

Alliance for Water Stewardship (AWS)

Audit Number: AO-001697

SITE DETAILS

Site: Caribbean Refrescos, Inc.

Address: Road 172 Km 13.4 Bo. Montellano, 00739, Cidra, Puerto Rico, UNITED STATES

Contact Person: Suellen Santiago Salamé AWS Reference Number: AWS-000710

Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Core

Date of certification decision: 2025-Oct-06

Validity of certificate: 2028-Oct-05

AUDIT DETAILS

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

Audit Type(s): Initial Audit Audit Start Date: 2025-Aug-19 Audit End Date: 2025-Aug-21

Lead Auditor: Maria Luisa Cuevas Fernandez

Site Participants:

Suellen Santiago, Sustainability Senior Management Wilnelia Lopez, Director of Operations and Manufacturing Bibiana Fraire, Occupational Safety Senior Manager Cruz O. Moran, Engineering and Maintenance Manager Jann Carlos Roman, Occupational Safety Analyst

Shirley Mercado, Environmental Specialist

Fernando Quintana, Planning Senior Manager

Antonio Santos, Senior Manager, Quality and Food Safety Systems

Hector Amador, Production Manager Dry Parts

Victor Torres, Lead Auditor Quality, Safety, Environmental

Giselle Rodriguez, Transportation Manager

Isabel Pluguez, Liquid Filling Production Manager

Theodore H. Braswell Jr., Director QSE North America

Nelson Arroyo, Facilities and Infrastructure Manager

Alexis Rosado, Chief Financial Officer

Leandro Medina, Plant Manager North America

Angel Flores, Automation Senior Manager

Marianna Carbo, Fast Follower Project Management Senior Manager



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ADDITIONAL INFO

Summary of Audit Findings: During the certification audit, 1 non-conformity and 7 observations were raised.

The Client is requested to submit a root cause analysis and corrective actions for the non-conformity to WSAS within 7 days of receipt of the audit report, by 26 September 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) by 05 November 2025.

The audit team recommends certification of Caribbean Refrescos, Inc at Core level pending closure of the non-conformity.

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

The Site is located in the municipality of Cidra in the central area of Puerto Rico. The Municipality of Cidra has a territorial area of approximately 37 square miles (95 square kilometers). The Site is situated within an industrial zone. The Site manufactures concentrates and beverage bases primarily supplied to the USA and Canada. Water is used as a raw material in our production process (main production ingredient). It is also used for the cleaning of tanks (sanitation), equipment, plant facilities, offices, buildings, and pavements, the operation of equipment (homogenizers, pumps, calibrations), utilities (boilers, chillers, cooling towers), restroom facilities, cafeteria, maintenance of green areas and a fire protection system. The water sources for production are one well, installed in 1983, and water from the local public water utility (PRASA). The Site operates its owned wastewater pretreatment facility for production wastewater. Treated wastewater is discharged to the Cavey WWTP, which discharges to the La Plata River. The Site does not have rainwater harvesting infrastructure; however, it is equipped with dikes and pits containing 35 stormwater valves and 25 industrial valves. The Site includes two treated well water storage tanks, each with a capacity of 70.000 gallons, as well as three reuse water tanks: two with a capacity of 6,000 gallons each, and one with a capacity of 10,000 gallons. The property where our operation is located spans approximately 53 acres and includes 520,000 square feet of buildings, with the warehouse offering a capacity of 20,000 pallet positions. The operation is supported by a dedicated team of associates, temporary employees, and resident contractors, working together to ensure seamless operations. The facility is located in the sub-catchment of Lake of Cidra, within the Bayamon River Catchment. The primary source of water supply is groundwater from the Pre-Robles aguifer.

The audit was conducted onsite on August 19-21.

The onsite visit included the assessment of the well, the two discharge points, the WWTP, the pre-treatment system, WASH Services, production lines, and part of the Lake of Cidra, as part of the audit.

FINDINGS

Observation1Observation6Non-Conformity1

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FINDING DETAILS

Finding No: TNR-019422
Checklist Item No: Annoucement

Status: Open

Finding level: Observation

Checklist item: At least eight (8) weeks before the start date of the initial certification

audit or the re-evaluation audit, AWS will publish on its website the dates of the assessment of the site(s) with the intention to pursue AWS (Re-)Certification. Stakeholder submissions are accepted from this date

and during the entire period of validity of the AWS Certificate. Submissions, comments and/or feedback received by AWS will be shared with the CAB so the audit team may use the information for their

investigations during the next audit.

The site(s) seeking certification shall complete the Stakeholder Announcement Form found on the AWS website, and release it in at least two outlets: published in local language(s) on the site's website(s) and in a local media outlet (if applicable, economical, practical, and available) that is appropriate for the site and the related stakeholders

(for example, local newspaper, radio, or websites).

Findings: The Site published the first announcement five weeks before the audit,

instead of eight weeks prior, as the standard required.

Finding No: TNR-019676

Checklist Item No: 1.3.2 Status: Open

Finding level: Observation

Checklist item: Site water balance, including inflows, losses, storage, and outflows shall

be identified and mapped

Findings: Additional small flows could be looked at to see if they should be

considered in the balance: the precipitation entering the WWTP and the evaporation from it, as well as water in the sludge from the WWTP.

WSAS WATER STEWARDSHIP ASSURANCE SERVICES

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Finding No: TNR-019675

Checklist Item No: 1.3.3 Status: Closed

Finding level: Non-Conformity

Due date: 2025-Nov-20

Checklist item: Site water balance, inflows, losses, storage, and outflows, including

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

and low variances shall be quantified.

Findings: The difference between the inputs and outputs exceeds the acceptable

5% according to the standard. During the audit, it was clear that the flows are correctly identified, but there are errors in the data collected

from the meters.

Corrective action: Review the 2024 Site Water Balance to include water donation,

evaporation, precipitation, and the water content in the sludge from the

wastewater treatment plant (WWTP). 10-03-2025 Completed

Reuse loops to be measured and reported as internal circulation, not as

fresh inflow or final outflow, 10-03-2025 Completed

Incorporate the calibration program for both the reuse water meter and the donated water meter to ensure measurement reliability. 09/30/2025.

Completed

Evidence of implementation: The site present a Site Water Balance including water donation,

evaporation, precipitation, and the water content in the sludge from the wastewater treatment plant (WWTP). They consider also reuse loops and reported as internal circulation, not as fresh inflow or final outflow. There is room from improvement seeking to reach a difference of less

than 5% (the difference is about 8%).

Finding No: TNR-019677

Checklist Item No: 1.3.7 Status: Open

Finding level: Observation

Checklist item: 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.

Findings: For better conformance, the site could identify cultural water-related

values generated, and for cost analysis, could include the salaries of

the employees that have water-related activities.



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Audit Number: AO-001697

Finding No: TNR-019463

Checklist Item No: 1.6.2 Status: Open

Finding level: Observation

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

Findings: The Site identified government initiatives that address these challenges,

as well as actions in which the site itself can influence alone or

collectively. However, it did not include initiatives from other actors such

as the hospital, the fishing club, and NGOs.

Finding No: TNR-019471

Checklist Item No: 3.7.2 Status: Open

Finding level: Observation

Checklist item: Evidence of engagement with suppliers and service providers, as well

as, when applicable, actions they have taken in the catchment as a result of the site's engagement related to indirect water use, shall be

identified.

Findings: The Site expects to involve its suppliers in the upcoming cleaning efforts

at Lake Cidra and to identify additional joint actions.

Finding No: TNR-019476

Checklist Item No: 4.1.2 Status: Open

Finding level: Observation

Checklist item: Value creation resulting from the water stewardship plan shall be

evaluated.

