CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-001781

WSAS WATER STEWARDSHIP ASSURANCE SERVICES

SITE DETAILS

Site: **Reyes Coca-Cola Bottling, Los Angeles**
Address: 1334 South Central Avenue, 90021, Los Angeles, California, UNITED STATES
Contact Person: Rob Zimmerman
AWS Reference Number: AWS-000723
Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Core
Date of certification decision: 2025-Dec-19
Validity of certificate: 2028-Dec-18

AUDIT DETAILS

Audited Service(s): AWS Standard v2.0 (2019)
Audit Type(s): Initial Audit
Audit Start Date: 2025-Oct-21
Audit End Date: 2025-Oct-23
Lead Auditor: Kimberly Worsham

Site Participants:
Robert Zimmerman, Corporate Sustainability
Joe Volpe, Consultant
Mary Andranikyan, EHS Engineer
Ivan Monge, Operations manager
Erin Steinorth, Business and Development Manager
Edward Mancilla, Factory Director
Imran Bajwa, Factory EHS Manager

ADDITIONAL INFO

Summary of Audit Findings: During the certification audit, 9 non-conformities and 17 observations were raised.

The Client is requested to submit a root cause analysis and corrective actions for each non-conformity to WSAS within 7 days of receipt of the audit report, by 28 November 2025.

The non-conformities must be closed within 90 days of the end of the audit. To meet this timeline, evidence is to be submitted to WSAS (within 75 days) by 07 January 2026.

The audit team recommends certification of Reyes Coca-Cola Bottling Los Angeles at Core level pending closure of the non-conformities.

Scope of Assessment: The scope of services covers the initial certification audit to assess the conformity of Reyes Coca-Cola Bottling, Los Angeles, with the AWS International Water Stewardship Standard Version 2.

The RCCB Los Angeles facility is located at 1334 South Central Avenue, Los Angeles, California, in an industrial area about two miles south of Downtown. This beverage production site manufactures carbonated soft drinks such as Coca-Cola, Diet Coke, and Fanta, primarily using water supplied by Los Angeles Water and Power (LADWP) through two mains.

Key water-related infrastructure includes filtration and reverse osmosis for ingredient water, with additional treatments for boiler water, two cooling towers, and a dedicated fire suppression system supplied by LADWP, with a backup generator-driven booster pump.

The facility, covering two acres with 100% impervious surfaces, collects and discharges stormwater to onsite drains, with samples tested during rain events. The plant has three production lines for filling PET bottles, employs 200 people, and operates three shifts, six days a week.

The plant is situated in the tectonically active Los Angeles Coastal Plain, an area characterized by complex stratified aquifers and groundwater issues. It sources water from the Los Angeles Department of Water and Power (LADWP), which draws from the San Fernando Groundwater Basin, Central Basin, Metropolitan Water District (including the Colorado River), and Owens Valley via the Los Angeles Aqueduct.

Discharged water is treated by the LA County Sanitation District and released into the Pacific Ocean. Approximately 15% of LADWP's water supply originates from the San Fernando and Central Basin aquifers, with fluctuations in supply depending on drought conditions. Groundwater supply management is handled by the LA County Water Replenishment District (WRD), which works to combat seawater intrusion. Water shortages are a significant risk, exacerbated by droughts and groundwater contamination, affecting LADWP's response capabilities. Contaminant plumes near production wells have limited increased groundwater pumping from the San Fernando Basin. The area also faces flooding issues due to stormwater infrastructure overload during heavy rains. The local climate is Mediterranean, with warm, dry summers and mild, wet winters, and annual rainfall averaging about 15 inches. Water usage is primarily urban, with agriculture consuming 80% of total water use in California.

The audit was conducted onsite on 21-23 October 2025. The onsite visit included assessments of the water systems, including the water plant, chemical stores, incoming and outgoing water locations, stormwater gutters, cooling towers, and primary wastewater treatment.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-001781

WSAS WATER STEWARDSHIP ASSURANCE SERVICES

FINDINGS

Observation	1
Observation	16
Non-Conformity	9

WSAS
2 Quality StreetNorth Berwick, EH39 4HW, UNITED KINGDOM

FINDING DETAILS

Finding No:	TNR-020951
Checklist Item No:	Annoucement
Status:	Closed
Finding level:	Non-Conformity
Due date:	2026-Jan-22
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:	Aside from the AWS website, the site did not publish the stakeholder announcement 8 weeks before the audit.
Corrective action:	A public announcement of the stakeholder meeting was posted to Reyes Coca-Cola Bottling's (RCCB's) website in mid-November. Direct outreach to identified stakeholders, including personal invitations to the public meeting scheduled for December 9, 2025, happened in mid-November. We are keeping a running list of RSVPs for the meeting.
Evidence of implementation:	Website posting: https://panel.reyescocacola.com/assets/pages/our_community/la-3-aws-stakeholder-meeting-announcement_los-angeles.pdf

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-001781

Finding No:	TNR-021705
Checklist Item No:	1.1.1
Status:	Open
Finding level:	Observation
Checklist item:	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.
Findings:	The site's boundaries and water systems onsite were not clearly mapped out.
Corrective action:	The "site" is the bottling plant. It is bounded on three sides by streets and the fourth side by a small parking lot. Our site assessment used that physical boundary for all calculations.

Finding No:	TNR-021126
Checklist Item No:	1.2.1
Status:	Open
Finding level:	Observation
Checklist item:	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.
Findings:	Two stakeholder interviewees indicated they were not familiar with the site or its water stewardship journey. This implies that the site may need to review its stakeholder list and its engagement with stakeholders. Also, the site did not include its indirect water service provider in the stakeholder list.
Corrective action:	Also, the site did not include its indirect water service provider in the stakeholder list. The site will provide more details on the water stewardship plan with external stakeholders. As AWS certification is new, many stakeholders are unaware of how their work with Reyes Coca-Cola fits into the company's water strategy.

Finding No:	TNR-020997
Checklist Item No:	1.3.1
Status:	Open
Finding level:	Observation
Checklist item:	Existing water-related incident response plans shall be identified.
Findings:	The site could have more awareness of the drought management document created.
Corrective action:	Drought is one of the water risks that is identified in the new Water Security Roadmap that is being developed by TCCC, Coca-Cola North American Operating Unit (NAOU), and Reyes Coca-Cola Bottling. The roadmap is for all Coca-Cola operations in California, and has site-specific risks for each source watershed, including those supplying the Los Angeles plant. The roadmap will be finalized and shared with company leaders in January 2026.

Finding No:	TNR-021067
Checklist Item No:	1.3.4
Status:	Open
Finding level:	Observation
Checklist item:	Water quality of the site's water source(s), provided waters, effluent and receiving water bodies shall be quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be quantified.
Findings:	While the information was analyzed, the site could have done more to interrogate some of the results, such as analyzing annual variances from the city's water quality reports.
Corrective action:	The site will work with LADWP to identify seasonal trends.

Finding No:	TNR-021004
Checklist Item No:	1.5.1
Status:	Open
Finding level:	Observation
Checklist item:	Water governance initiatives shall be identified, including catchment plan(s), water-related public policies, major publicly-led initiatives under way, and relevant goals to help inform site of possible opportunities for water stewardship collective action.
Findings:	The site should consider other water governance information beyond MWD's efforts in the catchment.
Corrective action:	MWD is the legally designated wholesaler of water to the major cities of Southern California, including Los Angeles. The site will continue engaging with MWD, as well as with organizations that are implementing projects to improve water quantity and quality in supply basins for MWD.

Finding No:	TNR-021068
Checklist Item No:	1.5.4
Status:	Open
Finding level:	Observation
Checklist item:	Water quality, including physical, chemical, and biological status, of the catchment shall be identified, and where possible, quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be identified.
Findings:	While the information was analyzed, the site could do more to interrogate some of the results, particularly by analyzing annual and seasonal variances from the city water quality reports and the impacts on the overall catchment.
Corrective action:	The site will work with LADWP to identify seasonal trends.

