

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001822

### SITE DETAILS

Site: **Reyes Coca-Cola Bottling, San Leandro**

Address: 14655 Wicks Boulevard, 94577, San Leandro, California, UNITED STATES

Contact Person: Rob Zimmerman

AWS Reference Number: AWS-000724

Site Structure: Single Site

### CERTIFICATION DETAILS

Certification status: Certified Core

Date of certification decision: 2026-Feb-25

Validity of certificate: 2029-Feb-24

### AUDIT DETAILS

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

Audit Type(s): Initial Audit

Audit Start Date: 2025-Nov-18

Audit End Date: 2025-Nov-20

Lead Auditor: Kimberly Worsham

Site Participants:

Robert Zimmerman, Corporate Environmental & Sustainability

Joe Volpe, Consultant

Wasim Tahir, Operations manager

Heidi Fernandez, Quality Controller

Bryan Wilson, Factory Director

Mark Starr, Factory EHS Manager

Jacqueline (Jackie) Marquez, Quality manager

Akuss Egbeni, Other

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### ADDITIONAL INFO

Summary of Audit Findings: During the certification audit, 8 non-conformities and 16 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. Due to the Christmas period this due date is extended to 05 January 2026.

The non-conformities must be closed within 90 days of the end of the audit (by 19 February 2026). To meet this timeline, evidence is to be submitted to WSAS (within 75 days) by 04 February 2026.

The audit team recommends certification of Reyes Coca-Cola Bottling San Leandro at the Core level once the site has close all non-conformities.

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

The San Leandro Production Center (SLPC) is a Coca-Cola beverage manufacturing facility located on 11 acres at 14655 Wicks Boulevard in San Leandro's industrial area, operating with 400 employees across three shifts and six days per week. The facility produces various carbonated soft drinks using water as the primary ingredient, sourced entirely from EBMUD through a single main line, with on-site treatment including filtration, lime softening, and reverse osmosis for ingredient water preparation. The plant operates five production lines (three can lines and two PET lines) with on-site blow molding, using water for beverage production, equipment cleaning, heating/cooling systems, and domestic purposes. All wastewater undergoes pH adjustment before discharge to the City of San Leandro's Water Pollution Control Plant. At the same time, stormwater from the 99% impervious site is collected and discharged to storm drains with regular monitoring during rain events.

San Leandro is situated in the East Bay Plain near San Francisco Bay, with a Mediterranean climate that receives about 19.5 inches of annual rainfall, primarily during the winter months. The city receives its water supply from the East Bay Municipal Utility District (EBMUD), which primarily sources water from the Mokelumne River Watershed in the Sierra Nevada Mountains, with backup from the Sacramento River during droughts. Wastewater is treated at the city's facility and discharged to San Francisco Bay through the East Bay Dischargers Authority. The area faces long-term water shortage risks due to climate change impacts on the Sierra Nevada snowpack. At the same time, winter flooding can occur during heavy rainfall events, exacerbated by extensive development and impervious surfaces. However, the region benefits from nearby protected areas, including wetlands and regional parks.

The audit was conducted onsite on 18-20 November 2025. The onsite visit included assessing its chemical stores, water treatment plant, wastewater pretreatment, production areas, including batch skids and filler rooms, WASH facilities, cooling towers, boilers, and QC lab.

### FINDINGS

<b>Observation</b>	1
<b>Observation</b>	15
<b>Non-Conformity</b>	8

# CERTIFICATION REPORT

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### FINDING DETAILS

Finding No:	TNR-021916
Checklist Item No:	Announcement
Status:	Closed
Finding level:	Non-Conformity
Due date:	2026-Feb-19
Checklist item:	<p>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.</p> <p>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).</p>
Findings:	Aside from the AWS website, the site did not publish the stakeholder announcement.
Corrective action:	The stakeholder announcement was posted on Reyes Coca-Cola Bottling's website on December 2. <a href="https://panel.reyescocacola.com/assets/pages/our_community/aws-stakeholder-meeting-announcement_2025_san-leandro.pdf">https://panel.reyescocacola.com/assets/pages/our_community/aws-stakeholder-meeting-announcement_2025_san-leandro.pdf</a>
Evidence of implementation:	<a href="https://panel.reyescocacola.com/assets/pages/our_community/aws-stakeholder-meeting-announcement_2025_san-leandro.pdf">https://panel.reyescocacola.com/assets/pages/our_community/aws-stakeholder-meeting-announcement_2025_san-leandro.pdf</a>

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Finding No: TNR-021917  
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: There were other potential neighborhood stakeholders that the site had not yet identified.

Corrective action: Representatives from the site have reached out to large water users in the area. As these connections are made, they will be included in future stakeholder engagement efforts.

Finding No: TNR-021912  
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 site had some stormwater quality data, it lacked its trend analysis of annual variance.

Corrective action: Site will compile historical data to quantify seasonal variance.

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Finding No: TNR-021921  
Checklist Item No: 1.4.2  
Status: Open  
Finding level: Observation  
Checklist item: The embedded water use of outsourced services shall be identified, and where those services originate within the site’s catchment, quantified.  
Findings: The site contacted outsourced service providers, but they have not responded yet. Indirect water use associated with outsourced services has not been quantified yet. The site may consider other ways to estimate indirect water use.  
Corrective action: Site received water use information from its laundry service. Still waiting for indirect water use from chemical vendors.

Finding No: TNR-021925  
Checklist Item No: 1.6.1  
Status: Open  
Finding level: Observation  
Checklist item: Shared water challenges shall be identified and prioritized from the information gathered.  
Findings: The site shall update its challenges identified with stakeholders once the site indicates a clearer methodology for communicating with stakeholders.  
Corrective action: Shared challenges will be discussed with stakeholders during the public meeting on January 6, 2026. The list of challenges will be modified afterwards, if necessary.

Finding No: TNR-021928  
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 IWRA in the catchment, such as San Leandro Creek.  
Corrective action: IWRA list will be updated to include all locations noted in "best practices".

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Finding No: TNR-021929  
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 in WASH focus on water quality and don't necessarily relate directly to WASH efforts. This can be improved and clarified to ensure WASH access.  
Corrective action: Site's corporate team is working to create an external WaSH strategy to support local government and NGO efforts. This is a focus outreach in 2026.

Finding No: TNR-021932  
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 local strategy that clearly defines its mission, vision, and goals for effective water stewardship.  
Corrective action: Site will identify specific strategies that ladder up to the corporate mission/vision/values with respect to water stewardship.

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Finding No: TNR-021933  
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: The site's WSP included redundant targets, and some SMART Goal targets were not sufficiently specific. See below for details:

Repeated target: Achieve Water Use Ratio (WUR) target of 1.65 in 2025; and 1.40 by 2030. (WUR was 1.45 in 2024)

Not specific targets:

- Report water use for laundry service; Ecolab products
- Maintain daily testing of water.
- Annually review any change with EBMUD.
- Annual targets achieved for all metrics.

Some targets are action-based, rather than setting targets for what the site wants to achieve (and actions leading to the achievement).

Corrective action: Site will review water stewardship plan and include more specific targets where necessary.