Findings: Although a qualitative analysis of the value creation of each action was

conducted, and the investment costs are known, the Site did not perform

a financial (cost-benefit) analysis of the savings resulting from the

actions to be implemented or the costs of not acting.

Finding No: TNR-019478

Checklist Item No: 5.3.1 Status: Open

Finding level: Observation

Checklist item: A summary of the site's water stewardship performance, including

quantified performance against targets, shall be disclosed annually at a

minimum.

Findings: In the following Surveillance Audit 1, the site must show evidence of the

summary of results of its WSP shared with the identified stakeholders

and other relevant actors identified over the months.



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Report	Value
Report prepared by	Maria Luisa Cuevas Fernandez
Report approved by	Carla Schmidt Oberdiek
Report approved on (Date)	04.September.2025

Surveillance

Proposed date for next audit

2026-Aug-18

Comment

The initial audit was conducted from August 19 to August 21, 2025. Surveillance Audit 1 must be scheduled within the next twelve months.

Stakeholder Announcements

Date of publi	cation Location
14/07/2025	On-site meeting with stakeholders
01/08/2025	Company web site
Comment	The Site informed stakeholders about its interest in the AWS certificate through two methods. The first was an email invitation to an in-person meeting at the Site's offices (July 14), and the second was via the Company's website (August 1).
Comment	During the on-site audit, two interviews were performed. One was online while the other was in person.



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Catchment Information

Catchment Information

The Site is located in the Bayamón River basin, Sub-catchment: Cidra Lake, an artificial reservoir completed in 1946.

The water sources for production include one well that draws water from the Pre-Robles aquifer. The secondary source is supplied by the local public water utility, which extracts water from Lago de Cidra and two groundwater wells located to the northwest and southwest of Cidra

The Bayamón River basin covers approximately 89.9 square miles in the North-Central Region of Puerto Rico. It includes rural and urban areas on the slopes of the Central Mountain Range within the municipalities of Aguas Buenas, Cidra, Toa Alta, and Toa Baja, as well as parts of the urban centers of Bayamón and Guaynabo in the coastal valley.

The Bayamón River begins in the mountainous area south of Cidra, at elevations reaching up to 1,637 feet above sea level. It flows northward to the Cidra Reservoir. Before entering the reservoir, the river receives tributaries from the Clavija and Sabana Rivers, then continues its course toward the southern part of Bayamón.

El acuífero Geology: Pre Robles Volcanic Rock Formation

Total depth 407 ft bgl

Filter screen interval: from 40 to 407 ft bgl

Pump type: submersible turbine

Pump depth: 270 ft bgl

Dynamic water level: 58-62 ft bgl at m3/h

Cidra WTP is located in State Road 783, Km. 3.3, Cidra, PR.

Water Source: Filtration Plant of Cidra

Effluent description: filters backwash and clarifiers tank drain, treated in a sludge treatment

system.

Effluent Receiving water: Bayamon River

Stormwater: Bayamon River

Catchment Features

- 1. There is a dry season from January to April. In drought years, rainfall can drop to 51 inches. The safe yield of the Cidra Reservoir is slightly positive (2024), meaning any increase in extraction during droughts could quickly lower water levels, affecting service.
- 2. The river channel was modified in the 1970s to control flooding in Bayamón's urban center and surrounding areas. The Río Hondo was also channelled for the same flood control purpose.
- 3. There are two important areas:
- a. El Rabanal: This is a small, protected area consisting of 16 acres of critical secondary forest in the municipality of Cidra. The forest tract is located in barrio Rabanal, in a 5,438 -acre hydrological basin (El Banco Creek, important for the La Plata basin), which is home to 21 species of birds, seven out of which are endemic to the region, including the Puerto Rican plain pigeon (considered a symbol of Cidra).
- b. Cidra Fishing Club: while not a protected area, it holds significant recreational value.
- 4. Water is transferred from the Río Grande de La Plata to the Guaynabo River basin.
- 5. The climate is humid subtropical, with very humid subtropical areas near the Cidra Reservoir.
- 6. Forests and pastures dominate (59%). Urban areas cover 35% (among the highest in Puerto Rico). Agriculture is minimal (4%). No industries discharge into the river under environmental permits.

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Lake Cidra sub-catchment_pages-to-jpg-0001.jpg



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Client Description and Site Details

Client/Site Background

The Site is located in the municipality of Cidra in the central area of Puerto Rico. Its northern border is the Municipality of Aguas Buenas, to the west are the municipalities of Comerío and Aibonito, to the south is the Municipality of Cayey, and to the east is the Municipality of Caguas. The Municipality of Cidra has a territorial area of approximately 37 square miles (95 square kilometers). The Site is situated within an industrial zone.

The Site manufactures concentrates and beverage bases primarily supplied to the USA and Canada.

Water is used as a raw material in our production process (main production ingredient). It is also used for:

- Cleaning of tanks (sanitation), equipment, plant facilities, offices, buildings, and pavements
- Operation of equipment (homogenizers, pumps, calibrations)
- Utilities (boilers, chillers, cooling towers)
- Restroom facilities
- · Cafeteria
- · Maintenance of green areas
- Fire protection system
- 1. The water sources for production are one well installed in 1983. The local public water utility, PRASA, provides the Plant's secondary source.
- 2. Potable and process water treatment facility.
- 3. In 2024, 63% of the extracted well water was used for production purposes, including product manufacturing, cleaning of tanks and filling areas, and tank calibrations.
- 4. In 2024, 12.2% of the extracted well water was used to supply two boilers that support production. Additionally, the cooling towers consumed 94% reused water and 6% well water.
- 5. The plant operates its wastewater pretreatment facility for production wastewater. Treated wastewater is discharged to the Cayey WWTP, which discharges to the La Plata River.
- 6. The Site is equipped with two glycol cooling towers and three chilled water-cooling towers.
- 7. The Site does not have rainwater harvesting infrastructure.
- 8. The Site is equipped with dikes and pits containing 35 stormwater valves and 25 industrial valves.
- 9. The Site has two fire water tanks, each with a capacity of 250,000 gallons, and a total of 22 risers.
- 10. The Site includes two treated well water storage tanks, each with a capacity of 70,000 gallons, as well as three reuse water tanks: two with a capacity of 6,000 gallons each, and one with a capacity of 10,000 gallons.

Three types of outflows are generated at the Site:

- 1. Production and utilities wastewater (Discharge 001)
- 2. Sanitary wastewater (Discharge 002)
- Surface runoff

Production and sanitary wastewater are collected separately. Sanitary wastewater is directly sent to the municipal wastewater treatment plant without prior treatment. Stormwater is discharged into the environment, flowing toward Cidra Lake, located north of the plant. Production wastewater undergoes biological pre-treatment before being discharged to the Cayey Regional Wastewater Treatment Plant and eventually to the La Plata River.

The property where our operation is located spans approximately 53 acres and includes 520,000 square feet of buildings, with the warehouse offering a capacity of 20,000 pallet positions. The operation is supported by a dedicated team of associates, temporary employees, and resident contractors, working together to ensure seamless operations.

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Coca-Cola Cidra Puerto Rico_pages-to-jpg-0001.jpg

Summary of Shared Water Challenges

Summary of Shared Water Challenges

- 1. Dry Conditions: Reduced water supplies
- 2. Severe Storms: Interrupted water supply
- 3. Water Quality: Contamination of the water supply during the rainy season

Comment

Priority Score was calculated by multiplying the consequence score by the likelihood score.

