

### **Alliance for Water Stewardship (AWS)**

Audit Number: AO-001644

#### SITE DETAILS

Site: Coca-Cola CPS Liberia

Address: Coca-Cola industrias, Solarium, Guanacaste, 50101, Liberia, COSTA RICA

Contact Person: Leonardo Vargas AWS Reference Number: AWS-000696

Site Structure: Single Site

#### **CERTIFICATION DETAILS**

Certification status: Certified Core

Date of certification decision: 2025-Sep-04

Validity of certificate: 2028-Sep-03

#### **AUDIT DETAILS**

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

Audit Type(s): Initial Audit Audit Start Date: 2025-Jul-02 Audit End Date: 2025-Jul-04 Lead Auditor: Claudia M. Jaime

Audit team participants:

Claudia M. Jaime, Lead Auditor

#### Site Participants:

Haidemily D Baez de Moraes, Assistant Manager - Quality Leonardo Vargas Martínez, Area Sustainability Manager Juan Carlos Mora, Maintenance Lead Stefanny Castro, Sustainability Analyst Natasha Ayub, QSE Director Natalia Arguedas, Quality Analyst Kattiana Bustamante, External Hidrologist Catalina Hidalgo, CDG Advisor



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#### **ADDITIONAL INFO**

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

The Client is requested to submit a root cause analysis and corrective actions for each of the non-conformities to WSAS within 7 days of receipt of the audit report, by 19/08/2025.

The non-conformities must be closed within 90 days of the end of the audit. In order to meet this timeline evidence is to be submitted to WSAS (within 75 days) 18/09/2025.

The audit team recommends certification of Coca-Cola CPS Liberia, Costa Rica at Core level pending closure of the non-conformities.

CLOSURE OF FINDINGS AND CORRECTIVE ACTION PLAN:

The Site has successfully closed all Non-conformities.

Scope of Assessment: The scope of services covers the Initial certification audit for assessing conformity of Coca-Cola CPS Liberia, Costa Rica against the AWS International Water Stewardship Standard Version 2.

The CPS Liberia plant is located in Llano Grande, in the central district of the first canton of Liberia, in the province of Guanacaste, Costa Rica next to Liberia Airport. The area where the plant is located is regionally known as the Northern Pacific. and The CPS Liberia plant has two production lines (dry parts and liquid parts), with an annual production of approximately 22,739.63 metric tons for both lines. The CPS Liberia water source is groundwater, currently extracted from two wells in operation, each 100 m deep. They are owned by the Solarium Condominium and are not directly managed by the plant. In addition, there is a third well, considered a backup and also duly authorized for use. These wells extract water from a fractured volcanic aquifer known as the Bagaces Aquifer System.

The audit was conducted onsite on 2-4 July 2025.

The onsite site visit included the assessment of supplies warehouse, chemicals, pre-consumption water treatment and wastewater treatment plant and visit to the creek matapalos that were visited onsite as part of the audit.

#### **FINDINGS**

**NUMBER OF FINDINGS PER LEVEL** 

Observation 3 Non-Conformity 3



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#### **FINDING DETAILS**

Finding No: TNR-018662

Checklist Item No: 1.5.5 Status: Open

Finding level: Observation

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.

The Site should assess the status of the Liberia River and confirm its Findings:

current condition.

Finding No: TNR-019188

Checklist Item No: 1.5.7 Status: Closed

Finding level: Non-Conformity Due date: 2025-Oct-03

Checklist item: The adequacy of available WASH services within the catchment shall be

identified.

Findings: There is a report on faecal pollution in Liberia Riber but sufficient

information on WASH services in the cantons that make up the Liberia

sub-catchment has not been provided.

Identified and highlight within the uploaded documents to WSAS the Corrective action:

required information on the 1.5.7 section.

Evidence of implementation: In the following document on page number 3 the table depicts the

information about WASH coverage per canton in the watershed.

Finding No: TNR-019355

Checklist Item No: 1.6.2 Status: Closed

Non-Conformity Finding level: Due date: 2025-Oct-03

Checklist item: Initiatives to address shared water challenges shall be identified. Findings:

The Site has not identified initiatives to address the shared water

challenges mentioned in 1.6.1.

Corrective action: Conduct a thorough review of the documentation related to the initiatives

implemented to address shared water-related challenges

Evidence of implementation: 4 initiatives related to the water challenges were upload. These shared

water challenges are covering topics such as water governance, water infrastructure and water pollution. At this moment a shared water

challenge related to lack of water was not identified.

# WSAS WATER STEWARDSHIP ASSURANCE SERVICES

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Finding No: TNR-018653

Checklist Item No: 2.3.2 Status: Closed

Finding level: Non-Conformity

Due date: 2025-Oct-03

Checklist item: A water stewardship plan shall be identified, including for each target:

- How it will be measured and monitored

- Actions to achieve and maintain (or exceed) it

Planned timeframes to achieve itFinancial 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: There are a few gaps in the site's water stewardship plan:

(a) it is not always clear how the site will monitor and measure the

argets;

(b) for some actions, the budget has not been broken down by action;

(c) the link to the 5 AWS outcomes is unclear.

Corrective action: Review the existing AWS plan to identify potential deviations in its

structure and reorganize the available information, as well as

incorporate missing information, strictly aligning with the guidance and

sequence outlined in the reference guide.

