

### Alliance for Water Stewardship Assessment Report Prepared for BRITISH AMERICAN TOBACCO (BAT) LTDA. – BRAZIL / Uberlândia Factory

Prepared by: SGS SGS Ref.: 02-958-19795 Version: 1 Date: 26 October 2021

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### **REPORT DETAILS**

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DATE SUBMITTED:	26th October 2021
CLIENT:	BRITISH AMERICAN TOBACCO (BAT) LTDA. Uberlândia Factory. Minas Gerais. BRAZIL. <u>VALERIA.SOUZA@bat.com</u>
AUDIT TEAM:	<ul> <li>13th – 14th October, 2021</li> <li>Lead Assessor/ Expert Hydrogeologist/Local Assessor:</li> <li>Jorge Peñaranda (JP) – onsite</li> <li>Support Assessor (expert):</li> <li>Ursula Antúnez de Mayolo (UA) – offsite / virtual</li> </ul>
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TECHNICAL SIGNATORY	
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#### Table of content

REF	PORT DETAILS
1	EXECUTIVE SUMMARY
2	SCOPE OF ASSESSMENT
3	PHYSICAL SCOPE AND DESCRIPTION OF CATCHMENT
4	SUMMARY OF SHARED WATER CHALLENGES
-	
5	
5 5.1	CORE INDICATORS
5 5.1 6	CORE INDICATORS
5 5.1 6 7	CORE INDICATORS CHECKLIST CORE INDICATORS
5 5.1 6 7 8	AUDIT FINDINGS AND OPPORTUNITIES FOR IMPROVEMENT

#### **1 EXECUTIVE SUMMARY**

The scope of services covers the assessment in compliance with the AWS International Water Stewardship Standard Standard Version 2.0 for BRITISH AMERICAN TOBACCO (BAT) LTDA. (BAT UDI) for their Uberlândia Factory, Minas Gerais, Brazil. The assessment has been completed in compliance with AWS Certification Requirements v 2.0 December 2019 and is a "full" conformity assessment.

British American Tobacco is a company that manufactures tobacco related products. It has operations world-wide, and in Brazil they established BRITISH AMERICAN TOBACCO (BAT) LTDA.

Given the document review undertaken, verification of evidence and on-site audit performed, SGS recommends that BAT UDI is granted a certificate for a cycle of 3 years to be AWS "CORE" Certified to the Version 2.0 of the AWS standards. Next audit will be the yearly surveillance assessment.

There were nil non-conformances raised during the course of the audit process.

#### 2 SCOPE OF ASSESSMENT

The scope of services covers the assessment to the AWS International Water Stewardship Standard Version 2.0 (CORE Level) for BRITISH AMERICAN TOBACCO (BAT) LTDA. (BAT UDI) for their Uberlândia Factory, Minas Gerais, Brazil. The assessment has been completed in compliance with AWS Certification Requirements v 2.0 December 2019.

The assessment was conducted during 2 days on site by the Lead Auditor who is also a local AWS assessor hydrogeologist, the 13th and 14th October, 2021, supported offsite (virtually) by a Supporting Auditor, as per shown in the audit plan, and 0.35 days off-site (preliminary review). The geographical scope has been only the Uberlândia Factory. The water used is mostly from groundwater from the Paraná Sedimentary Watershed.

The audit interviews were held for BAT UDI and stakeholders over 2 days for their water efficiency projects, WASH activities in the community, etc. BAT UDI and the stakeholders provided the requested supporting documentation as evidence whilst interviewed.

The external stakeholders visited and interviewed onsite were during the audit:

- DMAE (Departamento Municipal de água e Esgoto), for understanding how the integrated water system works and how they assure the water availability for the next decade. Furthermore, it was discussed with DMAE and BAT which are the cooperation activities currently and future opportunities.
- FEMIG (Federation of Companies of Minas Gerais), as they are part of the catchment committee and they group the companies of Minas Gerais state. BAT is engaging to participate with FEMIG in order to have a positive impact in the catchment.

The internal stakeholders visited and interviewed onsite were during the audit: BAT UDI personnel of different areas, such as:

- site management,
- projects,
- maintenance,
- environmental,
- sustainability,
- production,
- and others



Figure 1: Diagram of the Uberlândia Factory

#### **3 PHYSICAL SCOPE AND DESCRIPTION OF CATCHMENT**

The facility has about 872,000 m<sup>2</sup>, the site boundaries are roads or other industries, their boundaries are limites by fences. Mainly other industry and agriculture areas are surrounding. Towards south, and downstream, there is a creek in a distance of 580 m from the site, which is called "Arroio Liso". Stormwater goes into the municipality drainage network that possibly then goes to the Arroio Liso. The site does not have effluents, as they recycle all the water within the site, that is used it to irrigate the green areas within the site. There are no creeks or rivers that cross through the site. Rainwater is only used for emergency system, as they have an open pond artificial for the water storage that refills with the rainwater, but not for industrial or drinking water. During dry season (4-5 months per year), they also use groundwater for refilling the ponds for emergencies. The capacity of the pond is 1,127 m3.

The site has several facility maps last updated in 2014 as there were renovations that year. Since then, there were no significant changes. The maps are for the drinking water network, and the groundwater wells for industry.

The municipal water is used for drinking water (about 18% of the total consuption) the all system to manage de water (catchment, treatment, distribution, final treatment and final discharge) is in charge of a public company called DMAE (Departamento Municipal de água e Esgoto). Uberlandia is the city with the 3th best drinking water and sanitation, in the ranking of the "Instituto Trata Brazil". It is a legal requirement to use the drinking water from the municipal supplier, if it is available. The drinking water comes from the catchment state (Bacia Estadual) is the "Bacia do Rio Araguari", and the federal catchment (federal catchment) is "Bacia do Rio Paranaiba". It was provided the "Relatório de Qualidade das Águas da Bacia Hidrográfica do Rio Araguari", from 1997 a 2013.

BAT UDI has 4 water wells within the site for industrial water for the site. They represent most of the industrial water use (about 82% in 2020). The water of the 4 water wells go to water storage tanks with capacity 450 m3 each. For drinking water, there are 2 boxes of 50m3 each. They have the licenses of the 4 operative groundwater production wells, and the water quantity and quality are managed in a daily basis integrates with the internal water balance system.

In the past they had five groundwater monitoring wells, to collect and analise groundwater quality as a consequence of a legal requirements, those monitoring wells are currently with no use as there were no found environment issues related to the soil or groundwater quality.

Figure 2: Diagram of the DMAE surface points catchment



Figure 3: Map of the Rio Parnaíba catchment



#### 4 SUMMARY OF SHARED WATER CHALLENGES

BAT-UDI produced a report with a external consultant "Avaliação de Vulnerabilidade das Fontes de Água" (Water Vulnerability Assessment) were is included a table that lists the shared water challenges that BAT-UDI shares with different stakeholders that can have influence at the Rio Araguari catchment. This is a preliminary assessment (desktop study) to identify and prioritize water-related stakeholders including non-governmental organizations (NGOs), universities, major water users, municipalities, etc. The list of stakeholders (Stakeholders) related to water are presented in the table below. For each stakeholder, its mission, water-related challenges, and priorities were included. A qualitative assessment was also carried out to verify the perception in relation to BAT-UDI

#### Table 1: Summary of Relevant Stakeholders, shared challenges at the catchment

Parte Interessada	Membro organizacional (Governo, ONG, Indústria etc.)	Escopo Geográfico	Missão relacionada a água, desafios e prioridades	Importância para o Cliente	Percepção da Parte Interessada (stakeholder) sobre o Cliente
CNRH - Conselho Nacional de Recursos Hídricos	Órgão Governamental	Nacional	O Conselho Nacional de Recursos Hídricos é um órgão colegiado, consultivo e deliberativo, integrante da estrutura regimental do Ministério do Meio Ambiente (MMA) que promove a articulação do planejamento dos recursos hídricos com os planejamentos nacional, regional, estadual e dos setores usuários.	As decisões tomadas pelo CNRH afetam o gerenciamento dos recursos hidricos a nível nacional e estadual, já que o estado precisa se adequar às deliberações federais.	O stakeholder possui mais poder e influência que a unidade, mas pode vê-la como uma boa aliada.
ANA – Agência Nacional de Águas e Saneamento Básico	Órgão Governamental	Nacional	Atua na regulação, monitoramento, planejamento e aplicação da lei aos recursos hídricos em caráter federal.	Regula os usos e cobranças sobre os recursos hídricos e usos da água.	O stakeholder possui mais poder e influência que a unidade, mas pode vê-la como uma boa aliada.
SEMAD – Secretaria Estadual de Meio Ambiente e Desenvolvimento Sustentável	Órgão Governamental	Estadual	A SEMAD tem como missão formular e coordenar a política estadual de proteção e conservação do meio ambiente e de gerenciamento dos recursos hídricos e artícular as políticas de gestão dos recursos ambientais, visando ao desenvolvimento sustentável no Estado de Minas Gerais.	As decisões tomadas pela SEMAD afetam diretamente o abastecimento de água da unidade, bem como o descarte de efluentes tratados.	O stakeholder possui mais poder e influência que a unidade, mas pode vê-la como uma boa aliada.