The Challenges were classified in four categories:

- 1. Positive environmental impact; keep up the good work and extend activities as appropriate
- 2. Low environmental impact from this aspect; review at regular intervals.
- 3. Potential for moderate environmental impact; control required. Applies if there is a lack of information, regulatory control, or stakeholder interest in the aspect.
- 4. Potential for high environmental impact; the aspect should be prioritised in the environmental management programme and within the EMS.

0.0.1	Water Source & Discharge Locations	
0.01	Have any water source or discharge locations been visited during the audit, if so, which and where? If none were visited, please provide justification.	₹ Yes
Comment	During the initial audit, the extraction well and the discharge points of the WWTP and the sanitary systems within the Site were inspected.	

Additionally, a part of Lake Cidra, considered an IWRA, was visited.



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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 presented maps of its physical reach.

The Site is located in the Bayamón River basin, within the Cidra Lake sub-basin, in the municipality of Cidra, Puerto Rico. Due to the size of the basin, the physical reach is the Cidra Lake sub-basin.

The Site provided maps of:

- Physical boundaries of the plant, indicating where parts of its infrastructure are located, such as boilers, cooling towers, the well, treatment plant, discharge points 001 and 002, fire cistern, hazardous sites, diesel, among others.
- Map of areas where hazardous substances are stored and used.
- Map of rainwater collection, flow, and discharge routes.
- Piping diagrams of the well.
- Pathway followed by discharges of water to the final discharge point.
- Map of the basin and sub-basin of the physical reach.
- Location of the municipal filtration plant and the Site (the Site has a municipal water intake used only for the fire system and during maintenance of its well and cisterns).
- Piping diagrams of the industrial and sanitary treatment system.
- Path of the drinking water received from the city, from the filtration plant to the Site.
- Path followed by the effluent from the treatment plant and the sanitary water to the treatment plant.
- Satellite view of the Municipal WWTP and the receiving body where the waters are discharged (La Plata River).
- Basin from which water is extracted (Bayamón River) and basin where wastewater is discharged (La Plata).
- Map of the Pre-Robles Aquifer.

The maps, plans, and satellite images presented by the Site have coordinates, scale, legend, and in some cases, a compass rose or north arrow.

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



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1.2.1 Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall:



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

Comment

The Site identified 12 stakeholders, of which one is an authority (Cidra municipality), three are NGOs, two are part of the community, two are service providers (water and packaging), one is a hospital, two are industries, and one is a client. Some of these stakeholders are neighboring industries.

The Rabanal Neighborhood Residents Association, Almirante Sector, represents the vulnerable groups.

The entity responsible for the water treatment plant and the discharge plant is PRASA, included in the list of stakeholders.

The process to identify stakeholders was carried out following the AWS guide. First, the industries and entities that use the same water sources were identified, along with the water-related authorities, the NGOs present in the basin, and organizations they have worked with on environmental issues. Vulnerable groups were identified based on official documentation.

To identify the water challenges of each stakeholder, three steps were followed: first, their websites were checked to see if they mentioned any water challenges; the second step was an in-person meeting at the site (attendance attached); and finally, an online survey was conducted (https://forms.office.com/pages/responsepage.aspx? id=qyaNVKqM4UmXwqGxoGzDnHbtYejuYxlGjzszew584E9UN0tlVVJQTk9ZSzZaQ1FVWFFN SVY1UII0WC4u&route=shorturl). The survey results are presented in section 1.6.1.

For each stakeholder, their level of involvement was identified based on their level of interest and influence.

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





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Comment

The Site identified the current and potential level of influence of the stakeholders within the basin, following the methodology proposed by the standard. Each stakeholder was classified as 'Strategic' and 'Non-strategic' and in:

- A Those who have an impact on the organization (e.g., regulators, other water users, polluters, special interest groups)
- B Those on whom the organization has (or is perceived to have) an impact (e.g., other water users, neighbors, conservation management organizations)
 - C Those who have a common interest (e.g., similar business sectors)
- D Those who are neutral, with no specific link, but with whom it is beneficial to maintain a positive reputation and relationship

For the potential level of influence, they were classified as:

- Partnering with
- Engaging
- Consulting
- Informing
- Responding

See evidence in 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.



Comment

The Site has a drought response guide. The Site continuously monitors drought conditions and the current situation in the municipality. It registered on Drought.gov, which provides real-time drought information. The Site displayed North America's drought risk management strategy, which describes the actions the Site should take in case of water shortage. Among the most important actions is that a sister plant takes over production until the affected facility can resume operations. (see attached evidence).

The Site also provided the Integrated Contingency Plan as evidence, which describes disaster prevention actions, as well as the steps and recommendations to follow in case of an earthquake, spills, fire or explosion, severe weather (hurricanes), bomb threat, and air pollution episodes. Each section outlines the steps to take during the event (depending on where you are within the facilities) and after the event. In all cases, the Emergency Team is responsible for acting immediately; the members of this team and their ranks are listed on page 86.

The Site is exempt from having a Stormwater Pollution Prevention Plan (SWPPP), issued by the EPA (page 115 of the Integrated Contingency Plan, and certificate uploaded as part of the evidence). Despite this, the Integrated Contingency Plan includes measures for preventing rainwater contamination throughout the entire document.

The Spill Prevention, Control, and Countermeasure Plan (SPCC) is also included in the Integrated Contingency Plan, as mentioned on page 10.

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

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Comment

The Site presented a diagram of the water balance for 2024. 99.98% of its water comes from the well located within its facilities; of that percentage, 63% is used for processing and 37% for other uses. 0.02% comes from the municipality; this water is only used for the fire protection system.

The Site estimated evaporation based on the difference between its inputs and outputs.

The diagram shows the water flows, including both raw water and reuse water, the outlets, some losses, and storage. In each line representing the water flow, as well as in the tanks or water use areas, the amount of water consumed is indicated. However, the formulas for inputs and outputs were not provided. The calculation performed during the audit revealed a difference much greater than the 5% acceptable for the standard.

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.



Comment

The Site presented an analysis of the variance of the water consumed and the water usage flows from the well, including reuse. The evidence provided shows the average amount of water used in different stages and processes on a weekly and monthly basis from 2015 to 2025, as well as the water discharged from the WWTP, from the toilets, and the water donated to associates, among others. The same file also includes the Water Use Ratio per week; the cells in red indicate whether the weekly water consumption goal (L) per product produced (kg) was met.

The Site provided this summarized information in some graphs (see PPT). These graphs show water consumption per kilogram of product from 2015 to the present. Overall, the Site has managed to reduce its WUR each year, except in 2018 (due to Hurricane Maria) and in 2022 (due to issues with the well meters).

The Site did not identify in its survey of stakeholders or the documentary review it conducted that there was a challenge related to the water balance; on the contrary, the sub-catchment shows a positive balance (evidence 1.5.3).

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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 presented quality analysis results for its inflows and outflows, as well as the list of parameters tested according to different entities and the company.

The Site sources its primary water supply from a well installed in 1983. The secondary water source is provided by the local public water utility, PRASA.

The onsite well water is chlorinated to meet potable water standards for general site use. For manufacturing purposes, the treated water is subjected to additional processes, including coagulation, flocculation, chlorination, sand filtration, carbon filtration, polishing filtration, and UV disinfection. Depending on the specific manufacturing process, the water may undergo further treatment steps, such as softening and additional UV disinfection.

The secondary water sourced from the City of Cidra originates from Lago de Cidra. This water is conveyed via pipeline to the city's water treatment facilities, where it undergoes coagulation, flocculation, sedimentation, filtration, and chlorination. The city then distributes the finished treated water to residents, businesses, and the CRI facility.