Evidence of implementation: A new water management plan was created with the observations based

on the AWS Standard. Budget is broken down per action and also it is within the active year. Every action is related to an AWS challenge.

Finding No: TNR-018661

Checklist Item No: 3.4.1
Status: Open

Finding level: Observation

Checklist item: Status of progress towards meeting water quality targets set in the water

stewardship plan shall be identified.

Findings: The site should update to reflect progress towards its WSP objectives

and should present the percentage of progress towards the targets set

in its WSP on water quality, including evidence.

Finding No: TNR-018660

Checklist Item No: 5.1.1
Status: Open

Finding level: Observation

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 should demonstrate that it has disseminated the internal

governance of the site to the public.

#### WSAS



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Report Details		
Report	Value	
Report prepared by	Claudia M. Jaime	
Report approved by	Ozge GOKMEN	
Report approved on (Date)	12/08/2025	
Surveillance		

#### Proposed date for next audit

2026-Jul-06

#### **Stakeholder Announcements**

Date of publication		Location
04/05/2025		Noticias trivision (Facebook)
04/05/2025		Radio pampa (facebook)
Comment	The evidence was presented during the audit	

#### **Catchment Information**

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The Site is settled at the Liberia River Sub-basin.

Supplied by the Liberia River Sub-basin. No wastewater discharge; 100% treated and reused.

Water extracted from the fractured volcanic Bagaces Aquifer System (Middle Bagaces, Upper Bagaces, Liberia Formation). It is confined, formed in sedimentary deposits and recharged by rivers and permeable soils.

Water supplied by Solárium from wells CN-545 and CN-558. Stored in tanks near CPS Liberia. CPS has its own WWTPs. Treated water is reused; rainwater flows to Quebrada Matapalo.

Located in a low-rainfall region. High water demand due to tourism, agriculture, real estate. Vulnerable to extreme rainfall and localized flooding. CPS Liberia is not in a flood-risk area. 2.6% protected area. Land use: crops 35.5%, trees 23%, pasture 21%, urban < 1%. No inter-basin transfers. Water use: 55% domestic, 37% irrigation, 4% tourism, etc.



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Mapa Sub Cuenca Río Liberia.png

Comment The Site is located at he Liberia River Sub-basin

#### **Client Description and Site Details**

#### Client/Site Background

The Site primarily uses potable water supplied by SOLARIUM for both industrial and ordinary purposes such as restrooms, cafeteria, and gym. The raw water intake is approximately 303 m³/day used for deionized water production, cleaning and sanitization, emergency systems, wastewater treatment, HVAC systems, kitchen hygiene, laboratory operations, etc. Treated wastewater is reused for irrigation (approx. 125 m³/day) and in cooling towers (approx. 143 m³/day).

Water related infratsructure: Water from wells CN-545 and CN-558 is stored in two 800 m³ tanks. CPS Liberia has domestic and industrial WWTPs. Rainwater is directed to the nearest natural drainage. Infrastructure includes water storage tanks and internal distribution networks. Domestic WWTP effluent is stored for irrigation. Industrial WWTP effluent is reused in cooling towers. Rainwater is conveyed to Quebrada Matapalo.



#### 1.1.1 Mapa CPS Liberia.png

Comment

The site primarily uses potable water supplied by SOLARIUM for both industrial and ordinary purposes such as restrooms, cafeteria, and gym. The raw water intake is approximately 303 m³/day used for deionized water production, cleaning and sanitization, emergency systems, wastewater treatment, HVAC systems, kitchen hygiene, laboratory operations, etc. Treated wastewater is reused for irrigation (approx. 125 m³/day) and in cooling towers (approx. 143 m³/day).



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#### **Summary of Shared Water Challenges**

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The Site has included a list of shared water challenges in its WSP: Water scarcity Lack of infrastructure Water pollution



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#### STEP 1: GATHER AND UNDERSTAND

1.1 Gather information to define the site's physical scope for water stewardship purposes, including: its operational boundaries; the water sources from which the site draws; the locations to which the site returns its discharges; and the catchment(s) that the site affect(s) and upon which it is reliant.

**1.1.1** The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including:



- Site boundaries;
- Water-related infrastructure, including piping network, owned or managed by the site or its parent organization;
- Any water sources providing water to the site that are owned or managed by the site or its parent organization;
- Water service provider (if applicable) and its ultimate water source;
- Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies;
- Catchment(s) that the site affect(s) and is reliant upon for water.

Comment

- The Site has included a Map of the Site's boundaries;
- The Site presented a Map of the Water-related infrastructure, including piping network.
- The Site has included a Map of the Wates sources of the Site.
- The Site is zero discharge.
- The Site has included a Map of the Site's Catchment.
- 1.2 Understand relevant stakeholders, their water related challenges, and the site's ability to influence beyond its boundaries.
- **1.2.1** Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall:



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

Comment

The Site has identified a list of 24 stakeholders, including: government authorities, NGOs, academia, water operators, the Solarium group, business chambers, Indigenous Sector, Private Sector Companies, Business Chambers Federations, Community Water League and Unions of ASADAS (neighbouring communities) among others.

The selection of stakeholder consider the physical scope
The Site has consulted with stakeholders to identify shared water challenges in the
catchment. Including were authorities from the municipalities, Neighbours, Leaders of the
Asadas (communities), Members of the industrial park, among others.

