



Alliance for Water Stewardship Assessment Report

Prepared for Tabaqueira - Empresa Industrial de Tabacos, S.A.

Prepared by: SGS
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SIGNED:	
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1 EXECUTIVE SUMMARY

The scope of services covers the re-assessment in compliance with the AWS International Water Stewardship Standard Standard Version 2.0 for Tabaqueira - Empresa Industrial de Tabacos, S.A., a Philip Morris International affiliate, for Tabaqueira Factory, Rio de Mouro, Sintra, Portugal. The re-assessment has been completed in compliance with AWS Certification requirements, Version 2.0, March 2019.

Philip Morris International is a company that manufactures tobacco related products, with more than 80,000 employees. It has operations world-wide, and in Portugal they established Tabaqueira - Empresa Industrial de Tabacos, S.A.

Given the document review performed, verification of evidence and site visit inspections conducted by the audit team, SGS recommends that Tabaqueira - Empresa Industrial de Tabacos, S.A. continues to have the status of AWS Core Certified and next year a surveillance audit will be conducted.

There were nil non-conformances raised during the course of the audit process. Two observations were identified during this audit, and the old one previous observation was closed. At next surveillance audit in 2022, the new observation will be reviewed.

2 SCOPE OF ASSESSMENT

The scope of services covers the re-assessment to the AWS International Water Stewardship Standard Standard Version 2.0 for Tabaqueira - Empresa Industrial de Tabacos, S.A, a Philip Morris International affiliate, for Tabaqueira Factory, Rio de Mouro, Sintra, Portugal. For the previous cycle they were certified with CORE level, and now they presented evidence to maintain the same level of certification. The assessment has been completed in compliance with AWS Certification requirements, Version 2.0, March 2019.

The assessment was conducted during 4 days on site by a Lead Auditor, the 10th – 13rd May, 2022, SGS Portugal, S.A., (hereinafter referred to as “SGS”) conducted the conformity assessment for site’s facilities and activities with regard to the AWS Standard. Tabel 2.1 presents SGS audit team.

Table 2.1. SGS Audit Team

Audit Team		
Lurdes Brandão Guerra	Leader auditor and local expert	AWS certified auditor, with more than 10 years in environmental impact assessment and HSE monitorizations, ISO 14001 audit and training.
Paula Gómez	Technical Reviewer	AWS certified auditor, with more than 14 years experience in pollution control, environmental impact assessment, ISO14001 audit and training.

The geographical scope has been only the Tabaqueira Factory. The water used is mostly from the Laje sub-catchment, part of the Tejo catchment. The site is a tobacco Manufacture of Tobacco related products (Figure 1).



Figure 1: Diagram of the Tabaqueira Factory

The audit interviews were held for Tabaqueira and stakeholders over three days for their water efficiency projects, WASH activities in the community, etc. Tabaqueira and the stakeholders provided the requested supporting documentation as evidence whilst interviewed. SGS provided feedback on observations and findings raised during the closing meeting of the audit on the 13rd May 2022 at Tabaqueira Factory. The external stakeholders visited and interviewed onsite were during the audit:

- GNR (Guarda Nacional Republicana – local military authorities);
- Eurest (Local canteen responsible);
- Tekbox (WWT Plant responsible).

The internal stakeholders visited and interviewed onsite were during the audit: Tabaqueira E.I.T., S.A., personnel of different areas, such as:

- Sustainability
- Engineering
- External Affairs
- Production
- Community gardens;
- LEAF of Philip Morris International, which is not factory, but the area that coordinates with the tobacco growers and implements the sustainability projects.

3 STAKEHOLDER ANNOUNCEMENT AND CONSULTATION

Following the AWS Certification Requirements, before the on-site conformity assessment, site's prepared a stakeholder announcement, which stated intention to pursue AWS certification, level Core. The pursue of AWS certification for the site was publicly available on AWS site and in Tabaqueira, E.I.T. Linkedin, onsite factory disclosure pannels and Líder Magazine, at least one month in advance, according to the consulted records during the audit (5th and 6th of April 2022).



The image displays two screenshots of Tabaqueira's sustainability announcement. The left screenshot is from the Líder Magazine website, showing an article titled "Tabaqueira reafirma o seu compromisso com a sustentabilidade e boa gestão de recursos hídricos". The article mentions Tabaqueira's commitment to sustainability and water management, and includes a link to the "Relatório de Desempenho da Água 2021". The right screenshot is from Tabaqueira's LinkedIn profile, showing a post about the same topic. The post includes the text: "Para a Tabaqueira, a redução da pegada ambiental e a gestão sustentável dos recursos limitados do planeta são tão importantes quanto a redução da toxicidade dos produtos, o respeito pelas pessoas na cadeia de valor e a excelência operacional. Por esse motivo, assumimos o compromisso de utilizar a água de forma responsável, onde quer que operemos, o que já nos valeu uma certificação: a AWS – International Water Stewardship Standard." and a link to the "Relatório de Desempenho da Água 2021".

They have shared this information with their external stakeholders and their employees with some internal tools as screens in the factory.

4 DESCRIPTION OF CATCHMENT

Tabaqueira is in the basin of Ribeira do Marmelo. The Ribeira do Marmelo flows into the Ribeira de Laje, which in turn drains into the sea. Both streams are part of a larger basin. The basin of the Tejo River, which is the largest river in the Iberian Peninsula. The Tejo River is an International river, which is under a cross-border treaty (Portuguese and Spanish) that determines the minimum flow that crosses the border between the two countries.

The banks of the Marmelo and the Laje are both small and of intermittent flow, which almost disappears in the summer. The summer flow is mostly from industrial and household discharges.

Note that the site does not have any withdrawal from the water streams or rivers itself, as it is indirectly at this catchment because of the water municipal source that withdraws from the Tejo catchment for all the region.