Finding No: TNR-021966  
Checklist Item No: 3.1.1  
Status: Open  
Finding level: Observation  
Checklist item: Evidence that the site has supported good catchment governance shall be identified.

Findings: It was not clear how some of the targets under good catchment governance were related, such as WUR achievements, maintaining water costs within budget, and downtime.

Some targets lacked evidence of implementation.

Corrective action: Site will provide more details on catchment governance efforts. Water use ratio (WUR) is included as a measure since entities responsible for water governance in the catchment are primarily concerned with reducing water demand.

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Finding No: TNR-021970  
Checklist Item No: 3.3.1  
Status: Open  
Finding level: Observation  
Checklist item: Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.  
Findings: The following targets did not have evidence of implementation:  
-Achieve production, efficiency, and cost targets  
-Report water use for laundry service; Ecolab products  
Corrective action: Production, efficiency, and cost targets have been removed from the WSP. While critical for the business, these aren't directly tied to water stewardship efforts.  
Indirect water use will be tracked and reported annually.

Finding No: TNR-021971  
Checklist Item No: 3.4.1  
Status: Open  
Finding level: Observation  
Checklist item: Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.  
Findings: The following target did not yet have evidence of implementation:  
maintain daily testing of [incoming] water  
Corrective action: Provide the necessary documentation. The site tests incoming and outgoing water quality daily.

Finding No: TNR-021973  
Checklist Item No: 3.7.1  
Status: Open  
Finding level: Observation  
Checklist item: Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.  
Findings: The evidence of implementing the target "report water use for laundry service; Ecolab products" was not provided. However, this was still in process at the time of the audit.  
Corrective action: Collect and report data from site-controlled vendors on indirect water use. Cintas (laundry) has already provided this. Ecolab data pending.

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Finding No: TNR-021974  
Checklist Item No: 3.7.2  
Status: Closed  
Finding level: Non-Conformity  
Due date: 2026-Feb-19  
Checklist item: Evidence of engagement with suppliers and service providers, as well as, when applicable, actions they have taken in the catchment as a result of the site's engagement related to indirect water use, shall be identified.  
Findings: The site reported that it had reached out to Cintas regarding its water use in November 2025 but had not yet received a response.  
Corrective action: Cintas provided water use data via email received on November 24, 2025.  
Evidence of implementation: Email from Cintas showing RCCB San Leandro's portion of their water use at 90 gallons per week.

Finding No: TNR-021977  
Checklist Item No: 3.9.1  
Status: Open  
Finding level: Observation  
Checklist item: Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.  
Findings: While the site had provided some evidence of best practices implementation, it did not provide evidence of the 2023 water cleanup.  
Corrective action: Site will provide documentation of various community projects with water stewardship impacts.

Finding No: TNR-022584  
Checklist Item No: 3.9.3  
Status: Open  
Finding level: Observation  
Checklist item: Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.  
Findings: The site shared its efforts to maintain compliance with TCCC KORE wastewater requirements. That said, the site did not implement any additional best practices for water quality.  
Corrective action: Site will be investing in new water and wastewater treatment systems in 2026. This will provide real-time monitoring of water and wastewater quality.

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Finding No: TNR-021975  
Checklist Item No: 3.9.5  
Status: Closed  
Finding level: Non-Conformity  
Checklist item: Actions towards achieving best practice related to targets in terms of WASH shall be implemented.  
Findings: There was no evidence of implementation shared for best practices on WASH. The evidence of best practices in WASH were witnessed during the audit, with access to WASH facilities on-site.  
Evidence of implementation: RZ, 2/16: Summary of WaSH best practices is attached.

Finding No: TNR-021980  
Checklist Item No: 4.2.1  
Status: Closed  
Finding level: Non-Conformity  
Due date: 2026-Feb-19  
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 had not provided a written annual review of water-related emergency incidents.  
Corrective action: Site will provide this information. These reports exist in the EHS database.  
Evidence of implementation: The plant had one water-related incident in 2025. The investigation and corrective actions identified are shown in the attached file.

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Finding No: TNR-021981  
Checklist Item No: 4.3.1  
Status: Closed  
Finding level: Non-Conformity  
Due date: 2026-Feb-19  
Checklist item: Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.  
Findings: The site hadn't shared evidence of consultations on its water stewardship efforts.  
Corrective action: This topic will be reviewed with stakeholders attending our public meeting on January 6, 2026.  
Evidence of implementation: Slides shared at the public stakeholder meeting are attached. Slide 15 includes Water Stewardship Goals for the site; Slide 17 lists Water Stewardship Plan objectives; and Slide 20 shows Shared Water Challenges from our perspective.  
Sign-in sheet attached.  
Email follow-up to a call with Torani (nearby manufacturer and identified stakeholder) is attached.

Finding No: TNR-021982  
Checklist Item No: 4.4.1  
Status: Open  
Finding level: Observation  
Checklist item: The site's water stewardship plan shall be modified and adapted to incorporate any relevant information and lessons learned from the evaluations in this step and these changes shall be identified.  
Findings: The site did not explain how they would modify the WSP or how they would track changes.  
Corrective action: WSP will be reviewed quarterly with updated results. Any changes will be made with input from the site's water governance team. WSP will be reviewed and revised annually, with any changes noted.

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## Alliance for Water Stewardship (AWS)

Audit Number: AO-001822

Finding No: TNR-021983  
Checklist Item No: 5.1.1  
Status: Closed  
Finding level: Non-Conformity  
Due date: 2026-Feb-19  
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 water-related internal governance had been disclosed  
Corrective action: This topic will be shared during the public stakeholder meeting on January 6, 2026.  
Evidence of implementation: Slides from public stakeholder meeting on January 6, 2026 are attached. Slide 14 shows the site's water-related governance team members and roles.

Finding No: TNR-021984  
Checklist Item No: 5.2.1  
Status: Closed  
Finding level: Non-Conformity  
Due date: 2026-Feb-19  
Checklist item: The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.  
Findings: There was no evidence of the site's WSP, including its contribution to the AWS Standard outcomes, communicated to relevant stakeholders.  
Corrective action: The WSP will be shared during the public stakeholder meeting on January 6, 2026.  
Evidence of implementation: Slides 16 and 17 of the presentation address how the site's WSP align with AWS Standard outcomes.

Finding No: TNR-021985  
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 communicated with relevant stakeholders, but it planned to share these materials with them before January 2026.  
Corrective action: This information will be shared at the public stakeholder meeting on January 6, 2026.

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Finding No:	TNR-021986
Checklist Item No:	5.4.1
Status:	Closed
Finding level:	Non-Conformity
Due date:	2026-Feb-19
Checklist item:	The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.
Findings:	There was no evidence that the site had communicated its water-related challenges to relevant stakeholders.
Corrective action:	This information will be shared at the public stakeholder meeting on January 6, 2026. RZ, 2/16: The attached presentation, which was shared with the stakeholders during the public meeting, included what we identified as shared water challenges on Slide 20. This formed the basis for the discussion with stakeholders with the intent of finding shared issues of concern.
Evidence of implementation:	Slide 20 of the presentation shared during the site's public stakeholders meeting on January 6, 2026 shows the site's water-related challenges. RZ, 2/16: Not sure what else you are looking for. Our water-related challenges are clearly shown on Slide 20. RZ, 2/16: Attached meeting announcement and sign-in sheet from January 6, 2026 stakeholder meeting.