The Site has presented a matrix in which it has evaluated the power and interest of the stakeholders involved with the Site. These are divided into four categories: Keep satisfied, manage carefully, monitor, and keep informed. Once this evaluation was completed, the key stakeholders were identified, comprising a group of seven members.

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1.2.2 Current and potential degree of influence between site and stakeholder

shall be identified, within the catchment and considering the site's ultimate water source and ultimate receiving water body for wastewater.

Yes

Comment The Site has presented a matrix in which it has evaluated the power and interest of

stakeholders involved with the Site.

See Informe SVA (1.2.1)

1.3 Gather water-related data for the site, including: water balance; water

quality, Important Water-Related Areas, water governance, WASH;

water-related costs, revenues, and shared value creation.

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

Yes

Comment The Site has identified the current response plans for water-related incidents.

The Site has provided procedure PROC-04813 CPS Liberia Emergency Plan, which includes the Procedure in case of Water Leakage, Flooding (p. 56), Procedure in case of Flooding (p. 63), Procedure in case of heavy rain (p. 64), Procedure in case of earthquake (p. 67), Procedure in case of thunderstorm (p. 68), Procedure in case of tornado and hurricane (p. 68), and Procedure in case of work near bodies of water (p. 69).

The site has attached evidence of training in the use and handling of hazardous materials (31

August 2024) and the spill kit inspection log (2024).

As well as some images of spill kits and chemical use training list.

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



be identified and mapped

The Site presents as evidence presentation 1.3.2 workshop February 2024, which includes a process flow diagram on the third slide.

and low variances shall be quantified.

It indicates the inputs, the processes where water is used, the additives that are applied, the reject water, the purification systems, the water storage, and the different types of

manufacturing.

Additional slides describe in detail the treatment process for both industrial and sanitary wastewater, highlighting that the site has no discharges outside its facilities and that all water

The image 'Water Balance 2024 IH' shows the entire system with inputs, outputs, storage, losses, production process flows, product output, and water reuse systems.

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



Comment

Comment

The Site presents as evidence the image '1.3.3 Coca Cola water balance 2024'.

The volumes of water entering the system, those stored, those used in production processes, those reaching the industrial WWTP and the sanitary WWTP, and the volumes used for irrigation.

Image 1.3.3 WUR trend describes the variation in water use/production (WUR) throughout 2024.

mage 1.3.3 Sustainability indicators Sept 24 shows the variation in water consumption at the

1.3.4 Water quality of the site's water source(s), provided waters, effluent and

receiving water bodies shall be quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be quantified.



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#### Comment

The Site has quantified water quality analysis results:

Wastewater analysis 2023, which analyses the following parameters; pH. BOD, COD, TSS, SSED, fats and oils, SAAM, nematodes, coliforms, DO, residual chlorine, colour, total nitrogen, ammonia, phosphorus.

It has also submitted the results of the accredited laboratory's analysis for 2023. For the analysis of its wells, it has submitted results for 2024 from another accredited

During the Site audit the Site showed the information on the water quality monitoring results for the year 2024 and the information collected in 2025.

In addition, the results of soil sampling analyses are attached.

The Site conducts annual water quality analyses of physical, chemical, and organic

Water measurements for processes

Some daily parameters:

hardness, chlorine, and microbiological parameters. And some other parameters that are measured biweekly, monthly, or annually.

The site displays the results of its analyses carried out by an accredited laboratory. Some analyses are carried out in a laboratory in Costa Rica and others are sent to Europe.

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



#### Comment

The Site has provided the 'CPS Liberia hazard matrix' indicating the degree of corrosivity, toxicity, explosiveness, among others. In addition, a table listing the hazards and storage conditions (including products stored in cold and frozen warehouses) has been provided. They have also provided the products stored in their PTAR warehouse.

The Site has provided a copy of the procedures for hazard control and communication and for handling flammable liquids. It has also provided the procedure for spill prevention and control.

The Site's requirements for rainwater management have also been included.

It is recommended that sources of contamination, their nature and risks, together with the vulnerability of water bodies, be tabulated and mapped.

SOP Spill prevention (diagram)

During the tour of the site, it was observed that the site has procedures in place for the handling and storage of chemicals.

On-site Important Water-Related Areas shall be identified and mapped, 1.3.6

including a description of their status including Indigenous cultural

values.



Yes

#### Comment

The Site has not identified any IWRAs on Site.

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.

indirect costs, and operating costs.

The Site has identified water-related costs, including: extraction, treatment, distribution, use,

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



#### Comment

Comment

The Site has identified the WASH services provided to its workers, including:

toilets (male and female)

urinals

handwashing stations

showers

as well as water dispensers.

This was verified during the tour of the site and interviews with workers.



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**1.4** Gather data on the site's indirect water use, including: its primary inputs;

the water use embedded in the production of those primary inputs the status of the waters at the origin of the inputs (where they can be identified); and water used in out-sourced water-related services.

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

Yes

Comment The site has no primary inputs produced in the catchment.

During the on-site audit, we were shown on screen the identification of primary inputs that are

not produced in the same catchment.

1.4.2 The embedded water use of outsourced services shall be identified, and

where those services originate within the site's catchment, quantified.

Yes

Comment The water used by outsourced services is identified. In this case, the only service used is

laundry.

The Site has quantified 5,706.1 gallons of water per 40 kg of uniforms washed at the Site.