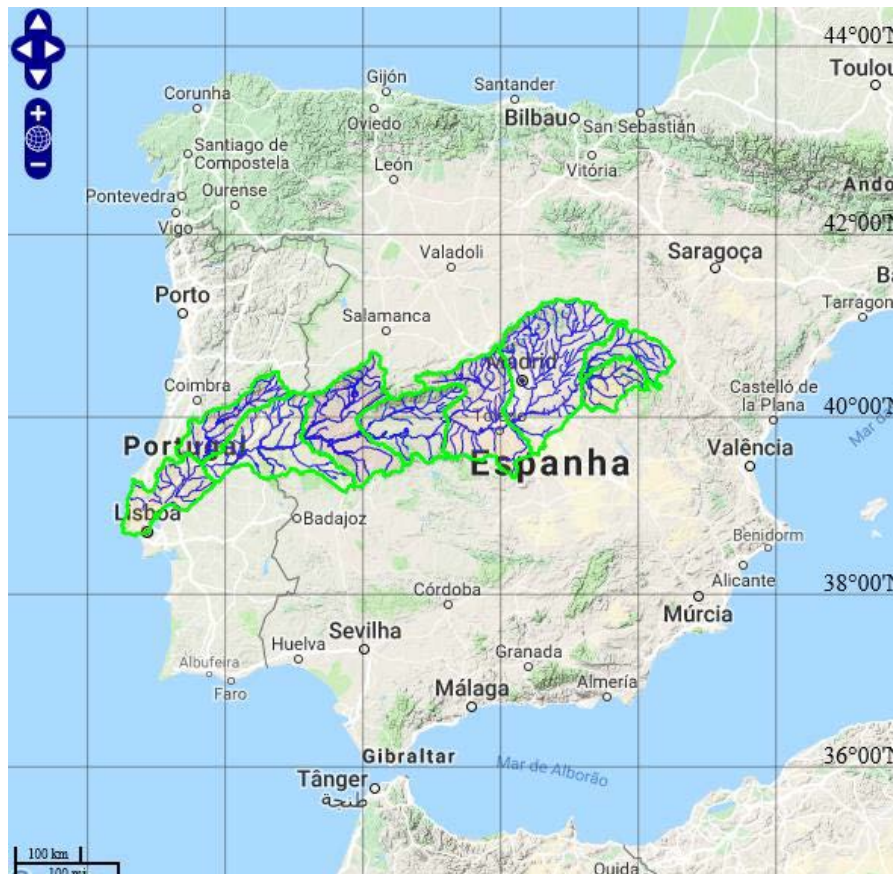


Figure 2: Tejo Catchment (www.riversnetwork.org)

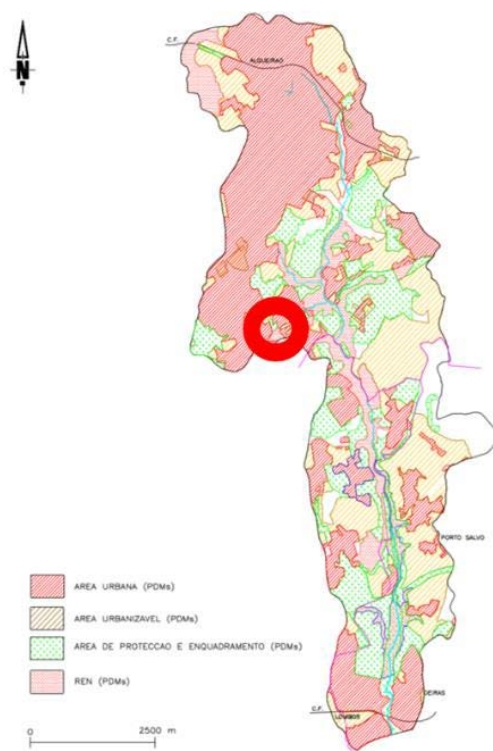


Figure 3: Laje Sub-Catchment

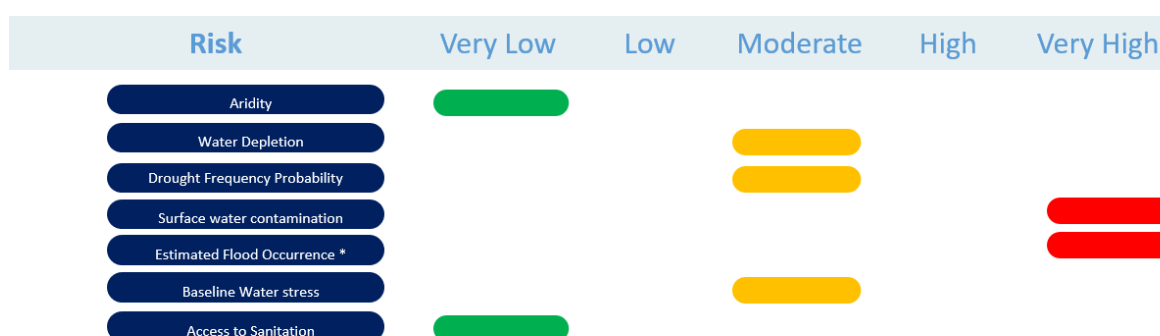


Figure 4: Santo Amaro Beach (Laje Sub-Catchment end-point)

Access to Sanitation



Water Risk Filter – PMI Portugal_Tabaqueira



* The estimated flood occurrence was estimated through a local analysis with local consultants.

Source : <http://waterriskfilter.panda.org/en/Explore/Map>

Figure 5: Graphics based on <http://waterriskfilter.panda.org> and the reflection made by Tabaqueira due to the shared water challenges

Tabaqueira E.I.T. presented their shared water challenges, considering the “Waterriskfilter” tool with a small PowerPoint presentation, including the new substation and identifies 11 important water related areas (source: protectedplanet.net) in the catchment area (WDPA ID: 127879 / 555531123; WDPA ID: 13341; Praia de Santo Amaro; WDPA ID: 555623260; WDPA ID: 555531078; WDPA ID: 555540884; WDPA ID: 5783; WDPA ID: 555531099; WDPA ID: 555531113; WDPA ID: 388861; WDPA ID: 20673).

Additionally, as a result of the last follow-up audit, the “AWS Stakeholders and Challenges” matrix was updated considering the observation raised. So, for each stakeholder, the site has a different potential to influence them, depending on their roles, interests and relationships, and Tabaqueira implemented different categories of methods of influence.

6 INDICATORS CHECKLIST

As per the requirement set out in the AWS certification requirements it was prepared a checklist of all the CORE AWS indicators with the relevant reviewed evidence provided by Tabaqueira and the indicator with which it is associated. The checklist was aligned to the clauses / indicators of the AWS standard Version 2.0. See ANNEX CHECKLIST in this report.

7 AUDIT FINDINGS

The observation raised during the previous follow-up audit were closed. No non-conformities were identified. Two new observation were raised for future improvement, which will be reviewed at next audit.

Relating to Previous Audit Results:

The observation noted during the previous audit (2021 period) were analyzed and considered an asset to the organization, both locally and to other affiliates of the PMI group, thus were implemented as part of the continuous improvement promoted by the AWS standard.

Table 1: Previous Audit – One observation pointed during the AWS follow-up audit process

No.	Type	Ref.	Details	Review Actions	Status
01	Observation	1.2.2	For each stakeholder, the site will have a different potential to influence them, depending on their roles, interests and relationships. So, Tabaqueira can implement different categories of methods of influence that include four different categories, like mentioned in the AWS Standard 2.0 Guidance (Jan2020).	01	Observation

ENDORSED:

Considering a continuous improvement approach, Tabaqueira solve the "Observation 1" raised in the last follow-up audit. The "AWS Stakeholders and Challenges" matrix was updated considering the observation raised. So, for each stakeholder, the site has a different potential to influence them, depending on their roles, interests and relationships, and Tabaqueira implemented different categories of methods of influence. Additionally, the internal and external stakeholders were separated in this renewed matrix, allowing a clearer approach to the necessary interactions with stakeholders.

