameters (e.g., Arsenic, Lead, Mercury, BOD, COD) in 2023-2024. The status of discharge meter installation to be implemented. Regulatory Submissions: The site provide copies of quarterly reports submitted to the City of Richmond in Q1 2024. Spill Response & Pollution Prevention: The site conducted spill response drills in 2023-2024. The spills kits are placed along the site. The required measures are in place to ensure contractors comply with spill reporting requirements. The site also provides incident logs or reports for any spills or noncompliance issues in the past 12 months. Water Stewardship & Improvement Plans: The Water Stewardship Plan been updated or reviewed since its initial creation. The team meets quarterly review it and update it. But the updates are more ad hoc. Steps have been taken to address water efficiency improvements and water reuse/recycling assessments. Training & Awareness: Two employees have undergone AWS Standard training in 2023-2024. The site ensure that all new employees and contractors are trained in wastewater compliance. Its part of the site induction program - basically onboarding of the new employees.
3.2.2	Where water rights are part of legal and regulatory requirements, measures identified to respect the water rights of others including Indigenous peoples, shall be implemented. Yes
Comment	There are water rights regulated by the Virginia Department of Environmental Quality (VDEQ), but in this instance, the program focuses on surface water withdrawals from onsite or adjacent sources. The site never investigated these regulations or requirements, as the site source all water through the municipality.
3.3	Implement plan to achieve site water balance targets.

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3.3.1	<i>Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.</i>	 in progress
Comment	<ul style="list-style-type: none"> Flow Metering on Site – The initiative yet to be implemented. Absence of a data-driven approach to water balance assessment. No SMART target to measure success. Replacement of Ornamental Plants with Native, Drought-Tolerant Species - Initiative has started, and discussions with landscapers are ongoing. No formal implementation plan for full-scale transition. There is no tracking mechanism to measure water savings achieved from reduced irrigation. No SMART target for reducing irrigation water use. Water Conservation & Efficiency Improvements - Cooling Tower Replacement. Initial assessment has begun with an engineering study purchase order. The project is in the early assessment phase, with no clear schedule for execution, installation, or impact measurement. No specific water savings goal. Absence of baseline indicators and post implementation monitoring. Chiller Replacement - The initiative to replace chillers with more water-efficient units yet to start. There is no measurement system in place to ensure it contributes to site water balance targets. No baseline water consumption assessment for chillers. Conduct a baseline water usage study before replacement to quantify the expected water savings. Set SMART target to achieve a 5% reduction in water use. Reducing Water Consumption Per Employee by 20%. No progress has been made, and the initiative yet to start. No accountability mechanism for tracking water reduction per employee. No SMART target to achieve 20% reduction by 2029. Decommissioning of Old USP/DI Water Systems - Previous USP/DI system decommissioning has been completed, reducing unnecessary water consumption. No data on the total water savings achieved. The project does not report how much water use was reduced after decommissioning. Installation of New USP/DI Water System - New system installation is 90% complete, with final qualification underway. No performance tracking mechanism to evaluate water balance impact. There is no established tracking system to determine whether the new system is operating at optimal efficiency. No clear target for water reduction and no SMART target for reducing DI/USP water consumption. 	
	Finding No: TNR-017234	
3.3.2	<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>	 Yes
Comment	The site has not established significant water scarcity targets but is in the process of defining them and setting a timeline for implementation. Additionally, when asked, the site did not identify water scarcity as a significant challenge.	
3.3.3	<i>Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.</i>	 Yes
Comment	The site sources its water supply directly from the city authority and does not have any mechanisms in place to reallocate water to third parties, including social, cultural, or environmental initiatives. Since the site does not manage or control independent water sources, it does not participate in any direct water-sharing or redistribution programs.	
3.4	<i>Implement plan to achieve site water quality targets</i>	
3.4.1	<i>Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.</i>	 Yes