**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

Yes

water stewardship collective action.

Comment The Site has identified the following public policies related to water: the CPS Liberia Water

Management Plan, the Guanacaste Water Plan, and governance issues involving civil society

actors and other entities.

In addition, the Site has analysed the objectives of the aforementioned governance instruments in order to identify apportunities for collective action

instruments in order to identify opportunities for collective action.

The Site has also analysed the institutional framework for water governance in Costa Rica, including the National Water Policy, the National Water Plan, the Water Management Plan of the CPS, the Water Management Plan of the Guanacaste Water Zone, and the Water

Management Plan of the Guanacaste Water Zone.

The Site has also analysed the institutional framework for water governance in Costa Rica, including the National Water Policy, the National Water Plan, the Water Management Plan of the CPS, the Water Management Plan of the Guanacaste Water Zone, and the Water

Management Plan of the Guanacaste Water Zone.

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 obtained a construction permit for a water treatment system, concession permits

for three wells, two permits for the location of treatment plants (ordinary) and industrial

wastewater treatment plants

They also attach Water Law No. 276 Declaration of legal compliance of the Site

1.5.3 The catchment water-balance, and where applicable, scarcity, shall be

quantified, including indication of annual, and where appropriate,

seasonal, variance.

**⊘** Yes

Comment The Site has estimated the water balance of the Liberia River sub-basin and has estimated a positive balance. The annual balance is interpreted as positive (5636.12 hm3/year) and

monthly supply exceeds demand (water potential). Even so, they have presented the annual

variation.

see document attached 1.5.3 catchment balance

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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.



Comment

The website has posted information on water quality in the catchment; however, the last water quality monitoring was done in 2021. There is no ongoing monitoring programme.

In interviews with stakeholders, they mention water quality as a shared challenge and the lack of a drainage network in the communities.

The Site mentions that water quality samples are taken from wells in the Solarium complex for monitoring purposes; however, there is no correlation with the water quality of the Liberia River.

The Liberia River has high faecal contamination, with average values of 1,020 to 88,421 faecal coliforms/100 mL, caused by the direct discharge of untreated domestic wastewater and by the tributary of the Liberia stabilisation lagoon itself. Confirmed with interviews from stakeholders.

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.

Q Obs.

Comment

The Site has identified the following as IWRAs:

- The Liberia River
- Matapalos Creek
- Lagoons: Granjita, Lagon, and Armadillo

Their current status has been mentioned, and in general, it has been noted that the lagoons and the creek are in a preserved condition.

With regard to the Liberia River, they mention its condition as slightly altered. This information contrasts with the information referred to in 1.5.4 and interviews with stakeholders, where the Liberia River is mentioned as highly contaminated with faecal waste.

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





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#### Comment

The Site has identified tha water related infrastructure in the catchment:

Water treatment plant

- · Supplies water to the urban area of Liberia.
- Water source: surface water collected from the Liberia River upstream, via a small dam.
- Plays a crucial role during health emergencies or periods of drought.

Wastewater treatment plants

- Four ordinary treatment plants and one industrial plant have been identified.
- They help mitigate pollution of the Liberia River and its sub-basin.
- Their strategic location allows for assessment of their exposure to possible flooding.
- They help mitigate pollution of the Liberia River and its sub-basin.

Groundwater abstraction wells

- There are 63 wells distributed throughout the sub-basin.
- They are the main source of supply for various uses.
- They are vulnerable to contamination by pesticides and infiltration.
- There is a risk of overexploitation in dry seasons.

Surface water intake points

- There are 10 water intake points on the Liberia River and streams.
- They are exposed to landslides, storms and flash floods.

Drinking water distribution pipes

- They cover an area of 27.05 km² within the sub-basin.
- Their layout and materials are crucial for resistance to extreme events such as earthquakes or floods.

Drinking water storage tanks

- 1,000 m3 storage tank in Martina Bustos.
- 2,000 m³ storage tank in La Carreta.
- 4,000 m³ storage tank in Santa Ana.

AyA Liberia wastewater treatment plant, in good condition

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



Comment

The Site has provided general information on WASH challenges. Assessment of wastewater from treatment plants.

The Liberia River sub-basin in Costa Rica comprises the cantons of Liberia, La Cruz,

Bagaces, Nicoya, Santa Cruz, Cañas and part of the canton of Carrillo.

The report of "Saneamiento Chorotega" referes to:

- Facultative stabilisation and maturation lagoons: in Liberia city:

Working at maximum capacity

Requires comprehensive study

Improvements with automatic cleaning grids.

-For the Cañas lagoons are as follows:

Operating at maximum capacity

Requires comprehensive study

Wastewater Commission (AyA - Municipality - MINSA)

-Santa Cruz Wastewater Treatment Plant:

Requires increased coverage in collection (sanitary sewerage)

Wastewater Commission (AyA –Municipality –MINSA)

-Nicoya WWTP

Operating at maximum capacity

Comprehensive study completed (US\$ 30 million)

In progress: designs for a palliative improvement to increase treatment capacity.

There is no reference to the percentage of the population with access to drinking water and sanitation in the cantons that are part of the Liberia River sub-basin in Costa Rica comprises the cantons of Liberia, La Cruz, Bagaces, Nicoya, Santa Cruz, Cañas and part of the canton of Carrillo

The Study is developed to seach for funding.

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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.