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## Alliance for Water Stewardship (AWS)

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### Report Details

Report	Value
Report prepared by	Kimberly Worsham
Report approved by	Juan Carlos Ceron
Report approved on (Date)	23/12/2025

### Surveillance

**Proposed date for next audit**

Comment This is the initial audit for the site.

### Stakeholder Announcements

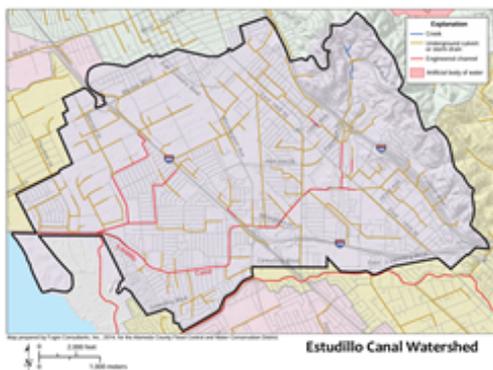
Date of publication	Location
09/01/2025	<b>Finding No: TNR-021916</b> <a href="https://a4ws.org/wp-content/uploads/2025/08/AWS-000724-RCCB-San-Leandro-StakeAnn-Nov25.pdf">https://a4ws.org/wp-content/uploads/2025/08/AWS-000724-RCCB-San-Leandro-StakeAnn-Nov25.pdf</a>
Comment	Aside from the AWS website, the site did not publish the stakeholder announcement 8 weeks before the audit.
Comment	The auditor had 2 stakeholder interviews remotely after the on-site audit.

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### Catchment Information



rccbsl catchment.png

### Catchment Information

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The City of San Leandro is located in a low-lying area adjacent to the San Francisco Bay, known as the East Bay Plain. The watershed is the Estudillo Canal watershed. The area is bordered to the east by the Hayward Hills, and, in general, it is part of the Coast Ranges of California. The City of San Leandro has a Warm-Summer Mediterranean Climate, defined as Köppen Class Csb to Csc. The mean annual rainfall in the area since 2000 is approximately 495 mm (19.5 inches). Most precipitation occurs during the winter months (November through March). Source waters for the Plant in the Sierra Nevada mountain range have received an average annual precipitation of 59.20 inches since 1991.

East Bay Municipal Utility District (EBMUD) is the current water supplier, with the primary source being surface water from the Mokelumne River Watershed (Sierra Nevada), sourced from the Pardee Reservoir, and to a lesser degree, the Briones Reservoir. Backup supply is provided from the Sacramento River during drought conditions. EBMUD is not solely reliant on its local watershed (Mokelumne) and has built mechanisms for dry-year supply via transfers—this adds resilience. However, the transfers are not unlimited and are planned for dry years—so they are part of a supply portfolio, not a primary permanent substitute.

Discharge is sent to the City's WTP, where it is treated and discharged to the San Francisco Bay/Pacific Ocean. The SLPC sends its wastewater to be treated at the City of San Leandro's WPCP Plant and Effluent Pump Station. Standard methods treat wastewater, and the fluids are transferred by pipeline to the East Bay Dischargers Authority Marine Dechlorination Facility, where they are dechlorinated and discharged deep in San Francisco Bay.

The San Leandro Production Center (SLPC) receives its water primarily from the Orinda Water Treatment Plant (WTP) with supplemental water supplied by the Upper San Leandro WTP on an as-needed basis.

Water shortages are a long-term risk in the Bay Area. Water supply is contingent on discharge from the Sierra Nevada mountains and, therefore, is inherently susceptible to water shortage and climate change. Due to the amount of development and impervious surfaces in the area, and the low-lying areas, flooding can be an issue during winter atmospheric river events. Local flooding around the site is not typical, as it is more common in low-lying shoreline zones and the San Leandro Creek Channel. However, stormwater infrastructure may be temporarily overwhelmed during heavy rainfall, leading to street flooding. There are some environmentally protected areas near the site. These include the Oyster Bay Regional Shoreline (plants, birds, wetlands), Damon Marsh (federal and state listed species), Anthony Chabot Regional Park (regional habitat and connectivity), and the Marine Protected Areas of San Francisco Bay (near shore aquatic habitat). Local water use is primarily urban, including residential, commercial, and some light industrial. For the wider catchments from which EBMUD gets water, the primary water uses are municipal, agricultural irrigation, hydropower/storage, and ecosystem/fisheries control.

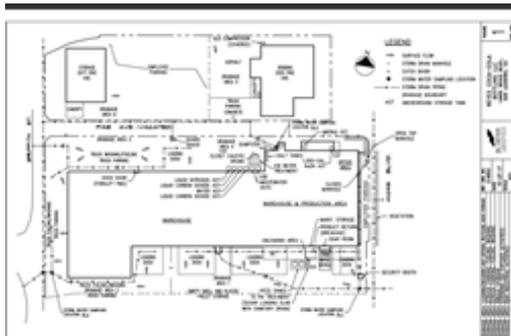
Comment      This information was supplied in the WSAS Site and Catchment Questionnaire.

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### Client Description and Site Details



site plan.png

#### Client/Site Background

The plant (SLPC) is located at 14655 Wicks Boulevard, San Leandro, Alameda County, California, US. The SLPC is in an industrial area in the southwestern portion of the City of San Leandro, south of the City of Oakland and east of the San Francisco Bay. The site comprises a beverage production facility and warehouse space.

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).

There are no onsite wells or rainwater systems, and all water is supplied by East Bay Municipal Utility District (EBMUD) through one main, including fire water. Wastewater is sent to the City of San Leandro's Water Pollution Control Plant (WPCP) and Effluent Pump Station. The site uses mixed media filtration, lime softening, and reverse osmosis to produce ingredient water. Non-ingredient applications are supplied directly from EBMUD. Water for boilers and cooling towers is subject to additional chemical treatment to prevent scaling. Steam condensate is captured and returned to the boilers.

Water use at the plant can be divided into the following main categories: process water, ingredient in product, utilities, water treatment, and domestic. The plant collects industrial wastewater and adjusts pH as required by permit. Sanitary waste is combined with this flow before discharge to the city WWTP. Process wastewater is collected, neutralized, and discharged to the City of San Leandro Water Pollution Control Plant via a line adjacent to the plant. Sanitary waste flows to the same line, bypassing the collection/neutralization step.

The site is 99% impervious surfaces. A small portion is landscaped with drip irrigation. Stormwater is collected onsite and discharged to onsite storm drains. Stormwater test samples are pulled and analyzed during rain events.

RCCB's SPLC covers approximately 11 acres and abuts the surrounding sidewalks and streets. The plant has five production lines with on-site blow molding. There are three can lines and two PET lines. The plant employs 400 people and runs three shifts, six days per week.

