

Alliance for Water Stewardship (AWS)

Audit Number: AO-001655

SITE DETAILS

Site: Atlanta Beverage Base Plant

Address: 1001 GREAT SOUTHWEST PKWY SW, 30336, Atlanta, Georgia, UNITED STATES

Contact Person: Alecia Welsh

AWS Reference Number: AWS-000699

Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Core

Date of certification decision: 2025-Sep-08

Validity of certificate: 2028-Sep-07

AUDIT DETAILS

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

Audit Type(s): Initial Audit Audit Start Date: 2025-Jul-29 Audit End Date: 2025-Jul-31 Lead Auditor: Kimberly Worsham

Audit team participants:

Kimberly Worsham, Lead Auditor



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ADDITIONAL INFO

Summary of Audit Findings: During the certification audit, no non-conformities and 8 observations were raised.

The audit team recommends certification of the Atlanta Beverage Base Plant at the Core level.



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Scope of Assessment: The scope of services covers the initial certification audit for assessing conformity of Atlanta Beverage Base Plant against the AWS International Water Stewardship Standard Version 2.

The Atlanta Beverage Base Plant is located at 1001 Great Southwest Parkway, Atlanta, GA 30336, and the premises are across 16.12 acres with approximately 150 employees. It produces concentrates and beverage bases used to produce various Coca-Cola products. Water is used in the product itself, but also for cleaning of equipment and rooms, as well as in the boilers and the cooling tower. The site is zoned as industrial within the city of Atlanta limits and outside of any major 100-year flood zones. The site is next to various commercial and industrial properties.

The plant uses municipal water supplied by the City of Atlanta, and uses intake water treatment, including UV systems. It also has a wastewater system that treats production wastewater, while sanitary water is collected separately and directly moved to municipal wastewater treatment without prior treatment. Treated production wastewater discharges to the Utoy Creek Reclamation Wastewater Treatment Plant. The site also has cooling towers, stormwater drains that discharge to the Wilson Creek, and a firewater system.

The site's main catchment is the Chattahoochee River Watershed. It is based on a humid subtropical climate.

It's source water is from the City of Atlanta, which uses treated surface water from the Chattahoochee River Watershed. The Chattahoochee River discharges into Lake Seminole at the Georgia-Florida border, where it merges with the Flint River to form the Apalachicola River, which flows into the Gulf of Mexico. The Chattahoochee River in Georgia is protected by the Metropolitan River Protection Act, which created a 2,000-foot buffer along both banks of the river and its impoundments. The river faces pollution and challenges related to development and recreational use. There are several threatened species in the watershed, as well.

The Chattahoochee River is one of the smallest river systems in the entire country to provide a water supply to a major metropolitan city. It faces many contamination threats from stormwater, wastewater, climate change, and other contributors. Although river health has improved in recent decades, more than 1,000 miles of waterways within the Chattahoochee watershed still do not meet water-quality standards. Since the watershed is small compared to the reservoir size, the water supply is susceptible to droughts. The last major drought was in 2010-2012. With recent intense storms from climate change, there has been increased flooding in rural and urban areas. There is no indication that treatment plants and facilities have had an interrupted supply due to flooding. The Chattahoochee River Basin is part of inter-basin transfers, which have affected its water balance.

The audit was conducted onsite on 29-31 July 2025. The on-site visit included the assessment of WASH facilities, on-site stormwater detention ponds, water meter monitoring dashboards, water treatment area, wastewater treatment plant, boilers, chillers, production and CIP washdowns, spill kits, incoming water, and outgoing water as part of the audit.

During the site tour, the auditor observed WASH facilities that were frequently cleaned, had free menstrual hygiene management (MHM) products, hygiene posters about handwashing, and locker rooms with ADA-compliant showers. The site canteen had free access to bottled water and dispensing machines, sinks, and refrigerators. The entrance to the production area included machines that washed hands thoroughly next to a screen that showed dashboard information about water use. There were eyewash stations (checked weekly) across the production area. The lab had clean sinks and several chemical hoods. Chemical stores in the production area were all on containment drums, separated from other operations, and designated. In the water treatment room, the site had 2 boilers with blowdown drainage, resulting in a puddle on the ground due to condensation. In the same area, the city's incoming water pipe and storage area were visible and clean, with no leaks. The treated

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water was through RO systems and ozone to kill off any contaminants throughout the pipes, with rejected water going into the sanitary sewer line. Outside the treatment area was a spill kit area with noodles and soak pads. The auditor observed extensive metering throughout these areas, and dashboard screens in the walking areas showed meter readings and alarms for leaks. There were very few leaks, despite the site cleaning some production areas that had puddles on the ground. All water on the production area floor was directed to the wastewater treatment plant. The site's production vehicles are all electric. The wastewater treatment plant (run by wastewater treatment system vendor) used aeration tanks and filters to do preliminary treatment; solids were composted. When visiting, the stormwater detention ponds were dry. Additionally, the site does not irrigate its lawn, garden, or tree area outside of the offices and relies on rainfall to manage growth.

FINDINGS

NUMBER OF FINDINGS PER LEVEL Observation 8



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FINDING DETAILS

Finding No: TNR-019067

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: The site was unable to get the amount of water consumed by the

laundry vendor, and it may want to try to get that amount from them at

some point.

Finding No: TNR-019151

Checklist Item No: 2.4.1 Status: Open

Finding level: Observation

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: The site could be more proactive in attempting to coordinate with public

sector agencies on risk mitigation plans.

Finding No: TNR-019187

Checklist Item No: 3.1.1
Status: Open

Finding level: Observation

Checklist item: Evidence that the site has supported good catchment governance shall

be identified.

Findings: Stakeholder interviews revealed room for improvement in visibility

beyond Fulton County, participation in public events, and making water

stewardship more prominent in public messaging.

Finding No: TNR-019175

Checklist Item No: 3.5.1
Status: Open

Finding level: Observation

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: More concrete evidence of the partnership's implementation with CRK,

such as test results, would have demonstrated stronger conformance.



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Finding No: TNR-019176

Checklist Item No: 3.7.1 Status: Open

Finding level: Observation

Checklist item: Evidence that indirect water use targets set in the water stewardship

plan, as applicable, have been met shall be quantified.

Findings: While the site had not received quantification of laundry water use from

the laundry vendor, persistent follow-up would help strengthen the

conformance of this indicator.

Finding No: TNR-019766

Checklist Item No: 3.8.1 Status: Open

Finding level: Observation

Checklist item: Evidence of engagement, and the key messages relayed with

confirmation of receipt, shall be identified.

Findings: The site would benefit from confirming with the City of Atlanta whether

they have received confirmation of receipt information for these emails.

Finding No: TNR-019181

Checklist Item No: 4.4.1
Status: Open

Finding level: Observation

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

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

Findings: The site had not yet fully modified the WSP. It is recognized that the site

has not reached a year of implementation since the WSP's finalization. At that time, the site's water stewardship plan should be modified and adapted to incorporate any relevant information and lessons learned

from the evaluations in Step 4 and identified changes.