Annually, the site submits samples of its well water, city water, and process-treated water to an external laboratory for analysis. Additionally, treated water samples are tested regularly throughout the year according to the frequency schedule specified by KORE. In addition, the water treatment operators perform daily residual chlorine measurements on drinking water. Monthly, bacteriological and residual chlorine parameters are analyzed by a third-party laboratory.

Water discharged from the facility consists of sanitary system effluent (Discharge 002) and pretreated process wastewater (Discharge 001). In compliance with the Wastewater Discharge Permit requirements outlined in the Self-Monitoring Report (SMR), an external laboratory performs monthly wastewater testing to Discharge 001. Onsite operators conduct additional testing as part of the process.

The Site is excluded from monitoring stormwater and sanitary discharges.

The limit for Oil & Grease, according to the regulatory body, is 50 mg/L and COD 250ml/L. The site confirmed that its effluent never exceeded the limits.

The site identified that during extreme events, the COD limits in the rivers increase; however, because the primary source of water of the site is groundwater, this situation doesn't affect it.

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



Comment

The Site identified within its maps the potential areas of contamination and hazardous waste (evidence 1.1.1). During the visit to the facilities, it was verified that the areas where hazardous waste is handled have restricted access and are clearly marked.

The Integrated Contingency Plan (pages 29-30) describes the hazardous substances, where they should be stored, the danger they pose, and the response guide to follow in case of a spill or accident related to each substance. On page 59, there is a description of the Spill Potential Areas (APD) (see plan in 1.3.1).

The site presented a list of potential sources of both point and non-point contamination, where some preventive measures are used to prevent spills. This same document includes maps that identify the areas where these substances are stored or used.

Diesel, ethanol, phosphoric acid, and caramel are the most dangerous substances due to the volume used and stored on site.

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 has no IWRAs within the facilities.

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1.3.7 Annual water-related costs, revenues, and a description or

quantification of the social, cultural, environmental, or economic

water-related value generated by the site shall be identified and used to

inform the evaluation of the plan in 4.1.2.

Comment The Site provided a summary of facility's annual water-related costs during 2024, that

included:

1.City Water Charges

2.Sewer Charges

3.Well Water Charges

4. Energy Costs (Diesel and Electricity)

5.Well Water Extraction and Treatment (includes energy, maintenance, chemicals and

6.Process Water Treatment (includes energy, maintenance, chemicals and calibration costs)

7. Process Wastewater Treatment (includes energy, maintenance, chemicals, calibrations, ozone generation, sludge management and permit costs)

8. Water Analysis Costs

9. Consultants (permits, changes in regulation, AWS certification)

10. Environmental & Sustainability Strategies (OpEx & CapEx)

11. Stakeholder Engagement Activities

The site does not generate revenues.

The site generates social, environmental, and economic value by creating jobs and continually striving to reduce its total water usage through enhanced water efficiency. Site management reports that the Site's water intensity—defined as the kilograms of product produced per liter of water used—Site management reports ongoing efforts to optimize water use in production processes, leading to measurable progress over recent years. In 2023, an updated well water flow meter provided more accurate data, highlighting adjustments needed for improved water management. The site has set ambitious targets for water efficiency improvements, aiming for significant reductions by 2030. The glide path from 2024 to 2030 targets a net 12% reduction in water usage. These reductions decrease water demand, making more water available for other users or environmental needs, and translating into cost savings for the site.

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



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Comment

The Site has several WASH facilities, one of them recently renovated, as could be verified during the on-site audit. The Site follows OSHA recommendations for appropriate bathrooms per employee, as well as regulations issued by the Puerto Rico Department of Health, which set water, sanitation, and hygiene standards for food establishments.

The male employees have access to twenty (20) bathroom areas, three (3) of which include a combined restroom and locker room with a shower. Similarly, the female employees have access to twenty (20) bathrooms, comprising seventeen (17) standard bathrooms and three (3) combined bathroom and locker rooms with a shower. The locations of these bathrooms and showers are specified in the document uploaded as evidence.

The Site has two primary handwashing stations located at the plant entrance, as well as additional handwashing stations within the manufacturing rooms. Also provides several drinking water points for all employees, contractors, and visitors. These are located in the Cafeteria, Lounge Area, and across the site, with a total of 21 water fountains available.

To ensure compliance with WASH adequacy in Puerto Rico, cafeterias must:

- 1. Provide a safe, potable water supply for food preparation and hygiene.
- 2. Maintain clearly designated handwashing, food washing, and utensil cleaning stations.
- 3. Implement proper wastewater and drainage systems, including grease traps.
- 4. Enforce strict hygiene practices for employees, such as handwashing and clean uniforms.
- 5. Establish robust pest control measures to keep food preparation areas sanitary.

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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.



Comment

One of the primary inputs supporting the Site's operations is packaging materials supplied by a third-party vendor (Vendor), located in Cidra, Puerto Rico, in the same catchment as the Site.

VENDOR manufactures a variety of plastic drums (35gal, 37gal, 55gal, 60gal) and plastic pails (3gal, 4gal, 5gal, 6gal) that are used to package and deliver CRI's products. These packaging materials are critical to ensuring product integrity and supply chain efficiency. However, the total packaging cost of VENDOR's as a percentage of the Site's annual costs is equivalent to 2%.

According to data provided by VENDOR, a total of 3,206 m³ (3,206,000 kg) of water was consumed by their facility over the last 12 months. This water is used exclusively for facility and utility operations and does not come into direct contact with the manufactured products. During 2024, VENDOR shipped approximately 4,263,000 pounds (1,933,662 kg) of resin-based packaging materials to the Site.

Since 97% of VENDOR's manufactured products are delivered to the Site, the indirect water use attributable is approximately: 97% of 3,206 m³ = 3,110 m³ (~3,110,000 kg).

The water used in VENDOR's operations is primarily for non-contact purposes such as plant utilities and general site operations (e.g., cooling systems and workforce sanitation). All wastewater and discharges are managed in accordance with local regulatory requirements to prevent water quality issues in the catchment. No water quality concerns have been reported.

VENDOR is the only supplier within the Site's 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.



Comment

The Site noted that two of its service providers (food and cleaning) use water within the facilities, which is already accounted for in the water balance, so there is no additional indirect water use to consider. Among these two companies, the Site does not identify other service providers within the same catchment.

However, the Site identified that the uniform laundry, located outside the site's catchment, is a high water consumption service; therefore, the Site requested a measurement of the water used for washing its uniforms, which amounts to 1,000 liters per year.

The Site also evaluated the water quality in the Cayey watershed, where the laundry service provider is located, and found no issues with water quality.

- 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

Water governance initiatives have been identified:

- -Natural Hazard Mitigation Plan, Municipality of Cidra, 2020
- -Vulnerability Study: Climate Change 2024
- -PRASA Strategic Plan 2020-2025
- -Executive Order OE-2013-016 and the DRNA Climate Adaptation Planning Guide.
- -AAA Adaptation Plan (2015):

The Site identified a series of goals for collaboration based on a document review and a meeting with stakeholders. These collaboration opportunities include private stakeholders, not just public ones.

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 identified and documented all applicable water-related legal and regulatory requirements through its Environmental Compliance Register and the Compliance Obligations Matrix. These include federal, state, and corporate obligations related to water use, quality, discharge, and conservation.