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

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### Summary of Shared Water Challenges

#### Summary of Shared Water Challenges

The site identified 5 shared water challenges: supply shortage, unforeseen disasters (such as earthquakes, wildfires, and mudslides), water contamination, increased water costs, and water equity.

#### 0.0.1 Water Source & Discharge Locations

<b>0.01</b>	<i>Have any water source or discharge locations been visited during the audit, if so, which and where? If none were visited, please provide justification.</i>	 No
Comment	No water source or discharge locations were visited, as this was the initial audit, and the focus was on the site visit. This can be visited during the surveillance audits.	

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**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.

  
Yes

**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 EBMUD region of the Estudillo Canala and Mokelumne River watersheds; the site's wastewater service provider, sewer mains that discharge to the San Francisco Bay. 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 Raphael Stone Collection, Cummins Sales and Service, and William's Brewing
- its location compared to the Bay Area's water systems, including water treatment, wastewater treatment, and storage facilities
- the location of the site's sewer main and its outfall to the Bay Area Pacific Ocean
- its water sources across the state
- its local watersheds, where the site is located in the Estudillo Canal Watershed, and the scope of the EBMUD water supply watershed in the Mokelumne River Watershed
- its water infrastructure locations include incoming water, stormwater test points, wastewater equalization, etc. (though the schematic is very complicated and a bit hard to read)
- its WASH facilities onsite, including facilities available to delivery truck drivers

**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.

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001822

**Comment** The site identified 25 stakeholders in its area, including local officials, regulators, NGOs, businesses, and environmental groups - the regional limitation is the Bay Area. 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. River Partners was identified as working in the ultimate water source, and Save the Bay and SF Baykeeper were stakeholders in the ultimate receiving water body. The site had also identified Kaiser Permanente hospital as a stakeholder in its neighborhood, though many other potential neighborhood stakeholders had not yet been identified (their importance to the site as stakeholders was unknown).

The site shared evidence of meeting minutes from the EBMUD in September 2025 and pitched water conservation ideas to EBMUD in October 2025. It also shared a watershed tour it conducted with River Partners in May 2025 to Feather River and Turning Point Reserve; however, those tour areas were not related to the catchment.

However, stakeholder interviews revealed that the site had not yet fully shared its water stewardship journey with its stakeholders.

The site could further expand the identification of other interested parties, such as neighboring stakeholders, which have not yet been fully identified in the current stakeholder mapping."

**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.* ✔  
Yes

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001822

**Comment** The site provided its Emergency Response Plan from May 2024 (updated every 3 years), 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 would be guided by stages managed by the state government and the City of San Leandro. This document wasn't one the site would review, but was shared as information on what the management review process could go through, as mentioned in the Emergency Response Plan.

The site also has a 2024 SPCC Plan (for chemical and oil management and storage—reviewed every 3 years) and a 2023 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 articulate better business operations' actions in response to more chronic water-related incidents. The company would have to submit it by EOY 2025.

**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 one inflow that bifurcates at the entrance, losses through cooling-tower evaporation, and outflows through finished product and the city sewer line. It also included cleaning, blending skids, a batch room, boilers, and other operations.

The site shared that its water storage systems could hold water for only 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. It had identified a shared water challenge related to water quantity, which could pose a threat to achieving a good water balance for people or the environment.

The site had about 300,000 GPD of incoming water. In its balance calculations, the site assumed an evaporative loss of about 8,000 GPD. It also showed that it had a finished product of 340,000 GPD and 136,000 GPD to wastewater systems for the city to treat. This information was for November 2025.

The site provided data from 2022 to 2025, showing a gradual decrease in both incoming and outgoing water. The annual loss variance was based on the water use ratio (WUR), which decreased annually from 2023 to 2025.

**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.

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

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**Comment** The site identified its water quality through the following:  
 -The Coca-Cola requirements and protocols for the site's water quality, including iron, floc levels, and chlorine  
 -Source and lime water treatment plant water quality tests (for 2023 and 2024) for biological, physical, and chemical parameters.  
 -RO water treatment plant water quality tests (for 2023 and 2024) for biological, physical, and chemical parameters.  
 -An EBMUD trends analysis of the consumer confidence report data from 2019 to 2024. The analysis reveals minimal variance in parameters, with some minor shortfalls in some contaminants. Chlorine residual showed some underperformance in residential situations.

The site had identified a water-related challenge around water quality.

The site developed an annual trend analysis of its source water (2022-2024) for physical, biological, and chemical contaminants. The analysis indicated decreases in contaminants since 2022. It also conducted a trend analysis of its monthly wastewater quality (2024-2025) for BOD and TSS, showing that TSS is consistent, while BOD varies by month (between 0 and 5000 mg/L).

The site shared stormwater testing results from October 2025, including BOD, TSS, oil and grease, and pH. It also noted that it was supposed to monitor stormwater quality; however, it does not collect data when it doesn't rain (which is most of the year).

**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:  
 -Chemical stores on skids seen by the auditor on a site tour  
 -SWPP (from 2023) that mapped oil and chemical storage locations  
 -A chemical list with 45 chemicals stored on-site  
 -Hazardous waste pickup logs (May, July, & September 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 entirely urban, with no significant water-related areas present. There is no grass on-site, no irrigation, etc. There is no IWRA on site

**1.3.7** *Annual water-related costs, revenues, and a description or quantification of the social, cultural, environmental, or economic water-related value generated by the site shall be identified and used to inform the evaluation of the plan in 4.1.2.* ✔  
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 site indicated it had no water-related revenue because it focused on bottling other products rather than water.

The site also provided descriptions and/or financial quantifications 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 water recharge projects, including replenishing 25% 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

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001822

Comment	<p>The site provided an overview of its WASH facilities and acknowledged compliance with OSHA regulations, including 3 restrooms for males and 3 for females. It noted that the site was unionized and that it had to ensure staff had restroom breaks.</p> <p>It also shared its general management practices, including the requirement for on-site handwashing facilities and sanitation systems (June 2024).</p> <p>The site also shared its results from the WASH Self-Assessment (October 2025), which indicated compliance with access and the adequacy of WASH facilities. The score indicated that the site could improve on community WASH efforts.</p>	
<b>1.4</b>	<p><i>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.</i></p>	
<b>1.4.1</b>	<p><i>The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be identified.</i></p>	 Yes
Comment	<p>The site identified no primary inputs with embedded water greater than 5% of the total weight of the goods generated or the site's costs within the site catchment. It also noted that its corn syrup, bottles, and containers were not sourced from within the watershed.</p>	
<b>1.4.2</b>	<p><i>The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.</i></p>	 Obs.
Comment	<p>The site identified a laundry service provided within the catchment through Cintas. The site reached out to the provider in November 2025 to understand its embedded water usage but had not received a response.</p>	
<b>1.5</b>	<p><i>Gather water-related data for the catchment, including water governance, water balance, water quality, Important Water-Related Areas, infrastructure, and WASH</i></p>	
<b>1.5.1</b>	<p><i>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.</i></p>	 Yes
Comment	<p>The site identified its own governance initiatives, including increasing on-site recycling systems, installing cisterns and implementing on-site infiltration practices, optimizing pretreatment to reduce BOD/TSS, cofounding watershed restoration in San Leandro Creek, and participating in the Green Infrastructure Plan implementation.</p> <p>The site identified some water governance initiatives (as of September 2025) beyond the fenceline and in the catchment, as well. This included work by EBMUD on the Bay Area Regional Reliability Project (focused on local water suppliers), Demonstration Recharge Extraction and Aquifer Pilot Project, and the Recycled Water Master Plan. It also shared the City of San Leandro's efforts to work on climate adaptation planning.</p>	
<b>1.5.2</b>	<p><i>Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.</i></p>	 Yes

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## Alliance for Water Stewardship (AWS)

Audit Number: AO-001822

**Comment** The site shared the last 3 versions of its 3-year industrial pretreatment/wastewater discharge permit (most recent as of June 2025), SPCC, and SWPP. The site indicated that the only water-related permit it had was this one - no stormwater or water intake permits were included. Additionally, the pretreatment permit only states that the site must comply with the City of San Leandro's ordinance on industrial wastewater parameters (as of 2018).