Comment

The Site has presented the WSP as evidence, for which they have held more than six informal meetings to consult on shared water challenges. This culminated in two formal meetings, from which they obtained a list of shared water challenges.

- Water scarcity
- Lack of infrastructure
- Water pollution
- Lack of infrastructure for water management
- 1.6.2 Initiatives to address shared water challenges shall be identified.



Comment

The Site has not identified initiatives to address the shared water challenges mentioned in

However, it has included in its WSP various actions that are in some way related to these issues

According to the guidance Initiatives should be related to and consistent with the conclusions of indicator 1.6.1.

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

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



Comment

The Site has identified a number of physical, regulatory and reputational risks. Risks include the likelihood of occurrence, severity, estimated cost and impact on the business.

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



Comment

The Site has identified a number of opportunities related to the risks identified in 1.7.1. The opportunities include priority, economic value, strategic value, magnitude, frequency, severity, and relative impact.

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.



Comment

The Site participates in the Citizen Water Observatory (OCA) of the Liberia River, which is part of the activities promoted by the National Alliance for Rivers and Catchments of Costa Rica (ANRCCR), a programme that encourages citizen and volunteer participation in concrete actions on water management and river protection issues.

- Water Watch programmes
- Improvements to the Liberia aqueduct
- Support for the 'Aqueducts of Life' project

Support the community and local government in solid waste management. Establish a partnership with SINAC to collaborate on reforestation issues. Support communities and local entities on water resource management issues.

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**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.



Comment

Best practices on site

a) Saving: this means avoiding using water! Reduce consumption as much as possible in any process, activity or task. The motto should be that 'there is no better cubic metre than the one that is not consumed'!

Saving has two important aspects that must be considered at all levels: operational practices and the efficient design of facilities and processes. Saving means being more efficient, doing more with the same or doing the same with less!

b) Recycle and reclaim: this means taking advantage of resources that are currently literally thrown away to replace the use of fresh water. Before disposing of water at a discharge point, we must ask ourselves whether it is possible to recycle it (reuse it without treatment) or whether it can be reclaimed with treatment. This strategy is formally enshrined in Coca-Cola's water policy. It is necessary to properly characterise the water currently used for irrigation. Wastewater has real potential, but it is also possible to capture treated water generated by other entities or companies that consume and dispose of water. Today, technology makes almost anything possible. The important thing is to be clear about the cost-benefit ratio in order to make decisions.

c) Harvesting water: this involves capturing water from the environment, such as rain and condensation generated in handling facilities when the air is cooled. Harvesting water requires infrastructure and civil and mechanical design of facilities. However,

Best practice in the catchment:

Implement monitoring piezometers in strategic areas to obtain data on groundwater behaviour.

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



Comment

The Site has attached Solarium's Water Quality Control Programme and well water analysis

reports.

The Site maintains a quality monitoring programme that exceeds national regulatory

requirements.

1.8.4 Relevant catchment best practice for site maintenance of Important

Water-Related Areas shall be identified.



Comment

Liberia River Clean-up Campaign Municipality of Liberia – Coca Cola

Solid waste collection in Santa Rosa National Park SINAC – Coca Cola, Municipality of Liberia

Infrastructure improvements at the Iguanita Wildlife Refuge

Maintenance of the ravine

GNP tour plus bird watching and the Liberia River

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



Comment

The Site has included a series of best practices on the Site including Hygiene and cleaning campaigns and in the catchment related to WASH.



# **Alliance for Water Stewardship (AWS)**

Audit Number: AO-001644

2	STEP 2: COMMIT & PLAN - Commit to be a responsible water steward and develop a Water Stewardship Plan
2.1	Commit to water stewardship by having the senior-most manager in charge of water at the site, or if necessary, a suitable individual within the organization head office, sign and publicly disclose a commitment to water stewardship, the implementation of the AWS Standard and achieving its five outcomes, and the allocation of required resources.
2.1.1	A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:  - That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes  - That the site implementation will be aligned to and in support of existing catchment sustainability plans  - That the site's stakeholders will be engaged in an open and transparent way  - That the site will allocate resources to implement the Standard.
Comment	The Site has submitted its commitment to the signed site statement and has demonstrated the Site where they disclosed the statement.
2.2	Develop and document a process to achieve and maintain legal and regulatory compliance.
2.2.1	The system to maintain compliance obligations for water and wastewater management shall be identified, including:  - Identification of responsible persons/positions within facility organizational structure  - Process for submissions to regulatory agencies.
Comment	The Site shares the results of the assessment of legal environmental requirements by the ECOLEGAL LAW FIRM and its responsible department, as well as the laws and regulations governing Costa Rica.
2.3	Create a water stewardship strategy and plan including addressing risks (to and from the site), shared catchment water challenges, and opportunities.
2.3.1	A water stewardship strategy shall be identified that defines the overarching mission, vision, and goals of the organization towards good Yes water stewardship in line with this AWS Standard.
Comment	The Site has shared its mission and vision for sustainability, as well as its environmental projections through 2030, towards good sustainable water management in accordance with the AWS Standard.
2.3.2	A water stewardship plan shall be identified, including for each target:  - How it will be measured and monitored  - Actions to achieve and maintain (or exceed) it  - Planned timeframes to achieve it  - Financial budgets allocated for actions  - Positions of persons responsible for actions and achieving targets  - Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.
Comment	The Site has included actions that began in 2023 and ended in March 2024 In some actions, the budget has not been broken down by action And the link to the 5 AWS results is unclear

#### WSAS



### **Alliance for Water Stewardship (AWS)**

Audit Number: AO-001644

Finding No: TNR-018653

Yes

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.