Parte Interessada	Membro organizacional (Governo, ONG, Indústria etc.)	Escopo Geográfico	Missão relacionada a água, desafios e prioridades	Importância para o Cliente	Percepção da Parte Interessada (stakeholder) sobre o Cliente
IEF – Instituto Estadual de Florestas	Órgão Governamental	Estadual	O IEF é uma entidade vinculada a SEMAD e sua missão, cumprir a "agenda verde" do Sistema Estadual do Meio Ambiente - SISEMA, atuando no desenvolvimento e na execução das políticas florestal, de pesca, de recursos naturais renováveis e de biodiversidade em Minas Gerais.	Como parte do SEMAD, o IEF tem influência direta nas atividades da unidade que causam impacto em florestas e recursos naturais renováveis.	O stakeholder possui mais poder e influência que a unidade, mas pode vê-la como uma boa aliada.
IGAM – Instituto Mineiro de Gestão das Águas	Órgão Governamental	Estadual	O IGAM é uma entidade vinculada a SEMAD e tem a missão de garantir a gestão compartilhada e descentralizada das águas e assegurar a sua oferta adequada em qualidade e quantidade, visando o desenvolvimento sustentável.	Como parte do SEMAD, o IGAM tem influência direta na utilização de recursos hídricos pela unidade. O órgão é responsável pela fiscalização do cumprimento das outorgas e pela autuação e cancelamento dos direitos em caso de descumprimento.	O stakeholder possui mais poder e influência que a unidade, mas pode vê-la como uma boa aliada.
FEAM – Fundação Estadual do Meio Ambiente	Órgão Governamental	Estadual	A FEAM é uma entidade vinculada à SEMAD, possuindo personalidade jurídica de direito público e autonomia administrativa e financeira. Além de observar as diretrizes da SEMAD, a FEAM ainda dá apolo e observa as deliberações do Conselho Estadual de Política Ambiental - Copam e do Conselho Estadual de Recursos Hídricos - CERH-MG.	Como parte do SEMAD, a FEAM possui influência direta nas deliberações do CERH, possuido, assim, influência sobre a utilização de recursos hídricos nas bacias do estado e, consequentemente, da unidade.	O stakeholder possui mais poder e influência que a unidade, mas pode vê-la como uma boa aliada.
COPAM – Conselho Estadual de Política Ambiental	Órgão Governamental	Estadual	O COPAM tem por finalidade deliberar sobre diretrizes e políticas e estabelecer normas regulamentares e técnicas, padrões e outras medidas de caráter operacional para a preservação e conservação do meio ambiente e dos recursos ambientais.	A COPAM está, também, vinculada à SEMAD e tem influência direta nas atividades da unidade que causam impacto no meio ambiente e nos recursos naturais.	O stakeholder possui mais poder e influência que a unidade, mas pode vê-la como uma boa aliada

# [ALLIANCE FOR WATER STEWARDSHIP ASSESSMENT REPORT]

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Parte Interessada	Membro organizacional (Governo, ONG, Indústria etc.)	Escopo Geográfico	Missão relacionada a água, desafios e prioridades	Importância para o Cliente	Percepção da Parte Interessada (stakeholder) sobre o Cliente
CERH – Conselho Estadual de Recursos Hídricos	Órgão Governamental	Estadual	O CERH promove o aperfeiçoamento dos mecanismos de planejamento, compatibilização, avaliação e controle dos Recursos Hidricos do Estado, tendo em vista os requisitos de volume e qualidade necessários aos seus múltiplos usos.	Como órgão estadual de gerenciamento dos recursos hídricos, as decisões tomadas pelo CERH impactam diretamente a quantidade e qualidade da água utilizada pela unidade.	O stakeholder possui mais poder e influência que a unidade, mas pode vê-la como uma boa aliada
COFEHIDRO/MG – Conselho de Orientação do Fundo Estadual de Recursos Hídricos	Órgão Governamental	Estadual	o Conselho de Orientação do Fundo Estadual de Recursos Hídricos (COFEHIDRO) tem como atribuição principal supervisionar a gestão do Fundo Estadual de Recursos Hídricos (FEHIDRO).	As decisões tomadas pelo COFEHIDRO afetam diretamente os projetos a serem realizados na bacia. O desenvolvimento destes projetos pode significar uma melhora no cenário dos recursos hídricos.	O stakeholder possui mais poder e influência que a unidade, mas pode vê-la como uma boa aliada.
CBH Araguari - Comitê de Bacia Hidrográfica do Rio Araguari	Órgão Governamental	Regional	O Comitê de Bacia do Rio Araguari é um ente do Sistema Nacional de Gestão dos Recursos Hidricos, constituem o "Parlamento das Águas", espaço em que representantes da comunidade de uma bacia hidrográfica discutem e deliberam a respeito da gestão dos recursos hidricos compartilhando responsabilidades de gestão com o poder público.	O comitê de bacia gera muitas informações relacionadas a qualidade e quantidade dos recursos hídricos. Ele também faz a mediação de discussões relacionadas ao tema, permitindo a participação do setor da indústria na tomada de decisões.	O comitê vê a BAT-UDI como um importante usuário de água e um aliado forte. A participação da unidade nos fóruns de discussão é bem-vinda e até mesmo apreciada.
DMAE – Departamento Municipal de Água e Esgoto	Setor Público	Municipal	O DMAE é o departamento da Prefeitura Municipal de Uberlândia responsável pelo abastecimento de água e pelo esgotamento sanitário do município.	Como fonte suplementar da planta da BAT-UDI, o DMAE tem grande influência no abastecimento de água da unidade.	Para a concessionária a unidade é um importante cliente.
Greenpeace	Organização Não- Governamental	Nacional	O Greenpeace tem a missão de proteger a biodiversidade em todas as suas formas; prevenir a poluição do ar, das águas e da terra; acabar com a ameaça nuclear e enfrentar as mudanças climáticas e	A ONG possui ótimas conexões com outros usuários de águas, bem como de investidores. Possui conhecimentos que podem ajudar bastante na execução de	Como um usuário significativo de água e devido a influência que possui, a ONG pode enxergar a unidade como aliada na proteção dos recursos hídricos.

Parte Interessada	Membro organizacional (Governo, ONG, Indústria etc.)	Escopo Geográfico	Missão relacionada a água, desafios e prioridades	Importância para o Cliente	Percepção da Parte Interessada (stakeholder) sobre o Cliente
			promover a paz, o desarmamento global e a não-violência.	projetos de sustentabilidade de recursos hídricos	
WWF – World Wide Fund	Organização Não- Governamental	Nacional	O objetivo principal da WWF é mudar a atual trajetória de degradação ambiental e promover um futuro no qual a sociedade e natureza vivam em harmonia.	A ONG possui ótimas conexões com outros usuários de águas, bem como de investidores. Possui conhecimentos que podem ajudar bastante na execução de projetos de sustentabilidade de recursos hídricos	Como um usuário significativo de água e devido a influência que possui, a ONG pode enxergar a unidade como aliada na proteção dos recursos hídricos.
TNC – The Nature Conservancy	Organização Não- Governamental	Nacional	A TNC tem como missão proteger as terras e águas das quais toda a vida depende.	A ONG possui ótimas conexões com outros usuários de águas, bem como de investidores. Possui conhecimentos que podem ajudar bastante na execução de projetos de sustentabilidade de recursos hídricos	Como um usuário significativo de água e devido a influência que possui, a ONG pode enxergar a unidade como aliada na proteção dos recursos hídricos.
OGA – Observatório das Águas	Organização Não- Governamental	Nacional	O OGA tem como missão gerar, sistematizar, analisar e difundir informações das práticas de governança das águas pelos atores e instâncias do SINGREH, por meio do acompanhamento de suas ações. Possui um conselho deliberativo formado por organizações que não possuem funções de gestão ou regulação municipal, estadual ou federal, bem como um conselho consultivo formado por órgãos gestores nacionais e estaduais, agência de bacias, secretarias de meio ambiente e recursos hídricos, comitês de bacias, fóruns de comitês de bacias e conselhos de recursos hídricos.	Por ser formado pela Associação Brasileira de Recursos Hidricos (ABRHidro); Fundação SOS Mata Atlântica; Instituto Democracia e Sustentabilidade (IDS/SP); Instituto Portas Abertas (ES); Instituto Rios Brasil (AM); Instituto Trata Brasil; O Nosso Vale! A Nossa Vida (RI); WWF-Brasile The Nature Conservancy (TNC) a OGA tem grande Gundero Carário de recursos hídricos brasileiro.	Como um usuário significativo de água e devido a influência que posui, o OGA pode enxergar a unidade como aliada na proteção dos recursos hídricos.