Finding No:	TNR-021009
Checklist Item No:	1.5.7
Status:	Open
Finding level:	Observation
Checklist item:	The adequacy of available WASH services within the catchment shall be identified.
Findings:	The site did not provide its sources for WASH access information clearly.
Corrective action:	The site has already started to engage with the water equity team at LADWP and with NGOs who provide WaSH services in Southern California. Developing a California WaSH strategy alongside The Coca-Cola Company is a priority for 2026.

Finding No:	TNR-020959
Checklist Item No:	1.6.1
Status:	Closed
Finding level:	Non-Conformity
Due date:	2026-Jan-22
Checklist item:	Shared water challenges shall be identified and prioritized from the information gathered.
Findings:	It was unclear how the site developed these challenges with stakeholders.
Corrective action:	Discussion of shared challenges occurs during one-on-one meetings with stakeholders, through regular participation in the California Water Action Collaborative (CWAC), and at public stakeholder meetings such as the one we will host on December 9, 2025. In addition, we will be using our shared file system created for the AWS initial certification audit as a document repository for records of interactions with stakeholders.
Evidence of implementation:	Internal site for tracking stakeholder interactions is created. Regular meetings with site leadership and RCCB's public affairs team are scheduled in 2026. Priorities for the site, and tasks associated with them, are shown in the presentation provided.

Finding No:	TNR-021069
Checklist Item No:	1.8.4
Status:	Open
Finding level:	Observation
Checklist item:	Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.
Findings:	Some of the best practices included locations that the site did not identify as IWRAs in the catchment, making it unclear whether this would change or whether they were actually identified as IWRAs.
Corrective action:	The site will continue refining its prioritization and engagement with organizations that manage nearby IWRAs. Much of the work to date has been in catchments that supply water to LADWP. In most cases, these are hundreds of miles away from the site.

Finding No:	TNR-021011
Checklist Item No:	1.8.5
Status:	Open
Finding level:	Observation
Checklist item:	Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.
Findings:	Many of the best practices around WASH are focused on water quality, which don't necessarily directly relate to WASH efforts. This can be improved and clarified to ensure access to WASH services.
Corrective action:	The site will better communicate WaSH access goals and programs for employees and the surrounding community in 2026.

Finding No:	TNR-021865
Checklist Item No:	2.2.1
Status:	Open
Finding level:	Observation
Checklist item:	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.
Findings:	The system was not consistent across the board, and much of it was implicit. Much of the information required several lines of communication to verify who was responsible for compliance. It seemed that there was no clear system in place for managing compliance, even though the interviewees on site were familiar with the site's governance system.
Corrective action:	There is a system for ensuring compliance with environmental regulations, permit renewals, and reporting. Reyes Coca-Cola Bottling uses ETQ Specs software to manage its compliance and audit schedules. The system was initiated in early 2025, but some procedures are still not integrated at certain plants. This will be completed by mid-2026, including training of staff on how to use the system.

Finding No:	TNR-021013
Checklist Item No:	2.3.1
Status:	Open
Finding level:	Observation
Checklist item:	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.
Findings:	The site could benefit from a more specific strategy that clearly defines its mission, vision, and goals for effective water stewardship.
Corrective action:	The site will work with the company's Sustainability and Communication teams to identify and implement ways that connect the water stewardship strategy with company mission/vision/values.

Finding No:	TNR-021127
Checklist Item No:	2.3.2
Status:	Open
Finding level:	Observation
Checklist item:	A water stewardship plan shall be identified, including for each target: - How it will be measured and monitored - Actions to achieve and maintain (or exceed) it - Planned timeframes to achieve it - Financial budgets allocated for actions - Positions of persons responsible for actions and achieving targets - Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.
Findings:	Although the method of measuring targets is implied in the SMART Goal, it could be clearer for most targets.
Corrective action:	Measurement methods will be stated more explicitly in the WSP document going forward.

Finding No:	TNR-021018
Checklist Item No:	3.1.1
Status:	Closed
Finding level:	Non-Conformity
Due date:	2026-Jan-22
Checklist item:	Evidence that the site has supported good catchment governance shall be identified.
Findings:	The site did not provide evidence on performance for all targets in the WSP related to water governance.
Corrective action:	Provide regular progress updates to RCCB leadership team on WSP targets: Monthly: Water Use Ratio (WUR), water and wastewater costs, water/wastewater test results out of normal range Quarterly: stakeholder engagements (NGOs, elected officials, community, private sector partners) Semi-annually: IWRAs and engagements specifically targeted toward them; replenishment projects Annually: water security review (including drought), capital investments in water systems
Evidence of implementation:	- Example of the monthly WUR report - Water security review for 2025 - Evidence of meetings with stakeholders - Meeting notes from two updates with utility and regulator regarding collaboration

Finding No:	TNR-021073
Checklist Item No:	3.4.2
Status:	Open
Finding level:	Observation
Checklist item:	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.
Findings:	While the site discussed best practice activities it had undertaken, evidence of implementing water quality best practices did not cover all of the practices mentioned.
Corrective action:	The site with work with LA County Water Reclamation District (WRD) to identify opportunities to materially improve wastewater quality.

Finding No:	TNR-021016
Checklist Item No:	3.7.1
Status:	Closed
Finding level:	Non-Conformity
Due date:	2026-Jan-22
Checklist item:	Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.
Findings:	For the target "Identify inputs that account for at least 90% of the indirect water use for RCCB-LA", the site provided no evidence of this being implemented.
Corrective action:	Implement a data collection system for indirect water use from goods and services purchases controlled by the site.
Evidence of implementation:	- Email with information from one of the service providers Cintas - Tracker

Finding No:	TNR-021080
Checklist Item No:	3.9.4
Status:	Open
Finding level:	Observation
Checklist item:	Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.
Findings:	The site is also working on gathering more evidence of correspondence with IWRA-related stakeholders in the catchment area to illustrate implementation further.
Corrective action:	The site implemented a file sharing protocol for all stakeholder correspondence, including with IRWA stakeholders.

Finding No:	TNR-021082
Checklist Item No:	3.9.5
Status:	Closed
Finding level:	Non-Conformity
Due date:	2026-Jan-22
Checklist item:	Actions towards achieving best practice related to targets in terms of WASH shall be implemented.
Findings:	The site stated that it was undertaking efforts to introduce additional WASH initiatives, but was unable to provide more evidence for implementation, which would have better conformed to the standard.
Corrective action:	Site has started to engage with organizations working on WaSH access for underserved communities in greater Los Angeles.
Evidence of implementation:	- Information on meetings with representatives of relevant authorities and researchers on water and sanitation access in California - Notes from an internal meeting

Finding No:	TNR-021125
Checklist Item No:	4.2.1
Status:	Open
Finding level:	Observation
Checklist item:	A written annual review and (where appropriate) root-cause analysis of the year's emergency incident(s) shall be prepared and the site's response to the incident(s) shall be evaluated and proposed preventative and corrective actions and mitigations against future incidents shall be identified.
Findings:	The site could create a more organized, written annual review of these types of water-related emergency incidents that clearly state the root-cause analysis, evaluation, preventive, and corrective action plans for mitigating future incidents, to better conform to this indicator.
Corrective action:	Reyes Coca-Cola Bottling follows The Coca-Cola Company's Incident Management Coordinated Response (IMCR) process for all emergencies, including water-related ones. The site will collate incident reports that pertain to water/wastewater annually.

Finding No:	TNR-021086
Checklist Item No:	4.3.1
Status:	Closed
Finding level:	Non-Conformity
Due date:	2026-Jan-22
Checklist item:	Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.
Findings:	The site shared that it had regular meetings with catchment stakeholders about performance against targets, but haven't shared evidence of these consultation efforts.
Corrective action:	Performance against WSP targets will be shared during future public stakeholder meetings.
Evidence of implementation:	- Presentation shared during the site's stakeholder meeting - Follow-up email from one of the attendees

Finding No:	TNR-021087
Checklist Item No:	4.4.1
Status:	Open
Finding level:	Observation
Checklist item:	The site's water stewardship plan shall be modified and adapted to incorporate any relevant information and lessons learned from the evaluations in this step and these changes shall be identified.
Findings:	This is the first version of the site's WSP. Consequently, no modification would be appropriate until after a full year of implementation. However, the site did modify the WSP during the audit. The site did not explain how they would modify the plan or track the changes.
Corrective action:	The site will implement a revision control process for the water management plan in 2026.