Key permits and regulations include:

- Clean Water Act (CWA) Compliance with EPA standards for water discharge and pollution prevention.
- Safe Drinking Water Act (SDWA) Oversight of potable water systems (Permit PWSID-521135).
- Puerto Rico Water Use and Conservation Regulation Governs extraction and use of groundwater resources.
- Well Water Extraction Permit (R-FA-FACO3-SJ-00305-19122019) Requires monthly extraction reports and annual water quality analysis.
- Pre-treatment Permit (GDA-88-505-001) Mandates monthly and semiannual self-monitoring reports for wastewater discharge.
- No Exposure Certification (PRNOEJ007) Ensures exclusion from stormwater permitting under EPA's Multi-Sector General Permit.
- Water Resource Sustainability and Water Reuse Corporate standards aligned with KORE requirements for sustainable water management.

No customary water rights have been identified beyond those legally defined by the Department of Natural and Environmental Resources (DRNA) and the Puerto Rico Aqueduct and Sewer Authority (PRASA).

The Site complies with local and federal regulations that govern water, sanitation, and hygiene (WASH) standards in food preparation and employee facilities.

- 1. Regulation No. 6090 General Regulation on Environmental Health (2010)
- 2. Regulation No. 8995 Regulation for the Operation of Food Establishments (2020)
- 3. Law No. 416 Environmental Public Policy Act (2004)
- 4. Fire Code of Puerto Rico (Law No. 43 of 1988)
- 5. Regulation No. 6040 Pest and Vector Control (2000)
- 6. OSHA 1910.141 Sanitation Standard

The Site presented during the audit the following documents:

- -Industrial Discharge Permit
- -Well concession
- -Compliance with the Lead and Copper Rule
- -Stormwater exclusion;

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



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Comment

The Site displayed the water balance of the Cidra Lake sub-basin along with the calculation formula. The formula shows that the sub-basin's balance is positive (+0.15 million m3/year), indicating it has available water. The current water balance for the Lago de Cidra sub-catchment is net positive but is subject to seasonal variability and climatic trends.

Recent analyses reveal incipient dryness in and around Cidra. Although most rivers across Puerto Rico are flowing at normal or even elevated levels, streams near Cidra show signs of lower-than-normal streamflow—a red flag for water supply reliability in the region.

On balance, water stress in Cidra is moderate but worrisome, driven by:

- Declining streamflow in key local waterways
- Fluctuating rainfall leading to erratic water availability
- Potential long-term resilience issues coupled with extreme weather patterns

Seasonal Rainfall Trends

- Wet Season (April to November): Rainfall peaks notably during September, with monthly averages around 9 inches (≈230 mm); May, August, October, and November are also relatively wet. This aligns with national patterns where the Caribbean experiences heavy monsoonal downpours during these months.
- Dry Season (December to March): These months are notably drier. For example, January–March typically records lower precipitation, from approximately 2.6 to 3.2 inches (≈65–80 mm) per month.

In summary, while Cidra enjoys substantial annual rainfall, there are some signs of dryness. Planning must reflect this dual nature: safeguarding water access during dry months and fortifying systems against floods and turbidity during wet months.

NOTE – The Site uses groundwater for its supply, and based on water level information, there is no indication of seasonal variability of water stress impacting long-term aquifer water levels.

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.





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Comment

The Site conducts annual groundwater testing through certified third-party laboratories, following the specifications outlined in the company's internal Water Monitoring Requirements standard. The analysis includes a comprehensive range of parameters. Results show groundwater doesn't have quality problems.

The City quality data identified by the Site indicates:

- Chlorine Residual: Stable and compliant across all years.
- Turbidity: Improved year-over-year, reaching 100% compliance in 2024.
- Lead: Stable and below action level; 2024 shows further reduction.
- Copper: Stable in 2022-2023; slight increase in 2024 but still compliant.
- TTHMs: Gradual increase from 2021 to 2024; still below 80 ppb limit.
- Haloacetic Acids: Fluctuations observed; 2023 peak followed by a reduction in 2024.
- TOC Removal: Slight improvement in 2024; occasional dips due to operational issues.

The Site presented a document summarizing the water quality of the Cidra Lake sub-basin. The environmental authority carries out water monitoring, and the following were found for 2024:

- Fecal coliform levels exceeding the permitted limit
- Turbidity levels exceeding the permitted limit, especially after heavy rains.

From September to October, there is an increased sediment influx due to landslides. During the stakeholder meeting, the hospital shared its experience with a landslide.

During the dry season, water levels decrease, pollutant concentrations increase, and therefore, biodiversity is stressed.

The Site included in its evidence a comparison of the water quality of the Cidra Lake sub-catchment, the Bayamón River, and La Plata. The Bayamón River shows the most improvement, especially in nutrients and turbidity. Lago de Cidra remains the most consistently impaired, with no delistings or improvements. The La Plata River shows mixed results: improvements in metals, but new concerns with turbidity and nitrogen.

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 IWRAs based on official documents and a stakeholder survey.

- -Lake Cidra
- -Bayamón River
- -La Plata River

For each identified IWRA, its current status and cultural, economic, environmental, and social value are described.

The Site identified other natural areas within the Bayamón River watershed that could be considered IWRAs, but are outside the physical scope defined by the Site (Lake Cidra sub-watershed).

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 identified the Infrastructure operated by PRASA, serving over 1.2 million customers. The system includes:

- 114 Water Treatment Plants (WTPs)
- 51 Wastewater Treatment Plants (WWTPs)
- Over 20,000 miles of water and sewer pipelines
- · Over 3,800 ancillary facilities, including tanks, pump stations, and wells

The Site identified that the infrastructure is aging and has been impacted by several hurricanes. In response, PRASA developed the FAASt Workplan, a \$7.8 billion investment strategy funded by FEMA and other sources, to rehabilitate and modernize the system over a 10-year horizon (2021–2030+). The plan includes 245 prioritized projects across 16 asset categories, with a strong focus on resiliency, hazard mitigation, and modernization.

The Site identified a PRASA Capital Improvement Program that shows planned projects and their status. The Site recently attended a meeting where upcoming projects were presented, along with information about those projects as evidence.

A key infrastructure initiative in the catchment was the Cidra Dam Rehabilitation Project, with an investment of \$5.4 million from PRASA's funds. Benefits over 13,000 families in Cidra, Aguas Buenas, and Caguas

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



Comment

The Site identified, in personal communication with the municipality, that there are communities in the upper reaches of Cidra that do not have continuous access to water. There is an initiative to support the city by providing funds to address this vulnerability.

Three percent of Puerto Rico's population lacks access to water, according to information collected by the Site.

Access to water for human consumption is disrupted by extreme events such as hurricanes and tropical storms.

In the hills above the San Juan–Caguas metro, Cidra depends heavily on surface water from Lake of Cidra and a PRASA water treatment plant that distributes to Cidra and parts of Aguas Buenas and Caguas. The Cidra WTP is a ~1.3 MGD filtration facility drawing directly from the lake; PRASA has been investing in filter and intake/Dam upgrades to improve potabilization and reliability.

Across Puerto Rico, about 40–41% of the population relies on septic or other onsite systems. In many rural and peri-urban areas, these systems are aging or poorly maintained, contributing to fecal contamination of surface and groundwater during heavy rains. Cidra's topography and rainfall patterns make overflows into the Lago de Cidra basin a persistent risk.

The Site also identified that when pumps or treatment are down—even briefly—households lose pressure, storage tanks run dry, and people turn to unsafe sources. Septic failures and overland flow can push pathogens into streams flowing to Lago de Cidra, increasing the risk of GI illness, especially for older adults, people with disabilities, and low-income families who cannot afford to buffer with filters, bottled water, or generator power.

- 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.