Comment The Site has mentioned in its emergency response plan that it will request external support using the national code 9-1-1, which manages the various emergency units through its

communication network according to the nature and severity of the incident. The plant's security posts (post 1 and post 2) have the relevant information to inform the emergency

services.

In addition, visits and assessments of the facilities are coordinated by the Costa Rican Fire Department. If emergency medical services (ambulance) are required, assistance will be

provided by 9-1-1.



# **Alliance for Water Stewardship (AWS)**

Audit Number: AO-001644

3	STEP 3: IMPLEMENT - Implement the site's stewardship plan and improve impacts
3.1	Implement plan to participate positively in catchment governance.
3.1.1	Evidence that the site has supported good catchment governance shall be identified.  Yes
Comment	The Site has provided evidence of the meeting with stakeholders in this case: Municipality of Liberia, Autonomous Institutions, Civil Society, Ministry of Health on our commitment through the AWS standard on governance issues.  This was verified during interviews with stakeholders.
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 has provided a copy of the law on water and the human rights policy that protects indigenous peoples.
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.
Comment	The Site has provided documentary evidence in legal and environmental matters, and monitoring of results latest legal audit and local laws and regulations.
3.2.2	Where water rights are part of legal and regulatory requirements, measures identified to respect the water rights of others including Indigenous peoples, shall be implemented.  Yes
Comment	The Site provides a list of documentary evidence in legal and environmental matters, and follows up on the results of the latest legal audit and local laws and regulations.
3.3	Implement plan to achieve site water balance targets.
3.3.1	Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.  Yes
Comment	The Site has presented progress on the two actions proposed in its WSP related to water balance in the catchment and the two Site objectives.  The Site will modify its WSP, and the wording and measurement and monitoring will change.
3.3.2	Where water scarcity is a shared water challenge, annual targets to improve the site's water use efficiency, or if practical and applicable, reduce volumetric total use shall be implemented.
Comment	The Site has presented evidence of efforts towards measurable and traceable targets for 2030.  Finished liquid product, more water is used and water reduction includes water in the product The reduction in water consumption is approved by senior management with clear achievable targets.
3.3.3	Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.  Yes
Comment	The Site is not authorised to reallocate water.

#### WSAS



# **Alliance for Water Stewardship (AWS)**

Audit Number: AO-001644

3.4	Implement plan to achieve site water quality targets
3.4.1	Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.  Obs.
Comment	Once the site has finished reworking its WSP 2.3.2, the progress of the proposed actions can be accurately assessed.
3.4.2	Where water quality is a shared water challenge, continual improvement to achieve best practice for the site's effluent shall be identified and yes where applicable, quantified.
Comment	The site keeps a WWTP logbook that includes COD, BOD, N, and P analyses, daily monitoring, and annual STAR CCL logbook. The current data in the industrial logbook has been reviewed on screen.
3.5	Implement plan to maintain or improve the site's and/or catchment's Important Water-Related Areas.
3.5.1	Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.  Yes
Comment	The Site has presented the following evidence: Achievements of the Playa Cambuyal 2024 volunteer programme WhatsApp images of the river clean-up campaigns. The images are on WhatsApp.
3.6	Implement plan to provide access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers at all premises under the site's control.
3.6.1	Evidence of the site's provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all yes workers onsite shall be identified and where applicable, quantified.
Comment	The site has provided evidence of adequate provision of toilets, washbasins, urinals, and drinking water dispensers. During the on-site audit, Dr. was interviewed, who stated that the Site provides influenza vaccination campaigns, dengue prevention and control, and blood donation. They also hold health fairs offering audiometry, respirometry, eye tests, and electrocardiograms.  The Site attaches evidence of the pest control programme and the hygiene and disinfection programme in kitchens and public areas.
3.6.2	Evidence that the site is not impinging on the human right to safe water and sanitation of communities through their operations, and that Yes 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.
Comment	The Site attaches its human rights policy, including water protection.
3.7	Implement plan to maintain or improve indirect water use within the catchment:
3.7.1	Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.  Yes
Comment	The Site has not established a target for indirect water use.

#### WSAS



### **Alliance for Water Stewardship (AWS)**

Audit Number: AO-001644

Comment

Comment

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.

Comment El Sitio ha entregado las evidencias del compromiso con los proveedores de servicio de

lavandería. Ver archivos

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.

The Site maintains active communication with Solarium (water supplier) via telephone and

email, through which any concerns about the water are reported.

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.

• Water Watch programmes: these consisted of improving the distribution system and water culture education in 12 educational centres nationwide in 2016, in collaboration with the ALIARSE Foundation for Aqueducts and Sewers (AyA, 2017).

• Improvements to the Liberia aqueduct: installation of two 22,000-litre storage tanks and improvements to the distribution system to supply water to some 1,280 residents of the El Salto community in Liberia (Piedra; 21 July 2018).