Finding No:	TNR-021088
Checklist Item No:	5.1.1
Status:	Closed
Finding level:	Non-Conformity
Due date:	2026-Jan-22
Checklist item:	The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.
Findings:	No evidence was provided that the site's internal governance had been disclosed.
Corrective action:	Include names of those who are responsible for site-level water governance in public stakeholder meeting.
Evidence of implementation:	- Slide deck shared during stakeholder meeting

Finding No:	TNR-021089
Checklist Item No:	5.2.1
Status:	Closed
Finding level:	Non-Conformity
Due date:	2026-Jan-22
Checklist item:	The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.
Findings:	Although the site had prepared engagement materials, there was no evidence of the site's WSP, including its contribution to the AWS Standard outcomes, communicated to relevant stakeholders.
Corrective action:	Include details of water stewardship plan and priorities in communications with stakeholders.
Evidence of implementation:	Information on water stewardship goals, detailed plan objectives, and shared water challenges we're focused on were shared during the public stakeholder meeting on December 9, 2025. These are shown in Slides 14, 16, and 19 of the presentation (attached).

Finding No:	TNR-021090
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:	The site had not yet disclosed this information to its stakeholders, but it had a plan to disclose it before the end of the year.
Corrective action:	The water stewardship plan and progress to date was shared with stakeholders during the public stakeholder meeting held on December 9, 2025.

Finding No:	TNR-021091
Checklist Item No:	5.4.1
Status:	Closed
Finding level:	Non-Conformity
Due date:	2026-Jan-22
Checklist item:	The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.
Findings:	Although the site had prepared engagement materials, there was no evidence that the site had communicated its water-related challenges to relevant stakeholders.
Corrective action:	The site hosted a public stakeholder meeting on December 9, 2025. Water-related challenges, along with the site's water stewardship plan, leadership team, measurements and progress were shared. Engagements with individual stakeholders, along with meetings with groups of stakeholders, will be saved to a shared site. The site, along with representatives from the corporate sustainability and public affairs teams, will review engagements quarterly.
Evidence of implementation:	Stakeholder meeting held on December 9, 2025. Attendee list and content that was shared is attached.

Report Details

Report	Value
Report prepared by	Kimberly Worsham
Report approved by	Carla Schmidt Oberdiek
Report approved on (Date)	18.November.2025

Surveillance

Proposed date for next audit
2026-Oct-31

Comment This is the initial audit for the site.

Stakeholder Announcements

Date of publication	Location
	Finding No: TNR-020951
08/01/2025	https://a4ws.org/wp-content/uploads/2025/08/AWS-000723-RCCB-Los-Angeles-StakeAnn-Oct25.pdf WSAS Website

Comment Aside from the AWS and WSAS websites, the site did not publish the stakeholder announcement 8 weeks before the audit.

Comment The auditor held 2 online meetings with stakeholders during the onsite audit.

Catchment Information

Watersheds & Groundwater

LA Water Slides - catchment.png

Catchment Information

The plant resides in the Los Angeles Coastal Plain. The area is complex relative to the stratified aquifers, groundwater pumping schemes, and politics. The area is also tectonically active.

The site sources from Los Angeles Department of Water and Power (LADWP), which in turn sources water from the following:
-San Fernando Groundwater Basin
-Central Basin of the Los Angeles Coastal Plain
-Metropolitan Water District (MWD), including the Colorado River Water and Lake Oroville
-Owens Valley and Mono Basin watersheds via the Los Angeles Aqueduct

Discharge is sent to LA County Sanitation District where it is treated and discharged to the Pacific Ocean.

Roughly 15% of LADWP's water supply is from the San Fernando Groundwater Basin and Central Basin aquifers. This percentage can vary based on availability of surface water sources that are more directly affected by drought and snowpack.

Wastewater is routed through LA Sanitation District pipes to the Hyperion Water Reclamation Plant, which treats it and discharges water to the Pacific Ocean.

Groundwater supplies are managed by the LA County Water Replenishment District (WRD). WRD uses stormwater and tertiary-treated wastewater and through a series of managed spreading grounds and injection wells, helps maintain the Central Basin Aquifer and mitigate seawater intrusion.

Water shortages are a long-term risk in Southern California. Imported water is susceptible to droughts and low water levels as is currently the case for the Colorado River. Additionally, groundwater contamination can limit of LADWP to respond to water shortages. LADWP responded to the most recent State declared drought by proactively increasing groundwater pumping from the San Fernando Basin (SFB) due to reduced SWP supplies. However, these increases were limited due to the presence of groundwater contaminant plumes in the vicinity of many LADWP production wells. LADWP closely monitored water quality conditions to ensure continued compliance with safe drinking water standards and protection of public health and the environment.

Due to the amount of development and impervious surfaces in the area, flooding can be an issue during atmospheric river events that happen during winter months. Local floods around the site are due to stormwater infrastructure being overwhelmed during downpours.

There are few environmentally protected areas near the site. The prominent water feature closest to the site is the Los Angeles River. Upstream, the LA River is being restored which will improve water quality and provide recreational services.

Inter-basin transfers represent the majority of water provided by LADWP.

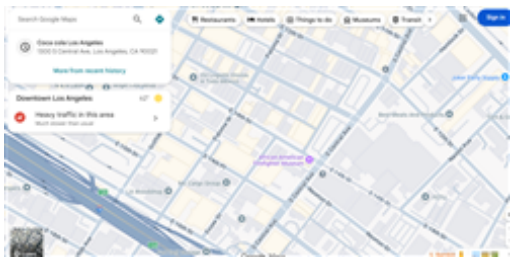
Local climate is Mediterranean (specifically, a CSA subtype if it includes hot summers), characterized by warm, dry summers and mild, wet winters. This classification is based on the Köppen climate classification system, which also notes that the climate is subtropical. Rainfall averages about 15" annually.

Local water use is primarily urban, including residential, commercial, and some light industrial. For the wider catchments from which LADWP gets water, the primary water use is agriculture, which represents 80% of total water use in California.

Comment This information was supplied in the WSAS Site and Catchment Questionnaire.

Client Description and Site Details

LA Site Map.png



Map of Neighborhood.png

Client/Site Background

The RCCB Los Angeles is in the City of Los Angeles, Los Angeles County, California, United States. 1334 South Central Avenue, Los Angeles, California 90021. The site is in a fully developed industrial area roughly two miles south of Downtown Los Angeles. The vicinity is entirely industrial. The site area consists of a beverage production facility.

The site produces carbonated soft drinks including Coca-Cola, Coke Zero, Diet Coke, Sprite, Sprite Zero, and Fanta. Water is the main ingredient of these products. Water is also used for equipment cleaning, process heating and cooling, lab equipment, and domestic uses (restrooms/locker rooms).

The site's water-related infrastructure and uses includes:
-No onsite wells or rainwater harvesting; all water supplied by Los Angeles Water and Power (LADWP) through two mains.
-Filtration and reverse osmosis to produce ingredient water.
-Water for boilers is subject to additional chemical treatment to prevent scaling. Condensate is captured and returned. Water is also used in the site cooling towers.
-Industrial wastewater with adjusted pH as required by permit. Sanitary waste is discharged through a dedicated sewer to the city WWTP.
-Two cooling towers on the roof for air compressors and chillers. Water treatment chemicals are used to prevent scaling and biofilms .
-Fire water is from the LADWP supply. Fire suppression is on a dedicated system and supply. A generator-driven booster pump is available in case of electrical failure.
-Use for process water, ingredient in product, utilities, water treatment, and domestic use. Process wastewater is collected, neutralized, and discharged to the LA County Sanitation District line adjacent to the plant. Sanitary waste flows to the same line bypassing the collection/neutralization step.

The site is 100% impervious surfaces. Stormwater is collected onsite and discharged to onsite storm drains. Stormwater test samples are pulled and analyzed during rain events.

RCCB's Los Angeles plant covers approximately 2 acres and abuts the surrounding sidewalks and streets. The plant has three production lines with onsite blow moulding. All three lines fill PET bottles. The plant employs 200 people and runs three shifts, six days per week.