Finding No: TNR-019767

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: While the site shared some information and accountable positions with

relevant stakeholders, it was unclear if this information needed to be

more explicitly disclosed.



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Report	Details

Report	Value
Report prepared by	Kimberly Worsham
Report approved by	Juan Carlos Ceron
Report approved on (Date)	2025-08-20

Surveillance

Proposed date for next audit

2026-Jul-31

Comment This was the initial audit for the site.

Stakeholder Announcements

Date of publication Location		
23/05/2025	https://www.coca-cola.cor ia-center/coca-cola-aws-c	
28/05/2025	Emails to relevant stakeho	olders
Comment	The site published the stakeholder announcement on its public website in I shared it over email with all of the relevant stakeholders on their list	May 2025. It also
Comment	The site organized 2 interviews with 2 stakeholders on Day 2 of the onsite in-person and one was remote.	audit. One was



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Catchment Information



catchment location.jpg

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The Chattahoochee River is one of the smallest river systems in the entire country to provide water supply to a major metropolitan city. It faces many contamination threats from stormwater, wastewater, climate change, and other contributors. Although river health has improved in recent decades, more than 1,000 miles of waterways within the Chattahoochee watershed still do not meet water-quality standards. Since the watershed is small compared to the reservoir size, the water supply is susceptible to droughts. The last major drought was in 2010-2012. With recent intense storms from climate change, there has been increased flooding in rural and urban areas. There is no indication that treatment plants and facilities have had an interrupted supply due to flooding. The Chattahoochee River Basin is part of inter-basin transfers, which have affected its water balance.

Comment The site provided information for the catchment details in the resquired questionnaire.



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Client Description and Site Details



site boundaries pic.jpg

Client/Site Background

The Atlanta Beverage Base Plant is located at 1001 Great Southwest Parkway, Atlanta, GA 30336, and the premises are across 16.12 acres with approximately 150 employees. It produces concentrates and beverage bases used to produce various Coca-Cola products. Water is used in the product itself, but also for cleaning of equipment and rooms, as well as in the boilers and the cooling tower. The site is zoned as industrial within the city of Atlanta limits and outside of any major 100-year flood zones. The site is next to various commercial and industrial properties.

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Comment The site provided information for the site details in the resquired questionnaire.

Summary of Shared Water Challenges

Summary of Shared Water Challenges

The site identified 5 main shared water challenges: dry conditions (reduced water supplies), severe storms (which interrupted the water supply), increased demand, water contamination, and higher costs.

Comment

The site shared its shared water challenges in a spreadsheet that included the methodology, assessment definitions, and guidelines.



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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 mapped the following physical scope areas (Att. #1 ABBP Water and Infrastructure with WasteWater.ppt):

- -A schematic that includes notes for its sewer lines and outfalls, sewer inspection area, storm drains, separate sanitary sewer line, pretreatment plant, stormwater pond, above-ground fuel storage tank, cooling towers, and a reuse water tank (ABBP Plant Layout.pdf)
- -Another schematic for the site drainage that shows the chillers, drainage areas, spill kit locations, outfall areas, and water flow direction (SWP3_FlowDiagram)
- -A schematic showing the firewater line across the site (Scan 20241209 191837.pdf)
- -A streetview map of its boundary lines situated with its neighbors (ABBP Site Boundary pdf)
- -A large map showing its location within the Chattahoochee basin, as well as the surrounding basins (81382_1_SVA_Atlanta_BBP_03_14_12 51 (1).pdf)
- -A map of the Lanier Watershed drainage, which is the Chattahoochee watershed water source. This is a sub-watershed, but the site is not included in the sub-watershed. (Watershed Lanier North GA.pdf)
- -An image of its water treatment plant on-site
- -A map that shows its location compared to where municipal water intake and water treatment plants are (Water plants and storage.ppt)
- -The wastewater line, the location of the WWTP, and ultimate receiving water bodies (Utoy Creek-water line-Utoy plant.ppt)
- 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.

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Comment

The site identified 25 stakeholder groups in its catchment, including government officials, agencies, NGOs, and industry. The site identified stakeholders by reviewing its neighbors, interactions with water-related organizations and agencies, and potential NGOs within the catchment area that could be partnered with for water-related activities, such as clean-ups. It also included a row for the sheltered and unhoused population in the list of stakeholders. The site indicated that there are no federally recognized tribes in Georgia, but it had identified houseless groups within the catchment.

The site had indicated the stakeholder consultation information about water-related interests and challenges (Column E)

The site noted in its communication log that many of the identified stakeholders did not include email addresses. The site indicated it had tried to find contacts at these sites, but the stakeholders are either uninterested in participating or have not responded.

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



Comment

The site identified the stakeholders' level of influence on it, indicating high and low degrees of influence. Only one stakeholder was deemed to have a high degree of influence in the catchment for the site - the Chattahoochee Riverkeepers.

- 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.



Y

Comment

The site identified a water incident response plan that indicates responses to chemical spills (as of 2025); an emergency response plan (as of June 2023), which includes spill response, inoperable on-site wastewater treatment plant, severe weather, and fires; a SWPPP (as of August 2022 - updated every 5 years) that includes spills, leads, and non-stormwater discharge; and an SPCC (as of December 2024 - updated every 5 years), which includes potential failures in the management system and disposal of recovered materials.

The incident response plans include contact details for the stakeholders related to each emergency.

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



Comment

The site mapped its water balance with a comprehensive map from incoming water to the county sewer, and included all of the locations where water was part of the site operations. It included inflows, storage, and outflows. The site identified losses in the cooling tower, condensate vents, and boiler (indicated with an arrow "to atmosphere"). The map includes flow details such as product water treatment, QA lab, cooling towers, boiler and chiller use, wastewater treatment, sanitary sewer flow, and office water use.

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





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Comment

The site quantified the monthly water in and water out from 2019 to June 2025. The site had identified the variance of water in and out by year and month, graphing those. The water storage was calculated as averages on the water balance map (Jan-Apr 2025). The site had indicated that the losses were quantified under condensate and cooling towers.

The site noted in each year the month with the maximum water use, which was when there was a duplicate system for water treatment (the new RO system was coming online and was being tested before the older system was retired).

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.



Comment

The site shared detailed information about its water quality monitoring process guidelines and monitoring plan. It also shared quantifications of:

-Water source: The site shared a 2024 City of Atlanta Water Quality Report, which included Total Coliforms, heavy metals, Turbidity, Nitrate, Organic Carbon, etc. The site had a record of these water quality reports from 2019.

-Provided waters: It also showed the third-party annual water quality test results for city water and treated incoming water, including 97 parameters. The site indicated that it is required to have a third-party test the incoming and treated water quality annually; the site also collects daily water quality data.

-Effluent: its monthly wastewater discharge water quality from 2022 to June 2025. It had quantified COD, BOD, Total Phosphorus, TSS, and TKN.