• Support for the 'Aqueducts of Life' project: provided a financial contribution of \$100,000 to support the project to improve aqueducts in the communities of Colorado, Paso Tempisque, La Libertad, Castillo de Oro, San Blas, Los Jocotes, Nuevo Colón and El Triunfo in the North Pacific Region. A chlorinator, 800 metres of 2- and 3-inch pipes, 108 solar panels (of various capacities, allowing energy savings of between 21% and 38%), two 22-litre storage tanks, chlorination tablets, hydrants and technical diagnostics were purchased and installed. The project was carried out in conjunction with the ALIARSE Foundation, the Community Water

League, the Federation of ASADAS of Liberia and the AyA (Presidency of the Republic of

Costa Rica; 24 March 2022).

See attached documents in 1.8.1

**3.9.2** Actions towards achieving best practice, related to targets in terms of

water balance shall be implemented.



Yes

Yes

Yes





#### **Alliance for Water Stewardship (AWS)**

Audit Number: AO-001644

#### Comment

Best practices on site

a) Saving: this means avoiding using water! Reduce consumption as much as possible in any process, activity or task. The motto should be that 'there is no better cubic metre than the one that is not consumed'!

Saving has two important aspects that must be considered at all levels: operational practices and the efficient design of facilities and processes. Saving means being more efficient, doing more with the same or doing the same with less!

b) Recycle and reclaim: this means taking advantage of resources that are currently literally thrown away to replace the use of fresh water. Before disposing of water at a discharge point, we must ask ourselves whether it is possible to recycle it (reuse it without treatment) or whether it can be reclaimed with treatment. This strategy is formally enshrined in Coca-Cola's water policy. It is necessary to properly characterise the water currently used for irrigation. Wastewater has real potential, but it is also possible to capture treated water generated by other entities or companies that consume and dispose of water. Today, technology makes almost anything possible. The important thing is to be clear about the cost-benefit ratio in order to make decisions.

c) Harvesting water: this involves capturing water from the environment, such as rain and condensation generated in handling facilities when the air is cooled. Harvesting water requires infrastructure and civil and mechanical design of facilities. However, Best practice in the catchment:

Implement monitoring piezometers in strategic areas to obtain data on groundwater behaviour.

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



Comment

The Site has attached Solarium's Water Quality Control Programme and well water analysis reports.

The Site maintains a quality monitoring programme that exceeds national regulatory requirements.

3.9.4 Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.



Comment

The Site maintains environmental volunteer programmes for rubbish collection and activities with partners for water conservation.

The Site maintains the following in the Matapalos ravine:

- 1. Maintains and reinforces native vegetation cover in areas adjacent to the riverbed to reduce erosion and promote infiltration.
- 2. Periodically monitors the physical and chemical parameters of the water (pH, dissolved oxygen, coliforms, nitrates, among others) to detect possible changes in quality.
- 3. Controls upstream activities that could increase sediment or waste loads, such as construction, logging, or intensive agriculture. This action can be carried out through the campaigns mentioned below, involving neighbouring users.
- 4. Avoids interventions in the riverbed or alterations to its natural morphology, except those necessary for duly justified risk mitigation.
- 5. Promote environmental education campaigns with the community, users and workers of the Solarium condominium to encourage appreciation of water resources.
- 6. Record extreme events such as floods or droughts and their impact on the riverbed to generate historical data useful for decision-making.

**3.9.5** Actions towards achieving best practice related to targets in terms of WASH shall be implemented.



Comment

The Site has added photographs of the health campaigns to the site.

It has published the reports on Las Asadas La Sanjita and El Salto (I have them on WhatsApp (website).

The site provides vaccination campaigns, dengue prevention, and blood donation. It coordinates health fairs for vision, respiratory, audiometry, and electrocardiogram tests.

#### WSAS



# **Alliance for Water Stewardship (AWS)**

Audit Number: AO-001644

4	STEP 4: EVALUATE - Evaluate the site's performance.
4.1	Evaluate the site's performance in light of its actions and targets from its water stewardship plan and demonstrate its contribution to achieving water stewardship outcomes.
4.1.1	Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be yes evaluated.
Comment	The Site has submitted a document evaluating the implementation of its WSP, which includes the five results of the standard.
4.1.2	Value creation resulting from the water stewardship plan shall be evaluated.  Yes
Comment	The Site has submitted an assessment that includes an analysis of the economic value of the actions implemented.  The implementation of the Site WSP has been designed to generate tangible and intangible value, not only environmental and social, but also economic value for the operation. The 17 prioritised strategic actions will reduce risks, optimise resources, prevent legal contingencies and improve water governance at the site and in its area of influence.  See document 4.1.2 Creación valor económico
4.1.3	The shared value benefits in the catchment shall be identified and where applicable, quantified.  Yes
Comment	Benefits of shared value in the catchment Financial sustainability and tariff transparency Reduced pollution in urban areas and watercourses Safe access to water in vulnerable communities near the site. El Salto, Liberia, etc. Water governance with a technical and equitable approach Improved capacity for local technical monitoring Cultural change towards responsible water use Expanded participation in catchment governance Financial sustainability and tariff transparency
4.2	Evaluate the impacts of water-related emergency incidents (including extreme events), if any occurred, and determine the effectiveness of corrective and preventative measures.
4.2.1	A written annual review and (where appropriate) root-cause analysis of the year's emergency incident(s) shall be prepared and the site's Yes response to the incident(s) shall be evaluated and proposed preventative and corrective actions and mitigations against future incidents shall be identified.
Comment	The Site has provided evidence of incidents in 2024, a list of brigade members, and training in chemical handling.  Response in the comment box Evidence uploaded  They have provided evidence of training and a breakdown of the emergency brigades.
4.3	Evaluate stakeholders' consultation feedback regarding the site's water stewardship performance, including the effectiveness of the site's engagement process.
4.3.1	Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.  Yes

WSAS



#### **Alliance for Water Stewardship (AWS)**

Audit Number: AO-001644

Comment The Site has distributed a survey to stakeholders regarding water resources.