## [ALLIANCE FOR WATER STEWARDSHIP ASSESSMENT REPORT]

Parte Interessada	Membro organizacional (Governo, ONG, Indústria etc.)	Escopo Geográfico	Missão relacionada a água, desafios e prioridades	Importância para o Cliente	Percepção da Parte Interessada (stakeholder) sobre o Cliente
FIEMG – Federação das indústrias de Minas Gerais	Entidade Civil	Estadual	A FIEMG representa o setor industrial do estado de Minas Gerais e atua na defesa de seus interesses local e nacionalmente. A instituição oferece às empresas mineiras assessoria e apoio em áreas vitais como crédito e financiamento, tributária, meio ambiente e trabalhista.	O stakeholder defende os interesses da unidade e possui maior influência do que a BAT-UDI sozinha.	O stakeholder vê a BAT-UDI como um importante parceiro e parte associada essencial.
CODEMA - Conselho Municipal de Desenvolvimento Ambiental	Órgão Governamental	Municipal	O CODEMA é um órgão colegiado, de assessoramento, consultivo ao Poder Público Municipal e deliberativo no âmbito de sua competência.	O conselho está diretamente ligado a execução da Política Municipal do Meio Ambiente.	O stakeholder possui mais poder e influência que a unidade, mas pode vê-la como uma boa aliada
UNEDI - União das Empresas dos Distritos Industriais de Uberlândia	Entidade Civil	Municipal	A UNEDI tem como missão atuar junto aos órgãos públicos e de classe na solução de problemas; estimular o espírito associativo; manter serviços de informações e assistências aos associados e promover a preservação do meio ambiente.	O stakeholder defende os interesses da unidade e possui maior influência do que a BAT-UDI sozinha.	O stakeholder vê a BAT-UDI como um importante parceiro e parte associada essencial.
UFU – Universidade Federal de Uberlândia	Setor Público	Municipal	A UFU é uma fundação pública, integrante da Administração Federal Indireta, vinculada ao Ministério da Educação (MEC). Tem como missão desenvolver o ensino, a pesquisa e a extensão de forma integrada, realizando a função de produzir e disseminar a sciências, as tecnologias, as inovações, as culturas e as artes, e de formar cidadãos críticos e comprometidos com a ética, a democracia e a transformação social.	O stakeholder é um parceiro importante na busca por informações relacionadas à saúde da área alvo, uma vez que desenvolve estudos ambientais na região.	O stakeholder vê a BAT-UDI como uma parceira importante na realização de projetos na região.

Also in this report was deduced a stakeholder degree of influence as a guide to BAT concentrate efford. This matrix is represented by the Figure 4 bellow.

#### Figure 4: Stakeholder influence/power/Interest matrix



#### 5 INDICATORS CHECKLIST

As per the requirement set out in the AWS certification requirements Section 2.11.3.1 it was prepared a checklist of all the CORE AWS indicators with the relevant reviewed evidence provided by BAT UDI and the indicator with which it is associated. The checklists were aligned to the clauses / indicators of the AWS standard Version 2.0. See Annex for checklist.

#### 5.1 AUDIT TRAILS

The strategy of BAT UDI prioritized with a specialized consultancy in the analysis in water vulnerability assessment that made a general analysis of the threats in a report called "Avaliação de Vulnerabilidade das Fontes de Água ", the following stand out: groundwater balance (BAT consumption represents 0.02% of the water available in the aquifer watershed), water valuation from the perspective of consumption savings by the ETE (wastewater treatment station) and its social impact due to savings.

At the same time, BAT researched with the same consultants on vulnerabilities to water sources, highlighting the resilience plan in the event of a total interruption of the supply of water from the wells. BAT UDI developed " Plan de Emergencia para el agua" (Emergency Plan for water) which is a document that addresses chemical leaks, verification of water quality with corrective actions and those responsible for them.

Finally, and with an even broader vision, BAT UDI applied its internal management experience by creating an action monitoring table called the "Plano de Mitigação de Vulnerabilidades" (Vulnerability Mitigation Plan) in which threats are classified by their relative degree of severity, the actions, those responsible, the area of the company responsible for it, schedule and costs. That is, there is a plan in execution based on the threats and opportunities that are mapped so far.

Among the most important challenges is knowing the aquifer in more detail, beyond the general hydrogeological context. It is mainly a matter of numerically assessing specific hydraulic aspects of the production wells that, under the analysis of a hydrogeologist, bring a basic hydrogeological model of the local aquifer, in addition to the areas of influence / interference between the BAT wells, or even external ones. As well as future estimates of the behavior of the local aquifer in terms of growth scenarios in production demand. Or medium and long-term

changes in the amounts of groundwater available due to water shortages caused by climate change and by increased demand in the area where BAT UDI is located.

Greater knowledge of the aquifer implies the potential for interaction with stakeholders that use the same resource at the watershed, or even in areas close to BAT UDI. As well as with watersheds outside the area of direct influence that are more dependent on groundwater.

Other opportunities come from initiatives within the scope of influence of the watershed committee thanks to the excellent relationship with the FEMIG (Federation of Companies of Minas Gerais). The most concrete possibilities are related to the potential for technical exchange on water treatment with other steakholders, education and dissemination of good practices. Also on the alert (to those manage the water at the watershed) in relation to the source of groundwater as a potential resource that needs a specific approach, since the management of water resources must be understood in an integral way.

More specifically, there is a document from the basin committee to which BAT has had access and there are listed specify projects, for some of them BAT UDI has already shown interest in becoming a direct collaborator. Once you have become a member of the watershed committee, it will be time to do it.

For 2022 there is a plan to reduce consumption of 3% from the reduction of losses due to evaporation, embedded water of the final product, human consumption and others.

#### October 26, 2021

#### 6 AUDIT FINDINGS

The findings raised during this certification audit were provided to the site, which were observations to V2-0 of the standard.

There were nil non-conformance raised during the audit process. Nevertheless, observations and opportunities for improvement were identified, as per detailed below:

#### • Observations:

**Obervation 01-2021 (clause 1.3.8)**: Historically reported changes in the water quality of DMAE: nitrate, turbidity, bacteria heterotrophic and total coliforms. Time plots should be produced for the anomalous parameters, and be part of the WASH water quality management group's routine assessment.

**Obervation 02-2021 (clause 1.5.4)**: The situation of the neighboring contaminated area under the responsibility of Stericycle needs to be constantly monitored. Until the formal closing of the case before the competent authorities, it will represent a threat to the water quality of the aquifer in relation to certain chemical compounds already defined in public documents.

#### 7 SUMMARY

In reviewing the evidence presented by BAT UDI, it was confirmed that they implemented their water stewardship system appropriately through the interviews and visits to the plant and the stakeholders. This was accompanied with the documentary evidence and actions to address the changes to version 2.0.

There were nil new non-conformances raised. Observations and Opportunities for Improvement were made during the audit, these are to be considered as areas for improvement which will be reviewed in future surveillance audit.

#### 8 **OPPORTUNITIES FOR IMPROVEMENT**

- Opportunity for improvement 01 2021 (clause 1.4.2): Regarding the third-party embedded water accounting, from the virtual water contained in the foods that GRSA uses in the canteen, it can be made a further analysis, even if minimal, if there is some food originated on the same catchment.
- **Opportunity for improvement 02 2021 (clause 1.5.1):** From the basin committee they got a document that shows the projects to be made viable in 2023 with the new management. The plant wants to fit within some of the objectives with concrete projects, once it has reached the status of member in 2023 with the new management.
- **Opportunity for improvement 03 2021 (clause 2.4.1):** A supply commitment may be formalized as much as possible with DMAE in the event of a forced shutdown of the supply wells. Within the context of possible future hydraulic tests, or an extreme shortage event.
- Opportunity for improvement 04 2021 (clause 1.5.3): Aquifer knowledge could come from proper planning of hydraulic tests in supply wells in order to understand the effect of hydraulic influence between wells. As well as modeling this influence on future local/regional drawdown scenarios of aquifer water levels.
- **Opportunity for improvement 05 2021 (clause 3.1.1):** DMAE announced (informally) during the visit to the installations of the new water catchment in the city of Uberlândia that this year a public call will be opened. Part of the ETA (water treatment) area will be able to receive educational projects focused on water.