-Receiving water bodies: The site showed the How's My Waterway report for the Chattahoochee River point of discharge (December 2024), which included the water quality status as impaired, including E.coli parameters, temperature.

The incoming and outgoing water quality included annual variances. The site's water quality variance data indicate that its wastewater COD, TKN, TP, and TSS levels decreased overall in 2024 compared to 2023. However, COD levels increased slightly in Q4, which is typical for the site due to the production of juice concentrates.

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



Comment

The site shared a comprehensive inventory list, with a chemical storage list for each area of the site in a separate tab. The information included the size of containers, lot numbers, manufacturer names, and vendor names.

The site also showed a map of (slide 9 of the Att. #1 ABBP Water and Infrastructure Wastewater), where the red boxes on the map denote the location of potential sources of pollution. The site also showed a separate map (slide 10) where the diesel tank and hazardous waste trailer are located outside of the building.

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



Comment

The site identified no on-site IWRAs.

It noted that the stormwater detention ponds do not typically have standing water, and there are no important staff areas outside of concreted smoke areas. There is a garden area with trees in front of the office entrance, but the site does not consider that an IWRA.

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.



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1.3.7



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Comment

The site identified and quantified its 2024 water-related costs, including water and sewer charges and energy consumption costs. The site also shared additional 2024 water-related costs, including AWS certification audit, water meters, wastewater chemical costs, treated water testing, service water equipment, and others over \$350.

The site indicated it did not generate any revenue directly from water.

The site also identified its water-related value, indicating that it creates jobs and endeavors to reduce its water footprint to increase water availability for environmental and social demands.

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



Yes

Comment

The site identified its access and adequacy of WASH, restrooms, and locker rooms. It indicated that it had achieved OSHA sanitation standards. It also shared images of hygiene directions, which may be in bathrooms but need to be verified.

The site also indicated, and the auditor verified through the site tour, access to water and other beverages in the canteens. The site shared that it provides water that the staff can bring to their work stations. The site has also provided reusable bottles in the past.

- 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.



Comment

The site shared that it had assessed embedded water that was more than 5% of the total annual costs. The site indicated that the primary inputs had no embedded water. The site also showed its list of ~277 vendors that it had assessed and found no embedded water in its primary inputs over 5%.

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

Q Obs.

Comment

The site indicated that it had 2 outsourced services with embedded water, including a laundry vendor, drum cleaning vendor, and wastewater treatment system vendor. The site had indicated it received an email in September 2024 from the drum cleaning vendor about the site's water usage for cleaning containers. The site had also indicated that the laundry vendor had shared the amount of laundry served weekly, but did not share its water usage, only indicating an effort to reduce water use by 33%.

- **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.





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Comment

The site shared information about what is happening on-site and in the catchment regarding water governance, noting that government initiatives in the area are typically underfunded. It also indicated onsite and catchment-related efforts by the site to participate in good water governance, including partnerships with the Chattahoochee Riverkeeper and Wolfe Creek cleanup projects.

The site shared the Metropolitan North Georgia Water Planning District's Water Resources Management Plan (December 2022), including plans to build local water action plans, connections to separated public sewers (rather than using a combined sewer overflow system), customer leak reduction programs, encouraging highly treated wastewater return to receiving water bodies, and managing a local drought response and water waste ordinance.

The stakeholder interviews also highlighted additional government initiatives for households, such as septic systems and drain cleanings.

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



Comment

The site showed its summary of water-related legal and regulatory requirements, including details on wastewater discharge, stormwater, water quality, and onsite WASH compliance needs (Att. #18 & #19 Water Related Legal Requirements). The site shared its 2025 compliance calendar, including Stormwater review and certification (January), quarterly stormwater testing during a rain event, Industrial wastewater permit (May), SPCC updates (October), as well as monthly reports and inspection reports.

The site shared a list of legal and regulatory requirements, including: EPA requirements, like chemical accident prevention, oil discharge and pollution prevention, hazardous substance management, industrial stormwater discharge, solid waste disposal; state requirements around stormwater, hazardous waste management; and Coca-Cola requirements (KORE) for water resources management.

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



Comment

1.5.4

The site shared the catchment's seasonal variances for average rain, river withdrawal, and evaporation loss based on the USGS's most recent data.

The site shared that the city's 2017 audit noted the catchment has a total system loss of 27.2 MGD based on unaccounted for water. The evaporation loss was also 28MGD in a year.

The site also shared that the water balance is entirely rainfall dependent, and that the city had 21 inches over the average rainfall amount.

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.





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Comment

The site shared the following water quality data in the catchment:

- -The site shared a 2024 City of Atlanta Water Quality Report, which included Total Coliforms, heavy metals, Turbidity, Nitrate, Organic Carbon, etc. The site had a record of these water quality reports from 2019.
- -The site showed 3 How's My Waterway reports for:
- --The Chattahoochee River point of discharge (December 2024), which included the water quality status as impaired, including E.coli parameters, temperature.
- --Lanier Lake (December 2024), which included water quality status as impaired, including chlorophyll and mercury in fish.
- --Utoy Creek (a tributary of Chattahoochee River) (December 2024), which included water quality status as impaired, including bacteria and microbes.

The site compiled the reports into a spreadsheet with the annual variances for the City of Atlanta data, but Utoy Creek, Chattahoochee River, and Lower Lanier Lake lack annual data on the How's My Waterway platform.

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.



Comment

The site identified 4 IWRAs within the catchment, including the Lake Lanier, Chattahoochee River, Utoy Creek, Wolfe Creek, and Wilson Creek; it mapped the last 3 IWRAs for the sake of scale. These were identified through using scientific information and some stakeholder engagement, particularly with the City of Atlanta.

The site identified the current conditions of the IWRAs, indicating that Lanier Lake was in good condition, the Chattahoochee River was in somewhat impaired condition, Utoy Creek was in somewhat impaired condition, and Wolfe Creek and Wilson Creek were both in acceptable condition.

1.5.6

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



Comment

The site identified a list of wastewater infrastructures, including drinking water treatment plants, reclamation centers, and stormwater infrastructures, including 122 miles of separate storm sewers, combined sewer systems, green infrastructure initiatives with permeable pavements.

The site also indicated a 5-year modernization program for water infrastructure costing the City of Atlanta \$1.26 billion. The site also noted that its aging infrastructure was leading to frequent flooding and an increased risk of climate events.

The site shared that Fulton County indicated increased flooding can create knock-on effects to the water infrastructure beyond the piping, and that the treatment plants would also be affected.

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



Comment

The site shared that a 2023 study showed 2,867 houseless people in Atlanta who struggle to get access to water and sanitation services. It also highlighted the risk of rural households lacking access to WASH in the area. The site also shared efforts to address WASH access issues, including education and outreach, green infrastructure, and stream stewardship.

It also shared that the corporate site had done some work in the catchment to address high-risk areas, including some of the aging septic systems issues, high runoff, and increased intestinal diseases. The details also include sewer connections in low-, medium, and high-risk zones in the catchment.