Comment This information was supplied in the WSAS Site and Catchment Questionnaire.

Summary of Shared Water Challenges

Summary of Shared Water Challenges
The site identified 5 shared water challenges that were identified with stakeholders: emerging water contaminants, saltwater intrusion, stormwater runoff, imported water quantity, and water equity.

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.* — No

Comment During the initial audit, the site focused on the onsite tour before visiting the water source and discharge locations. Those can be looked at during surveillance audits.

1	STEP 1: GATHER AND UNDERSTAND

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

1.1.1 *The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including:*
- Site boundaries;
- Water-related infrastructure, including piping network, owned or managed by the site or its parent organization;
- Any water sources providing water to the site that are owned or managed by the site or its parent organization;
- Water service provider (if applicable) and its ultimate water source;
- Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies;
- Catchment(s) that the site affect(s) and is reliant upon for water.

Obs.

Comment

The site identified its physical scope for the site's water service provider; its various water sources and the catchment/watershed that it is reliant upon for water; the hydrogeological context; the watershed context - specifically in the Los Angeles River; the site's wastewater service provider, discharge point to the Pacific Ocean. The document explains that the site has no water sources owned or managed by the site or its parent organization.

The site mapped the following aspects:
-boundaries and layout, including compared to its neighbors, including a local firefighter museum and some FETU;
-its location compared to Los Angeles's water systems, including water treatment, wastewater treatment, and storage facilities
-the location of the site's sewer main and its outfall to the Pacific Ocean
-its water sources across the state
-its local watersheds, where the site is located on the border of the Los Angeles River watershed and the Santa Monica Bay watershed. Site's cCatchment (Catchment that the site uses to define the area to be considered for all indicators that refer to "Catchment"): Los Angeles River watershed.
-its site water infrastructure locations include incoming water, stormwater test points, wastewater equalization, etc.
-its WASH facilities onsite
-the groundwater basins of the LA Coastal Plains and catchment

Its boundaries and water systems onsite were not clearly mapped out.

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

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

Obs.

Comment

The site identified 24 stakeholders in its area, including local officials, regulators, NGOs, businesses, and environmental groups - the catchment limitation is the Los Angeles River Watershed. The site also identified its process used to identify and map water-related stakeholders and included the following information:
- Description/link to factory
- Stakeholder type
- Water-related concerns or challenges
- Assessment of stakeholder engagement (influence & interest)
- Potential for the site to influence stakeholder water stewardship
- Selected method of communication

The site had identified the sheltered and unsheltered populations as a vulnerable stakeholder group. It also had identified its neighbors, such as the LA Unified School District, the African-American Firefighter Museum, and MDM Citrus. WRD was the ultimate water source, serving as the agency responsible for replenishing the city's groundwater supply. The site had also included the Ballona Creek Reserve as a stakeholder in Santa Monica Bay, its ultimate receiving water body. The site indicated it had already engaged with them on an IWRA to remove plastics (since 2022). However, the site did not include its indirect water service provider on the list.

The site shared evidence of meeting minutes from the MWD in July and August 2025, as well as a watershed tour it conducted with River Partners in May 2025.

Two stakeholder interviewees indicated they were not familiar with the site or its water stewardship journey. This implies that the site must reconsider its stakeholder list and how it engages with all stakeholders.

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

Yes

Comment

The site identified stakeholders' potential degree of influence, categorized by sector. It also identified its process for identifying and mapping stakeholders.

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.*

Obs.

Comment	The site provided its Emergency Response Plan from October 2025, which included environmental releases, chemical spills, truck accidents with environmental impact, and other significant environmental incidents. This included contaminated soil or surface water, regulatory inspections or contacts, serious injuries/illnesses, natural or man-made disasters (including earthquakes), flooding and hail storms, water supply outages, and human threats. The site also shared a drought management document, indicating that its response plan to drought would be guided by stages managed by the state and city governments. This document wasn't one the site would review, but shared as information on what the management review process could go through - as mentioned in the Emergency Response Plan. The site also has a 2023 SPCC Plan (for chemical and oil management and storage—reviewed annually) and a 2024 SWPPP certification and document (including stormwater management, best management practices, and testing for pH, TSS, oil and grease, and BOD). The site mentioned that its corporate level was working on a North American climate resilience plan to better articulate some of the actions of business operations for more chronic water-related incidents.

1.3.2	*Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped*	Yes
Comment	The site identified and mapped its water balance, including inflows from two locations, losses through cooling tower evaporation and water recovery RO, and outflows through finished product and the city sewer line. It also included cleaning, blending skids, boilers, chillers, and other operations. The site shared that its water storage systems only contained water for a maximum of 20 minutes due to the high volume of product produced.	
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.*	Yes

Comment

The site quantified its water balance, including inflows, losses, and outflows.

The site had about 300,000 GPD of incoming water. In its balance calculations, the site assumed about 5,000 GPD of evaporative loss. It also showed that it had a finished product of 190,000 GPD and 110,000 GPD to wastewater systems for the city to treat. This information was for July 2025.

The site provided data from 2022 to 2025, which showed a gradual decrease in incoming and outgoing water. The annual loss variance was based on the water use ratio (WUR), which decreased slightly year over year from 2024 to 2023. The site said that in March 2025, a water leak was found in the restrooms.

Seen on the site tour: The water plant on-site included an RO system, sand filters, UV, and carbon. Outside the water plant cage, the site displayed an analogue water-use ratio dashboard up to August 2025; schematic dashboards with meter readings were also displayed on a computer screen within the plant. There are many drains and bundings in the area, with an eyewash station within the cage, as well. There were a few leaks in the carbon filter area, and the team had not noticed them before. There was also a lab within the plant, and the site noted that it tested the treated water daily and the incoming water weekly. There is a storage tank at the plant that receives chlorine treatment, and the water turns over in at most 20 minutes. The site has 2 incoming water flow meters—one for production and the other for domestic use. Both main pipes have bundings around them. There were no leaks, and nearby drains led to the underground clarifiers. The cooling towers outside showed no signs of leaks. The production area uses water for lubricating the machinery. The boiler room had no leaks and included water softeners.

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.*

Obs.

Comment

The site identified its water quality through the following:
-The Coca-Cola requirements and protocols for the site's water quality
-Stormwater discharge reports (including from March and June 2025) from qualifying rain events included TSS, pH, BOD, and oil and grease.
-Industrial wastewater discharge water quality reports up to October 2025 include TSS, pH, dissolved sulfides, and other elements. The site indicated that it had an on-site monitor that tracked pH, and the wastewater discharge reports are from an external party.
-Source and water treatment plant water quality tests (October 2025) for biological, physical, and chemical parameters.
-A quantitative trends analysis and table between 2010-2015 and 2020-2025 of water quality, showing that generally the water quality has overall improved somewhat in physical, chemical, and biological measures. The information was sourced from several sources, including local NGO Heal the Bay, the EPA, State Water Resources Control Board, Santa Monica Bay Environmental Program, and newspaper articles.
-A LADWP water quality report, quality trends analysis, and table from 2022 to 2024. The analysis reveals minimal variance in parameters, except for a notable spike in natural arsenic in 2024, a decline in lead levels, and an increase in copper. The report also identified emerging contaminants, including PFAS and Chlorate.

While the information was analyzed, the site could have done more to interrogate some of the results, such as analyzing annual variances from the city's water quality reports.

