

August 12, 2016

**Comments and Answers to Questions Regarding  
AWS Standard System Development Procedure  
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**A. Introduction**

The third paragraph states that the initial phase of AWS Standard implementation “will be used to work out any kinks and ensure capacity is sufficient to meet system needs.” This process could be aided significantly if the Procedure document included an organization chart. The chart could be added as an appendix so it could be up-dated easily without having to revise the entire document. Easy access to an org chart would be of great benefit to the reader.

**1. General Provisions**

1.2 Aim – “AWS seeks to avoid duplication and be consistent with standards that have overlapping scopes ....” Is “standards” the best term to use here? I tend to think of AWS as the “standard” and other water protocols as “tools” for assessing, characterizing, or disclosing – but not necessarily certifying – water use practices. I suggest “other water use tools and protocols” rather than “standards.”

**2.2 Stakeholder Identification**

Stakeholders need to be identified on both the basis of sector and regional location. It may be necessary to establish sub-sets of stakeholders that represent their sector for each region, collaborate on system wide matters, but provide guidance on specific implementation processes and procedures at the regional level.

One group of stakeholders that need to be identified and included for each region is regional resource managers.

**2.6 Decision-Making**

Question 1 – Agree that the consensus mechanism described in the Technical Committee ToR is sufficient for the Standard System Development Procedure.

Question 2 – The key to a successful decision-making structure is transparency. The directives outlined and established in the Development of AWS Governance and Membership Consultation Paper for Partners and Members (June 2016) provides a framework that includes the necessary elements. These include: 1. A clear statement of the question or issue being decided; 2. Identification of the stakeholders, sections, and regions with interest in the issue; 3. Provisions for public notice of the pending decision-making action; 4. An opportunity for comment; 5. An available record of the decision-making discussion; 6. A clear record and announcement of the decision with description of

stakeholder comments and treatment of those comments; 7. An opportunity for response or appeal of the decision.

Question 3 – The period of time between successive AWS Standard review and revisions should be once every 5 years. Any period less than this would be impracticable, given the time needed for members to implement and complete the certification process.

### **2.9 Transition Period**

This section raises the question of the best way to administer the System up-dates and certification terms. Should all certifications be open ended and have to be up-dated at the same time once revisions in the Standard are made? Or, should each certification have an expiration date (i.e. 5 years after issue) when the certificate holder would have to renew and bring operations into compliance? This would prevent all certificate holders in the system having to renew at the same time and would also provide assurance to new certificate holders that their operations would not have to be reviewed and up-dated for a set period of time.

### **2.11 Resolving Complaints**

Questions 4 and 5 – It would be appropriate to make the more comprehensive draft Comments, Complaints and Appeals Procedure a part of the next version of the AWS Standard. I do not see the need or advisability of substituting the procedure for the current version in the existing Standard. This would avoid giving the impression that the existing Standard is a moving target.

### **3.1 Sustainability Outcomes**

*Aim: The standard only contains requirements that support achievement of the defined sustainability outcomes.*

Question 6 – Uptake of the Standard, in many cases, can be enhanced by making it easy to mesh the Standard with broader corporate sustainability programs. The “Aim” statement reflects this and is very important. Interpretation of it needs to be quite broad. We learned through CGLI piloting of the Beta version of the Standard that companies pursue broadly scoped, multi-media based sustainability programs. The water stewardship portion must fit within each company’s specific and broad sustainability initiative often already in place. This means that occasional trade-offs between water and other sustainability elements may be needed. The Standard, while maintaining and satisfying its water sustainability ideals, will have to allow for necessary trade-offs that support the broader sustainability objectives.

### **3.3 Consistent Interpretation**

Question 7 – Scoring can be made part of regional guidelines documentation and reflect the specific needs of that particular region. This would provide the flexibility needed to bridge the gap between Standard objectives and attainment/protection of those within the regional context.