It shared links to where some of the information was coming from, such as Neighborhood Water Watch, BacteriAlert, and EPA Beach Action.

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1.6	Understand current and future shared water challenges in the catchment, by linking the water challenges identified by stakeholders with the site's water challenges.	
1.6.1	Shared water challenges shall be identified and prioritized from the information gathered.	⊘ Yes
Comment	The site identified 5 main shared water challenges: dry conditions (reduced water supplies), severe storms (which interrupted the water supply), increased demand, water contamination and higher costs. The stakeholders in column N indicated that they shared the same water challenges as the site.	
1.6.2	Initiatives to address shared water challenges shall be identified.	⊘ Yes
Comment	The site identified initiatives to address shared water challenges (Column J for the Att. #26 1.6.1 and 1.7 Shared Water Challenges Rev.4.xls). In the column, the site indicated stakeholder initiatives to address shared water challenges, as stakeholders shared the information with it in 2024 and 2025.	
1.7	Understand the site's water risks and opportunities: Assess and prioritize the water risks and opportunities affecting the site based upon the status of the site, existing risk management plans and/or the issues and future risk trends identified in 1.6.	
1.7.1	Water risks faced by the site shall be identified, and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.	⊘ Yes
Comment	The site determined its water risks mapped to the 5 shared water challenges, and prioritized the risks. The site had assessed the likelihood and severity of the risks (on a scale of 7), giving them priority scores by indexing the risk scores.	i
1.7.2	Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.	⊘ Yes
Comment	The site identified opportunities for each risk/shared water challenge, including what stakeholders had identified for themselves.	
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 identified 8 best practices for water governance, including: -Advanced metering and real-time monitoring -Employee engagement and training on conservation awareness -Water assessment on potential water savings opportunities -Building a WSP -Coordinating community cleanup events -Monitoring and restoration of local streams and other natural environments -Climate resilience planning -Promoting community engagement and education	
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

The site identified 10 best practices for water balance, including:

- -Water assessment on potential water savings opportunities
- -Monthly ABBP "town hall" meetings (within the fenceline)
- -Water campaigns competition for associates to pitch efficiency ideas
- -Leak survey
- -Installing water meters
- -Automating sinks and toilets
- -Collaborating on North America's Environmental (corporate) meetings
- -Support river restoration to improve biodiversity and ecosystem resilience
- -Promote community awareness about the importance of river conservation
- -Support programs to reduce point-source contamination, like septic systems, urban runoff,

etc.

Comment

1.8.3

Relevant sector and/or catchment best practice for water quality shall be

identified, including rationale for data source.



The site identified 11 best practices for water quality, including:

- -Partnering with relevant stakeholders on stream clean-ups and storm drain markings
- -Wastewater tanks in secondary containment areas
- -Perform annual testing for source and treated water
- -Continually look for wastewater best practices, including wastewater reuse, process optimization, substituting inputs to reduce treatment burdens, and proactive monitoring and real-time quality sensors
- -Perform annual testing for source and treated water (per corporate guidelines)
- -Perform daily water quality monitoring
- -Proper wastewater management and practices outside of permit requirements
- -Adopt international water standards (ex: ISO 14001)
- -Research opportunities to participate in stream cleanups and sampling with key stakeholders
- -Pretreatment of wastewater above and beyond permit requirements

Relevant catchment best practice for site maintenance of Important

Relevant sector and/or catchment best practice for site provision of

-Implementing stormwater best practices, such as sweeping of paved roads, using nontoxic alternatives for cleaning, green infrastructure, and staff training on spill response

1.8.4

Water-Related Areas shall be identified.



2

Yes

Comment

The site identified 3 best practices for IWRAs, including:

- -achieve 100% circular water use, or regenerative water use
- -work with relevant stakeholders to help improve the health of the local watershed
- -aim to achieve water neutrality for site water usage

Comment

1.8.5

equitable and adequate WASH services shall be identified.

The site identified 10 best practices for WASH, including: -Using the WBCSD Self Assessment Tool annually

- -Employee uniform laundry service
- -Handwashing stations at the front of the plant
- -MHM products in bathrooms
- -Lock rooms with ADA-compliant showers
- -Signage in bathrooms about washing hands
- -Bottled and fountain drinking water
- -Develop WASH-related education programs for schools
- -Work with local/state/federal agencies to implement cohesive WASH policies in the catchment
- -Place trash and recycling bins in frequently visited areas along the river to reduce littering

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2 STEP 2: COMMIT & PLAN - Commit to be a responsible water steward and develop a Water Stewardship Plan

2.1 Commit to water stewardship by having the senior-most manager in charge of water at the site, or if necessary, a suitable individual within the organization head office, sign and publicly disclose a commitment to water stewardship, the implementation of the AWS Standard and achieving its five outcomes, and the allocation of required resources.

2.1.1 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 showed a signed statement by the site director (October 2024) that committed to transparently implementing water stewardship efforts and the AWS outcomes. The site disclosed this commitment internally in the production facility and on public communication tools.

It was publicly disclosed on their website at this URL: https://www.coca-cola.com/content/dam/onexp/us/en/media-center/coca-cola-aws-certification /awscommitment word10 11 24.pdf

- **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 shared a list of water legal requirements that included wastewater and stormwater. It included a process for submission (specifically, who to submit what to and when) and responsible positions (Water_Calendar.xls). It included SWPPP updates, Clean Water Act reporting, monthly discharge monitoring reports, stormwater inspections, and emergency spill reporting.

- 2.3 Create a water stewardship strategy and plan including addressing risks (to and from the site), shared catchment water challenges, and opportunities.
- 2.3.1 A water stewardship strategy shall be identified that defines the overarching mission, vision, and goals of the organization towards good water stewardship in line with this AWS Standard.



Comment

The site shared its strategic priorities, including environmental stewardship efforts that focused on water neutrality. It also included a video of the corporation's water security strategy, including goals to improve the AWS outcomes (particularly water balance, water quality, IWRAs, and WASH).

The vision is to work across the different sites to improve water systems while adapting to the impacts of climate change. The mission is to improve WASH access, adapt to the climate, and recover from crisis by 2030.

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



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

Comment

The site identified a WSP with 22 targets (a combination of columns E + F). It indicated for all of the targets the link to the AWS outcomes (column O), timeframes (column G), financial budgets (column H), team responsible for the target (column J), and how they would be monitored (column L). Column F ("Target") is also how the target will be measured. The actions to achieve and maintain the targets are column I.