The site also shared a compliance calendar on the SoftTools online platform. The calendar has the frequency of compliance efforts, including activities such as spill response drill, source water vulnerability assessment review, stormwater inspection, water usage minimization study, wastewater risk assessment, and SWPP review. The compliance calendar includes the assigned team member on-site and the due dates. Inside each activity, there is more detailed information on the legal requirements for that activity, the results of completed tasks, and the history of previous tasks.

**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 indicated a shared water quantity challenge in the basin. The site provided a catchment water balance based on EBMUD 2023 data, indicating an annual surplus of 42,000 acre-feet. The site also showed a 10-year trend analysis (2015-2025) that includes details on the catchment's surplus or deficit levels and whether each year was dry or wet. The trend analysis indicated that the EBMUD water supply variance over the last 10 years had a deficit of 7,160 AF as of 2024.

The data included inflows from the Mokelumne River, local watershed runoff, and the Sacramento River, and outflows from system losses and water delivery.

**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.* ✔  
Yes

**Comment** The site had identified water quality challenges in the catchment. It shared water quality trends for the San Leandro area from 2018 to 2024, indicating risks to each water source, including contamination and encroachment. The Bay-focused trends analysis and table, 2018-2024, of water quality categories for the region, showing that most contaminants remained consistent, though chlpyrifos had improved.

It also shared an EBMUD trends analysis of the consumer confidence report data from 2019 to 2024. The analysis reveals minimal variance in parameters, with some minor shortfalls in some contaminants. Chlorine residual showed some underperformance in residential situations.

The site developed an annual trend analysis of its source water (2022-2024) for physical, biological, and chemical contaminants. The analysis indicated decreases in contaminants since 2022.

**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

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## Alliance for Water Stewardship (AWS)

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**Comment** The site identified and mapped 10 IWRAs, including the Heron Bay Trail, San Lorenzo Bay Trail, Oyster Bay Regional Shoreline, Anthony Chabot Regional Park, San Francisco Bay, Hayward Regional Shoreline, Five Canyons Park, Reinhardt Redwood Regional Park, Eden Landing Ecological Reserve, and McLaughlin Eastshore State Park.

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 data on IWRAs by reviewing green spaces located either near the site or in its minor watershed, including their replenishment projects.

**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, based on the EBMUD and City of San Leandro's water infrastructure plans. This included the condition and potential exposure to extreme events of each.

The infrastructure included Mokelumne Aqueducts, Pardee Reservoirs, Lafayette Reservoirs, local water treatment plants, Upper San Leandro Reservoir, San Leandro Water Pollution Control Plant, and recycled water efforts.

The site mentioned discussing with EWD in September 2025 about leak repair projects that the site could support or fund.

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

**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 noted that the water infrastructure in the catchment was over 70 years old and that public awareness about WASH coverage needs in the region was low.

**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.* 🔍  
Obs.

**Comment** The site identified 5 shared water challenges: supply shortage, unforeseen disasters (such as earthquakes, wildfires, and mudslides), water contamination, increased water costs, and water equity.

The site shall update its challenges identified with stakeholders once the site indicates a clearer methodology for communicating with stakeholders.

**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, including regularly meeting with EBMUD on water quality and quantity issues, reviewing the local consumer confidence report, testing water quality and tracking trends, and meeting with the city to discuss water rate changes.

**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.*

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## Alliance for Water Stewardship (AWS)

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<b>1.7.1</b>	<i>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.</i>	 Yes
Comment	<p>The site identified 5 shared water challenges, which are also recognized as its risks. This included: supply shortage, unforeseen disasters (such as earthquakes, wildfires, and mudslides), water contamination, increased water costs, and water equity.</p> <p>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).</p>	
<b>1.7.2</b>	<i>Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.</i>	 Yes
Comment	<p>The site identified water-related opportunities in its WMP and shared challenges spreadsheets, including prioritization and business opportunities. The potential savings were not calculated but detailed (similarly to risks above) based on context and potential additional scenarios.</p>	
<b>1.8</b>	<i>Understand best practice towards achieving AWS outcomes: Determining sectoral best practices having a local/catchment, regional, or national relevance.</i>	
<b>1.8.1</b>	<i>Relevant catchment best practice for water governance shall be identified.</i>	 Yes
Comment	<p>The site identified best practices for the catchment, including implementing smart meters, adopting high-efficiency CIP practices, scheduling periodic water audits with the AWWA M36 methodology, developing a WSP, working with the city and other stakeholders on local efforts, community clean-ups, collaborating on regional climate efforts with EBMUD, and promoting community engagement and education.</p>	
<b>1.8.2</b>	<i>Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.</i>	 Yes
Comment	<p>The site identified best practices, including reducing water usage by 17% between 2023 and 2030; reducing water withdrawals; managing monthly staff town hall meetings; leveraging employee insights on water-efficiency ideas; identifying and repairing leaks; automating water-use systems, such as faucets; and supporting local replenishment projects.</p>	
<b>1.8.3</b>	<i>Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.</i>	 Yes
Comment	<p>The site identified best water quality practices through wastewater tanks in secondary containment areas, daily wastewater testing, adoption of international water quality standards, stakeholder-led research on watershed quality efforts, and implementation of best practices for stormwater management.</p>	
<b>1.8.4</b>	<i>Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.</i>	 Obs.
Comment	<p>The site identified the best IWRA practices, including implementing nature-based and green infrastructure solutions, supporting city efforts to revitalize natural areas, contributing to forest restoration projects upstream, and collaborating with local NGOs on cleanup events.</p> <p>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. Example: San Leandro Creek</p>	

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## Alliance for Water Stewardship (AWS)

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<b>1.8.5</b>	<i>Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.</i>	Q Obs.
Comment	<p>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.</p> <p>Many of the best practices around WASH focus on water quality and don't necessarily directly relate to WASH efforts. This can be improved and clarified to ensure WASH access.</p>	