Relating to this Audit Results:

Table 2: Observations identified during the AWS recertification audit process

No.	Type	Ref.	Details
01	Observation	4.1.1	<p><i>"Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated."</i></p> <p>The requirement is met, but the way the information is presented was not clear for tracking the compliance and contribution of the actions to each of the "outcomes" mentioned by the AWS standard.</p>
<u>ENDORSED:</u> On the last day of the audit, Tabaqueira team were kind enough to reformulate the contents of the document "Evaluation of water stewardship strategy plan", including a clear and unambiguous reading of the effective contribution (in %) of the implemented actions, since 2019 and until 2021 for each of the "outcomes" of the AWS Standard. Therefore, this is an implemented observation.			
02	Observation	4.1.3	<p><i>"The shared value benefits in the catchment shall be identified and where applicable, quantified."</i></p> <p>There is a need for Tabaqueira to report more fully, on the benefit that its actions originate for the watershed, in its sphere of influence, whether this is a financial benefit or not, with quantified contributions. It can also be a qualitative benefit, such as improving the natural capital and services of surrounding ecosystems, or improving water security.</p>

8 SUMMARY

In reviewing the evidence presented by Tabaqueira, it is apparent that a considerable quantity of effort and work has been put into the preparation for the audit for Alliance for Water Stewardship Certification.

The observation of last visit is closed.

Two observations were made during the audit. However, one of them was closed before closing the audit. This one would be considered as area for improvement which will be reviewed in the follow-up audit.

Non major and minor non-conformities have been identified.

9 CONCLUSIONS AND RECOMMENDATIONS

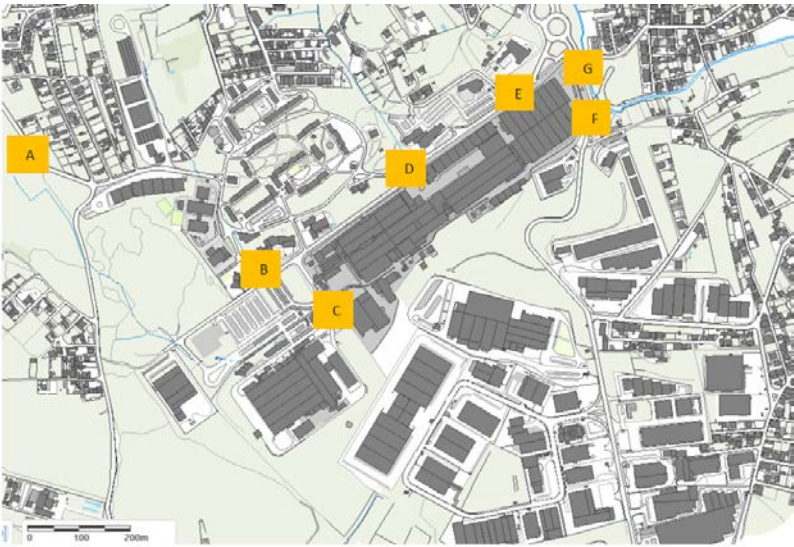
Given the evidence review and the site visit inspections performed, SGS recommends that **Tabaqueira, E.I.T, S.A.** located at Av. Alfredo da Silva 35 – Albarraque, 2639-002 Rio de Mouro, Sintra, Portugal is awarded **AWS Core Certified** status with a surveillance audit interval of annual frequency.

10 REFERENCES

- PMI Environmental Commitment v1.09/24.09.2018 (in English);
- Commitment at Portuguese market webpage (in Portuguese);
- EHS Manual TP-EHS-1 of 25th June 2020;
- AWS Master Plan – 2022;
- “Directriz da Agua” TP-ENV-1 v2.0.0 of 25th June 2020;
- “AWS Assessment - Preliminary results Catchment area and shared water challenges” in October - November, 2018, Updated 12.3.2019;
- Water Risk Filter - PMI Portugal_Tabaqueira;
- Caracterização da situação existente, diagnóstico da situação actual e projecto de execução para controlo de caudais pluviais em situação e cheia na zona da fábrica da Tabaqueira;
- Water Sankey Diagram, May 2022;
- AWS Strategy and action plan;
- “OGSM” Objectives, Goals, Strategies and Measurements;
- “Plano de Segurança – Medidas de Autoproteção” from July 2017;
- Tabaqueira EIT S.A. Business Continuity Plan «Report – Phase 1»;
- Stakeholder Interviews Summary;
- Planeamento da Monitorizacao das Águas na Tabaqueira 2021 e 2022;
- Relatorio e Contas Tabaqueira;
- Local Management Review Agenda and Meeting Notes 2021;
- Regulations;
- Monitoring Records;
- 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	<p>The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including:</p> <ul style="list-style-type: none"> - 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. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>The site prepared the document "Directriz da Agua" TP-ENV-01 which is the "Water Framework" (last update in 2nd of July 2021, which includes the previously planned substation project – renaturalization of cross between substation water flow and Ribeira do Marmelo, mitigation of flooding risks in Marmelo River and Lage River). The mentioned document defines where data was collected, where assess risk was made and the geographical scope for stakeholder engagement, including the site map, which shows the surrounding areas and buildings. The council classification of the site is "mixed zone which is industrial and residential". It specifies that the total area of the facility is 122 571 m² with 56 664 m² of buildings. It shows the neighbours which are:</p> <ul style="list-style-type: none"> • To the north, it has a residential area, a health centre, schools and minor commerce. • To the south, there is a factory, chemical warehouses. • To the east, there is a National Road • To the west, there is a printshop, community gardens and non-built land and the most recent project, the substation (a damping basin was constructed, originating from the new AT 60/10 kV substation and merging into Ribeira do Marmelo, with the objective of mitigating flooding. This initiative allowed a better control of the flood flow and ensure that the population and stakeholders don't suffer from this issue, assuring the stability of biodiversity as well). Additionally, to implement the substation an environmental impact assessment was conducted. Regarding the descriptor Water Resources and Water Quality, the non-implementation of the current project maintains, in general, the characteristics described in the baseline situation, since no significant changes are expected to be observed in the time scale considered, with the exception of the intensification of the exploitation, both of the more superficial water levels and of the deeper water levels in the groundwater body of the undifferentiated western border of the Tagus Basin, through the construction of new groundwater abstractions. However, Santos (2003) refers to the existence of a trend towards a redistribution of rainfall throughout the year, with a greater number of periods of heavy rainfall and, on the other hand, the occurrence of periods of very low rainfall, which is conducive to the occurrence of floods and periods of drought. <p>These meteorological changes will predictably lead to a decrease in water infiltration and recharge of aquifers, with a consequent lowering of groundwater and piezometric levels. The lowering will be noticed significantly in free aquifers, more exposed to direct recharge.</p> <p>The map shows a detailed plant diagram that draws internally each of the buildings of the facility, the water stream (creeks) that runs through the factory which is called "Ribeira do Marmelo". There are other 3 water streams that feed into Ribeira do Marmelo at the Factory. These are: Ribeira do Bairro da Tabaqueira, Ribeira de Albarraque and Ribeira de Varge Mondar. The map also shows the starting point of the Ribeira do Marmelo which is located north of the Factory. Furthermore, it is shown a water stream to the East of the factory that runs through the nearby areas.</p>