#### 9 CONCLUSIONS AND RECOMMENDATIONS

Given the evidence reviewed and the virtual audit performed, SGS recommends that BAT UDI Brazil gets certified for a CORE 3-year cycle version 2.0., with annual surveillance audits.

#### **10 REFERENCES**

- Commitment letter
- Diagram Uberlândia Factory
- Satellite map of surrounding area
- Map of catchment
- Water Stewardhsip Strategy / Plan
- Records fo communications with stakeholders
- Emergency and Resilience plans
- Water Balance
- Records about projects with the farmers and at site
- Licenses for each of the water wells
- Monitoring records for each well
- Laboratory tests of external lab for each monitoring point
- Other support documents

#### **ANNEX CHECKLIST**

Clause	Details	Yes	No	Comments/Evidence
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.			The facility has about 872,000 m2. It started operations in 1978. It is located in an industrial district. Before that, it was an area of public domain. The company Souza Cruz has more than 100 years operating in Brazil. The site boundaries are roads or neighbours. The boundaries are with fences. Mainly other industry and agriculture areas are surrounding. There is a creek in a distance of 580 m from the site, which is called "Arroio Liso". Stormwater goes into the municipality drainage network that possibly then goes to the Arroio Liso. The site does not have effluents, as they recycle all the water within the site and then they use it to irrigate the green areas within the site. There are no creeks or rivers that cross through the site. Rainwater is only used for emergency system, as they have an open pond artificial for the water storage that refills with the rainwater, but not for industrial or drinking water. During dry season (4-5 months per year), they also use groundwater for refilling the ponds for emergencies. The capacity of the pond is 1,127 m3. The site has several facility maps last updated in 2014 as there were renovations that year. Since then, there were no significant changes. The maps are for the drinking water metwork, and the groundwater wells for industry. The map "REDES_AGUA_RESUMO" show all the network of the drinking water, the groundwater wells and the recycled water in different colors. Furthermore, they show the boxes / tanks and drinking points.

Clause	Details	Yes	No	Comments/Evidence
				called DMAE (Departamento Municipal de água e Esgoto). Uberlandia is the city with the 5th best drinking water and sanitation, in the ranking of the "Instituto Trata Brazil". It is a legal requirement to use the drinking water from the municipal supplier, if it is available.
				They have 4 water wells within the site for industrial water for the site. The water of the 4 water wells go to water storage tanks with capacity 450 m3 each. For drinking water, there are 2 boxes of 50m3 each. On the past, they had groundwater monitoring well, but it is currently closed. They have the licenses of the 4 operative groundwater wells. The groundwater monitoring well did not require a license as it was not for water extraction, only for monitoring.
				They have a map of effluents showing all the sanitary areas (toilets) and industrial lines accross the facility as well as the WWTP. This map was last updated in 2017.
				The water source for the 4 water wells is from the "Bacia Sedimentar do Parana" acuifer. The drinking water comes from the catchment state (Bacia Estadual) is the "Bacia do Rio Araguari", and the federal catchment (federal catchment) is "Bacia do Rio Paranaiba". It was provided the "Relatório de Qualidade das Águas da Bacia Hidrográfica do Rio Araguari", from 1997 a 2013.
1.2	Understand relevant stakeholders, their water-related challenges, and the site's ability to influence beyond its boundaries.			
1.2.1	<ul> <li>Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall:</li> <li>Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people;</li> <li>Consider the physical scope identified, including stakeholders,</li> </ul>			They identified the local stakeholders: Municipal Environment Council (CODEMA), Federation of Industries of Minas Gerais (FIEMG), Union of Companies of the Federal District of Uberlandia (UNEDI). Stakeholders of the groups in which BAT Brazil participates involve several entities of the community such as industries, commerce, social organizations, government and others.

Clause	Details	Yes	No	Comments/Evidence
Clause	Details 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.	Yes	No	Comments/Evidence The site is not aware of indigenous groups located in the proximity of the site. The site prepared the map of the boundaries of the facility which shows the neighbour areas, such as other factories and agriculture. This is an industrial area but has some agriculture areas as the industry is in development. They also have process map for their ISO Integrated management system for environment and H&S, but it is not specific to water topics which are the 5 outcomes of the water stewardship of AWS. The process map of the integrated management system includes public entities, suppliers, workers, clients and others. Then, it is identified the risks and opportunities after the stakeholder analysis. The "Instituto Souza Cruz" which is a Souza Cruz Foundation for implementing sustainability projects in the community or for protecting biodiversity. Also, one of the aims of the Instituto Souza Cruz is keeping the youth in the area / farming activities to continue with the family business with the programme "Novos Rurais". It was prepared with the consultant a stakeholder matrix, which classifies them as Government / NGO / industry, etc Also, the water related challenge, the priorities, the importance for BAT and the perception of the interested
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.			Also, in this report was deduced a stakeholder degree of influence as a guide to BAT concentrate effort. It is presented in a matrix
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.			They have an incident/emergency response plan called "PROCEDIMENTO PARA

Clause	Details	Yes	No	Comments/Evidence
				CONTROLE DE EMERGÊNCIA" of August 2019, which includes 5 annex for the different situations. It covers situations of chemical spills and fire at the "Parque Ambiental" which is a forest area of about 40 ha within the site. There are also other situations related to other topics.
				Brazil is not an area of earthquakes. The incident/emergency response plan is a requirement for the operational license for the sites.
				For drinking water, their water storage average at 2 boxes with the total within the site is 100 m3, therefore, it lasts for about 1 day, as approximately 18% of the total use of water of the factory is for drinking water, but they can prioritize some key areas in order to make last longer the drinking water.
				When there is a problem with the groundwater wells, they can use the water from the municipal service.
				For Maintenance of the WWTP, they conduct it during time breaks of closing the factory. In June 2020 that there was a maintenance of the WWTP, the site requested to DMAE (the municipal water and wastewater entity) to discharge the effluent to the public network, with the quality tests associated. It was shown the authorization from DMAE for discharge.
				The "Emergency Water Plan" is a specific document prepared after the 2020 audit that addresses chemical spills, verification of water quality with those responsible, occurrence, affected area, corrective actions, responsible for the action, from preventive to corrective action.
1.3.2	Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped.			For each groundwater well, they have the historical data of the static and dynamic level of the groundwater well. Also, for each groundwater well, they have the license record of 2019 that was requested by the Minas Gerais State Authority "LICENCIAMENTO AMBIENTAL -OUTORGA DE ÁGUA - GEOPROCESSAMENTO E CAR GEOLOGIA E MINERAÇÃO -POÇOS ARTESIANOS -ESTAÇÕES HIDROMÉTRICAS ENERGIA SOLAR E HÍDRICA -ASSESSORIA JURÍDICA". With this record, it was

Clause	Details	Yes	No	Comments/Evidence
				authorized the license of each groundwater well. This was prepared by a water consultant expert. The record shows the levels, consumption in m3 and hours. The licenses that the Minas Gerais State provides are either for 5 years or for 10 years. Also, they have a tool for Utilities, where they track daily the flow of each groundwater well, and it there is any deviation, it is discussed in the daily meeting of energy / water consumption of the Utilities area. Also, the track the total daily consumption and the monthly consumption, in order to take immediate action when needed.
				In the water map provided (1st December 2019 to 31st October 2020) it is shown the 2 water inputs, which are municipal source DMAE for drinking water (23,112 m3) and the extraction from the 4 internal water wells (89,635 m3). Both quantities are metered. From the extraction, 83,290 goes for industrial use, and 6,345 goes to the lagoons for fire reservoir.
				As output, it was calculated the effluent which is 45,181 m3 measured with a flowmeter on a continuous basis, which is reused/recycled for gardening, toilets, and cleaning. Finally, the water consumption would be the differential of inputs vs. outputs, which is 67,566 m3 (about 60% of the total). This consumption is for evaporation / steaming, water embedded in the final product, and human consumption and others.
				The site fills the global tool of the Environmental Data Management "Credit 360" for their Targets KPI which tracks the environmental performance indicators. There is a section for water topics, reporting: Total water withdrawn, municipal/3rd party water supplier, renewable groundwater and water recycled / reused (as they do not discharge effluent outside).
				Water consumption is the differential between the water withdrawal and water discharged. The tool is filled quarterly and shared with the leadership team and sent to BAT for the internal tracking and global goal setting.