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Comment	<p>PiE Assessment – The annual PiE assessment has been completed, with results documented and held by the EHS department. This contributes to increased visibility of Active Pharmaceutical Ingredients (API) in discharge and supports compliance with regulatory requirements.</p> <p>Environmental Compliance Calendar - The compliance calendar has been developed and implemented, ensuring that environmental activities, including water quality-related tasks, are scheduled and tracked annually.</p>	
3.4.2	<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>	 Yes
Comment	Water Garden - Replace some sections of grass and water-consuming ornamental plants with native, drought-tolerant plants. 2024 Waste Water permit reviewed.	
3.5	<i>Implement plan to maintain or improve the site's and/or catchment's Important Water-Related Areas.</i>	
3.5.1	<i>Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.</i>	 in progress
Comment	<p>Rainwater has been identified as the most important Important Water-Related Area (IWRA) at the site, particularly for its role in supporting IWRA. The site has established a vegetable garden as part of its water stewardship and community engagement efforts, supporting local water-related values through sustainable land use and contributing to shared benefits with local stakeholders.</p> <p>The Wildlife Habitat Committee is responsible for overseeing IWRA management, but no evidence was provided to demonstrate the implementation of stewardship practices. This constitutes a minor non-conformity, as there is no documented proof of active measures taken to maintain or enhance the IWRA.</p>	
Finding No: TNR-017239		
3.6	<i>Implement plan to provide access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers at all premises under the site's control.</i>	
3.6.1	<i>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.</i>	 Yes
Comment	The site continues to provide the WASH facilities for their employees.	
3.6.2	<i>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.</i>	 Yes
Comment	<p>The site does not have direct withdrawal from source water bodies and does not discharge wastewater directly to water bodies, and thus is not impinging on the human right to safe water and sanitation of communities.</p> <p>The site adheres to all relevant water-related laws and regulations. Several measures implemented by the site have a direct positive impact on water quality, enhancing the reliability of water supply for other users within the catchment area. Additionally, the site has established several water quality practices (refer to indicator 2.3.2).</p>	
3.7	<i>Implement plan to maintain or improve indirect water use within the catchment:</i>	

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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 has not yet identified or quantified its indirect water use as required by the water stewardship plan.

The site has effectively identified and quantified its primary sources of indirect water use, specifically electricity and natural gas. Despite the strong identification and quantification work, several critical elements required for full conformity remain unaddressed: There is no evidence of active engagement with key suppliers to encourage reductions in embedded water use or improve water efficiency practices. No specific targets, strategies, or procurement criteria have been established to address or influence the site's indirect water impacts. The site has not documented any dialogue with suppliers nor incorporated water-related performance considerations into supplier management or procurement processes. The site's broader sustainability target-setting process is underway (first meeting August 1, 2024), but it's still in very early stages and not specifically focused yet on catchment-level indirect water use.


Finding No: TNR-017240

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.*  in progress

Comment The site has not yet demonstrated structured engagement with external stakeholders—particularly suppliers—on reducing indirect water use. While internal water stewardship efforts are underway, there is currently no program or documented outreach to encourage suppliers to assess or improve their water efficiency practices. This represents a gap in advancing broader value chain water stewardship and limits opportunities to drive reductions in indirect water use.

Finding No: TNR-017241


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.*  in progress

Comment Due to the absence of a structured stakeholder engagement framework, the site has not identified any shared water-related infrastructure concerns. As a result, the site has neither implemented nor participated in any related initiatives. Additionally, there is no documented evidence of engagement or actions taken in this area.

Finding No: TNR-017242





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.*  Obs.

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Comment	<p>The site has identified "A designated plant water stewardship owner" as a water-governance best practice. As a reflection of this best practice, the facility has defined the position and appointed an individual (Wilfredo Santiago – designated owner of the Program).</p> <p>However, no document or evidence is provided regarding key details such as the scope of this person's authority, how their responsibilities are implemented, when and how the implementation began, review mechanisms, or integration into internal communication and governance processes.</p> <p>In other words, while the practice appears to have been initiated, the scope and impact of its implementation remain unclear.</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>Under the Water Balance section in the "Best Practices" tab, the facility has indicated the implementation of the following practices:</p> <p>Monthly monitoring through the SCADA system</p> <p>Site water balance has been calculated</p> <p>Improvements have been made in process water reuse</p> <p>A water efficiency evaluation process has been defined for the purchase of new equipment</p>	
3.9.3	<i>Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.</i>	 Obs.
Comment	<p>The site has implemented several actions in line with best practices for water quality management, including regular monitoring of effluent, internal audits, and external reporting to the Environment Agency. While these practices reflect a strong compliance framework, it is not clearly demonstrated how these actions are linked to specific water quality improvement targets. Establishing or referencing clear performance targets could further enhance alignment with best practice expectations.</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>	 closed
Comment	<p>Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas to be implemented.</p> <p style="text-align: right;">Finding No: TNR-017245</p>	
3.9.5	<i>Actions towards achieving best practice related to targets in terms of WASH shall be implemented.</i>	 Yes
Comment	<p>Feminine hygiene products available in every Women's bathroom and Employee Resource Group provided donations (hygiene kit) to shelters.</p>	