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Comment

The Site identified three SWC

- 1. Dry Conditions: Reduced water supplies
- 2. Severe Storms: Interrupted water supply, especially in the upper part of the catchment.
- 3. Water Quality: Contamination of the water supply due to extreme weather events and their impact on soil erosion, the falling of trees and other materials that cause pollution to the city's water supplies.

The SWC were determined based on the challenges identified by the site and the challenges mentioned by the stakeholders during the in-person meeting and the survey.

The value of the consequence was multiplied by the probability, and that determines the priority. The probability and consequence scores were obtained from the in-person meeting with the stakeholders.

1.6.2 Initiatives to address shared water challenges shall be identified.

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Comment

The Site identified the initiatives to address the SWC. The identified initiatives not only correspond to those that the Site is carrying out or seeking to influence, but also include initiatives from the government.

See evidence in 1.6.1

costs and business impact.

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



Comment

The Site identified four water-related risks, which are included in its integrated contingency plan. Three of the four challenges were also mentioned by the stakeholders.

- 1. Dry Conditions: Reduced water supplies
- 2. Severe Storms: Interrupted water supply
- 3. Water Quality: Contamination of the water supply due to extreme weather events and their impact on soil erosion, the falling of trees, and other materials that cause pollution to the city's water supplies.
- 4. Cost: Increased cost due to regulation changes, increase of water extraction and discharge permits, among others.

Due to production and distribution resiliency, no costs are anticipated in relation to these risks

This risk matrix is the same one where the shared water challenges of the stakeholders were integrated. The prioritization of risks was based on severity and likelihood of occurrence. The timeframe is one month, which is why the potential costs for the business are nil.

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 identified opportunities and potential savings regarding the four identified risks. One of the main opportunities identified was to increase water reuse within the facility, such as recycling process water or using treated wastewater for non-potable purposes (e.g., cooling systems or irrigation). This lowers reliance on freshwater and discharge volumes.

See evidence in 1.7.1

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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.



Comment

The Site identified good water governance practices, including:

- Communication and dissemination of its WSP,
- Maintaining good communication with the national water authority,
- Establishing collaborations with organizations and industries to improve community access and sanitation, as well as water body cleanliness,
- Promoting environmental education with the help of NGOs and the government,
- The Site's staff have gone to schools to give talks about responsible water management.

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

The Site identified best practices for water balance both within its facilities and in the sub-catchment. Some of these best practices are:

- Reduce water consumption by at least 17% by 2030 compared to the levels recorded in 2015.
- Implement procedures to identify and report leaks.
- Maintain and replace water meters.
- Review water indicators at the plant level monthly.
- Conduct water campaigns inside the plant and in the community for responsible water use.
- Install sensor systems in bathrooms for energy savings.
- Support replenishment projects.
- Reuse treated water for bathrooms, cooling systems, etc.

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



Comment

The Site identified the best water quality practices at the Site level and the catchment level.

- Ongoing water quality monitoring to comply with KORE parameters
- Improve practices for WWTP operation
- Cleaning of water bodies
- Collaborate on water quality monitoring with local authorities and NGOs

1.8.4 Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.



Comment

The Site identified best practices related to the maintenance and conservation of the IWRAs in the basin, among which were:

- Participate in water body cleanup campaigns
- Collaborate on runoff management
- Environmental education projects and community engagement in natural resource care
- Develop restoration projects with other stakeholders
- Monitor the water quality of the identified IWRAs

The site does not have on-site IWRAs.

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



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Comment

The Site identified best practices for WASH services, including:

- On-site sanitation services with sensors and single-handle faucets
- Provide safe water to members
- Regular testing and maintenance of water sources and ice machines
- Specific installation for workers to fill water tanks and take water home
- Showers for temporally workers and staff
- Annual hygiene and handwashing campaigns to prevent health risks related to water
- Specific handwashing stations at two points of the facilities.
- WASH services for men and women above regulatory standards
- Conducting educational talks in schools about the importance of hygiene and cleanliness at the catchment level
- Collaborate with other stakeholders
- Provide tanks to be used as trash bins to prevent waste from being carried into water bodies



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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 presented a statement on water stewardship, signed by the Site's general manager in

October 2024. The letter specifies that:

- That the Site will implement and promote the progress of sustainable water management plans to achieve improvements in the outcomes of sustainable water management of the AWS:
- -That the Site's implementation will support and align with the existing sustainability plans of the basin(s);
- -That the Site's stakeholders will participate openly and transparently;
- That the Site will allocate resources to implement the Standard.

This letter was published on the official website

https://www.coca-cola.com/content/dam/onexp/us/en/media-center/coca-cola-aws-certification/compromisodeawspol00073.pdf

It was also presented at the stakeholder meeting held in July 2025.

- **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 has a system and procedures to maintain compliance with regulatory obligations. The Site submitted a document specifying the individuals/positions responsible for reviewing regulatory and operational compliance at different stages of the water process. Additionally, it presented the compliance matrix for environmental requirements, which details the permit name, permit number, issue date, expiration date, renewal date, and the actions required for renewal. The team responsible for carrying out these actions is the plant's environmental team.

2.3 Create a water stewardship strategy and plan including addressing risks (to and from the site), shared catchment water challenges, and opportunities.

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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 presented a water stewardship strategy in line with the AWS Standard, including the mission, vision, and goals (2030 Water Security Strategy)

(https://www.coca-colacompany.com/content/dam/company/us/en/about-us/bottlers-links/Wat

er_Sustainability_Comms_Guidebook_09.pdf) and a video to summarize the strategy

(https://www.youtube.com/watch?v=cfAHAiTE63E).

Also, the Company's Sustainable Goals (energy, water, packaging) were submitted as

evidence.

The Site included as evidence the sustainable strategy for the North America Region.

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 presented its WSP. The opportunities and vulnerabilities are defined by the company; these opportunities were aligned with the AWS results. The site identified 32 activities, of which eight are related to good governance, 13 to water balance, nine to water quality, two to IWRAs, and five to WASH services.

The WSP includes:

- How it will be measured and monitored

- Planned timeframes to achieve it

- Financial budgets allocated for actions

- Persons responsible for actions and achieving targets

- Link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.

2.4 Demonstrate the site's responsiveness and resilience to respond to water risks

2.4.1 A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.

Yes

Yes

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Comment

The Site shares its Integrated Contingency Plan with various government agencies to verify that the most important risks are being considered, that compliance with the specifications of hazardous waste management permits and water waste management is being maintained. The Plan is updated every five years, and the newest plan is shared.

Every year, a report is sent to government agencies to inform them of the quantities of hazardous substances stored at the Site. Evidence of the quantities stored in 2024 is provided in 2025.

Additionally, the Site shared a collaboration agreement with the municipality of Cidra, in which they commit to donating water to the municipality's tanker trucks to ensure water supply to communities and vulnerable populations in case of extreme events or any emergency.

The Site displayed North America's drought risk management strategy, which outlines the actions the Site should take in the event of a water shortage. Among the most important actions is for a sister plant to take over production until the affected facility can resume operations. (see attached evidence).

The Site participates in the Lake of Cidra Cleaning Day to avoid water body contamination. In the activity, the government also participates.

The water authority has not announced changes in sewer fees; however, the Site has a contentious budget in case of increased costs.