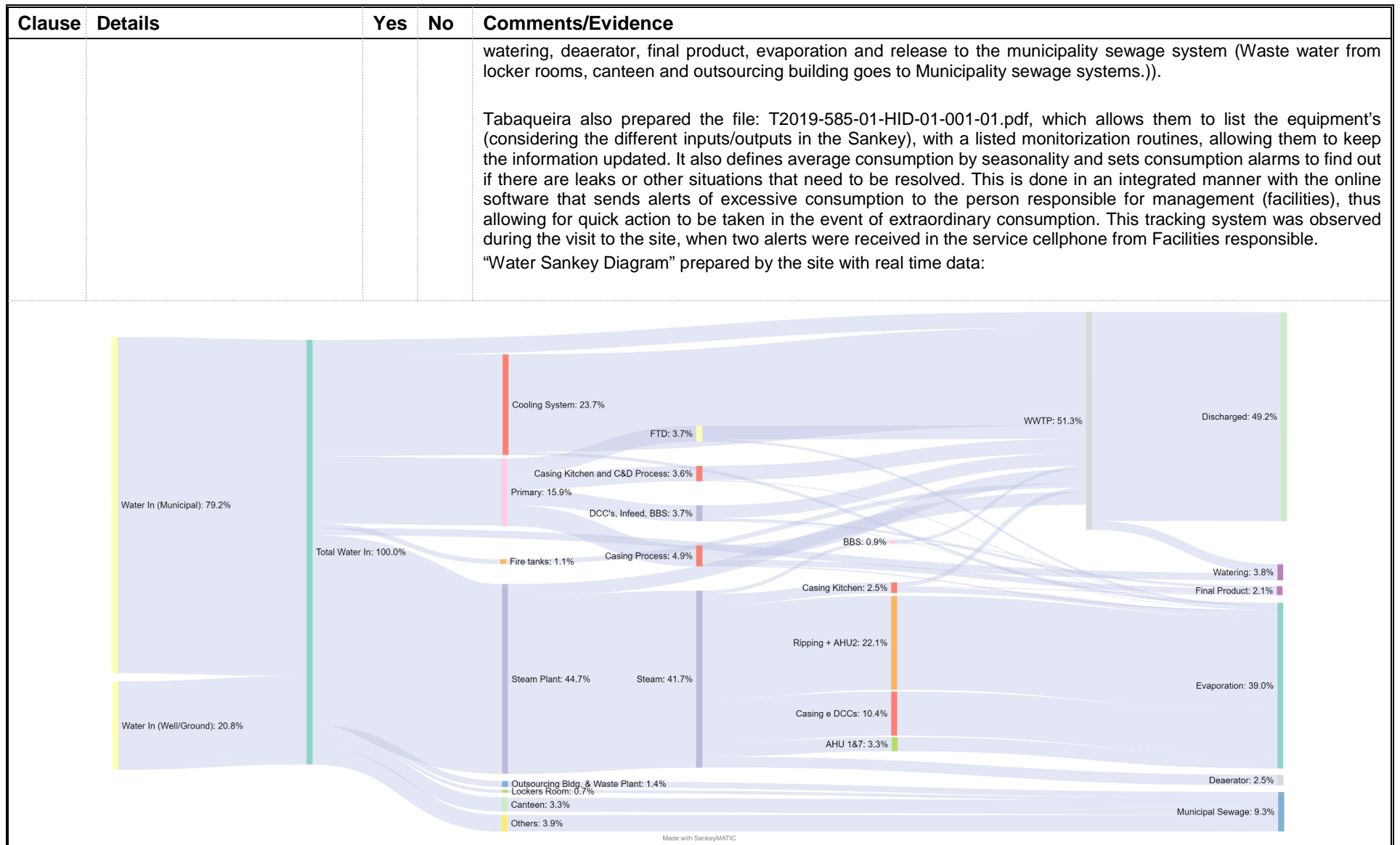
Clause	Details	Yes	No	Comments/Evidence
				<p>Therefore, the site's boundaries are clearly defined. Tabaqueira does not use any water from the Ribeira da Laje, but discharges into it, not directly, but through the Ribeira do Marmelo, which passes within the factory.</p> <p>The water discharge point is also shown (and mapped in the <u>Directriz da Agua</u>" TP-ENV-01) as it is the Ribeira do Marmelo exit point from the Factory and the level of treatment from this effluent is tertiary. The document also clarify the relevant catchment to the site's water and wastewater. This document considers also the pipeline network for drinking water and wastewater.</p>  <p>A. Spring of Ribeira do Marmelo; B. Ribeira do Bairro da Tabaqueira; C. Ribeira do Marmelo; D. Ribeira de Albarraque; E. Ribeira de Varge Mondar; F. Exit from Ribeira do Marmelo (factory); G. Watercourse that passes near the Plant.</p> <p>Tabaqueira receives its drinking water from the municipal water and sanitation services of Sintra (SMAS-Sintra), which in turn receives water from the Empresa Pública de Águas de Lisboa (EPAL). The consumption of Tabaqueira is about 170m³/day representing only 0.21% of the daily distribution of SMAS-Sintra). SMAS-Sintra is supplied by EPAL, and Tabaqueira's consumption represents approximately 0,02% of EPAL's supply system. These values support the</p>