Clause	Details	Yes	No	Comments/Evidence
				The next renewal of exploration permission is for well POÇO 02 to expire on 6/14/24. The rest of the wells have renewals to in 2024, others are for 2029.
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.			They have data of the global tool "Credit 360" since 2010, so they show the historic for Q1 to Q4 since to 2010 to 2020.
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.			For the 4 groundwater wells they have tests performed, showing the results as conform. The regulation Resolucao 420 establishes the parameters. The results show that all the parameters are complying with the maximum thresholds of the local regulation. They were performed in July 2020 by a third party accredited laboratory. The effluents after the WWTP are also tested by a third party accredited laboratory. Last results shown of 05/09/2020, "Relatorio de Ensaios LAB N° 0009/20 and all parameters were compliant with the local regulation (pH, BOD, COD, coliforms, oils and greases, suspended solids, sedimented solids, surfactants and temperature
1.3.5	Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.			They have an inventory of chemicals of the site which is an excel spreadsheet. This is updated at least yearly. Furthermore, they have the Safety Data Sheets (SDS) of all chemical products are available in physical at the point of use, and also in a shared folder in the intranet. The chemicals are stored in special warehouses / rooms as required by regulations. Also, they have a containment area for the chemicals to avoid that any spillage pollutes the soil. This was validated by an expert that provided the report "Laudo 04/20" confirming that the areas are impermeabilized. Also, they have

Clause	Details	Yes	No	Comments/Evidence
				emergency kits in key locations, with the spillage procedures.
1.3.6	On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.			They have a park within the facility the "Parque Ambiental Unidade Uberlandia" of 40 hectares. In 2007, there was a project of recuperation of degradated areas, and reforestation with native species. They provided the full report about this project.
				In 2019, it was provided a presentation of the status of the park that was given to the municipality. This included details such as: area of 40 ha, more than 60 species of flora and 120 species of fauna. Also pictures were provided of the current status.
				Furthermore, the municipality issued the 22/05/2020 the report of the "Diretoria de Desenvolvimento Ambiental" of the "Prefeitura de Uberlandia, Secretaria Municipal de Financas" where it confirms the proper maintenance of the park, after validating through site visit of 14/05/2020 and detailing in the report the species identified in the habitat.
				In September 2020, there was a bush fire in the park, where about 25% of the forest was lost, however, they took actions to prevent re-ocurrance of bush fires. The park will reccuperate through the time.
				There are no indigenous cultural values features on the 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.			They have the bills of the water- related costs for: Water service provider, effluent treatment chemicals and outsourced operation, monitoring of the water and wastewater parameter by external labs, the water consultant to measure the static and dynamic level of the groundwater wells, and eventually, invoices of other external consultant or experts. Fees for renewal of water licenses and a fixed fee for the use of the groundwater wells. All the costs are in the SAP system;
				therefore, the information can be

Clause	Details	Yes	No	Comments/Evidence
				The annual water supply costs of the last 3 years are reported in the ANTEA report 05021VS035/21, TABLE 5.1 2018 R\$ 404,740.00, 2019 R\$ 431,048.00 and in 2020 R\$ 375,954.00. Also in the ANTEA Group report, the ETE's closed treatment is valued. The water saved could supply 2,756 people (consumption 3.3m3 water person/month), a social value. At Cultural, it was not valued, but the intangible value of the concept of the circular water economy and sustainability is identified through the exhibition of good practices: technical visits by stakeholders such as DMAE.
				At the study "Avaliação de Vulnerabilidade das Fontes de Água ", the following stand out: groundwater balance (BAT consumption represents 0.02% of the water available in the aquifer watershed), water valuation from the perspective of consumption savings by the ETE (wastewater treatment station ) and its social impact due to savings
1.3.8	Levels of access and adequacy of WASH at the site shall be identified.			For the water quality of the source, they have the quality tests for the drinking water performed by a third party accredited laboratory. It shows that is free of esterichia coli and coliforms and compliant with bacterias, color and turbidity. This is based on the regulation "Portaria de Consolidacao N°5/2017, anexo XX" (test of 11/09/2020). The test of January 2020 was of all the parameters, including the chemical and physical ones. The regulation says that the test shall be periodically but does not specify the frequency. Therefore, the site performs a full test yearly, and a simplified test monthly, all by an accredited third party lab. <b>Obervation 01-2021:</b> Historically reported changes in the water quality of DMAE: nitrate, turbidity, bacteria heterotrophic and total coliforms. Time plots should be produced for the anomalous parameters, and be part of the WASH water quality management group's routine assessment.

Clause	Details	Yes	No	Comments/Evidence
				regulated in Brazil for industrial sites, such as minimum quantity of toilets per number of persons. They have of all the toilets at the site, which is used for cleaning purposes mostly.
1.4	Gather data on the site's indirect water use, including: its primary inputs; the water use embedded in the production of those primary inputs the status of the waters at the origin of the inputs (where they can be identified); and water used in out-sourced water- related services.			
1.4.1	The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be identified.			The primary inputs for the site are not located in the catchment, as they are tobacco, paper & carton, acetate, glue, chemicals / flavours and plastic for some packaging. There are no tobacco farmers are in the same catchment. The paper & carton / acetate / glue / plastic / chemicals / flavours manufacturers are in Rio Grande do Sul, Sao Paulo or other states that are other catchments, or even from other countries. They provide a report annually to IBAMA of the government with all the raw material quantities used. Internally, they have an excel where they prepare all the information to be reported to IBAMA. This was shown with detials of each raw material (input), quantities and units. BAT Globally has the LEAF area which has "Sustainable agriculture and farmer livelihoods" that aims also to optimize the use of chemicals in tobacco farming and warehouses for fertilizar storages at the farmers. It is consolidated an annual water consumption table was drawn up in the production of raw materials from
				The result indicates approximately 5.93m3/MCE, which is 122,568m3 of indirect water.
1.4.2	The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.			The outsourced services that they have are mostly for personnel contracted to work on-site, such as security, cleaning, canteen, WWTP operation, maintenance & operation of utilities area internal transport in

Clause	Details	Yes	No	Comments/Evidence
				warehouses, which is already accounted for in the site calculations.
				Transportation of raw material and final products is also outsourced.
				The only ones that can be identified as embedded water would be food consumed from a third party GRSA (meal supplier), but the ingredients may come from different parts of Brazil or from other countries. So, there is currently no quantification and UDI understands this as a future opportunity.
				<b>Opportunity for improvement 01 -</b> <b>2021:</b> Regarding the third-party embedded water accounting, from the virtual water contained in the foods that GRSA uses in the canteen, it can be made a further analysis, even if minimal, if there is some food originated on the same catchment.
1.5	Gather water-related data for the catchment, including: water governance, water balance, water quality, Important Water-Related Areas, infrastructure, and WASH			
1.5.1	Water governance initiatives shall be identified, including catchment plan(s), water-related public policies, major publicly-led initiatives under way, and relevant goals to help inform site of possible opportunities for water stewardship collective action.			They have the document "relatório de qualidade das águas da bacia do rio Araguari. This document is published by the "Comité Bacia do rio Araguari" which is a surface water quality report published by the Bacia do rio Araguari commitee. At this document can be found a full map of the catchment, including all the rivers and water streams. It shows also the sub- catchments and key information. It focuses on superficial water. This report indicates the catchment area, and also the monitoring points for surface water.
				Note that UDI does not have any withdrawal from the water streams or rivers itself, as it is indirectly at this catchment because of the aquifer use and replenishment. The municipal water is used for drinking water and this company is called DMAE (Departamento Municipal de água e Esgoto)

Clause	Details	Yes	No	Comments/Evidence
				The water public poilicies ara also included at the repport "relatório de qualidade das águas da bacia do rio Araguari" in terms of federal laws as Águas, IGAM, na Lei Nº 12.584, from 17th July 1997
				Minor publicity-led initiatives related to the cacthment area are not also defines at the "relatório de qualidade das águas da bacia do rio Araguari"
				Groundwater whithdraw. They have 4 water wells within the site for industrial water for the site. The water source for the 4 water wells is from the "Bacia Sedimentar do Parana" acuifer. The drinking water comes from the catchment state (Bacia Estadual) is the "Bacia do Rio Araguari", and the federal catchment (federal catchment) is "Bacia do Rio Paranaiba".
				There were shown good hydrogeologic technical information related only to the well SC-02, the reference document is a legal requirement to the state regulation agency IGAM.
				<b>Opportunity for improvement 02 –</b> <b>2021:</b> From the basin committee they got a document that shows the projects to be made viable in 2023 with the new management. The plant wants to fit within some of the objectives with concrete projects, once it has reached the status of member in 2023 with the new management. Registration: Normative Resolution CBH Araguari No. 53, December 2019
1.5.2	Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.			UDI uses a BAT database for tracking changes in legislation. This basis is in the BAT management system. An excel file was shown "Normas relacionadas a Água" containing the updated legal requirements related to only the surface water
				Groundwater regulatory monitoring. The legal requirements sent to public control agencies were shown, At the BAT database it is registered the surface water regulations.