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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.
Comment	The Site announced its collaboration agreement with the municipality of Cidra for the donation of water in emergency cases.
	The site presented the PPT that was shown to employees during the annual training, which discussed the importance of water conservation, the site's water efficiency goals, the AWS standard, and its implications. The annual training takes place in the last quarter of the year, which is why the material shown in 2024 is provided as evidence.
	The Excel sheet where all the donations of water tanks made by the site to the community and authorities are recorded was also submitted as evidence. The Site does not recommend its use for storing drinking water. Evidence of the water tanks donated to employees was also shown.
	The Site showed evidence that the first phase of meter connection (well meter) in the corporate Energy Monitoring Systems has been completed. In 2025, approximately 5 more meters are expected to be connected. This will help to increase transparency regarding the plant's water consumption.
	The Site shared two certificates of the voluntary training sessions staff attended to stay current and strengthen its relationship with authorities and regulatory agencies.
	The presentation shown to the stakeholders at the July meeting was also attached as evidence.
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 presented its human rights policy.
	Additionally, he showed his current permits for groundwater extraction and for discharges of sanitary and residual waters.
	The site issued a statement acknowledging that they are not the owners of the well and that they cooperate with the municipality of Cidra in donating water when needed.
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.



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Comment

The site has the legal compliance matrix (1.5.2) and uses the MS Planner app to track notifications, requirements, permits, and KORE reports that need to be sent. The responsible persons are identified in each procedure that must be followed, with their profile picture from the email. Additionally, this planner is linked to the calendar of each responsible person or individual involved in monitoring legal compliance.

Additionally, every Tuesday the legal compliance of environmental aspects is verified, and monthly meetings are held with other factories in the company to review water and energy goals, share obstacles, and lessons learned.

The site presented a screenshot of the MS Planner and the calendar with the weekly and monthly meetings scheduled.

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 There are no water rights that need protection. The Site showed a valid extraction and

discharge permit.

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 implemented actions related to water balance since 2024. Among the actions already completed are connecting the well meter to the global Energy Monitoring System (EMS) (evidence in 3.1.1), contacting the uniform cleaning service provider to calculate the indirect water use (attached email), and contacting the supplier of inputs within the basin to understand the indirect water use related to the Site (attached email).

Activities that are not yet completed but have progress include connecting the other meters to the EMS (33%) (as mentioned in the attached email). Water reuse for Phase 1 (83% progress) and Phase 2, which includes the reuse of water for the juice area (25%) (the Site showed an internal document with the project's progress). The project to improve the capacity of the reused water storage tanks and their quality (80%) (a photo of the installed system is provided).

Regarding replenishment, discussions have taken place with the NGO that will carry out the activity (evidence of the meeting attached).

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

Water scarcity is not a shared challenge; however, the site works to meet the company's global goals of reducing water consumption per kilogram produced. The chart of the site's annual goals from 2015 to date was presented, along with the actual goals achieved. Since 2023, the site has met and exceeded the established goals.

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 is not obligated to provide water for other uses or users; however, it has an agreement with the municipality of Cidra to donate water from its well in emergency cases (evidence in 3.2.1).

The Site has a water intake dedicated to employees. Employees can fill water tanks daily for consumption in their homes.



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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 has achieved 85% of the goal to build a second well. This second well will not be for extracting more water, but to allow more frequent maintenance of the original well and thereby ensure the quality of the underground water that is extracted. That is why this goal is focused on water quality and not on water balance.

As evidence of the implementation of the goal to improve and maintain water quality with the company's parameters (which are above local regulations), the quality report sent by the corporate office to the site was presented.

The site implements continuous monitoring of the water quality of its industrial discharges to comply with local regulations, but also with the company's KORE parameters, which are more demanding. An image with graphs showing the behavior of four parameters is attached as evidence

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



Comment

Water quality is a shared challenge only during the rainy season, as runoff carries solid waste into the bodies of water that supply the city with water.

The Site continuously monitors the quality of its industrial effluent both internally and externally. The latest water quality analyses of the effluent, conducted by an external laboratory, are attached as evidence, along with a photo showing the appearance of the water at different stages of the treatment process. The Site has received awards for the quality of its effluent from the Water and Sewer Authority (AAA). All operators of the WWTP must hold a valid license. During the Site visit, the operators' certificates were verified.

Regarding the sanitary effluent (which uses recycled water), it goes directly to the municipality's WWTP. The site is not required to monitor this effluent.

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.



Comment

The Site set a goal related to the identified IWRAs, which is the cleaning of Lake Cidra. This activity took place on September 20th. In previous editions, site employees, their families, and the general public participated.

So far, the invitation has been sent to the employees, and the routes to be followed for cleaning the lake and the surrounding areas have already been marked.

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.



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Comment

During the visit, the status of the WASH services and access to drinking water for the employees were verified.

The Site has five activities related to WASH as part of its WSP, including ensuring that all women's bathrooms have free feminine hygiene products available and that the organization exceeds the requirements of the United Nations Office for the Coordination of Humanitarian Affairs (OCHA) regarding access to WASH services. In November, training will be provided to employees on hygiene and sanitation (attached is evidence of coordination between the environmental area and human resources).

3.6.2

Evidence that the site is not impinging on the human right to safe water and sanitation of communities through their operations, and that traditional access rights for indigenous and local communities are being respected, and that remedial actions are in place where this is not the case, and that these are effective.



Comment

The Site showed its current permits for groundwater withdrawal and extraction, water quality studies of its effluent, as well as evidence that it complies with and exceeds the regulations regarding the number of toilets, urinals, and sinks within its facilities.

It is highlighted that the Site has an agreement with the municipality to donate water from its well in emergency cases for the population. Additionally, there is a water intake within the Site so that employees can fill water tanks for use in their homes (evidence uploaded).

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.



Comment

The Site included in its WSP two actions aimed at quantifying the indirect use of water, both from its packaging supplier and the uniform washing service. In both cases, evidence of communication with these suppliers was provided to determine the volume of water used for the services and supplies provided to the Site.

It is important to note that the laundry service provider is not actually within the boundaries of the sub-catchment (physical scope). Still, it is in the Site's interest to strengthen its relationship with them.

3.7.2 Evidence of engagement with suppliers and service providers, as well as, when applicable, actions they have taken in the catchment as a result of the site's engagement related to indirect water use, shall be identified

Q Obs.

Comment

The Site showed evidence of ongoing communication with the laundry service providers and packaging suppliers.

See evidence in 3.7.1.

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.





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Comment

The Site shares infrastructure with the municipality because its discharges—both all the sanitary and a small part of the wastewater—go to the municipal sewage system and its WWTP.

The Site has a strong relationship with the Puerto Rico Aqueduct and Sewer Authority (PRASA), which manages both the water infrastructure. PRASA participated in the meeting on July 14th (signed as AAA in the uploaded evidence), where the Site presented its WSP and the AWS expected results.

As part of its corporate requirements, the Site must visit the WWTP once a year.

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.



Comment

The Site is considering and is implementing in its WSP several of the best practices identified as:

- Employee Engagement
- Monitoring and Reporting, share monitoring results with relevant stakeholders and regulatory bodies to promote transparency and accountability
- Partnership with peer organization and Stakeholders to promote water stewardship
- Additional Provisions for Worker Well-Being
- Advanced Metering and Real-Time Monitoring
- Water Assessment by a consultant
- Water Campaigns and employee awareness

These governance best practices have varying levels of progress, although five of the actions considered good practices are ongoing because they are carried out weekly or as needed throughout the year.

See evidence in 2.3.2 and 3.1.1

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



Comment

The Site included in its WSP, and is implementing, several best practices for water balance, including:

- Advanced Metering and Real-Time Monitoring
- Water Assessment by consultants
- Collaboration: Support restoration projects to improve biodiversity and ecosystem resilience
- Monitoring and Reporting: Maintain detailed records of water extraction volumes and quality metrics
- Monitoring Drought conditions
- Partnership and Stakeholders to promote water stewardship
- Leak Reporting Procedure
- Advanced Metering and Real-Time Monitoring

Three of the activities related to these good practices have been completed, others are ongoing, some are being executed, and one more is in the planning process and will be carried out next year, as indicated in the WSP (see evidence in 2.3.2 and 3.3.1).