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

Yes

Comment	The site provided the following materials: -Images of the chemical stores on skids from a site tour (and seen also on site tour with auditor) -A chemical map across the site (from the wall) -SPCC (from 2024) that mapped oil storage locations -Hazardous waste pickup logs (from January 2025) that include when its chemicals are on-site, as well as a chemical list online on its Source Intelligence platform (updated when new chemicals are needed)	
1.3.6	*On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.*	Yes
Comment	The site is all urban, with no important water-related area present. There is no grass on-site, no irrigation, etc.	
1.3.7	*Annual water-related costs, revenues, and a description or quantification of the social, cultural, environmental, or economic water-related value generated by the site shall be identified and used to inform the evaluation of the plan in 4.1.2.*	Yes
Comment	The site identified its annual water-related costs, including water and sewer charges, energy costs for water systems, water treatment services, boiler/cooling water treatment, cleaning & sanitation, water quality testing, consultants, and the AWS certification. The total annual water-related costs amounted to $6.87 million (as of 2024). The site indicated it had no water-related revenue, as it was focused on bottling other products rather than water. The site also provided a description and/or financial quantification of some of its social, environmental, and economic water-related values. It included that its finished product's water efficiency improved. It also noted that its corporate level had worked on $1.2 million in water recharge projects, including replenishing 150% the water used in the site's watershed.	
1.3.8	*Levels of access and adequacy of WASH at the site shall be identified.*	Yes
Comment	The site identified an overview of its WASH facilities and acknowledged that they complied with OSHA regulations, providing 2 restrooms for males and 2 restrooms for females. It noted that the site was unionized and had to ensure that there were restroom breaks for staff. It also shared its general management practices, including the requirement for on-site handwashing facilities and sanitation systems (June 2024). The site also shared its results from the WASH Self-Assessment (completed in 2025), which indicated compliance with access and adequacy of the WASH facilities. The score indicated that the site could improve on community WASH efforts.	
1.4	*Gather data on the site's indirect water use, including: its primary inputs; the water use embedded in the production of those primary inputs the status of the waters at the origin of the inputs (where they can be identified); and water used in out-sourced water-related services.*	
1.4.1	*The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be identified.*	Yes
Comment	The site identified no primary inputs with embedded water greater than five percent of the total weight of the goods generated or the costs of a site within the site catchment. It also noted that its bottles and containers were not sourced from within the watershed.	
1.4.2	*The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.*	Yes

Comment The site identified a laundry service provided within the catchment. Based on an email from the service provider, Cintas, the site's weekly water usage was quantified: the provider responded to an October 2025 email stating that it used 105,000 gallons of water daily and that the site accounted for 0.27% of its total water use.

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.*

Obs.

Comment The site identified its own governance initiatives, including building a rainwater capture on the rooftop, onsite water recycling loops, working on green streets efforts, and supporting groundwater basin recharge.

The site also shared the WRD 2024-2026 Strategic Plan, which includes groundwater replenishment, educational programs on water efficiency, and climate resiliency efforts for the catchment. There was also a MWD Climate Implementation Strategy (from April 2025), which included a policy framework for water reliability, resilience, financial sustainability for water management, water affordability, and equity. It also had a timeline for water-related resiliency projects, such as water efficiency programs, managing reservoirs, and other initiatives.

The site should consider other water governance information beyond MWD's efforts in the catchment.

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

Yes

Comment The site shared its industrial wastewater treatment permit, stormwater discharge permit, water monitoring requirements, SPCC, SWPP, and industrial wastewater permit with discharge limits (from December 2023), which indicates. The site also provided a screenshot (December 2024) of its compliance calendar events related to water for these requirements (updated in October 2025).

The site had no water intake or stormwater runoff permit - only a wastewater discharge permit.

The site identified the state's water rights from 2021, noting efforts to modify water-rights permits from the Delta project during droughts, change points of diversion from the Delta Conveyance Project, data modernization, and manage water transfers. The site also identified how changes to the state's water rights affected the catchment and outlined the timeline for different changes. For the site, it became clear that the only way it impacted its operations was if the Delta Conveyance Project had to adjust its water flows during droughts, which had not yet happened.

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

Yes

Comment The site provided a catchment water balance from 2005 to 2022 based on LADWP data, indicating an increasing annual water deficit, which is why the catchment relies more on purchases and transfers from other areas. The data included aqueduct supplies, imported wholesale water from MWD, groundwater, recycled water, stormwater capture, and other smaller purchases and transfers to the catchment.

The site indicated that the most recent data was from 2022 (the government would update it in 2027), but nothing more current was available.

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.*

Obs.

Comment

The site shared the LADWP data from 2024, which indicated risks for each of the water sources, such as contamination and encroachment issues. It also mentioned runoff and groundwater overpumping. It also shared a groundwater contamination report (from 2024), though the report was somewhat focused on the RCCB Downey site location instead.

The site also shared:
-A quantitative trends analysis and table between 2010-2015 and 2020-2025 of water quality, showing that generally the water quality has overall improved somewhat in physical, chemical, and biological measures. The information was sourced from several sources, including local NGO Heal the Bay, the EPA, State Water Resources Control Board, Santa Monica Bay Environmental Program, and newspaper articles.
-A LADWP water quality report, quality trends analysis, and table from 2022 to 2024. The analysis reveals minimal variance in parameters, except for a notable spike in natural arsenic in 2024, a decline in lead levels, and an increase in copper. The report also identified emerging contaminants, including PFAS and Chlorate.
-An EPA How's My WaterWay Report on the Santa Monica Bay with data from 2024, showing the impairments on the bay, including arsenic, mercury, DDT, and PCBs. The available data did not provide any quantified information, as the website does not share such details.

While the information was analyzed, the site could do more to interrogate some of the results, particularly by analyzing annual and seasonal variances from the city water quality reports and the impacts on the overall catchment.

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.*

Yes

Comment

The site identified and mapped 8 IWRAs, including the Los Angeles River, Arroyo Seco, Eugene Obregon Park, Ernest Debs Regional Park, Ballona Creek, Angeles National Forest, Griffith Park, and Redondo Beach. The site indicated its status and prioritized the IWRAs for its focus. The site mapped the IWRAs, indicating their locations relative to the site. There are two maps, as some are closer than others.

The site developed the data on the IWRAs by reviewing previous clean-up and collaboration projects they had worked on in the catchment, as well as examining scientific information and satellite maps to determine them.

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

Yes

Comment

The site shared maps detailing water-related infrastructure in the catchment, indicating the condition and potential exposure to extreme events of each, including the LA Aqueduct, Tinemaha Dam, LA Reservoir UV Disinfection Plant, pump stations, groundwater systems, recycled water, and MWD conveyance infrastructure. The evidence was sourced from LAWDP, MWD, EPA, and the State Water Resources Control Board documents.

The site discussed with MWD in August 2025 the possibility of supporting groundwater recharge efforts and retrofitting existing infrastructure that the site could support.

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

Obs.

Comment

The site identified the adequacy and availability of WASH within the catchment. The site indicated that access to WASH is inequitable due to low-income neighborhoods and unhoused populations not having good access. It also indicated efforts to invest in improved infrastructure for the city. The site may want to disclose its sources, though.

1.6 *Understand current and future shared water challenges in the catchment, by linking the water challenges identified by stakeholders with the site's water challenges.*

1.6.1 *Shared water challenges shall be identified and prioritized from the information gathered.* ✓ closed

Comment: The site identified 5 shared water challenges: emerging water contaminants, saltwater intrusion, stormwater runoff, imported water quantity, and water equity.

It was unclear how they developed these challenges with stakeholders.

Finding No: TNR-020959

1.6.2 *Initiatives to address shared water challenges shall be identified.* ✓ Yes

Comment: The site provided details of initiatives it pursued to address shared water challenges, such as a contingency plan on PFAS contamination, collaborating with the LA Water Reclamation District on a well replenishing project, direct potable reuse efforts, and an invasive species project.

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

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

Comment: The site identified 5 shared water challenges, which are also recognized as its risks. This included: emerging water contaminants, saltwater intrusion, stormwater runoff, imported water quantity, and water equity.

The risks are all prioritized, and include likelihood, severity of impact within a given timeframe (the scoring of likelihood is based on increasing timeframe periods), descriptions of potential costs (but the costs are dependent on the context of each risk scenario and not including costs already incurred to manage risks), and business impact (detailed more under Current Status, detailing what would potentially happen in the short- and long-term).

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

Comment: The site identified water-related opportunities in its WMP, including prioritization and business opportunities. The potential savings were not calculated but detailed (similarly to risks above) based on context and potential additional scenarios.

1.8 *Understand best practice towards achieving AWS outcomes: Determining sectoral best practices having a local/catchment, regional, or national relevance.*

1.8.1 *Relevant catchment best practice for water governance shall be identified.* ✓ Yes

Comment: The site identified best practices for the catchment, including groundwater replenishment, water recovery collaborations with LADWP, partnering with local stakeholders on sustainability efforts like the LA Sanitation and Environment and LA River Revitalization projects (and with local NGO groups), climat resilience planning with LA Regional Collaborative for Climate Acition, promoting community engagement such as working on a One Water education program with the city.