Audit Number: AO-001822

<b>2</b>	<b>STEP 2: COMMIT &amp; PLAN - Commit to be a responsible water steward and develop a Water Stewardship Plan</b>	
<b>2.1</b>	<i>Commit to water stewardship by having the senior-most manager in charge of water at the site, or if necessary, a suitable individual within the organization head office, sign and publicly disclose a commitment to water stewardship, the implementation of the AWS Standard and achieving its five outcomes, and the allocation of required resources.</i>	
<b>2.1.1</b>	<i>A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:</i> <ul style="list-style-type: none"> <li>- That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes</li> <li>- That the site implementation will be aligned to and in support of existing catchment sustainability plans</li> <li>- That the site's stakeholders will be engaged in an open and transparent way</li> <li>- That the site will allocate resources to implement the Standard.</li> </ul>	 Yes
Comment	The site identified a signed water commitment from August 2025 that included commitments relevant to the indicator as required. The site publicly disclosed the commitment on its website at <a href="https://reyescocacola.com/our-community">https://reyescocacola.com/our-community</a> .	
<b>2.2</b>	<i>Develop and document a process to achieve and maintain legal and regulatory compliance.</i>	
<b>2.2.1</b>	<i>The system to maintain compliance obligations for water and wastewater management shall be identified, including:</i> <ul style="list-style-type: none"> <li>- Identification of responsible persons/positions within facility organizational structure</li> <li>- Process for submissions to regulatory agencies.</li> </ul>	 Yes
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. <p>It shared a 3-year wastewater pretreatment permit (as of June 2025), which included requirements from the city ordinance. The City of Leandro have industrial wastewater limits ordinance (as of 2018) which shares limitations of effluent including contaminations from metals. There's also a city-specific BOD, TSS, and COD industrial wastewater discharge limits (n.d.).</p> <p>The site shared it did not have a stormwater permit, and it followed the state-specific regulations and rules around sampling for industrial stormwater.</p> <p>The site also shared a compliance calendar on the SoftTools online platform. The calendar has the frequency of compliance efforts, including activities such as spill response drill, source water vulnerability assessment review, stormwater inspection, water usage minimization study, wastewater risk assessment, and SWPP review. The compliance calendar includes the assigned team member on-site and the due dates. Inside each activity, there are more detailed information about the legal requirements to comply with for each activity, the results from the completed tasks, and the history of previous tasks.</p>	
<b>2.3</b>	<i>Create a water stewardship strategy and plan including addressing risks (to and from the site), shared catchment water challenges, and opportunities.</i>	

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## Alliance for Water Stewardship (AWS)

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<b>2.3.1</b>	<i>A water stewardship strategy shall be identified that defines the overarching mission, vision, and goals of the organization towards good water stewardship in line with this AWS Standard.</i>	 Obs.
Comment	<p>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% 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.</p> <p>The site could benefit from a more specific strategy that clearly defines its mission, vision, and goals for effective water stewardship.</p>	
<b>2.3.2</b>	<i>A water stewardship plan shall be identified, including for each target:</i> <ul style="list-style-type: none"> <li>- How it will be measured and monitored</li> <li>- Actions to achieve and maintain (or exceed) it</li> <li>- Planned timeframes to achieve it</li> <li>- Financial budgets allocated for actions</li> <li>- Positions of persons responsible for actions and achieving targets</li> <li>- Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.</li> </ul>	 Obs.
Comment	<p>The site identified 22 targets (labeled as SMART Goals). For each target, the site identified the following:</p> <ul style="list-style-type: none"> <li>- How it will be monitored for all, and measured, is implied in the SMART Goal somewhat for all, but could be clearer for some</li> <li>- Actions to achieve and maintain (or exceed) it for all, though some are unclear or a repeat of the targets</li> <li>- Planned timeframes to achieve it for some; some indicated that it was a daily or monthly target throughout the year</li> <li>- Financial budgets allocated for actions for all</li> <li>- Positions of persons responsible for actions and achieving targets for all</li> <li>- The link between each target and the achievement of best practices to help address shared water challenges was indicated through a column indicating if it was a best practice or a KORE requirement (which was a TCCC core requirement, but above compliance requirements), and many were considered not a best practice</li> <li>-The links to AWS outcomes for all</li> </ul> <p>Some targets are action-based, rather than setting targets for what the site wants to achieve (and actions leading to the achievement).</p> <p>TO TR: WSP ATTACHED AT STEP 2</p>	
<b>2.4</b>	<i>Demonstrate the site's responsiveness and resilience to respond to water risks</i>	
<b>2.4.1</b>	<i>A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.</i>	 Yes

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## Alliance for Water Stewardship (AWS)



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**Comment** Water risks and proposed actions to address them have been identified in the site's Emergency Response Plan, SPCC Plan, and SWPPP, with several public agencies (including the fire department, EBMUD, and the CA Office of Emergency Services), and in the SWPPP with the State Water Resources Control Board. The site noted that it had conducted a collaborative assessment of the Bay Area's infrastructure with the Pacific Institute and the Coca-Cola Company, in coordination with EBMUD, as previously mentioned in Step 1 (September 2025).

The site identified opportunities and actions to address and manage risks, including plans to fund water reclamation efforts in the watershed, support IWRA initiatives, review EBMUD's consumer confidence reports, and engage in policy efforts.

It was noted that U.S. regulations limit opportunities 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.

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<b>3</b>	<b>STEP 3: IMPLEMENT - Implement the site's stewardship plan and improve impacts</b>	
<b>3.1</b>	<i>Implement plan to participate positively in catchment governance.</i>	
<b>3.1.1</b>	<i>Evidence that the site has supported good catchment governance shall be identified.</i>	 Obs.
Comment	<p>The site's WSP identified 12 good catchment governance targets, with the following evidence:</p> <ul style="list-style-type: none"> <li>-Annual report of drought status to senior leaders at RCCB: The site shared its 2024 drought status report with senior leaders across the corporation. It was focused on the California drought and highlighted implications for the site's specific drought context.</li> <li>-Achieve Water Use Ratio (WUR) target of 1.65 in 2025; and 1.40 by 2030 (WUR was 1.45 in 2024): The site provided evidence of its WUR dashboard presentation from August 2025, showing its WUR efforts, indicating that its YTD WUR was 1.63.</li> <li>-Active stakeholder engagement starting in 2025 with at least 3 orgs: The site shared evidence of communicating with EBMUD in September 2025 about meeting minutes and in October 2025 about leak initiatives and the water tour in May 2025 with River Partners.</li> <li>-Meet with water and wastewater utilities at least annually: The site shared evidence of communicating with EBMUD in September 2025 about meeting minutes and in October 2025 about leak initiatives</li> <li>-Quarterly meetings with elected officials by GA team and plant leaders: The site provided evidence of the GA team communicating with elected officials, and mentioned an upcoming site tour with a state senator in December 2025.</li> <li>-Maintain water costs within budget.</li> <li>-No downtime related to water treatment systems: The site mentioned that it had no downtime related to its water treatment system. However, while on site, the site had to be down for several days because its incoming water from EBMUD was contaminated with coliforms. As a result, the site had to halt operations and clean all equipment to ensure water quality.</li> </ul> <p>The following targets had no evidence provided:</p> <ul style="list-style-type: none"> <li>--Maintain daily testing of water</li> <li>Annual targets achieved for all metrics</li> <li>-Semi-annual meetings with regulators by GA team</li> <li>-Achieve production, efficiency, and cost targets</li> </ul> <p>It was not clear how some of the targets under good catchment governance were related, such as WUR achievements, maintaining water costs within budget, and downtime.</p>	
<b>3.1.2</b>	<i>Measures identified to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be implemented.</i>	 Yes
Comment	<p>The site stated that it had no need or direct reason to respect others' water rights. It demonstrated its understanding of EBMUD's rights requirements, including when a water right permit may be required, such as for direct surface water diversions, groundwater extraction, or the operation of private non-potable water systems. It also created a table noting the water rights required to be respected at the site, such as groundwater extraction, but that was not applicable at the site.</p> <p>It shared that its sources were from the State Water Resources Control Board, EBMUD, and MED documents.</p>	