The targets include the following (NB: some are repeated in the plan but the site agreed that they could be put together for ease of reporting):

- 1-Ensure continuous collection of relevant data to assess drought conditions and detect early warning signs.
- 2-Reduce Water Use Ratio by end of 2025 vs. 2024
- 3-Launch a water campaign, to gather water conservation ideas, and implement the top 2-3 to achieve water conservation.
- 4-Conduct third party Water assessment to obtain water conservation/efficiency suggestions 5-Identify and repair all water leaks within the facility by conducting a through inspection of pipes, fixtures, on a monthly basis
- 6-Install water meters in all major water consumption points within the plant to accurately monitor and track water usage.
- 7-Quantify water usage of service providers
- 8-Water efficiency
- 9-Water usage minimization through the reduction in the number of CIP's
- 10-Continue to have raw and treated water tested by a qualified laboratory (annually) and track trends.
- 11-Review City of Atlanta Consumer Confidence Report
- 12-Discharged wastewater quality above permit requirement
- 13-Develop a local baseline baseline values for COD, TSS, and pH
- 14-No Notice of Violation (NOV) stormwater & wastewater
- 15-Maintain awareness of regulatory/policy changes through emails and announcements
- 16-Maintain contact with the City of Atlanta and Corporate legal and PAC regarding regulatory/policy changes.
- 17-Align associates on idea of water conservation not only at work but at home
- 18-Ensure employees have access to restrooms, for proper hygiene
- 19-Ensure women's restroom are stocked with hygienic supplies
- 20-Educate employees on importance of good personal hygiene
- 21-Partner with Chattahoochee River Keeper (CRK)
- 22-Partner with Fulton County Department of Public Works, Fulton County Water Service Division Works, and Gresham Smith

Stakeholder interviews noted an opportunity for improvement in the more timely implementation of initiatives, but this did not affect the conformance to the indicator.

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.

Q Obs.

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Comment

The site noted that the USA regulatory regime limits the opportunity for coordination with public-sector agencies on risk mitigation plans. The site, however, submits SPCC to the Georgia Environmental Protection Division (EPD) when requested. The site also indicated that parts of its emergency response plan are submitted to the local fire department (the local Emergency Planning Committee).

The site could be more proactive in attempting to coordinate with public sector agencies on risk mitigation plans.



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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.

Q Obs.

Comment

The site identified 5 targets for good catchment governance with the following evidence:

1-No Notice of Violation (NOV) - stormwater: The site shared evidence of no NOVs from the EPA ECHO site, indicating that as of July 2025, the site has had no NOVs for stormwater within the last 3 years.

2-No Notice of Violation (NOV) - wastewater: The site has shown no evidence of NOVs since 2023, as evidenced by the shared wastewater quality updates. The site's evidence included COD, TKN, Total Phosphorus, TSS, and BOD.

3-Maintain awareness of regulatory/policy changes through emails and announcements: The site shared the site for its internal KORE updates (KORE Public Announcements). It shared that whenever there are updates, the KORE group shares push emails and newsletters with updates. For example, in June 2025, the KORE team shared new best practices in managing sanitation within the labs. The site also shared the National Safety Council's May 2025 bulletin with regulatory alerts, particularly around EPA and OSHA updates.

4-Maintain contact with the City of Atlanta and Corporate legal and corporate public affairs (PAC) regarding regulatory/policy changes: The site shared an email from June 2025 indicating that the corporate legal team was making changes, but had no updates on policy changes. The site also shared an email with the City of Atlanta in June 2025, noting new staff changes for the Department of Watershed Management and wishing the site good luck on the AWS certification.

5-Align associates on the idea of water conservation, not only at work but at home: The site shared evidence from Community KOnnect, a corporate community forum and communications tool. The evidence shared included a post with pictures teaching employees how to use rainbarrels at home to capture rainwater in March 2025. The site also shared posts from April 2025 for Earth Day that educated employees on how to participate in sustainable solutions. Lastly, the team shared in June 2025 that the site collaborated on a stream cleanup in the Chattahoochee River Boat Ramp with the Fulton County Department of Public Works. with images of the staff participating. This was also confirmed during stakeholder interviews.

Stakeholder interviews revealed opportunities for improvement in visibility within the broader community, including participation in public events, emphasizing water stewardship in public messaging, and inviting more groups to water-related activities outside of the fence line.

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.





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Comment The site shared that it does not hold any water rights for the water supply.

It also provides detailed information about the local water wars, noting that the Chattahoochee River had been the subject of an interstate dispute over river users since the 1990s because it had never been sanctioned for public water supply use. In 2021, a Supreme Court decision allowed Georgia to continue its water use levels after a Florida lawsuit, noting that there was no evidence that Georgia was harming any habitats for river species or the local water rights of others.

The site shared that in December 2023, it gained a corporate human rights policy, using the UN Guiding Principles on Business and Human Rights.

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 showed evidence of implementation, including a stormwater audit from Georgia EPD for February-March 2024, which showed no findings in exceeding regulatory requirements. It also showed evidence of its stormdrain outfall monitoring from April 2025. This included monitoring dates, permit ID, and discharge location. It also showed a wastewater monitoring report for compliance in May 2025, showing evidence of wastewater quality results.

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.

Comment The site shared that it does not hold any water rights for the water supply.

The site shared that in December 2023, it gained a corporate human rights policy, using the UN Guiding Principles on Business and Human Rights.

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.





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Comment

The site identified 9 targets for water balance with the following evidence:

1-Ensure continuous collection of relevant data to assess drought conditions and detect early warning signs: The site showed the auditor that it received weekly Drought.gov (run by NOAA) summary emails indicating if its location was in drought. The most recent emails were in July 2025. The site's alerts show that the site is currently not in drought.

2-Reduce Water Use Ratio by the end of 2025 vs. 2024: The site shared the CPS Sustainability Dashboard that includes annual water use ratio trends (June 2025). It also showed the water use, production volume, and the trends over time (ABBP Water Performance YTD.ppt). There were also tables showing performance YOY, and the monthly trends in a separate graph. The dashboard is accessible within Corporate SharePoint for all sites

3-Launch a water campaign to gather water conservation ideas and implement the top 2-3 to achieve water conservation: The site showed a QR code to a water savings campaign (August 2024). The QR code went to a water savings campaign form where staff could share ideas. The site also shared the 13 resulting ideas as of September 2024, including reusing water tanks, combining shifts in washdowns, calibrating water tanks, repairing pipe leaks, adding valves, and using spraydown schedules.

4-Conduct a third-party Water assessment to obtain water conservation/efficiency suggestions: The site shared a water use assessment from May 2025. The assessment included details of different areas of production, including treated water, wastewater treatment, and CIP segments. For each segment, the assessment shared observations, opportunities, and potential water savings.

5-Identify and repair all water leaks within the facility by conducting a thorough inspection of pipes, fixtures, on a monthly basis: The site shared a leak survey (starting in February 2025), where the site shared maintenance requests and tracking where the leaky pipe was located, date completed, and any necessary comments or actions. The survey included 18 pipes that needed fixing, with 5 having been fixed. Additionally, some of the reported leaks were actually condensate.

6-Install water meters in all major water consumption points within the plant to accurately monitor and track water usage: The auditor saw water meters on important points of water use, including the water treatment area. The auditor also saw the water meter dashboard on a screen in the production walkway, showing the total gallons of water used by several meters.