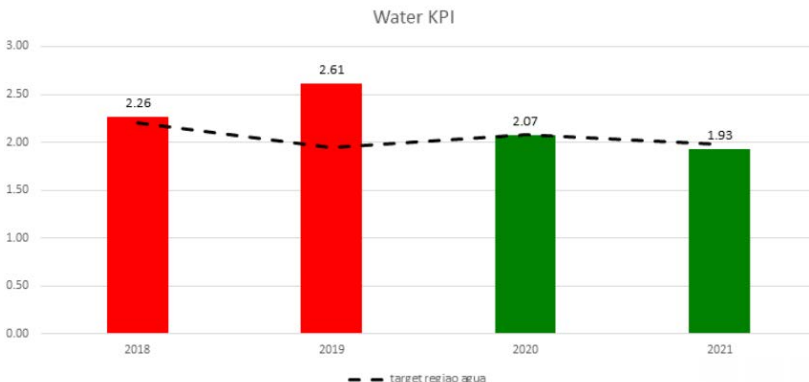
Clause	Details	Yes	No	Comments/Evidence
				<p>decision to consider the Marmelo stream and the basin where it is inserted, the Laje basin as Tabaqueira's area of influence.</p> <p>Internally, they have prepared "Plano de Amostragens 2022" which facilitates the monitoring plan in continual improvement and update, as it provides the links. This is in constant articulation with Facilities department. This plan accommodates a Legionella preventing monitorization on it. It was updated in 20th october 2021 (Sustainability/Facilities team insert notes and other relevant information and so it is a dynamic document of continuous monitorization). Periodicities redefined due to some cases of legionella detected in the system but without evidence of cases in workers. Direct articulation between accredited laboratory (Agroleico) and disinfection by adiquimica. TEKBOX continues as internal control (double sampling).</p> <p>At the IMS Manual it is explained the scope of the management system, the processes and activities involved, which are requirements of ISO 14001 and ISO 45001 (validity 22nd November 2022, issued at 5th February 2021).</p> <p>The internal document "<u>Diretriz AWS</u>" has an adapted google map of the facility called "Localização das infraestruturas relacionadas diretamente com o uso da água, na qual a empresa tem ação direta" where it was marked the boundaries and the key locations:</p> <ul style="list-style-type: none"> • The entry point for the municipal water source, with water meter, and the Water storage reservoirs associated • Community Gardens • Groundwater treatment (osmosis) for steam production • Wastewater treatment plant for effluents of the facility, and the treated water storage tanks for irrigating the gardens • Fire emergency water tanks (2). <p>The municipal water provider is SMAS (Serviços Municipalizados de Águas e Saneamento de Sintra).</p> <p>The groundwater of the site is rain water that accumulates at the basement of the factory. About 5 years ago, the factory implemented a project to recuperate this water and treat it with osmosis for generating steam, instead of pumping it and returning it to the river. This didn't require any license or permit as they didn't have to dig a well and is not using an aquifer.</p> <p>The factory does not use the water of the "Ribeira do Marmelo" water stream as a source of water.</p> <p>The same document "Directriz AWS" is used for effluent discharges.</p>

Clause	Details	Yes	No	Comments/Evidence
				<p>The effluents of the site are treated in the WWTP which includes equalization, activated sludge, aerobic treatment, flotation, chlorine station and filtration. Then, when the water achieves the regulatory thresholds, it can be released to the water stream or used for irrigating the gardens.</p> <p>They have a license L006727.2021.RH5A, with validity until 14/04/2026 for water discharge which includes the release to the water stream "Ribeira do Marmelo". Additionally, the national water law has changed and for irrigating the gardens they need an additional license (Awaiting issuance - consulted the last reinforcement made to the competent authorities (Agência Portuguesa do Ambiente - APA) by email on 30th September 2021, also sending all the elements requested by the authorities to close the licensing process). The substation implemented on site also has a permit to wastewater rejection, under the licence L001455.2019.RH5A from 25th January 2019 until 24th January 2024.</p> <p>For contingency plan, the site has a connection to the municipal waste water sewage system, which is not used in normal situation, but Tabaqueira implemented this connection in 2009-2010 for any potential situation where they are unable to discharge to the water stream. The site has a municipal permit for this purpose (N/Ref. D2090118389 from 26th November 2019 with expiration date in 30th November 2029).</p> <p>Tabaqueira is in the basin of Ribeira do Marmelo. The Ribeira do Marmelo flows into the Ribeira de Laje, which in turn drains into the sea. Both streams are part of a larger basin. The basin of the Tejo River, which is the largest river in the Iberian Peninsula. The Tejo River is an International river, which is under a cross-border treaty (Portuguese and Spanish) that determines the minimum flow that crosses the border between the two countries.</p> <p>The banks of the Marmelo and the Laje are both small and of intermittent flow, which almost disappears in the summer. The summer flow is mostly from industrial and household discharges.</p> <p>The Diretriz da Agua document, includes this description and a map of the catchments. The first map is for the Tejo River catchment, and the second map is for the Laje sub-catchment which is where the site is located and it is shown the end-point at the sea.</p> <p>Note that the site does not have any withdrawal from the water streams or rivers itself, as it is indirectly at this catchment because of the water municipal source that withdraws from the Tejo catchment for all the region.</p> <p>Tabaqueira prepared the presentation, considering Water Risk Filter application, in october 2021. In this presentation, they are included the maps of the catchment, sub-catchment and key locations. Furthermore, the Water Risk Filter tool was used to identify the:</p> <ul style="list-style-type: none"> • Water Depletion (3-moderate risk) • Surface water contamination (5-very high risk) • Estimated occurrence of floods (1-very low risk): however, Estimated Flood Occurrence at local scale and historic occurrences/data shows a different paradigm. The estimated flood occurrence was estimated through

Clause	Details	Yes	No	Comments/Evidence
				<p>a local analysis with local consultants. To face this, Tabaqueira have some hidrological/hydraulic studies in this area from where resulted the renaturalization of the ribeira that passes inside Tabaqueira's parking lot that now works as a water buffer (retention basin).</p> <ul style="list-style-type: none"> • Drought frequency probability (3-moderate risk) • Aridity (1-very low risk) • Baseline water stress (3-moderate risk) • Access to sanitation (1-very low risk) <p>This presentation includes the new substation and also identifies 11 important water related areas (source: protectedplanet.net) in the catchment area (WDPA ID: 127879 / 555531123; WDPA ID: 13341; Praia de Santo Amaro; WDPA ID: 555623260; WDPA ID: 555531078; WDPA ID: 555540884; WDPA ID: 5783; WDPA ID: 555531099; WDPA ID: 555531113; WDPA ID: 388861; WDPA ID: 20673).</p>
1.2	Understand relevant stakeholders, their water-related challenges, and the site's ability to influence beyond its boundaries.			
1.2.1	<p>Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall:</p> <ul style="list-style-type: none"> - Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people; - Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies; - Provide evidence of stakeholder consultation on water-related interests and challenges; - Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups; - Identify the degree of stakeholder engagement based 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>The site prepared an excel spreadsheet "AWS Stakeholders and Challenge" (last update 8th of April 2022), which includes the identification of stakeholders, internal and external with identification of their location, according to their watershed, Description, Water Related Challenges, Interest of Stakeholder Influence of Stakeholder, Stakeholder Influence and Interest Matrix, Current Influence of TAB/Power of Stakeholder, Potential Influence between Tabaqueira and Stakeholder Relationship, First AWS engagement and Engagement to Date. These are:</p> <ul style="list-style-type: none"> • Internal stakeholders: Farmers of Community Gardens, Workers and contractors, TDGI and Eurest; • External stakeholders: Corporate PMI, SMAS Sintra, Municipality of Sintra, APA/ARH, DS Smith, Amcor, ICM Trans, ABAE (Associação Bandeira Azul da Europa), Municipality of Oeiras, Movimento Claro, ISPA, Local community, Customers, Clients/Retail, CIP - Confederação Empresarial de Portugal, BCSD – Portugal, GRACE, APEE, GNR Sintra, Bombeiros Voluntários S.Pedro de Sintra, Global Media Group, CECD Mira Sintra, ICNF, AMO (Associação Mãos à Obra Portugal) e Fundação Aga Khan Portugal. <p>The AWS Stakeholders and Challenge and this information is linked to AWS Master Plan 2022, and in this document reflects the benefit/cost relation for environmental, social and economic value considering each stakeholder type (i.e. Environment protection and awareness & Sustainability; River and sea pollution. Flooding in urbanized areas; Local communities; etc.).</p>