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- 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 previously shared its SPCC and SWPPP with the auditor. The site also shared its internal compliance water quality maturity assessment tool.
- The site also shared a compliance calendar on the SoftTools online platform. The calendar has the frequency of compliance efforts, including activities such as spill response drill, source water vulnerability assessment review, stormwater inspection, water usage minimization study, wastewater risk assessment, and SWPP review. The compliance calendar includes the assigned team member on-site and the due dates. Inside each activity, there is more detailed information on the legal requirements for that activity, the results of completed tasks, and the history of previous tasks. The site showed a sample of complete compliance activities, including a completed Water Management Plan (June 2024) and a dry weather inspection report for San Leandro (October 2025), which included a log of reviews for drainage areas.
- 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 stated that it had no need or direct reason to respect others' water rights. It demonstrated its understanding of EBMUD's rights requirements, including when a water right permit may be required, such as for direct surface water diversions, groundwater extraction, or the operation of private non-potable water systems. It also created a table noting the water rights required to be respected at the site, such as groundwater extraction, but that was not applicable at the site.
- 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.* 🔍  
Obs.
- Comment The site's WSP identified 5 targets for water balance, with the following evidence:
- Achieve Water Use Ratio (WUR) target of 1.65 in 2025; and 1.40 by 2030. (WUR was 1.45 in 2024): The site provided evidence of its WUR dashboard presentation from August 2025, showing its WUR efforts, indicating that its YTD WUR was 1.63.
  - >100% of San Leandro's 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 San Leandro water use (576.45 ML in 2024) and the San Leandro replenishment estimate for 2025 (25.33% for 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.
  - Identify inputs that account for at least 90% of the indirect water use for RCCB San Leandro: In Step 1, the site identified that it had no indirect water use beyond 5% of its total weight of goods.
- The following targets did not have evidence of implementation:
- Achieve production, efficiency, and cost targets
  - Report water use for laundry service; Ecolab products
- 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

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Comment	The site highlighted water challenges associated with water scarcity.  It shared its annual target to improve water use in its WSP, with a WUR target of 1.65 in 2025 and 1.40 by 2030. (WUR was 1.45 in 2024). As evidence of implementation, the site shared its WUR summary for August 2025 in a monthly report email, including every site's WUR. The site indicated that this was relevant to good catchment governance by reducing water use in the catchment.	
<b>3.3.3</b>	<i>Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.</i>	 Yes
Comment	The site 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 EBMUD's Drought Management Program. The site did not have the capacity to provide bottled water for water emergencies.	
<b>3.4</b>	<i>Implement plan to achieve site water quality targets</i>	
<b>3.4.1</b>	<i>Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.</i>	 Obs.
Comment	The site's WSP identified 4 targets for water quality, with the following evidence:  -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., Trihalomethanes, Total Haloacetic Acids 5, Nitrate, Sulfate, Chlorate, Hg, Barium, Fluoride) that were above the KORE limits but still within regulatory limits.  -Annually review any [new contaminants] change with EBMUD: The site shared a log of reviewing the annual EBMUD consumer confidence report from the on-site quality manager. 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 NOV's with its wastewater permit. As of September 2025, the site had no NOV's or permit violations.  The following target did not have evidence of implementation: Maintain daily testing of [incoming] water  During the audit, the site experienced an emergency shutdown due to a coliform buildup in its incoming water, requiring it to clean all equipment and retest before restarting operations (which occurred during the audit).	
<b>3.4.2</b>	<i>Where water quality is a shared water challenge, continual improvement to achieve best practice for the site's effluent shall be identified and where applicable, quantified.</i>	 Yes
Comment	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., Trihalomethanes, Total Haloacetic Acids 5, Nitrate, Sulfate, Chlorate, Hg, Barium, Fluoride) that were above the KORE limits but still within regulatory limits.	
<b>3.5</b>	<i>Implement plan to maintain or improve the site's and/or catchment's Important Water-Related Areas.</i>	

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<b>3.5.1</b>	<i>Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.</i>	 Yes
Comment	<p>The site's WSP identified 3 targets for IWRAs, with the following evidence:</p> <p>-Maintain a comprehensive list of IWRAs within twenty miles of the San Leandro plant: This was evidenced in Step 1.</p> <p>-&gt;100% of San Leandro's 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 San Leandro water use (576.45 ML in 2024) and the San Leandro replenishment estimate for 2025 (25.33% for 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.</p> <p>The following target did not have evidence of implementation: Contact responsible parties for (3) IWRAs by 12/31/25. However, this was still in process at the time of the aud</p>	
<b>3.6</b>	<i>Implement plan to provide access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers at all premises under the site's control.</i>	
<b>3.6.1</b>	<i>Evidence of the site's provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers onsite shall be identified and where applicable, quantified.</i>	 Yes
Comment	<p>The site provided an overview of its WASH facilities, acknowledging compliance with OSHA regulations, including 3 restrooms for males and 3 for females, serving approximately 400 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.</p> <p>During the site tour, the auditor looked at the two restrooms. The toilets and urinals had manual flushes, but the handwashing basins had sensors. The cleaning logs in the restrooms were up to date, and there was WASH signage for handwashing everywhere. There was free access to bottled water in the break rooms and the outdoor picnic area for staff.</p> <p>The site identified 2 WASH targets. The evidence provided includes:</p> <p>-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.</p> <p>-Annual reporting of WaSH indicators in the community: The site shared the evidence from Step 1 on assessing WASH in the community.</p>	
<b>3.6.2</b>	<i>Evidence that the site is not impinging on the human right to safe water and sanitation of communities through their operations, and that traditional access rights for indigenous and local communities are being respected, and that remedial actions are in place where this is not the case, and that these are effective.</i>	 Yes
Comment	<p>The site identified that it does not impinge on communities' WASH rights, as EBMUD is the water retailer and controls 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 EBMUD's responsibility.</p>	
<b>3.7</b>	<i>Implement plan to maintain or improve indirect water use within the catchment:</i>	
<b>3.7.1</b>	<i>Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.</i>	 Obs.