7-Quantify water usage of service providers: The site shared evidence of emails in April 2025 with vendors about their water usage and quantifying the site's comparative amount of usage.

8-Water efficiency (Alert associate of possible trouble with excess water usage in system): The site showed a picture of a dashboard from July 2025 - a MAIN LIQ MIX Menu. This included boxes for different processes. The next screen included the water usage from the city's water supply, treated water, and steam. These screen buttons turn red when there is an alarm, but since there was no alarm, the screen remained clear.

9-Water usage minimization through the reduction in the number of CIPs: The site shared its water efficiency 2030 tactical implementation plan (CPSNA Water Efficiency TIP Rev.2025.xls). For these practices, a note from July 2025 indicates that they were implemented in June. It also shared a water usage change in November 2024 in a dashboard screenshot, noting 12 hours of no-water usage (Water_Comparison_ShiftSchedule.ppt).

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.



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Comment

The idea identified an annual target of reducing water use efficiency in 2025. The site shared the CPS Sustainability Dashboard that includes annual water use ratio trends (June 2025). It also showed the water use, production volume, and the trends over time (ABBP Water Performance YTD.ppt). There were also tables showing performance YOY, and the monthly trends in a separate graph. The dashboard is accessible within Corporate SharePoint for all sites.

3.3.3 Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.



Comment

The site does not have to re-allocate water. This is because the City of Atlanta doesn't require reallocation. Even in a drought setting, industrial users are exempt from numeric reduction requirements. However, the site noted a precedent set in 2009's drought that industry could try to cut usage by 20% if the drought persists.

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.



Comment

The site identified 4 targets for water quality with the following evidence:

-Continue to have raw and treated water tested by a qualified laboratory (annually) and track trends: The site shared evidence of third-party annual water quality test results for city water (raw) and treated incoming water, including 97 parameters. The site indicated that it is required to have a third-party test the incoming and treated water quality annually; the site also collects daily water quality data.

-Review City of Atlanta Consumer Confidence Report (CCR): The site shared a 2024 City of Atlanta Water Quality Report, which included Total Coliforms, heavy metals, Turbidity, Nitrate, Organic Carbon, etc. The site had a record of these water quality reports from 2019. They also said that this is the same thing as the consumer confidence report for the City of Atlanta, and includes what the EPA requires for CCRs.

-Discharged wastewater quality above permit requirement (The wastewater discharge quality is 5% below the permit parameters): The site shared the wastewater quality trend links since 2022, which include graphs with the permit requirement levels. According to the graphs, the site is well above 5% higher quality than the permit requirements for COD, TKN, TSS, and Total Phosphorous (Att. #8 Wastewater Upgrade EffluentQuality.xls).

-Develop a local baseline baseline values for COD, TSS, and pH for a 3-year period (specifically around stormwater quality): The site shared that Georgia has no proposed limits for indicator monitoring for stormwater quality. It was determined to monitor the stormwater quality values for each outfall (2023-2025), as shared by the site (Att.#8 Stormwater_indicator Monitoring.xls). In the spreadsheet, the site's 2025 levels for COD were between ND and 51.7, TSS were between 8.7 and 110, and pH were between 6.3 and 6.8. The site shared that the difference in outfall qualities was due to the locations in the plant (e.g., in grassy areas vs. industrial production areas)

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





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Comment

The site had a target that included discharged wastewater quality above permit requirements (The wastewater discharge quality is 5% below the permit parameters), which could be seen as a best practice for effluent.

The site shared the wastewater quality trend links since 2022, which include graphs with the permit requirement levels. According to the graphs, the site is well above 5% higher quality than the permit requirements for COD, TKN, TSS, and Total Phosphorous (Att. #8 Wastewater Upgrade EffluentQuality.xls).

- 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.

Q Obs.

Comment

The site identified 2 targets for IWRAs with the following evidence:

1-Partner with Chattahoochee River Keeper (CRK): The site shared evidence of river sampling in November 2023, where the site grabbed water samples from the Cascade Nature Preserve (which is at the headwater of Utoy Creek) and Utoy Creek. The CRK never informed the site of the test results, and the email archives for the corporate email system delete anything after 12 months. Some more concrete evidence of implementation to show the results of the tests would have been stronger conformance.

2-Partner with Fulton County Department of Public Works, Fulton County Water Service Division Works, and Gresham Smith: The site shared photo evidence from April 2024 of it working with the Fulton County Department of Public Works on a storm drain cleanup. The site cleaned 29 storm drains that went directly to the Chattahoochee River. The site also collaborated with Fulton County and Gresham Smith on a street cleanup in June 2025, and with Fulton County again on October 2024 at Wolfe Creek (removing 1,620 pounds of garbage). This was also confirmed during stakeholder interviews.

- 3.6 Implement plan to provide access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers at all premises under the site's control.
- 3.6.1 Evidence of the site's provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers onsite shall be identified and where applicable, quantified.



Comment

The site quantified access to bathrooms (including hygiene, water, and sanitation services), noting that both male and female employees have access to three bathrooms each.

The site identified 3 targets for WASH with the following evidence:

- -Ensure employees have access to restrooms for proper hygiene: The auditor saw these bathrooms while on the site tour and deemed them adequate, with constantly-cleaned bathrooms, running water, and ample soap for handwashing. The auditor also observed the canteens, which provided bottled water access for staff.
- -Ensure women's restrooms are stocked with hygienic supplies: The auditor saw these supplies while on the site tour and deemed them adequate, with baskets of menstrual health supplies in each bathroom visited.
- -Educate employees on the importance of good personal hygiene: The auditor saw hygiene signs while on the site tour and deemed them adequate, with visible signs in each bathroom. The site also shared a personal hygiene procedure (from November 2018) that outlines the standard hygiene practices all staff must follow.



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3.6.2

0.0.2	and sanitation of communities through their operations, and that traditional access rights for indigenous and local communities are being respected, and that remedial actions are in place where this is not the case, and that these are effective.	Yes
Comment	The site shared that it does not impinge on the human right to safe WASH access of other as it receives water from the City of Atlanta. It also shared that it was reducing water used and improving wastewater quality to ensure good access to water for others.	
	The site shared that in December 2023, it gained a corporate human rights policy, using UN Guiding Principles on Business and Human Rights.	the
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.	Q Obs.
Comment	The site has a target on indirect water: Quantify the water usage of service providers. The site shared evidence of emails in April 2025 with the drum cleaning vendor and the laundry vendor about their water usage and quantifying the site's comparative amount of usage. While the site had not received quantification of laundry water use from the laundry vendor, persistent follow-up would help strengthen the conformance of this indicator.	
3.7.2	Evidence of engagement with suppliers and service providers, as well as, when applicable, actions they have taken in the catchment as a result of the site's engagement related to indirect water use, shall be identified.	⊘ Yes
Comment	The site shared evidence of emails in April 2025 with the drum cleaning vendor and the laundry vendor about their water usage and quantifying the site's comparative amount of usage.	
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.	Q Obs.