Clause	Details	Yes	No	Comments/Evidence
				The applicable legislation was identified in Antea's report. Shows item 8 of the report. The legal part of the UDI did not identify any non- compliance by the CAL 4.0 and ISO 14.001 control system.
1.5.3	The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.			Water scarcity does not appear to be a current challenge for the "Bacia Sedimentar do Parana" acuifer or the "Bacia do Rio Araguari", however, it is an emerging challenge as the withdrawns are increasing and climate change is impacting.
				Groundwater whithdraw. They have 4 water wells within the site for industrial water for the site. The water source for the 4 water wells is from the "Bacia Sedimentar do Parana" acuifer. The drinking water comes from the catchment state (Bacia Estadual) is the "Bacia do Rio Araguari", and the federal catchment (federal catchment) is "Bacia do Rio Paranaiba".
				It was shown hydrogeologic technical information related only to the well SC- 02, the reference document is a legal requirement to the state regulation agency IGAM
				Long term groundwater management. Aquifers can usually show signs of decreasing water levels at different times than surface water. The hydraulic characteristics of the aquifer were evaluated by groundwater specialists or hydrogeologist under a long-term perspective in the face of extraordinary situations: climate change or the decrease in aquifer levels by overexploitation.
				<b>Opportunity for improvement 04 -</b> <b>2021</b> : Aquifer knowledge could come from proper planning of hydraulic tests in supply wells in order to understand the effect of hydraulic influence between wells. As well as modeling this influence on future local/regional drawdown scenarios of aquifer water levels.
				The Antea report diagnoses an index of water stress in the basin. There is no stress. The balance was taken. There is no future shortage forecast at the moment.

Clause	Details	Yes	No	Comments/Evidence
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.			For the surface water, there is the "relatório de qualidade das águas da bacia do rio Araguari, published by the "Comité Bacia do rio Araguari" which is a surface water quality report published by the Bacia do rio Araguari commitee. In it there is information on the status of the quality of the basin's water bodies and behavior and trends over time. 14 water stations withn the basin are analyzed. In this sense, the study points out the parts of the basin with the worst and best water quality conditions. Identifies the sub-basins and municipalities most impacted by analyzing the Water Quality Indicator - IQA, Toxic Contamination - CT and Trophic State Index - EIT. It also analyzes the time evolution of the parameters that do not comply with the Resolution COPAM / CERH Regulation No. 01/2008 For the 4 groundwater wells they have tests performed, showing the results as conform. The regulation Resolucao 420 establishes the parameters. The results show that all the parameters are complying with the maximum thresholds of the local regulation. They were performed in July 2020 by a third party accredited laboratory. <b>Obervation 02-2021:</b> The situation of the neighboring contaminated area under the responsibility of Stericycle needs to be constantly monitored. Until the formal closing of the case before the competent authorities, it will represent a threat to the water quality of the aquifer in relation to certain chemical compounds already defined in public documents. Based on the identification of the areas of the basin that has the surface water most affected in terms of quality, stakeholders interested in improving and managing water quality were mapped. CEMAE, CODEMA, and CBH are the stakeholders mapped in Antea's report.
1.5.5	be identified, and where appropriate, mapped, and their status assessed including any threats to people or the natural environment, using scientific			(CBH Rio Araguari) is a discussion forum that integrates public authorities, civil society and water users to plan, in a participatory and

Clause	Details	Yes	No	Comments/Evidence
	information and through stakeholder engagement.			decentralized way, the use of water resources in the region of the hydrographic basin of the Araguari River, as well as how to protect water sources and contribute to sustainable development.
				The main competence of a Basin Committee is to approve the Basin Water Resources Plan. This plan assesses the conditions of availability and demand for water; the impact of public policies on water; measure future uses; proposes the creation of areas subject to use restrictions, aiming at the protection of water resources; develops programs and projects that guarantee the ideal conditions of the basin. The Committee is also responsible for monitoring the implementation of the Plan, ensuring compliance with the guidelines established therein. CBH Araguari already has its Water Resources Plan approved since 2008.
				The Report includes the following conservation areas, and establishes which are the priorities depending on the current status and projections:
				Existing Conservation Areas:
				"□ Parque Municipal de Pratinha (proteção dos córregos Prata e da Guarda, de abastecimento da cidade, com 40 hectares – área desapropriada mas sem implantação);
				<ul> <li>Parque Municipal do Sabiá (proteção da nascente do córrego Jataí) em Uberlândia;</li> </ul>
				<ul> <li>Área de Proteção Especial (proteção de manancial de abastecimento de Araxá, com 148 km2 – falta plano de manejo);</li> </ul>
				<ul> <li>RPPN do Galheiro, com 2.800 ha – compensação ambiental da UHE de Nova Ponte;</li> </ul>
				<ul> <li>RPPN do Jacó, com 360 ha – compensação ambiental da UHE de Miranda;</li> </ul>
				RPPN Serrote, com 548 ha – município de Ibiá;"
				New Conservation Areas:
				"□ Parque Estadual do Pau Furado em Araguari;
				□ APA do rio Claro:

Clause	Details	Yes	No	Comments/Evidence
				<ul> <li>Parque Municipal da Mata do Desamparo, de São Roque de Minas</li> <li>Áreas de baixa produtividade e alta declividade no município de Serra do Salitre."</li> </ul>
1.5.6	Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.			The existing water-related infrastructure is related to public service of Water and Sanitation. Also, the state of Minas Gerais has a high level of Hydropower plants managed by CEMIG. There are no records or knowledge of natural disasters such as earthquakes, or extreme events capable of causing flooding in the area.
1.5.7	The adequacy of available WASH services within the catchment shall be identified.			The Municipality of Uberlandia is one of the highest ranking in Brazil for WASH
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.			The "shared water challenges" are called Vulnerability, which translates into the BAT mitigation plan "BAT UDI VULNERABILITIES MITIGATION PLAN". BAT-UDI produced a report with a external consultant "Avaliação de Vulnerabilidade das Fontes de Água" (Water Vulnerability Assessment) were is included a table that lists the shared water challenges that BAT-UDI shares with different stakeholders that can have influence at the catchment. This is a preliminary assessment (desktop study) to identify and prioritize water-related stakeholders including non-governmental organizations (NGOs), universities, major water users, municipalities, etc. The list of stakeholders (Stakeholders) related to water are presented in a table. For each stakeholder, its mission, water-related challenges, and priorities were included. A qualitative assessment was also carried out to verify the perception in relation to BAT-UDI

Clause	Details	Yes	No	Comments/Evidence
1.6.2	Initiatives to address shared water challenges shall be identified.			The CBH Araguari Water Quantity Impact Program was identified for addressing the potential shared water challenges related to Important Water Related Areas / Biodiversity.
				For the water challenge related to water quantity diminishing, they established reduction targets at the site.
				The CBH Araguari Water Quantity Impact Program was identified, which proposes actions to mitigate the environmental impact aimed at revitalizing the Araguari River basin and, consequently, improving the quantity of water resources, as well as ensuring the incorporation of knowledge and continuity of water resources. actions. Its initiatives and objectives are:
				<ul> <li>Know the sub-basins to select areas to be studied;</li> </ul>
				<ul> <li>Identify critical areas, through satellite image and field visit;</li> </ul>
				<ul> <li>Make an environmental diagnosis in the selected areas;</li> </ul>
				<ul> <li>Make a registration of users of the selected sub-basin, with a questionnaire, previously defined methodology and visit to all properties, aiming to identify the use of water resources and socioeconomic condition of the residents;</li> </ul>
				<ul> <li>Propose mitigating measures aimed at reducing the erosion process and silting up water bodies;</li> </ul>
				<ul> <li>To act in the protection and recovery of degraded areas and permanent preservation areas (APP);</li> </ul>
				• Stimulate the conservationist use of the soil;
				<ul> <li>Readjust and conserve rural roads;</li> </ul>
				• Implementing riparian forests;
				<ul> <li>Conserve and recover spring, riparian forest and permanent preservation area (APP):</li> </ul>
				<ul> <li>To act in the mobilization and awareness of the population for participatory management of water resources, aiming at</li> </ul>