Clause	Details	Yes	No	Comments/Evidence
	on their level of interest and influence.			
1.2.2	Current and potential degree of influence between site and stakeholder shall be identified, within the catchment and considering the site's ultimate water source and ultimate receiving water body for wastewater.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The "Directriz da Agua" TP-ENV-01" document, defines that the site's sphere of influence is the Laje catchment which is the closest area to the site as per AWS guidance, aligning to each of the stakeholders identified. The matrix of "Riscos e Oportunidades" (last update 2/5/2022) identifies the risks, and the actions to implement in AWS Master Plan2022 and for each stakeholder, it is determined their level of influence. This matrix has a detailed update to desegregate more the information and facilitate the implementation and actions on site. As a result, there is an action (or more) proposed for each stakeholder. The evaluation is high, medium or low. As a result, there is an action proposed for each stakeholder.
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Their Integrated Management System Manual includes the water stewardship, and it was supported with the document created "Directriz AWS". Furthermore, Tabaqueira has the "Directriz da Água" which is the water stewardship plan. The incident response plan is for flooding which is also regulated (explained above).</p> <p>The organization is well aware of water-related emergencies and anticipates the need to be prepared to react to them. Tabaqueira defined an emergency-response plan that addresses water-related risks and events. It is be part of a general incident response plan, but also includes specifically water-related events, which is the "<u>Plano de Segurança – Medidas de Autoproteção</u>" from July 2017. This is the document that describes the emergency response plan and it mentions the action plan in case of flooding, droughts or extreme natural events, for example.</p> <p>Also, Tabaqueira has another document "Autorização de Ligação de Contigência" that further defines who the communication channels are and how the discharge communication takes place.</p> <p>For other type of incidents such as chemical spills, they use their procedures of ISO 14001 and OHSAS 18001.</p> <p>The "Sustainability alerts" were created in 2021. Thus, whenever occurrences linked to environmental issues are detected, a "Sustainability alert" is launched, which briefly describes the occurrence, its origin and actions to mitigate or eliminate it. As a good practice, the procedure was adopted globally at PMI.</p>
1.3.2	Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>The document "<u>Caracterização da situação existente, diagnóstico da situação actual e projecto de execução para controlo de caudais pluviais em situação de cheia na zona da fábrica da Tabaqueira</u>" has the water balance of the Laje catchment, and maps of the area. Through the water risk filter tool, it was shown that the site is not in a water stress area.</p> <p>The site prepared a water balance, which is an assessment of water inflows, throughflows and outflows, onsite water storage and changes in storage, between January 2021 and December 2021, including all the sources and releases of water. There are 2 water sources (municipal and groundwater) and 6 releases (treated wastewater to the river,</p>



Clause	Details	Yes	No	Comments/Evidence
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Tabaqueira updated their water balance (considering January 2021 until December 2021, a one-year timescale). They undertake a more detailed water balance study to focus on the streams that were not measured directly such as steam, mapping of water consumption and additionally mapping the water meters to consider or not, where it would be important to install new ones in the future and a new alert system. This water balance is useful for verifying that water volumes and flows are reliably measured and accounted for.</p> <p>The information related with annual variance in water usage rates was considered in the integration of all water-related control in plant defining consumption alarms to find out if there are leaks or other situations that need to be resolved. This is done in an integrated manner with the online software that sends alerts of excessive consumption to the person responsible for management, thus allowing for quick action to be taken in the event of extraordinary consumption. Since 2018, Tabaqueira reduced water consumption by 14,6%.</p>  <p>In 2018 and 2019, Tabaqueira evidenced significant deviations from the water consumption KPI due mainly to the method of calculating it (formula below) - the total volume was affected by lower tobacco exports out of PMI.</p> $\frac{m^3 \text{ água}}{\text{Volume Cigarros} + \text{Volume Semi Produto Exportado para fora da PMI}}$
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,	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>For the water effluents, there is a legal requirement given the existing national framework on wastewater discharges (Decree-Law No. 152/97, June 19 (amended by Decree-Laws Nos. 348/98, 261/99, 172/2001, 149/2004, 198/2008, 133/2015)). It also includes some mandatory testing. Some tests are conducted in-house and some tests are independently conducted by third parties (Adiquímica). For the water quality of the site's source's (provided waters) it is controlled in the entry by in-house conducted tests (and it is provided by the local provider of water SMAS Sintra, which controls the water network/quality of water). The receiving water bodies are well identified: Ribeira do Marmelo and that influences the quality of the water downstream, in Ribeira da Laje and Beach of Santo Amaro de Oeiras. The new water discharge license defines the quality control only in the exist of the plant, but in a preventive way, Tabaqueira maintains the quality control on entry and exit of the plant. The site maintains records of the quality of all incoming water</p>