Evidence that the site is not impinging on the human right to safe water

Comment

The site shared three emails to the City of Atlanta from July and August 2024, inquiring about the drought contingency plan and infrastructure funding for any upcoming upgrades. This email received no response, though another email with the City of Atlanta in June 2025 noted new staff changes for the Department of Watershed Management and wished the site good luck on the AWS certification.

The site would benefit from confirming whether they have received confirmation of receipt information for these emails.

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.





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Comment

The site identified the following evidence of implementing best practices for water governance:

-Advanced metering and real-time monitoring: The auditor saw water meters on important points of water use, including the water treatment area. The auditor also saw the water meter dashboard on a screen in the production walkway, showing the total gallons of water used by several meters.

-Employee engagement and training on conservation awareness: The site shared evidence from Community KOnnect, a corporate community forum and communications tool. The evidence shared included a post with pictures teaching employees how to use rainbarrels at home to capture rainwater in March 2025. The site also shared posts from April 2025 for Earth Day that educated employees on how to participate in sustainable solutions. Lastly, the team shared in June 2025 that the site collaborated on a stream cleanup in the Chattahoochee River Boat Ramp with the Fulton County Department of Public Works. with images of the staff participating. This was also confirmed during stakeholder interviews.

-Water assessment on potential water savings opportunities: The site shared a water use assessment from May 2025. The assessment included details of different areas of production, including treated water, wastewater treatment, and CIP segments. For each segment, the assessment shared observations, opportunities, and potential water savings

-Building a WSP: The site's existing WSP is evidence of implementation

-Treating industrial wastewater above and beyond the permit requirements: The site shared the wastewater quality trend links since 2022, which include graphs with the permit requirement levels. According to the graphs, the wastewater discharge quality is 5% below the permit parameters.

-Collaborating on community cleanups: The site shared photo evidence from April 2024 of it working with the Fulton County Department of Public Works on a storm drain cleanup. The site cleaned 29 storm drains that went directly to the Chattahoochee River. The site also collaborated with Fulton County and Gresham Smith on a street cleanup in June 2025, and with Fulton County again in October 2024 at Wolfe Creek (removing 1,620 pounds of garbage). This was also confirmed during stakeholder interviews.

-Monitoring and restoration of local streams and other natural environments: See above

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





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Comment

The site identified the following evidence of implementing best practices for water balance: -Water assessment on potential water savings opportunities: The site shared a water use assessment from May 2025. The assessment included details of different areas of production, including treated water, wastewater treatment, and CIP segments. For each segment, the assessment shared observations, opportunities, and potential water savings

- -Monthly ABBP "town hall" meetings (within the fenceline)
- -Water campaigns competition for associates to pitch efficiency ideas: The site showed a QR code to a water savings campaign (August 2024). The QR code went to a water savings campaign form where staff could share ideas. The site also shared the 13 resulting ideas as of September 2024, including reusing water tanks, combining shifts in washdowns, calibrating water tanks, repairing pipe leaks, adding valves, and using spraydown schedules.
- -Leak survey: he site shared a leak survey (starting in February 2025), where the site shared maintenance requests and tracking where the leaky pipe was located, date completed, and any necessary comments or actions. The survey included 18 pipes that needed fixing, with 5 having been fixed. Additionally, some of the reported leaks were actually condensate.
- -Installing water meters: The auditor saw water meters at important points of water use, including the water treatment area. The auditor also saw the water meter dashboard on a screen in the production walkway, showing the total gallons of water used by several meters.
- -Automating sinks and toilets: The auditor saw working automatic sinks and toilets while on the site tour.
- **3.9.3** Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.



Comment

The site identified the following evidence implementing best practices for water quality: -Partnering with relevant stakeholders on stream clean-ups and storm drain markings: The site shared evidence from Community KOnnect, a corporate community forum and communications tool. The evidence shared included a post with pictures teaching employees how to use rainbarrels at home to capture rainwater in March 2025. The site also shared posts from April 2025 for Earth Day that educated employees on how to participate in sustainable solutions. Lastly, the team shared in June 2025 that the site collaborated on a stream cleanup in the Chattahoochee River Boat Ramp with the Fulton County Department of Public Works. with images of the staff participating.

- -Wastewater tanks in secondary containment areas: The auditor saw these secondary containment areas while on the site tour and can confirm evidence of implementation.
- -Perform annual testing for source and treated water: The site showed the third-party annual water quality test results for city water and treated incoming water, including 97 parameters. The site indicated that it is required to have a third-party test the incoming and treated water quality annually; the site also collects daily water quality data.
- -Perform daily water quality monitoring: The site shared evidence of daily water quality testing. The most recent was from the wastewater passdown on July 28, 2025. This included pH, TSS, COD, TN, TP, and DO for influent and effluent.
- -Proper wastewater management and practices outside of permit requirements: The site shared the wastewater quality trend links since 2022, which include graphs with the permit requirement levels. According to the graphs, the wastewater discharge quality is 5% below the permit parameters.
- -Adopt international water standards (ex: ISO 14001): The site shared its ISO 14001 certification (January 2023 February 2026).
- -Pretreatment of wastewater above and beyond permit requirements: See above.

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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 identified the following evidence of implementing best practices for IWRAs: -Work with relevant stakeholders to help improve the health of the local watershed: The site shared evidence from Community KOnnect, a corporate community forum and communications tool. The evidence shared included a post with pictures teaching employees how to use rainbarrels at home to capture rainwater in March 2025. The site also shared posts from April 2025 for Earth Day that educated employees on how to participate in sustainable solutions. Lastly, the team shared in June 2025 that the site collaborated on a stream cleanup in the Chattahoochee River Boat Ramp with the Fulton County Department of Public Works. with images of the staff participating.

-aim to achieve water neutrality for site water usage: The site shared this information through the water assessments shared previously, the leak survey, and other similar practices shared in the WSP.

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



Comment

The site identified the following evidence of implementing best practice for WASH: -Using the WBCSD Self Assessment Tool annually: The site showed evidence of completing the assessment tool. It was filled out and updated in July 2025.

- -Employee uniform laundry service: The site shared evidence of email exchanges with its laundry service provider.
- -Handwashing stations at the front of the plant: The auditor observed these best practices during the site tour.
- -MHM products in bathrooms: The auditor observed these best practices during the site tour.
- -Lock rooms with ADA-compliant showers: The auditor observed these best practices during the site tour.
- -Signage in bathrooms about washing hands: The auditor observed these best practices during the site tour.
- -Bottled and fountain drinking water: The auditor observed these best practices during the site tour.