Clause	Details	Yes	No	Comments/Evidence
				<ul> <li>the continuity and optimization of the proposed results;</li> <li>Establish and expand nurseries (partnerships);</li> <li>Provide seedlings (planting / maintenance);</li> <li>Search for partners to promote projects.</li> </ul>
1.7	Understand the site's water risks and opportunities: Assess and prioritize the water risks and opportunities affecting the site based upon the status of the site, existing risk management plans and/or the issues and future risk trends identified in 1.6.			
1.7.1	Water risks faced by the site shall be identified, and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.			"The site identifies the risks related to water at the Credit 360 tool for climate change risks. The risks identified was the reduction of precipitation (lower availability of water) but it is unlikely in probability in the long term (coming 5 years), but with a medium severity. However, this could affect also the hydropower generation, therefore, it would be high severity for energy source. Furthermore, there is a third risk identified of Forest fire (Environmental Park) which was evaluated also as unlikely in probability in the short-term (1-3 years), with a medium severity."
1.7.2	Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.			"The site identifies the opportunities related to water at the Credit 360 tool for climate change risks. The opportunities identified were: - Water consumption efficiency, as the water quantity can affect the energy resources (brazil is highly hydropower) and less need to use the underground water resources. The tool also evaluates the savings and the financial figures."
1.8	Understand best practice towards achieving AWS outcomes: Determining sectoral best practices having a local/catchment, regional, or national relevance.			
1.8.1	Relevant catchment best practice for water governance shall be identified.			<ul> <li>The best practice identified related to governance are:</li> <li>Compliance with regulations</li> <li>Participation in a round table or events</li> <li>Engage actively in projects outside the boundaries of the factories</li> </ul>

Clause	Details	Yes	No	Comments/Evidence
1.8.2	Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.			<ul> <li>For best practice in water balance.</li> <li>Energy and Water Map are examples of best practices for water efficiency as they allow visualizing losses and directing efforts and monitoring water consumption.</li> <li>Water Reduction and Recycling</li> <li>Zero effluents factories</li> </ul>
1.8.3	Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.			<ul> <li>The best practice identified related to water quality are:</li> <li>Compliance with the water quality parameters for the state government for wastewater treatment.</li> <li>To treat the water to a level of recycle / re-use within the site</li> <li>Lower the use of chemicals</li> </ul>
1.8.4	Relevant catchment best practice for site maintenance of Important Water- Related Areas shall be identified.			Collaboration with preserving and improving IWRAs (water streams, aquifer and soil / biodiversity). This could be internally at the site or externally with initiatives of the municipality or other stakeholders.
1.8.5	Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.			The best practice identified related to WASH would be within the site: - Provide safe water drinking facilities to all the persons on site (workers and contractors) - Provide sanitation / hygiene facilities as per local regulation. With relation to WASH in the catchment, the Municipality of Uberlandia is one of the highest ranking in Brazil, therefore, there is no much need of the companies to support in WASH projects outside their site boundaries.
2	COMMIT AND PLAN		•	
2.1	Commit to water stewardship by having the senior-most manager in charge of water at the site, or if necessary, a suitable individual within the organization head office, sign and publicly disclose a commitment to water stewardship, the implementation of the AWS Standard and achieving its five outcomes, and the allocation of required resources.			
2.1.1	A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:			The site has an environmental policy for their EMS, that covers some of the requirements of water stewardship. The policy is available in the intranet

Clause	Details	Yes	No	Comments/Evidence
	<ul> <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>			and included in the integrated management system manual. It is also available at the webpage of BAT Brazil in: http://www.souzacruz.com.br There is a public document, and also an internal one, dated August 2021. "COMPROMISSO SOUZA CRUZ FABRICA UBERLÂNDIA". Created specifically for water. Registration: "COMPROMISSO SOUZA CRUZ FABRICA UBERLÂNDIA". It mentions AWS. The plant manager signs. And it is within the strategic plan on the internet.
2.2	Develop and document a process to achieve and maintain legal and regulatory compliance.			
2.2.1	<ul> <li>The system to maintain compliance obligations for water and wastewater management shall be identified, including:</li> <li>Identification of responsible persons/positions within facility organizational structure</li> <li>Process for submissions to regulatory agencies.</li> </ul>			For legal obligations, they use IUSNATURA which is a service of legal management for the site. The system is called "Cal 4.0". This platform identifies all the applicable regulations for the site. IUSNATURA sends monthly alerts by email of updated regulations. Then, each responsible of the site has a user in the system and fills the information regarding compliance.
2.3	Create a water stewardship strategy and plan including addressing risks (to and from the site), shared catchment water challenges, and opportunities.			
2.3.1	A water stewardship strategy shall be identified that defines the overarching mission, vision, and goals of the organization towards good water stewardship in line with this AWS Standard.			They prepared a Water Road Map with BAT globally, however, not yet an overall water stewardship strategy. The Water Road Map Master is the procedure for the criteria the Water Road Map and for each element it can score from 1 to 4, where 4 is the maximum score. The site focus to improve the elements where the score is lower. There is a public document, and also an internal one, dated August 2021. "COMPROMISSO SOUZA CRUZ FABRICA UBERLÂNDIA". Created specifically for water. Registration: "COMPROMISSO SOUZA CRUZ
				"COMPROMISSO SOUZA CRUZ FABRICA UBERLÂNDIA". It mentions AWS. The plant manager signs. And it is within the strategic plan on the internet.

Clause	Details	Yes	No	Comments/Evidence
2.3.2	A water stewardship plan shall be identified including for each target:	$\boxtimes$		The Water Road Map 2020 includes the following projects for the site:
	- How it will be measured and			<ul> <li>Automatization with sensors at the hand wash basins.</li> </ul>
	- Actions to achieve and maintain (or			- Water use reduction devices to replace at taps and dishwashers
	- Planned timeframes to achieve it			- Continue using the treated waste
	<ul> <li>Financial budgets allocated for actions</li> </ul>			<ul> <li>water for irrigation within the site.</li> <li>Creation of a checklist for toilets to prevent deviations.</li> </ul>
	- Positions of persons responsible for actions and achieving targets			- Water reduction in the compressors.
	- Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.			It is described in the Annual Performance Report. It is specified in terms of persons responsible, actions, targets and costs from 2022 to 2024 (time BAT parameter) and in the action plan.
				For 2022 there is a plan to reduce consumption of 3% from the reduction of losses due to evaporation, embedded water of the final product, human consumption and others.
2.4.1	Demonstrate the site's responsiveness and resilience to respond to water risks			
2.4.1	A plan to mitigate or adapt to identified water risks developed in co- ordination with relevant public-sector and infrastructure agencies shall be identified.			They have an emergency plan for their integrated management system "PROCEDIMENTO PARA CONTROLE DE EMERGÊNCIA" of August 2019, which includes 5 annex for the different situations. It covers situations of chemical spills and fire at the "Parque Ambiental". In it, they establish contingency categories based on quality or quantity restrictions to activate crisis, monitoring and resolution committees. What, who and when.
				For resilience, also the site started identifying the risks related to water at the Credit 360 tool for climate change risks.
				<b>Opportunity for improvement 03 -</b> <b>2021</b> : A supply commitment may be formalized as much as possible with DMAE in the event of a forced shutdown of the supply wells. Within the context of possible future hydraulic tests, or an extreme shortage event.
3	IMPLEMENT			

Clause	Details	Yes	No	Comments/Evidence
3.1	Implement plan to participate positively in catchment governance.			
3.1.1	Evidence that the site has supported good catchment governance shall be identified.			"The best practice identified with related to governance are: - Compliance with the water quality parameters, which was confirmed by the state government - information to Supram - TMAP (state environmental agency) - Participation in a round table in an event organized by the City Hall and Federal University of Uberlândia with the participation of a representative from Coca - Cola and BAT Brazil, disseminating information about the environmental and water resources management of their units." <b>Opportunity for improvement 05 -</b> <b>2021:</b> DMAE announced (informally) during the visit to the installations of the new water catchment in the city of Uberlândia that this year a public call will be opened. Part of the ETA (water treatment) area will be able to receive educational projects focused on water.
3.1.2	Measures identified to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be implemented.			Client indicated there is no indigenous groups in the area
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.			For legal compliance, they use IUSNATURA which is a service of legal compliance check carried out monthly using CAL 4.0. IUSNATURA conducts every year an internal audit of compliance that last for a week. The results are presented in a report "compliance report". The last report was "Relatório de Visita VERIFICAÇÃO DE CONFORMIDADE LEGAL N. 377/20" of November 2020. The platform is permanently updated, as it includes the changes of the legal framework and compliance new information provided by the site. It was also verified the IUSNATURA report of August 6, 2020. ISO 14001 By Lloyds was finalized on 08/06/2021 SQA0701388/2356164. With evidence sent.