1.8.2	*Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.*	Yes
Comment	The site identified best practices, including monthly town hall meetings for staff, staff-led water recycling campaigns, leak survey and water meter installation, automatic sensors in the bathroom facilities, supporting replenish projects, and promoting community awareness on river conservation.	
1.8.3	*Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.*	Yes
Comment	The site identified best water quality practices through wastewater tanks in secondary containment areas, daily wastewater testing, adopting international water quality standards, researching watershed quality efforts with stakeholders, and implementing best practices for stormwater management.	
1.8.4	*Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.*	Obs.
Comment	The site identified best IWRA practices, including maintaining stormwater discharge areas, implementing nature-based and green infrastructure solutions, supporting city efforts in natural areas for revitalization, contributing to forest restoration projects upstream, and collaborating with local NGOs on cleanup events. Some of the best practices included locations that the site did not identify as IWRAs in the catchment, making it unclear whether this would change.	
1.8.5	*Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.*	Obs.
Comment	The site identified best practices for WASH, including laundry services for staff, handwashing signage in bathrooms, stormwater capture programs, coordination on industrial water reuse programs, sponsoring of a public handwashing or hydration station, educational outreach, and providing information and partnerships with local nonprofits and watchdogs working on water quality. Many of the best practices around WASH are focused on water quality, which don't necessarily directly relate to WASH efforts. This can be improved and clarified to ensure WASH access.	

2	STEP 2: COMMIT & PLAN - Commit to be a responsible water steward and develop a Water Stewardship Plan	
2.1	*Commit to water stewardship by having the senior-most manager in charge of water at the site, or if necessary, a suitable individual within the organization head office, sign and publicly disclose a commitment to water stewardship, the implementation of the AWS Standard and achieving its five outcomes, and the allocation of required resources.*	
2.1.1	*A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:* *- That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes* *- That the site implementation will be aligned to and in support of existing catchment sustainability plans* *- That the site's stakeholders will be engaged in an open and transparent way* *- That the site will allocate resources to implement the Standard.*	Yes
Comment	The site identified a signed water commitment from July 2025 that included commitments relevant to the indicator as required. The site publicly disclosed the commitment on its website at https://reyescocacola.com/our-community.	
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.*	Obs.
Comment	The site shared information on the process for complying with the SPCC Plan and the SWPPP. However, the plans and compliance registers did not specify the responsible individuals, except for those who signed the plans for submission of compliance. Separately, the site shared a list of individuals responsible, but they were unrelated to compliance obligations. The site shared its compliance calendar events (as of 2025) related to water and wastewater. The calendar included the submission process under "tasks" and outlined the frequency of these tasks. The site mentioned that its Management Systems staff member is responsible for all compliance obligations, but this was not explicit in its compliance systems. This was articulated in the compliance calendar spreadsheet. That being said, the system was not consistent across the board, and much of it was implicit. Much of the information required several lines of communication to verify who was responsible for compliance. It seemed that there was no clear system in place for managing compliance, even though they were familiar with the site's governance system.	
2.3	*Create a water stewardship strategy and plan including addressing risks (to and from the site), shared catchment water challenges, and opportunities.*	
2.3.1	*A water stewardship strategy shall be identified that defines the overarching mission, vision, and goals of the organization towards good water stewardship in line with this AWS Standard.*	Obs.

Comment

The site shared its water-related goals based on the corporate strategy that it said required all sites under the corporation to meet. According to the CSR Report, the corporation's goal was to reduce its water use ratio by 17.5% at each location by 2030 (compared to 2021), and replenish over 300 million gallons of water in California. The corporation also had a water mission and vision that were not specific to the site. However, the site stated that its mission and vision were identical to those of the corporation.

The site could benefit from a more specific strategy that clearly defines its mission, vision, and goals for effective water stewardship.

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.

Obs.

Comment

The site identified 23 targets (labeled as SMART Goals). For each target, the site identified the following:
- How it will be monitored for all, and measured, is implied in the SMART Goal somewhat for all, but could be clearer for most
- Actions to achieve and maintain (or exceed) it for all, though some are unclear and are just names of agencies
- Planned timeframes to achieve it for some; some indicated that it was a daily or monthly target throughout the year
- Financial budgets allocated for actions for all
- Positions of persons responsible for actions and achieving targets for all
- The link between each target and the achievement of best practices to help address shared water challenges was not shared - this was indicated through a column indicating if it was a best practice or KORE requirement (which was a TCCC core requirement, but above compliance requirements)
-The links to AWS outcomes for all

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

Comment

Water risks and proposed actions to address these have been identified in the site's Emergency Response Plan, SPCC Plan, with several public agencies (including the fire department, LA Regional Water Quality Control Board, and the CA Office of Emergency Services), and SWPPP with the State Water Resources Control Board. The site had identified opportunities and actions to address and manage the identified risks, such as plans to fund water reclamation efforts in the watershed, fund IWRA support initiatives, reviewing consumer confidence reports by LADWP, and engaging in policy efforts.

It was noted that the USA regulations limit the opportunity for coordination with relevant public-sector and infrastructure agencies on these plans. Still, the site formally submitted these plans to the relevant regulators for approval.

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.*

closed

Comment

The site identified 12 targets for good catchment governance. The evidence provided includes the following:

-Annual report of drought status to senior leaders at RCCB: The site shared evidence of a Q&A report from April 2024, where it discussed the water-related business risks and strategy for each of the corporate sites in California. However, evidence of the email to senior leaders would be more in line with the evidence.

-Achieve Water Use Ratio (WUR) target of 1.56 in 2025; and 1.40 by 2030. (WUR was 1.51 in 2024): The site shared its WUR summary for each month and in the year, including the monthly report email from August 2025 with every site's WUR. The site indicated that this was relevant to good catchment governance by reducing water use in the catchment.

-Active stakeholder engagement starting in 2025 with at least 3 orgs: The site showed evidence of email correspondences with River Partners from October 2025, MWD in July 2025 on groundwater replenishment, and WRD from May 2025 on water meter readings.

-Maintain daily testing of water: The site showed a spreadsheet of its treated water testing data from 12-14 October 2025, indicating test results from various shifts on TDS, Turbidity, pH, Alkalinity, and other tests.

-Meet with water and wastewater utilities at least annually: No evidence was provided.

-Annual targets achieved for all [corporate water-related] metrics: The site showed evidence of achieving the WUR target of 1.56 in August 2025.

-Semi-annual meetings with regulators by the GA team: No evidence was provided.

-Quarterly meetings with elected officials by the GA team and plant leaders: No evidence was provided.

-~$110K/month spent in 2025 for water. Budget of $1.3M for 2026: The site showed its monthly water usage expenditure from 2022 to 2025. The site's average in 2025 YTD was $113,263, according to its utility history spreadsheet.

-~$34K/month spent in 2025. (Wastewater charges only.) Budget of $750K in 2025: The site showed its monthly water usage expenditure from 2022 to 2025. The site's average in 2025 YTD was $34,805, according to its utility history spreadsheet.

-No downtime related to water treatment systems: The site did not provide evidence, other than sharing that it did not have any downtime in 2025. It shared that it typically planned downtime for the water treatment system and indicated that there were no downtime failures.

-Achieve production, efficiency, and cost targets: The site shared its spreadsheet called RCCB Supply Chain Scorecard, showing its targets in the "goal input" tab of $4.06 cost per case for September 2025 and the actuals input of $3.76 for the same period.