Clause	Details	Yes	No	Comments/Evidence
	seasonal, high and low variances shall be quantified.			<p>supplies, outgoing effluent (after treatment in the WWTP) and of water bodies that receive the effluent. For example, several analysis reports were consulted during the site visit, to water and wastewater quality data that if used to verify compliance.</p> <p>1st Quarter 2021</p> <p>February (2021_1848 de 11/02/2021): WWTP Exit: pH; COD; BOD5; TSS; Total phosphorus (24-hour composite sample) - all parameters met - within all ELVs;</p> <p>March (2021:4026 de 25/03/2021): WWTP Exit: pH; COD; BOD5; TSS (24-hour composite sample) - all parameters met - within all ELVs;</p> <p>2nd Quarter 2021</p> <p>May (2021_6678 de 13/05/2021) WWTP Exit: pH; COD; BOD5; TSS; Total phosphorus (24-hour composite sample) - all parameters met - within all ELVs;</p> <p>June (2021_8495 de 11/06/2021) WWTP Exit: pH; COD; BOD5; TSS (24-hour composite sample) - all parameters met - within all ELVs;</p> <p>3rd Quarter 2021</p> <p>July (2021_10804 de 15/07/2021 WWTP Exit: pH; COD; BOD5; TSS; Total nitrogen (24-hour composite sample) - all parameters met - within all ELVs;</p> <p>September (2021_15419 de 23/09/2021) WWTP Exit: pH; COD; BOD5; TSS (24-hour composite sample) - all parameters met - within all ELVs;</p> <p>Sampling Plan includes Phosphorus or Nitrogen, as indicated in the license.</p> <p>No deviations from the WWTP parameters that put the water environment at risk were identified or evidenced.</p> <p>Legionella evaluation: Report n.º 1305076 – Result: not detected.</p>
1.3.5	Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>They have a procedure for chemicals which includes a map with the chemical storages and it is also used for ISO 14001 and ISO 45001 (EHS.D.404-ENV:Spill prevention, issued at 12nd april 2019). Also, Tabaqueira have a list of all the chemicals used on site at the intranet TP-OH-07 (last update: 09/05/2022), evaluation the risk possessed. Prior to be purchased, they need to be approved the first time by the environment, health & safety area. MSDS are available for each chemical, and also, all the requirements of storage and use are to be fulfilled. During the audit, the chemicals storage area was visited and it was properly managed. (collaborative OnePlace work platform - with indication authorization form, training and information, list of chemicals and MSDS). During the site visit, it was checked that the chemical storage is appropriately protected from leaking into water streams or soil, as it is in especially designed rooms for contention against spills. The site advised that they did not have any spill that could have polluted the water. It was also added a new topic to the document “Diretriz da água” which identifies (in map/photos) 7 critical areas of possible non-controlled discharge and contamination.</p> <p>During the site visit, it was checked that the chemical storage is appropriately protected from leaking into water streams or soil, as it is in especially designed rooms for contention against spills. The chemical storages are identified in a map presented in EHS.D.404-ENV:Spill prevention procedure.</p>
1.3.6	On-site Important Water-Related Areas shall be identified and	<input checked="" type="checkbox"/>	<input type="checkbox"/>	They identified 2 IWRA's on-site that are correctly identified and mapped, including a description of their current status:

Clause	Details	Yes	No	Comments/Evidence
	mapped, including a description of their status including Indigenous cultural values.			<ul style="list-style-type: none"> streams that cross the facility, and community gardens in a non-built area. <p>Each onsite IWRA feature is listed, with a description of what it is, its status (including indigenous cultural value), water-related risks and specific concerns (i.e. drought of Ribeira do Marmelo during summer) in "<u>Directriz da Agua</u>" TP-ENV-01".</p>
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>They have the annual document "<u>Relatorio e Contas 2021</u>", which is the financial report for the shareholders that includes the following water costs:</p> <ul style="list-style-type: none"> Cost of Municipal water use Monitoring (water testings) WWTP maintenance costs Environmental Insurance <p>Also, they have prepared the spreadsheet "<u>Suporte Utilities Accruals 2021</u>" (This document is used to track water consumption throughout the year and direct cost.</p> <p>Other costs such as monitoring, WWTP and WTP are tracked in True Cost of Water), which was updated to the end of calendar year 2021 (True cost of water is updated until April 2022. The rise in the real value of water stands out because electricity rates have skyrocketed). This includes:</p> <ul style="list-style-type: none"> Cost of Municipal water use (SMAS Sintra); Monitoring (water testings and calibration); Electricity for the WWTP; Tanks cleaning. <p>PMI/Tabaqueira has developed a global tool that detail the annual water-related costs and revenues (True Cost of Water Tool – including Water Consumption, Water Treatments, Waste Water Treatment, WWP and WTP management, Water Governance, WASH and Water Balance – also detailing this listed items). Also, consolidate the description or quantification of the social, cultural, environmental, or economic water-related value generated by the site. For instance, in the "<u>1.4 True Cost of Water 2021</u>" it is described the values generated, including WASH program (employees and contractors for hygiene at showers), an awareness campaign of cigarette butts and litter collection for avoiding pollution in the ocean. Thus, addressing in a practical and dynamic way a challenge shared by the different PMI affiliates, has a clear response to the second observation raised in the last follow-up audit.</p>
1.3.8	Levels of access and adequacy of WASH at the site shall be identified.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>During the site visit, it was confirmed that the workers, have access to safe water, sanitation and hygiene, as this is also a requirement of the regulation for factories in Portugal. Nevertheless, the key actions for WASH had been in the supply chain at tobacco producers. See questions 3.7.1 and 3.7.2.</p>