The Site is part of the community water observatories, which have showcased the conversations they hold with strategic actors. This has been verified during interviews with stakeholders, who have expressed the company's interest in maintaining an open dialogue and providing assistance to communities facing significant water supply challenges.

4.4 Evaluate and update the site's water

stewardship plan, incorporating the information obtained from the evaluation process in the context of continual improvement.

**4.4.1** The site's water stewardship plan shall be modified and adapted to incorporate any relevant information and lessons learned from the

evaluations in this step and these changes shall be identified.

Yes

Comment

AWS CPS Liberia Annual Assessment Plan.

- Assessment of Compliance with AWS Standards: Monitor best practices and strategies implemented for sustainable water management.
- Monitoring of Key Performance Indicators (KPIs): Evaluate the results of water management actions, such as reduction in consumption, water quality, efficiency in resource use, and stakeholder participation.
- Identification of Areas for Improvement: Detect opportunities for optimisation in water management and governance practices.
- Documentation and Reporting: Prepare an annual report summarising progress towards established objectives, challenges and solutions implemented.
   Activities and Phases of the Annual Assessment Plan

Phase 1: Planning and Preparation

- •Activities:
- Establishment of monitoring objectives (see Metrics 2025-2030)
- Identification of relevant indicators and metrics.
- Definition of monitoring frequency (monthly, quarterly, annual).
- Review of AWS standards and specific areas to be evaluated.
- Budget planning for water use optimisation projects.



# **Alliance for Water Stewardship (AWS)**

Audit Number: AO-001644

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.	<b>Q</b> Obs.
Comment	The Site has publicly available the internal gobernanza structure. It is published on Radio Pampa and Trivisión.	
	The Site also shared at the Sustainability general presentation, and in the last slide, present governance for any water governance issue with the Site	t
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.	<b>⊘</b> Yes
Comment	The Site has provided evidence of meeting with stakeholders to present its WSP, which includes the five steps of the AWS Standard.  The Site has published a Sustainable Water Management Plan:  09 June Sustainable Water Management Plan with stakeholders	
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.	<b>⊘</b> Yes
Comment	The Site has submitted a document with its annual results report, which summarises the results obtained in 2024 regarding the implementation of the Site's WSP. Evidence will be reviewed during the on-site audit. In addition, the Site mentions that this results presentation meeting will be held annually and will be published on the following page: Sustainability   Coca-Cola	d
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.	<b>⊘</b> Yes



### **Alliance for Water Stewardship (AWS)**

Audit Number: AO-001644

#### Comment

The Site describes how progress on shared water challenges will be reported.

The Site describes the measures that will be adopted to address shared water challenges: Active participation in the Liberia PCGIRS Committee and the Tempisque River Catchment Intersectoral Commission (CIGITEM).

- Installation of climate change-resilient infrastructure in nearby ASADAS (pumps, tanks, pipes).
- Implementation of quarterly monitoring with piezometers and SIMASTIR for the Bagaces aquifer.
- Development of a regulatory proposal to regulate large industrial consumers.
- Partnerships with universities (UCR, HIDROCEC) for research and technical monitoring.
- · Launch of internal and community water culture campaigns.
- Coordination with OCAS and institutions for physical and chemical monitoring of the river and stream.
- Outreach to private actors (Solarium) to integrate them into governance spaces.
- Technical support to pilot ASADAS for the implementation of tiered tariffs.
- Design of progressive compliance plans for ASADAS with technical limitations.
- Inclusion of women, older people and young people in community water processes.
- **5.4.2** Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.



Comment

The site has submitted a document detailing the achievements made and referring to the stakeholders involved and beneficiaries.

I would like to mention that all these achievements should be reflected in the actions proposed in your Water Management Plan (WSP) with actions proposed on site and in the catchment.

The site's analysis includes members of the public sector.

In interviews with stakeholders, the director of wastewater was interviewed and spoke of the site as a model for other companies to follow.

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.



Comment

The Site has a procedure for reporting any violations related to compliance with the site's water regulations and the relevant corrections (if any).

The Site mentions the following preventive actions:

- Emergency brigade training (leaks and spills) twice a year. Chemical containers for manufacturing have a containment dike.
- Hydraulic infrastructure in liquid parts manufacturing areas is directed directly to the WWTP for treatment.
- · Annual emergency drills.
- Real-time list of brigade members on duty, visible to supervisors and managers. List of incidents during 2024 and environmental manager's report.

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



Comment

The site has accident investigation reports and root cause analyses are carried out to prevent recurrence (flexible hose leak investigation report with action plan).

**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.



Comment

The Site is committed to transparency. It states that in the event of a significant violation (cases where there is an immediate threat to local stakeholders, health and ecosystems), the Site shall immediately notify the relevant public sector bodies of the violation.

#### WSAS



### **Alliance for Water Stewardship (AWS)**

Audit Number: AO-001644

#### **Previous Findings**

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