Finding No: TNR-021018

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 indicated that it had no need or direct reason for respecting others' water rights. It demonstrated its understanding of the LADWP water rights requirements, including when a water right permit may be required, such as for direct surface water diversions, groundwater extraction, or operating private non-potable water systems. It shared that its sources were from the State Water Resources Control Board, LADWP, and MED documents.	
3.2	*Implement system to comply with water-related legal and regulatory requirements and respect water rights.*	
3.2.1	*A process to verify full legal and regulatory compliance shall be implemented.*	Yes
Comment	The site provided evidence of complying with its stormwater permit with discharge reports (including from March and June 2025) from qualifying rain events, including TSS, pH, BOD, and oil and grease. Industrial wastewater discharge water quality reports up to October 2025 include TSS, pH, dissolved sulfides, and other elements. The site indicated that it had an on-site monitor that tracked pH, and the wastewater discharge reports are from an external party.	
3.2.2	*Where water rights are part of legal and regulatory requirements, measures identified to respect the water rights of others including Indigenous peoples, shall be implemented.*	Yes
Comment	The site indicated that it had no legal obligation for respecting others' water rights. It demonstrated its understanding of the LADWP water rights requirements, including when a water right permit may be required, such as for direct surface water diversions, groundwater extraction, or operating private non-potable water systems. It shared that its sources were from the State Water Resources Control Board, LADWP, and MED documents.	
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 identified 4 targets for water balance. The evidence provided is as follows:

-Achieve WUR target of 1.56 in 2025; and 1.40 by 2030. (WUR was 1.51 in 2024): The site shared its WUR summary for each month and in the year, including the monthly report email from August 2025 with every site's WUR. The site indicated that this was relevant to good catchment governance by reducing its catchment water use.

-Achieve production, efficiency, and cost targets: The site shared its spreadsheet called RCCB Supply Chain Scorecard, showing its targets in the "goal input" tab of $4.06 cost per case for September 2025 and the actuals input of $3.76 for the same period.

->100% of Los Angeles' volume replenished in 2030 and subsequent years: The site shared a screenshot of a dashboard of its corporate replenishment efforts. The dashboard displays its replenishment efforts and water use for 2025, including calculations for LA water use (340.62 ML for 2024) and the LA replenishment estimate for 2025 (at 153.82% for EOY 2024). The dashboard also showed the locations of the water sources for the site and places for the replenishment projects, which are usually on a 10-year project cycle.

-100% of Los Angeles' volume replenished in 2030 and subsequent years: The site shared a screenshot of a dashboard of its corporate replenishment efforts for the previous target. It also showed the same dashboards for its 2 other sites in California and calculated its water replenishment for 2024. It is less clear how this is a site-specific target rather than a corporate-level target.

The auditor noticed on the site tour that some staff were discarding bottled drinks in large bins. The site indicated that it was due to improper packaging and shared that the discarded drinks would be sent to its recycling center to balance their pH before being sent back through the city sewer. It was not discussed during the audit if this should be included in the WSP.

3.3.2 *Where water scarcity is a shared water challenge, annual targets to improve the site's water use efficiency, or if practical and applicable, reduce volumetric total use shall be implemented.*

Yes

Comment

The site highlighted water challenges associated with water scarcity.

It shared its annual target to improve water use in its WSP through the WUR target of 1.56 in 2025 and 1.40 by 2030. (WUR was 1.51 in 2024). For implementation evidence, the site shared its WUR summary for each month and in the year, including the monthly report email from August 2025 with every site's WUR. The site indicated that this was relevant to good catchment governance by reducing its catchment water use.

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

Yes

Comment

The site stated that it had no legal obligation to reallocate or transfer water supplies to other users. This was based on the California Water Code (2019 - 350-356) and the Los Angeles Municipal Code (updated June 2025 - 121.08).

3.4 *Implement plan to achieve site water quality targets*

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

Yes

Comment

The site identified 4 targets for water quality. The evidence provided includes:

-Maintain daily testing of water: The site showed a spreadsheet of its treated water testing data from 12-14 October 2025, indicating test results from various shifts on TDS, Turbidity, pH, Alkalinity, and other tests.

-100% compliance with TCCC KORE requirements: The site shared annual water quality reports from 2023 and 2024 that include the KORE water quality requirement limits. The 2024 test report indicated a few elements (i.e., HPC-biological) that were beyond the KORE limits, but it may have been a testing error (i.e., using an old testing sample); the 2023 sample was within the limits. The site indicated in 2024 that it did a resample for the HPC and found it was still over the limit and needed a correction action plan to address its water storage tank permeate.

-Annually review any change with LADWP: The site shared a log of reviewing the annual LADWP consumer confidence report from the on-site quality manager, which was last done in December 2024. This focused on particular changes that need to be addressed by the site through its water treatment.

-100% compliance with [wastewater] permit: The site used the EPA ECHO site (echo.epa.gov) to look for any NOVs with its wastewater permit. As of September 2025, the site had no NOVs or permit violations.

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.*

Obs.

Comment

The site identified water quality as a shared water challenge.

As identified in its best practice list in Step 1, the site shared its efforts to maintain TCCC KORE wastewater requirements by providing annual water quality reports for 2023 and 2024 that include the KORE water quality requirement limits. The 2024 test report indicated a few elements (i.e., HPC-biological) that were beyond the KORE limits, but it may have been a testing error (i.e., using an old testing sample); the 2023 sample was within the limits. The site indicated in 2024 that it did a resample for the HPC and found it was still over the limit and needed a correction action plan to address its water storage tank permeate.

The site discussed the challenges of balancing water balance and water quality efforts, and it focused on doing what was needed to exceed the required limits consistently. The site shared evidence of its weekly inspection form from October 2025, including its chemical stores, which the site indicated was a stormwater quality best practice.

While the site discussed best practice activities it had undertaken, evidence of implementing water quality best practices did not cover all of the practices mentioned.

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

3.5.1 *Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.*

Yes

Comment

The site identified 3 targets for IWRAs. The evidence provided includes:

-Maintain a comprehensive list of IWRAs within 20 miles of the Los Angeles plant: The site provided a list of IWRAs within the catchment in Step 1 as evidence of implementation.

-Contact responsible parties for (3) IWRAs by 12/31/25: The site shared an engagement log from the site's government affairs team about who they met with in 2025. This included 9 councilmembers and 3 other government officials. The summary indicates that it discussed the Los Angeles River Watershed replenishment efforts and a partnership with local NGOs to build rain barrels for residents. It also mentioned efforts in 2022 with Ballona Creek on cleanups and a continuous effort to reduce invasive species in the Angeles National Forest.

->100% of Los Angeles' volume replenished in 2030 and subsequent years: The site shared a screenshot of a dashboard of its corporate replenishment efforts. The dashboard displays its replenishment efforts and water use for 2025, including calculations for LA water use (340.62 ML in 2024) and the LA replenishment estimate for 2025 (153.82% of EOY 2024). The dashboard also showed the locations of the site's water sources and the sites for the replenishment projects, which are usually on a 10-year project cycle. The Angeles National Forest was part of the replenishment list on the dashboard.

3.6 *Implement plan to provide access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers at all premises under the site's control.*

3.6.1 *Evidence of the site's provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers onsite shall be identified and where applicable, quantified.*

Yes

Comment

The site provided an overview of its WASH facilities, acknowledging compliance with OSHA regulations, including 2 restrooms for males and 2 for females, serving approximately 200 staff on-site. It noted that the site was unionized and that it had to ensure staff had restroom breaks. The site also mapped on-site WASH facilities on a site map, showing three distinct areas with WASH facilities.

During the site tour, the auditor looked at the 4 restrooms. The urinals had sensors, as did half of the restrooms' toilets and handwashing basins —the other restrooms still had manual flushes. The cleaning logs in the restrooms were up to date, and there was WASH signage for handwashing everywhere. One of the female toilets was out of service during our visit to the site. There was free access to bottled water in the break rooms and the outdoor picnic area for staff.

The site identified 2 WASH targets. The evidence provided includes:
-All employees have unfettered access to clean water and safe sanitation facilities: The auditor can confirm evidence of implementation through the site tour and visiting all of the WASH facilities.

-Annual reporting of WASH indicators in the community: The site shared the evidence from Step 1 on assessing WASH in the community.

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

Yes

Comment

The site identified that it does not impinge on the WASH rights of communities, as LADWP is the water retailer and has control over WASH access in the city. The site also stated that it does not impinge on indigenous people's freedom to access their traditional water resources freely, as this would also be LADWP's responsibility.

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.* closed

Comment The site's WSP had 2 indirect water use targets with the following evidence:
-Identify inputs that account for at least 90% of the indirect water use for RCCB-LA: The site provided no evidence of this being implemented.