Clause	Details	Yes	No	Comments/Evidence
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.			The site has the licenses necessary for the underground water, which is the requirement for operation in Brazil. Client indicated there is no indigenous groups in the area
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.			The Energy and Water Map of the site shows the water efficiency as they allow visualizing losses and directing efforts and monitoring water consumption.
				This site has a monitoring system for water consumption of each of the 4 groundwater wells, as well as the municipal water source.
				With the Energy program, it is possible to monitor water consumption online so that it does not impact the water level in the well and does not exceed the authorized flow.
				With the new fire reservoir in the future the system will receive an update. But the same verification system remains.
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.			Water scarcity does not appear to be a challenge in the area. In the Antea report it is calculated, based on the water balance, that the participation of groundwater
				consumption is 0.21% of the total groundwater in the basin, considering the surface plus underground water, it is 0.02% of the total available in the basin.
3.3.3	Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.			No legally-binding documentation for the re-allocation of water to social, cultural or environmental needs
3.4	Implement plan to achieve site water quality targets.			
3.4.1	Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.			The water quality is adequate for the intended purpose. For industrial use, it is not necessary to use drinking water, so we use underground water. With this practice, we preserve water destined for noble uses and lead to the economy of the municipality with the cost of water treatment and energy consumption.

Clause	Details	Yes	No	Comments/Evidence
				The site has a WWTP and recycle / reuse all the water again in the system, or irrigatin within the site
3.4.2	Where water quality is a shared water challenge, continual improvement to achieve best practice for the site's effluent shall be identified and where applicable, quantified.			The site does not have effluents, as they recycle all the water within the site and then they use it to irrigate the green areas within the site. There are no creeks or rivers that cross through the site.
3.5	Implement plan to maintain or improve the site's and/or catchment's Important Water-Related Areas.			
3.5.1	Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.			"The site collaborates in the CBH Araguari Water Quantity Impact Program, through donating 182 seedling to the Municipal nursery in 2018 and 2019. The seedlings are of native trees that will then be planted by the Municipality for reforestation. It was provided the evidence of reception issued by the Municipality of Uberlandia.
				The site also has a forest/park ""Parque Ambiental Unidade Uberlandia"" of 40 hectares within their land which is to promote biodiversity."
3.6	Implement plan to provide access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers at all premises under the site's control.			
3.6.1	Evidence of the site's provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers onsite shall be identified and where applicable, quantified.			The site provides drinking fountains with drinking water scattered throughout the unit, adequate facilities in toilets, showers in the changing rooms and dissemination of good hygiene practices to employees and contractors
3.6.2	Evidence that the site is not impinging on the human right to safe water and sanitation of communities through their operations, and that traditional access rights for Indigenous and local communities are being respected, and that remedial actions are in place where this is not the case, and that these are effective.			As per above.
3.7	Implement plan to maintain or improve indirect water use within the catchment.			
3.7.1	Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.			With the primary inputs suppliers, such as paper products, they give priority to engage with suppliers that have a sustainable approach. Environmental Legal requirements and sustainable

Clause	Details	Yes	No	Comments/Evidence
				management is one of the criteria for contracting suppliers.
				The big suppliers and contractors, such as transport, are not based in the catchment. However, smaller suppliers or contractors such as catering are of the catchment.
				With the tobacco farmers the maintenance and improvement actions are through the LEAF department, however, the tobacco is from other catchments."
3.7.2	Evidence of engagement with suppliers and service providers, as well as, when applicable, actions they have taken in the catchment as a result of the site's engagement			For the contractors that will work on- site, they conduct awareness sessions, that include water resources for efficiency and prevention of pollution.
	identified.			Also for the canteen, the engineering department is implementing a project for water consumption monitoring and prevention of leakeage. When there is a higher consumption or deviation, the site takes action.
3.8	Implement plan to engage with and notify the owners of any shared water- related infrastructure of any concerns the site may have.			
3.8.1	Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.			N/A as they do not have shared water infrastructure. The external water infrastructure is of the municipality, and the internal is of BAT, but it is not shared.
3.9	Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.			
3.9.1	Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.			The site takes action through: - Compliance with regulations - Participation in a round table or events
3.9.2	Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.			The site takes action through: - Energy and Water Maps of all the BAT sites of the world, in order to compared practices in different countries / sites, which allow visualizing losses and directing efforts and monitoring water consumption.
3.9.3	Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.			The site takes action through: - Compliance with the water quality parameters for the state government for wastewater treatment.

Clause	Details	Yes	No	Comments/Evidence
				- To treat the water to a level of recycle / re-use within the site
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.			The site takes action through: - Having the IWRA on-site of the park of native species
3.9.5	Actions towards achieving best practice related to targets in terms of WASH shall be implemented.			<ul> <li>The site takes action through:</li> <li>Provide safe water drinking facilities to all the persons on site (workers and contractors)</li> <li>Provide sanitation / hygiene facilities as per local regulation.</li> </ul>
4	EVALUATE			
4.1	Evaluate the site's performance in light of its actions and targets from its water stewardship plan and demonstrate its contribution to achieving water stewardship outcomes.			
4.1.1	Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.			The site collects the data and fill the "Credit 360"" tool that is for monitoring globally the water consumption and effluents. These are focused mostly on water quantity,
4.1.2	Value creation resulting from the water stewardship plan shall be evaluated.			Effluent flow & recycling Effluents and stormwater are tracked throught the compliance method
4.1.3	The shared value benefits in the catchment shall be identified and where applicable, quantified.			As this site does not have effluents to the exterior, the waste water quantity appear in the Credit 360 as recycling for activities that does not require high water quality and otherwise, recycling for irrigation of the forest area with native species.
4.2	Evaluate the impacts of water-related emergency incidents (including extreme events), if any occurred, and determine the effectiveness of corrective and preventative measures.			
4.2.1	A written annual review and (where appropriate) root-cause analysis of the year's emergency incident(s) shall be prepared and the site's response to the incident(s) shall be evaluated and proposed preventative and corrective actions and mitigations against future incidents shall be identified.			The assessment of targets in relation to the water stewardship plan is in the Annual Performance Report 2020/2021, dated 11/3/2021 and publicly posted in October 2021. The site did not have any emergency situation this year
4.3	Evaluate stakeholders' consultation feedback regarding the site's water stewardship performance, including the effectiveness of the site's engagement process.			

Clause	Details	Yes	No	Comments/Evidence
4.3.1	Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.			The stakeholder engagement plan is based on the SVA report, there is a matrix there, and as a result they already interact with CODEMA and FIEMG. The possibility is identified with the University, and on 10/13/21 a work plan was sent that has the potential to be implemented in December 2021.
4.4	Evaluate and update the site's water stewardship plan, incorporating the information obtained from the evaluation process in the context of continual improvement.			Resolved in SVA report item 11.1
4.4.1	The site's water stewardship plan shall be modified and adapted to incorporate any relevant information and lessons learned from the evaluations in this step and these changes shall be identified.			They have a plan which is made available to the public. As a complement to all the plan's initiatives, there is an annual review document in Excel called the PLANO DE ATUALIZAÇÃO DAS INFORMAÇÕES BASE. Evidence: PLANO DE ATUALIZAÇÃO DAS INFORMAÇÕES BASE
5	COMMUNICATE & DISCLOSE			
5.1	Disclose water-related internal governance of the site's management, including the positions of those accountable for legal compliance with water-related local laws and regulations.			
5.1.1	The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.			The Annual Performance Report and the STRATEGIC PLAN are the public and signed documents that demonstrate the commitment. And there is also a Communication Manual
5.2	Communicate the water stewardship plan with relevant stakeholders.			that guides you through the procedures that should be followed to publicly communicate all aspects of
5.2.1	The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.			water resources management and AWS.
5.3	Disclose annual site water stewardship summary, including the relevant information about the site's annual water stewardship performance and results against the site's targets.			
5.3.1	A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.			

Clause	Details	Yes	No	Comments/Evidence
5.4	Disclose efforts to collectively address shared water challenges, including: associated efforts to address the challenges; engagement with stakeholders; and co-ordination with public-sector agencies.			
5.4.1	The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.			
5.4.2	Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.			
5.5	Communicate transparency in water- related compliance: make any site water-related compliance violations available upon request as well as any corrective actions the site has taken to prevent future occurrences.			
5.5.1	Any site water-related compliance violations and associated corrections shall be disclosed.			The regulators make public the permits granted to the facilities, therefore, their information is available transparently. Also, any violation is available at the portal, but they had none in the portal.
5.5.2	Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.			N/A as there were no water-related compliance violations, as shown in the government portal.
5.5.3	Any site water-related violation that may pose significant risk and threat to human or ecosystem health shall be immediately communicated to relevant public agencies and disclosed.			They did not have any water-related violation that may pose significant risk and threat to human or ecosystem health. And the site confirmed that they did not have any water-related violation on the last year