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4	STEP 4: EVALUATE - Evaluate the site's performance.	
4.1	Evaluate the site's performance in light of its actions and targets from its water stewardship plan and demonstrate its contribution to achieving water stewardship outcomes.	
4.1.1	Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.	⊘ Yes
Comment	The site shared that it had started evaluating the progress of targets, which were categorized into corporate categories called "Opportunity/Vulnerability". The opportunities/vulnerabilities were evaluated based on the following stages: "started", "planned", "continuous", "executing" and "completed". The site noted that, as of July 2025, 41% of the targets were completed, 33% were continuous, and 7% were planned. 0% were not yet started.	
	The site also noted that, in the WSP, Status Comments (column N) more concretely evaluated its performance against targets.	
	*Note that the plan is in its early stages of implementation (within year 1). Thus, a fuller evaluation of performance against targets may be expected in future years.	
4.1.2	Value creation resulting from the water stewardship plan shall be evaluated.	⊘ Yes
Comment	The site shared its evaluation of WSP's value creation. It included a table, including 11 action points from the WSP, the USD investment, expected financial benefit, and value type. These action points include leak survey, wastewater quality, water campaign, water meters, and rainbarrels. The site has invested significantly in efficiency projects. It noted that ROI may take time to realize, but that the site was committed to water stewardship.	
	*Note that the plan is in its early stages of implementation (within year 1). Thus, a fuller evaluation of value creation may be expected in future years.	
4.1.3	The shared value benefits in the catchment shall be identified and where applicable, quantified.	⊘ Yes
Comment	The site identified its shared water benefits for the catchment and provided a detailed summary of these shared water benefits. In it, it noted that there was better quality in wastewater discharge, increased water conservation efforts by the site overall, increased partnerships to strengthen water governance (such as with CRK and Fulton County), and increased site commitment to water stewardship. It noted its actions and how it expects that t improve catchment quality over time.	to
	*Note that the plan is in its early stages of implementation (within year 1). Thus, a fuller identification of shared value benefits is expected in future years.	
4.2	Evaluate the impacts of water-related emergency incidents (including extreme events), if any occurred, and determine the effectiveness of corrective and preventative measures.	
4.2.1	A written annual review and (where appropriate) root-cause analysis of the year's emergency incident(s) shall be prepared and the site's response to the incident(s) shall be evaluated and proposed preventative and corrective actions and mitigations against future incidents shall be identified.	⊘ Yes
Comment	The site has not had any emergency incidents since 2019, so no written annual review was necessary.	

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4.3 Evaluate stakeholders' consultation feedback regarding the site's water stewardship performance, including the effectiveness of the site's engagement process.

4.3.1 Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.

⊘ Yes

Comment

The site shared that it had a stakeholder meeting in July 2025 to review its water stewardship performance. The presentation included Utoy Creek Reclamation Plant representatives, Fulton County representatives, and wastewater treatment system vendor - the site showed a screenshot of the virtual attendance of participants, as well. The site said that it shared the WSP on a screenshare during the conversation.

4.4 Evaluate and update the site's water stewardship plan, incorporating the information obtained from the evaluation process in the context of continual improvement.

4.4.1 The site's water stewardship plan shall be modified and adapted to incorporate any relevant information and lessons learned from the evaluations in this step and these changes shall be identified.

Q Obs.

Comment

The site had not yet fully modified the WSP, although it had previously displayed the WSP, which differed from the WMP. It had shared that it was adjusting the WSP based on lessons learned from the WMP, such as digital tool availability, employee buy-in, and stakeholder management.

It is recognized that the site has not reached a year of implementation since the WSP's finalization. At that time, the site's water stewardship plan should be modified and adapted to incorporate any relevant information and lessons learned from the evaluations in Step 4 and identified changes.



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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. Obs.
Comment	The site shared its tailored version of a corporate template for disclosure. The template included the site's water-related internal governance. However, the site had not yet disclosed this information to relevant stakeholders. The site shared that, while walking through the WSP in July 2025 with relevant stakeholders, the SES Specialist indicated that they were the point of contact for stakeholders related to water governance, and that the WSP included a column for persons responsible (column J).
	While the site shared some information and accountable positions with relevant stakeholders, it was unclear if this information needed to be more explicitly disclosed. To better conform to this indicator, clearer disclosure to relevant stakeholders would be stronger.
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 Yes relevant stakeholders.
Comment	The site shared that it had a stakeholder meeting in July 2025 to review its water stewardship performance. The presentation included Utoy Creek Reclamation Plant representatives, Fulton County representatives, and wastewater treatment system vendor - the site shared a screenshot of the virtual attendance of participants, as well.
	The site mentioned that it shared the WSP on a screenshare during the conversation, explaining how it contributes to the AWS outcomes.
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 Yes minimum.
Comment	The site shared that it had a stakeholder meeting in July 2025 to review its water stewardship performance. The presentation included Utoy Creek Reclamation Plant representatives, Fulton County representatives, and wastewater treatment system vendor - the site shared a screenshot of the virtual attendance of participants, as well. The site said that it shared the WSP on a screenshare during the conversation, which includes its performance/progress against targets to date.
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.

WSAS

5.4.1

2 Quality StreetNorth Berwick, EH39 4HW, UNITED KINGDOM

these challenges shall be disclosed.

The site's shared water-related challenges and efforts made to address

Yes



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Comment The site shared its tailored version of a corporate template for disclosure. The template

included the site's shared water challenges and discussed actions for addressing each challenge. The site had disclosed these things during the meeting with relevant stakeholders in July 2025. There, the Utoy Creek Reclamation Plant mentioned reusing wastewater for site washdowns and concerns about maintaining solids during droughts, while discussing

water-related challenges and efforts to address them.

5.4.2 Efforts made by the site to engage stakeholders and coordinate and

support public-sector agencies shall be identified.

Vas

Comment The site shared that it had a stakeholder meeting in July 2025 to review its water stewardship

performance. The presentation included Utoy Creek Reclamation Plant representatives, Fulton County representatives, and wastewater treatment system vendor - the site shared a screenshot of the virtual attendance of participants, as well. The meeting included many public-sector agencies, and the site coordinated discussions on shared water challenges with

these stakeholders.

5.5 Communicate transparency in water-related compliance: make any site

water-related compliance violations available upon request as well as any corrective actions the site has taken to prevent future occurrences.

5.5.1 Any site water-related compliance violations and associated corrections

shall be disclosed.

Yes

Comment The site disclosed legal compliance with relevant stakeholders. The site shared that no

water-related compliance violations had happened since 2023 (when there was insufficient

water in the sample taken, and there was an exceedance in COD).

5.5.2 Necessary corrective actions taken by the site to prevent future

occurrences shall be disclosed if applicable.

Yes

Comment The site disclosed legal compliance with relevant stakeholders. The site shared that no

water-related compliance violations had happened since 2023.

5.5.3 Any site water-related violation that may pose significant risk and threat

to human or ecosystem health shall be immediately communicated to

relevant public agencies and disclosed.

Yes

Comment The site disclosed legal compliance with relevant stakeholders. The site shared that no

water-related compliance violations had happened since 2023.

Previous Findings

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

closed.



Comment This was the initial audit.