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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>The site has not evaluated the performance of implemented actions against the targets set in its Water Stewardship Plan, nor assessed their contribution to the intended outcomes. As a result, no documentation or actions were presented during the audit to demonstrate conformity with the indicator.</p> <p>However, the site has established a quarterly review meeting to track progress against the WSP, including the evaluation of the performance. but the first meeting is yet to be conducted.</p> <p style="text-align: right;">Finding No: TNR-017178</p>	
4.1.2	<i>Value creation resulting from the water stewardship plan shall be evaluated.</i>	 in progress
Comment	<p>The site has not evaluated the performance of implemented actions against targets in the site's water stewardship plan, neither has evaluated the contribution to achieving water stewardship outcomes.</p> <p style="text-align: right;">Finding No: TNR-017179</p>	
4.1.3	<i>The shared value benefits in the catchment shall be identified and where applicable, quantified.</i>	 in progress
Comment	<p>The share value indicator for the catchment is very generic and this need to be evaluated to identify more quantifiable indicators and track evaluate creation in terms of water conservation/ water balance/ water quality etc. or cost.</p> <p>The some initiatives the share value creation is more relevant to site versus catchment.</p> <p style="text-align: right;">Finding No: TNR-017270</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>	 Obs.
Comment	<p>The site maintains an annual review process and has a documented emergency response manual in place. Emergency events for 2024 and Q1 2025 have not yet been formally tracked.</p> <p>The EHS One platform has the functionality to capture emergency-related data. It is capable of recording evaluations of listed emergency events along with associated preventative, corrective, and mitigation actions.</p> <p>The January 2025 water supply disruption has been identified as a recent emergency event but has not yet been mapped within the system.</p>	





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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
Comment	As the actions and targets are still in progress, the site has not yet evaluated its performance against targets in the water stewardship plan. Therefore, while consultation efforts on the site's water stewardship plan has been identified (refer to indicator 5.2.1), consultation efforts with stakeholders on the site's water stewardship performance has not been identified. Finding No: TNR-017271	
4.4	<i>Evaluate and update the site's water stewardship plan, incorporating the information obtained from the evaluation process in the context of continual improvement.</i>	
4.4.1	<i>The site's water stewardship plan shall be modified and adapted to incorporate any relevant information and lessons learned from the evaluations in this step and these changes shall be identified.</i>	 in progress
Comment	To be discussed in the upcoming quarterly review meeting in April 2025. The site has established a procedure to modify and adapt the water stewardship plan, as referenced in indicator 4.1.1, following the completion of evaluations. However, the evaluation of the plan has not yet been conducted. The site's water stewardship plan to be modified and adapted to incorporate any relevant information and lessons learned from the evaluations in this step and these changes have not been identified. Finding No: TNR-017272	

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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. in progress 
Comment	<p>Clear Responsibility & Accountability Established: Responsibility for water-related actions is formally assigned to the Tech Ops Manager and EHS Manager, covering oversight of site-level water use, compliance, and implementation of water initiatives. However, these responsibilities are not publicly disclosed or published in external documents or sustainability reports.</p> <p>Regulatory Compliance Oversight: The EHS Manager is accountable for ensuring compliance with all applicable water-related laws and regulations. This responsibility, while defined internally, is not externally communicated or transparently reported at present.</p> <p style="text-align: right;">Finding No: TNR-017172</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. in progress 
Comment	<p>The Haleon team indicated that a stakeholder handout was shared in July 2024 as part of their WSP communication efforts. However, the handout provided during the audit does not include specific details of the Water Stewardship Plan.</p> <p>The current handout lacks content outlining the WSP. Additional documentation or updates are needed to demonstrate that stakeholders were adequately informed of the WSP's objectives, actions, or commitments.</p> <p style="text-align: right;">Finding No: TNR-017173</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	<p>At the time of the audit, the site had not established a formal system to track progress against its water stewardship initiatives or associated performance targets. As a result, there was no quantified data available. Going forward, the site is encouraged to implement a structured monitoring and reporting framework to regularly assess initiative outcomes, track progress toward defined targets, and enable annual performance disclosure in line with AWS requirements.</p> <p style="text-align: right;">Finding No: TNR-017174</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 

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Comment The stakeholder handout partially outlined shared water challenges but lacked specific detail and did not disclose the site's efforts to address them. Enhanced transparency and inclusion of mitigation actions are needed in future communications.

Finding No: TNR-017175

5.4.2 *Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.*

Q
Obs.

Comment There is currently no efforts to collectively address shared water challenges and no coordination with public sector agencies, so nothing to disclose yet.

5.5 *Communicate transparency in water-related compliance: make any site water-related compliance violations available upon request as well as any corrective actions the site has taken to prevent future occurrences.*

5.5.1 *Any site water-related compliance violations and associated corrections shall be disclosed.*

✓
Yes

Comment The audit team reviewed the 2023 CDP report and did not identify any water-related violations. The Haleon team also confirmed that the 2024 CDP submission includes no such violations; however, it has not yet been published.

5.5.2 *Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.*

✓
Yes

Comment According to the CDP submissions for 2023 and 2024, no regulatory violations related to water were reported, and no corrective actions were required.

5.5.3 *Any site water-related violation that may pose significant risk and threat to human or ecosystem health shall be immediately communicated to relevant public agencies and disclosed.*

✓
Yes

Comment As per the CDP reports, there were no reported regulatory violations related to water for both 2023 and 2024. No formal communication or public disclosure of violations has been made.

Photographic Evidence from Audit

✓
Yes

Comment NA

Previous Findings

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

↓
N/A

Comment NA