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



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Comment

The site incorporated into its WSP some of the best practices related to water quality identified, including:

- Ensure proper wellhead protection through secure infrastructure and regular inspections to prevent surface contamination.
- Perform daily wastewater testing to avoid potential accidental releases.
- Reuse of wastewater treated for utilities and other purposes
- Process optimization
- Perform periodic inspection of the industrial drainage as per KORE guidelines.
- Substitute inputs with biodegradable materials to reduce pollutants at the source and mitigate potential impacts in the event of a release.

The progress of these best practices is in the WSP (evidence 2.3.2)

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 incorporated a best practice related to IWRAs into its WSP.

- Community Engagement and Restoration: Cidra Lake Clean Up with the collaboration of Cidra Fishing Club, Scuba Dog Society and Cidra Municipality
- Collaboration: Support restoration projects to improve biodiversity and ecosystem resilience.

The first best practice has already been implemented (see evidence in 2.3.2 and 3.5.1.), and the second is scheduled for implementation in September 2025 (evidence of the planning meeting was uploaded).

Comment

3.9.5

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



The Site included some of the best practices identified for WASH services within its WSP.

- Workplace Training and Campings: Hygiene
- Gender-Specific Facilities: Ensure adequate numbers of separate, high-standard toilet and washroom facilities for men and women to maintain privacy and comfort, beyond regulation.
- Monitoring and Continuous Improvement. Regular inspections and audits of WASH facilities to ensure they remain in compliance with corporation standards.
- Permanent provision of sanitary pads for women employees.

The degree of implementation of each action can be checked in 2.3.2 and 3.6.1.



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4	STEP 4: EVALUATE - Evaluate the site's performance.
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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.

Comment

The Site's environmental team has a weekly meeting to review the WSP follow-up; in the same document, the status of actions that are being carried out or have already been completed is updated, and this is recorded in the box at row 36, column D of the WSP. This progress is related to the objectives or vulnerabilities established by the company.

In row 60, the progress regarding the AWS results is recorded. The assessment of this performance is based on the number of activities by their status relative to the total activities per result. In a table below, the percentage of progress for each standard result is recorded, based on the status of the activities.

See evidence in 2.3.2

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

Q Obs.

Yes

Comment

The site evaluated the driving values qualitatively and quantitatively based on the investment made for each objective within the WSP.

In reuse projects, savings are considered to be the liters of water that are no longer consumed, rather than the money saved. This is because in Puerto Rico, water costs very little, so real savings are not typically seen when investing in infrastructure improvements or water reuse projects.

See evidence in 2.3.2

4.1.3 The shared value benefits in the catchment shall be identified and where applicable, quantified.



Comment

The Site included in its WSP a column with the shared benefits of the actions carried out in the sub-catchment of Lake Cidra, such as:

- Promotes a culture of sustainability by encouraging water-saving behaviors.
- Strengthens community ties and meets local needs through resource sharing.
- Enhances local watershed health through community engagement.
- Water access to vulnerable communities (WASH)
- Demonstrates innovative use of recycled water for energy system efficiency.
- Prepares for drought conditions to minimize impact on resources.

See evidence in 2.3.2

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.

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.



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4.2.1



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Comment

There haven't been any water-related emergency incidents in 2024 or 2025.

The Site did not have any water-related incidents to report; however, it has emergency and contingency plans that are reviewed periodically and submitted for approval by the competent authority.

The Site has a safety and management review routine where all risks are evaluated and root cause analyses are conducted in case of an emergency. No incidents have been recorded in 2024 or so far in 2025.

The Executive Summary 2024 and 2025 is presented as evidence.

The preventive measures and actions to be taken in case of an emergency or incident related to water are outlined in the Integrated Contingency Plan (see 1.3.1).

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.



Comment

The Site met with the stakeholders on July 14th, where they presented their plan, the progress they have made in terms of water savings per kilogram of production, showed photos and results from the cleanup campaign carried out at Lake Cidra in 2024, and invited them to the cleanup scheduled for 2025. They also presented water reuse projects and routines to verify compliance with water quality standards for their well and the effluent from the WWTP.

In that meeting, the WTP and the water-related challenges identified by the site were presented; it was in this meeting that the shared challenges were defined and an initial prioritization was made.

Due to confidentiality reasons, the site did not share the presentation but showed it during the audit. In indicator 1.2.1, the attendance list of the meeting is provided. The cover page of the presentation shown, which includes the restriction disclaimer for distribution, is attached.

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.



Comment

In the WSP file, there is a sheet to record significant changes that the plan may undergo. Additionally, there is a status comments column to record setbacks or areas of opportunity for each objective.

See evidence in 2.3.2



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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.
Comment	The internal governance of the site regarding water, including the responsibilities of those in charge of compliance with water laws and regulations, was presented to the stakeholders at an in-person meeting held at the site facilities on July 14.
	The Site does not have a specific website, and therefore, there is no organizational chart that can be shown to the general public. However, the Site mentions that when someone from the community needs information, they come to the plant and ask to speak with the environmental manager. The person at the entrance has the contact information for all the staff, and that information is provided to anyone who requests it.
	At the corporate level, there is an organizational chart with the persons responsible for each area, including the sustainability leader (https://www.coca-colacompany.com/about-us/leadership).
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 presented its WSP, sustainability strategy, water savings goals achieved up to that point, videos of implemented actions such as the cleaning of Lake Cidra in 2024, the routines they follow to verify legal compliance and KORE, among other topics.
	The cover page and agenda of the presentation are attached.
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. Q Obs.
Comment	The Site presented to the gathered stakeholders on July 14 the WUR from 2015 to date, the WSP, the progress achieved up to that point, and how these objectives related to the standard's results.
	The site has planned to hold a new meeting with the stakeholders between May and June 2026 to present the results achieved for the entire WSP 2024-2025.
5.4	Disclose efforts to collectively address shared water challenges, including: associated efforts to address the challenges; engagement with stakeholders; and co-ordination with public-sector agencies.
5.4.1	The site's shared water-related challenges and efforts made to address these challenges shall be disclosed. Yes

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Comment	At the corporate level, the shared water challenges are presented at the link
	https://www.coca-colacompany.com/about-us/sustainability

At the site level, since they do not have an exclusive website, the identified challenges were discussed with the stakeholders in person. A survey was conducted with the stakeholders, whether present at the meeting or not, to validate the challenges identified as shared. Twenty-two surveys were sent out; so far, five responses have been received.

The WSP presented during the audit already includes the link between each objective and the validated shared challenges. The site will present its stakeholders with a summary of the achievements made to address these challenges during May or June of 2026.

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



Comment

The Site held a meeting on July 14 with the identified stakeholders, including government agencies. During the meeting, the WSP and the standard were presented, and water challenges were discussed, among other topics. Additionally, a survey was conducted to understand the challenges faced by each stakeholder.

The Site has a cooperation agreement with the municipality of Cidra to donate water in case of emergencies. Additionally, it has invited the municipality to join the cleanup campaign of Lake Cidra that will take place on September 20th. The municipality has supported in other occasions by providing transportation.

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 stated that it has not committed any violations of federal or local regulations.

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



Comment

The Site reports that it has not committed any violations of federal or local regulations.

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 did not violate any regulations, nor did it have any incidents to report to the competent authority, so it has not endangered the health of the ecosystem or people.

Previous Findings

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



Comment

The site is in the initial certification stage and therefore has no previous findings.