-Report water use for laundry service; Ecolab products: The site shared evidence of engagement with its laundry service provider, Cintas. In the October 2025 email, Cintas quantified the site's daily water usage, stating that it used 105,000 gallons, accounting for 0.27% of its total water use.

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

Comment The site shared evidence of engagement with its laundry service provider, Cintas. In the October 2025 email, Cintas quantified the site's daily water usage, stating that it used 105,000 gallons and that the site accounted for 0.27% of its total water use.

3.8 *Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have.*

3.8.1 *Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.* Yes

Comment The site shared evidence of meeting notes with MWD in August 2025, the possibility of supporting groundwater recharge efforts, and retrofitting existing infrastructure that the site could support.

3.9 *Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.*

3.9.1 *Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.* Yes

Comment The site shared evidence of an IWRA project in the Upper Los Angeles Watershed in December 2023, where it worked with The Council for Watershed Health on an invasive species removal effort.

It also showed evidence of funding a WRD Leo Vander Injection Well Project in 2023, which would decrease the amount of treated water discharged to the Los Coyotes River (located in a different catchment, useful to know for IWRA conversations). This project was focused more on the state-level with the corporation team, but is near the site's location. Additionally, the site supported WRD in building its Leo J. Vander Lans Advanced Water Treatment Facility. The site shared a groundwater basin report on the projects from WRD in June 2024.

The site shared evidence of meeting minutes from the MWD in July and August 2025, as well as a watershed tour it conducted with River Partners in May 2025.

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

Comment

The site shared evidence of water balance best practices with its WUR plant update from August 2025 of monthly water efficiency, highlighting that it has been overachieving its WUR target since April 2025.

The site also shared a screenshot of its corporate replenishment efforts dashboard. The dashboard displays its replenishment efforts and water use for 2025, including calculations for LA water use (340.62 ML for 2024) and the LA replenishment estimate for 2025 (at 153.82% for EOY 2024). The dashboard also showed the locations of the water sources for the site and places for the replenishment projects, which are usually on a 10-year project cycle.

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

Yes

Comment

The site showed a spreadsheet of its daily treated water testing data from 12-14 October 2025, indicating test results from various shifts on TDS, Turbidity, pH, Alkalinity, and other tests.

The site shared annual water quality reports for 2023 and 2024, which include the KORE water quality requirement limits. The 2024 test report indicated a few elements (i.e., HPC-biological) that were beyond the KORE limits, but it may have been a testing error (i.e., using an old testing sample); the 2023 sample was within the limits. The site indicated in 2024 that it did a resample for the HPC and found it was still over the limit and needed a correction action plan to address its water storage tank permeate.

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.*

Obs.

Comment

The site shared a screenshot of its corporate replenishment efforts dashboard. The dashboard displays its replenishment efforts and water use for 2025, including calculations for LA water use (340.62 ML for 2024) and the LA replenishment estimate for 2025 (at 153.82% for EOY 2024). The dashboard also showed the locations of the water sources for the site and places for the replenishment projects, which are usually on a 10-year project cycle. The Angeles National Forest was part of the replenishment list on the dashboard.

The site is also working on gathering more evidence of correspondence with IWRA-related stakeholders in the catchment area to illustrate implementation further.

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

closed

Comment

The site shared evidence of annual WASH reporting in the community from Step 1. However, it stated that it was undertaking efforts to introduce additional WASH initiatives but was unable to provide more evidence of implementation, which would have better conformed to the standard.

Finding No: TNR-021082

4	STEP 4: EVALUATE - Evaluate the site's performance.	
4.1	*Evaluate the site's performance in light of its actions and targets from its water stewardship plan and demonstrate its contribution to achieving water stewardship outcomes.*	
4.1.1	*Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.*	Yes
Comment	In the WSP, the site evaluated its performance and progress on most targets, as detailed in column G labeled "Progress/Results". Some targets were evaluated using performance numbers and percentages up to June 2025, while others were marked as "meeting goal" or "completed" for tasks such as meeting completion or document reviews.	
4.1.2	*Value creation resulting from the water stewardship plan shall be evaluated.*	Yes
Comment	The site provided an evaluation of each target's value creation in its WSP. In it, it described the type of value and the financial benefit of the target.	
4.1.3	*The shared value benefits in the catchment shall be identified and where applicable, quantified.*	Yes
Comment	The site identified the shared value benefits in the catchment from its actions and targets within the WSP, in Column U. All targets have been identified as benefiting the catchment. The site calculated that it had spent $875,000 in the last decade on water replenishment projects.	
4.2	*Evaluate the impacts of water-related emergency incidents (including extreme events), if any occurred, and determine the effectiveness of corrective and preventative measures.*	
4.2.1	*A written annual review and (where appropriate) root-cause analysis of the year's emergency incident(s) shall be prepared and the site's response to the incident(s) shall be evaluated and proposed preventative and corrective actions and mitigations against future incidents shall be identified.*	Obs.
Comment	The site experienced one water-related incident in 2024, in which someone vandalized the incoming water meter, shutting down water access to the site. The site shared a spreadsheet detailing downtime on water lines due to vandalism, during which IMCR (the site's hotline to trigger on-site emergency incidents) was utilized. The site also shared an incident spreadsheet that indicated the date, finding (which indicated the root-cause analysis), outcome, and comments on corrective action called "Summary of Regulatory Events." The site had shared an email with LADWP about this incident in October 2025, indicating that the city had a preventive action plan in place. It also noted that the site was interested in relocating the water meter (presumably to mitigate future vandalism). The site could create a more organized, written annual review of these types of water-related emergency incidents that clearly state the root-cause analysis, evaluation, preventive, and corrective action plans for mitigating future incidents, to better conform to this indicator.	
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.*	closed

Comment	The site shared that it had regular meetings with catchment stakeholders about performance against targets, but hadn't shared evidence of these consultation efforts yet. ***Finding No: TNR-021086***
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.* Obs.
Comment	This is the first version of the site's WSP. Consequently, no modification would be appropriate until after a full year of implementation. However, the site did modify the WSP during the audit. The site did not explain how they would modify the plan or track the changes.

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.* ✓ closed

Comment: The site provided a list of its water-related internal governance, including the positions of those involved (site leadership, supply chain leadership, and corporate leadership). However, no evidence was provided that it had been disclosed; the site had planned to do so before the end of the year.

Finding No: TNR-021088

5.2 *Communicate the water stewardship plan with relevant stakeholders.*

5.2.1 *The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.* ✓ closed

Comment: Although the site had prepared engagement materials, there was no evidence of the site's WSP, including its contribution to the AWS Standard outcomes, communicated to relevant stakeholders.

Finding No: TNR-021089

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.* 🔍 Obs.

Comment: The site had prepared engagement materials to share evidence of its quantified performance against targets; however, it had not yet communicated to relevant stakeholders. The site plans to share these materials with stakeholders before the end of the year.

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.* ✓ closed

Comment: Although the site had prepared engagement materials, there was no evidence that the site had communicated its water-related challenges to relevant stakeholders.

Finding No: TNR-021091

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

Comment: The site shared evidence of meeting minutes from the MWD in July and August 2025, as well as a watershed tour it conducted with River Partners in May 2025. The site also shared an email with LADWP in October 2025 regarding coordination on shared challenges related to the site's water infrastructure (e.g., water meter vandalism).

5.5	*Communicate transparency in water-related compliance: make any site water-related compliance violations available upon request as well as any corrective actions the site has taken to prevent future occurrences.*	
5.5.1	*Any site water-related compliance violations and associated corrections shall be disclosed.*	Yes
Comment	The site had no water-related violations in the last year or two, according to the EPA ECHO database information.	
5.5.2	*Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.*	Yes
Comment	The site had no water-related violations in the last year or two, according to the EPA ECHO database information.	
5.5.3	*Any site water-related violation that may pose significant risk and threat to human or ecosystem health shall be immediately communicated to relevant public agencies and disclosed.*	Yes
Comment	The site had no water-related violations in the last year or two, according to the EPA ECHO database information.	

Previous Findings

	All non-conformities raised in the previous audit have been satisfactorily closed.	N/A
Comment	This was the initial audit and did not require reviewing previous non-conformities.	