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Comment	<p>The site's WSP had 2 targets related to indirect water use with the following evidence of implementation:</p> <p>-Identify inputs that account for at least 90% of the indirect water use for RCCB San Leandro: In Step 1, the site identified that it had no indirect water use beyond 5% of its total weight of goods.</p> <p>The target "Report water use for laundry service; Ecolab products" had no evidence of implementation. However, this was still in process at the time of the audit.</p>	
<b>3.7.2</b>	<p><i>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.</i></p>	 closed
Comment	<p>The site reported that it had reached out to Cintas regarding its water use in November 2025 but had not yet received a response.</p> <p style="text-align: right;"><b>Finding No: TNR-021974</b></p>	
<b>3.8</b>	<p><i>Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have.</i></p>	
<b>3.8.1</b>	<p><i>Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.</i></p>	 Yes
Comment	<p>The site shared evidence of meeting notes with EBMUD in September 2025 and an October 2025 email proposing support for leak improvement efforts.</p>	
<b>3.9</b>	<p><i>Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.</i></p>	
<b>3.9.1</b>	<p><i>Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.</i></p>	 Obs.
Comment	<p>The site shared evidence of meeting minutes from the EBMUD in September 2025, as well as a watershed tour it conducted with River Partners in May 2025.</p> <p>In 2023, the site noted that it had participated in a cleanup with Smartwater and the Global Water Challenge, though no evidence was provided.</p> <p>It had developed a WSP, which was identified for implementing a best practice in Step 1.</p>	
<b>3.9.2</b>	<p><i>Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.</i></p>	 Yes
Comment	<p>The site shared evidence of water balance best practices in its WUR plant update from August 2025, which highlighted that it has been overachieving its WUR target since January 2025.</p> <p>It also shared an EBMUD email thread from September 2025 showing the site's meter readings/usage from August to September 2025, discussing the fluctuations and trends of its water use.</p> <p>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 San Leandro water use (576.45 ML in 2024) and the San Leandro replenishment estimate for 2025 (25.33% for 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.</p>	

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- 3.9.3** *Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.* 🔍  
Obs.
- Comment The site shared its efforts to maintain compliance with TCCC KORE wastewater requirements by providing annual water quality reports for 2023 and 2024 that include the KORE water quality requirements. The 2024 test report indicated a few elements (i.e., Trihalomethanes, Total Haloacetic Acids 5, Nitrate, Sulfate, Chlorate, Hg, Barium, Fluoride) that were above the KORE limits but still within regulatory limits.
- That said, the site did not implement any additional best practices for water quality.
- 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.* ✅  
Yes
- Comment The site shared a 2022-2024 report from the California Water Action Collaborative (CWAC) that detailed projects across the state as well as the learning journeys the site had attended. The site explained that its participation in CWAC enabled it to engage in replenishment projects within the catchment and to connect with local stakeholders working in IWRAs.
- 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 San Leandro water use (576.45 ML in 2024) and the San Leandro replenishment estimate for 2025 (25.33% for 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, including a project in the Mokelumne River Watershed.
- 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-021975**

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4 STEP 4: EVALUATE - Evaluate the site's performance.	
<b>4.1</b>	<i>Evaluate the site's performance in light of its actions and targets from its water stewardship plan and demonstrate its contribution to achieving water stewardship outcomes.</i>
<b>4.1.1</b>	<i>Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.</i> <span style="float: right;">✔ Yes</span>
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 metrics and percentages through August-September 2025, while others were marked as "meeting goal" or "completed" for tasks such as meeting completion or document reviews.
<b>4.1.2</b>	<i>Value creation resulting from the water stewardship plan shall be evaluated.</i> <span style="float: right;">✔ Yes</span>
Comment	The site provided an evaluation of all target's value creation in its WSP. In it, it described the type of value and the financial benefit of the target.
<b>4.1.3</b>	<i>The shared value benefits in the catchment shall be identified and where applicable, quantified.</i> <span style="float: right;">✔ Yes</span>
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.
<b>4.2</b>	<i>Evaluate the impacts of water-related emergency incidents (including extreme events), if any occurred, and determine the effectiveness of corrective and preventative measures.</i>
<b>4.2.1</b>	<i>A written annual review and (where appropriate) root-cause analysis of the year's emergency incident(s) shall be prepared and the site's response to the incident(s) shall be evaluated and proposed preventative and corrective actions and mitigations against future incidents shall be identified.</i> <span style="float: right;">✔ closed</span>
Comment	The site had not provided a written annual review  During the audit, the site had a water-related emergency shut down. However, it had noted that it was still too soon for the written review to have been generated. Discussions on the review was ongoing during the audit.  <b>Finding No: TNR-021980</b>
<b>4.3</b>	<i>Evaluate stakeholders' consultation feedback regarding the site's water stewardship performance, including the effectiveness of the site's engagement process.</i>
<b>4.3.1</b>	<i>Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.</i> <span style="float: right;">✔ closed</span>
Comment	The site hadn't shared evidence of consultations on its water stewardship efforts.  <b>Finding No: TNR-021981</b>
<b>4.4</b>	<i>Evaluate and update the site's water stewardship plan, incorporating the information obtained from the evaluation process in the context of continual improvement.</i>
<b>4.4.1</b>	<i>The site's water stewardship plan shall be modified and adapted to incorporate any relevant information and lessons learned from the evaluations in this step and these changes shall be identified.</i> <span style="float: right;">🔍 Obs.</span>

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**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.

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5 STEP 5: COMMUNICATE & DISCLOSE - Communicate about water stewardship and disclose the site's stewardship efforts	
5.1	<i>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.</i>
5.1.1	<i>The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.</i> <span style="float: right;">✔ closed</span>
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 in January 2026. <p style="text-align: right;"><b>Finding No: TNR-021983</b></p>
5.2	<i>Communicate the water stewardship plan with relevant stakeholders.</i>
5.2.1	<i>The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.</i> <span style="float: right;">✔ closed</span>
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. <p style="text-align: right;"><b>Finding No: TNR-021984</b></p>
5.3	<i>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.</i>
5.3.1	<i>A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.</i> <span style="float: right;">🔍 Obs.</span>
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 in January 2026.
5.4	<i>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.</i>
5.4.1	<i>The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.</i> <span style="float: right;">✘ No</span>
Comment	Although the site had prepared engagement materials, there was no evidence that the site had communicated its water-related challenges to relevant stakeholders. <p style="text-align: right;"><b>Finding No: TNR-021986</b></p>
5.4.2	<i>Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.</i> <span style="float: right;">✔ Yes</span>
Comment	The site shared evidence of communicating with EBMUD in September 2025 about meeting minutes, in October 2025 about leak initiatives, and in May 2025 about the water tour with River Partners.
5.5	<i>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.</i>

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<b>5.5.1</b>	<i>Any site water-related compliance violations and associated corrections shall be disclosed.</i>	 Yes
Comment	The site had no water-related violations in the last year or two, according to the EPA ECHO database information.	
<b>5.5.2</b>	<i>Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.</i>	 Yes
Comment	The site had no water-related violations in the last year or two, according to the EPA ECHO database information.	
<b>5.5.3</b>	<i>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.</i>	 Yes
Comment	The site had no water-related violations in the last year or two, according to the EPA ECHO database information.	

### Previous Findings

	<i>All non-conformities raised in the previous audit have been satisfactorily closed.</i>	 N/A
Comment	As this was an initial audit, there were no non-conformities raised from previous audits.	