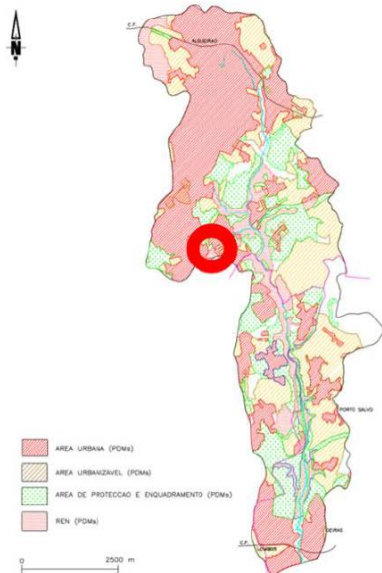

Clause	Details	Yes	No	Comments/Evidence
1.4	Gather data on the site's indirect water use, including: its primary inputs; the water use embedded in the production of those primary inputs the status of the waters at the origin of the inputs (where they can be identified); and water used in out-sourced 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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>They contracted a consultant for conducting a global study about the tobacco life cycle using the water scarcity model and calculating the water footprint.</p> <ul style="list-style-type: none"> Tobacco Farm Irrigation Direct Material Inputs (casings, flavors, filter, packaging, ethanol, primary and secondary packaging) and Others Manufacturing water use <p>At a local level, the supplier that is in the catchment is the printshop, who was contacted and provided the annual water consumption details.</p> <p>Tabaqueira E.I.T., identified their main Suppliers of raw materials/primary and their country of origin. The estimated water scarcity footprint of each raw material was calculated on the basis of the WST (Water Stress Index), the annual water quantity consumed by the Supplier and the annual quantity of raw material acquired PMI. PMI's Indirect Water Use Supplier List has also requested and information regarding their water-use and water management has been updated. Philip Morris International assesses themes regarding water consumption, water scarcity and shared water challenges in many countries that produce primary input products.</p> <p>The embedded water use of outsourced service providers are listed as follows:</p> <ul style="list-style-type: none"> TDGI: responsible for soft water-related maintenance activities such as cleaning and general management. SMAS Sintra: Tabaqueira's water service provider, responsible for providing potable water as well as all catchment municipalities and industries around the site. <p>All outsourced service providers have been actively involved during the AWS certification procedure and are listed amongst the internal and external stakeholders.</p> <p>Regarding to water quality, several efforts have been put into account to measure water use within the supply chain, especially, with LEAF articulation and with their concrete projects.</p> <p>LEAF:</p> <p>Implementing a new strategy with more concrete targets, considering the continue validating volumetric water benefits (with the volumetric water benefit accounting (VWBA): a method for implementing and valuing water stewardship activities): 2019 - 2021 (cumulative): 437,913 m³; 2019 - 2022 (cumulative, planned): 700,000 m³. To achieve theirs goals, several projects are in force: Water Guardian in Brazil; Rainwater Harvesting in Turkey; Crop Switch in Turkey Irrigation Ponds in India; Pakistan Laser Leveler; Argentina Drip Irrigation; Italy Irrigation Sensors.</p> <p>PMI is aiming to provide farmers and workers with:</p> <ul style="list-style-type: none"> Access to safe drinking water, sanitation and hygiene

Clause	Details	Yes	No	Comments/Evidence
				<ul style="list-style-type: none"> - Improve water quality by reducing pollution - Increase water-use efficiency and supply of freshwater to address water scarcity <p>2022 Project Goals:</p> <ul style="list-style-type: none"> - 305 spring protections in Argentina - 35 new boreholes, 45 rehabilitated boreholes, 35,550 purification kits, and 110 protected wells in Malawi - 30 new boreholes, 50 rehabilitated boreholes, 10,000 purification kits, and 20 protected wells in Mozambique <p>Manage water resources and address related risks to minimize environmental impact and provide WASH services by 2030 (Goal); Implement sound water stewardship strategies in all at-risk growing areas. They want to have targets to be achieved in 2025 – no negative impacts. And 2030 – positive impacts. Doing global water risk assessment – doing it globally. Therefore, a PMI LEAF defined a volumetric water target by 2030: <i>We commit to reducing our water-related impact and to becoming an environmental service provider through context-specific projects in our agricultural activities and in the watersheds where we operate. In doing so, between 2019 and 2030 PMI will optimize 10 million cubic meters of water across our tobacco growing areas by identifying and reducing shared water challenges.</i></p> <p>The water stewardship framework implemented allowed to reduce water withdrawals and reducing downstream impacts of CPAs and fertilizers, allowing to create positive impact by reducing runoffs and improving recharge areas through conservation and restoration initiatives and regarding education, awareness raising, contribution to global data collection.</p> <p>In numbers: 19 suppliers, 24 countries, 6 tobacco types and 89 submissions, 99% volume covered less submissions in 2020 than 2019 because we changed the grouping, we consolidated into tobacco growing regions in 2020.</p> <p>Different project strategies (flood to drip irrigation, sprinkler to drip irrigation, leak detection, enhanced soil sensors & optimization and water reuse, Stormwater capture & recharge, Flood retention basins</p> <p>Recharge ponds, Phytodepuration, CPA collection, Rainwater capture, cover crops, Wetland, Conservation, Watershed Conservation, Reforestation, Riparian Zone Restoration, Invasive Species Removal, Fencing, Grassland Restoration, Flow Restoration) were conducted, considering field irrigation methods (mostly rainfed options).</p> <p>Additionally, GRA (Global Risk Assessment – evaluates and models water risk at a high level) and LRA (Local risk assessment – performed on site context based, granular level assessment) is being conducted. Finally, a volumetric water benefit accounting (VWBA): a method for implementing and valuing water stewardship activities with different stakeholders, leading to a volumetric benefit validation.</p> <p>In 2019, with the support of Leaf Suppliers, PMI sponsored WASH projects:</p> <ul style="list-style-type: none"> • drilling of 13 solar-pump boreholes and 30 hand-pump boreholes in Central Malawi & 60 hand-pump boreholes in Tete Province, Mozambique.

Clause	Details	Yes	No	Comments/Evidence
				<p>In 2020, PMI/LEAF drilled 47 new boreholes in MW and 50 in MZ and in 2021, we have continued focusing on building boreholes in MW & MZ and also starting to focus on borehole rehabilitation.</p> <p>These boreholes directly benefit more than 3.500 tobacco farmers and their families and are estimated to benefit 80.000 community members. In 2021 we have created water quality and water availability guidelines and revised our WASH monitoring guidelines.</p> <p>In Malawi more than 60% of the rural population lacks access to WASH Services. The WASH project in Malawi will demonstrate concrete actions that can be undertaken to improve the situation and shall serve as a basis for further roll-out of WASH projects, namely the willing to expand this kind of projects to Brazil, Argentina, India and Argentina – evaluating the possibility to extend this program next year (now evaluating the technology to implement on site, WASH collecting data, etc.) to reach 2025 and 2030 the objectives.</p> <p>Additionally, new water stewardship projects are planned to 2022, such as: Future Water Risk Integration: Review Leaf procurement goals and evaluate sourcing volumes at risk from future water related risks; Connect further on AWS – develop a project with a manufacturing facility that exists within one of our Tobacco Growing Areas and Include carbon assessment in volumetric water benefit accounting tool to build holistic strategy.</p>
1.4.2	The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>The outsourced service identified as relevant for water stewardship is the canteen. Indirect water use of the tobacco processing outsourced service was calculated for the new period. Data was collected with Stakeholder Universal Leaf and updated in the file.</p> <p>The current figures of water consumption of the factory reflect the canteen, as it is located and another site and therefore, considered as their outsourced service (food making and providing to Tabaqueira employees). Since December 2020 there has been a dedicated meter for this purpose, the value being around 5% of the total amount of water consumed in the facilities (water sankey).</p>
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Laje sub-catchment:</p> <ul style="list-style-type: none"> Regulation N°45/86 of 26 of September 1986: protected areas for reducing the flooding risk. "Regulamento de Drenagem de Águas Residuais Industriais (RDARI)" DR N°108-2a serie, which requires an Authorization of connection to the Municipality Sewage System for industrial use. Decreto-Lei N° 226-A/2007 of 31st May 2007 - Permit to discharge the treated wastewater to Ribeira do Marmelo and irrigation with reused water. <p>The site also has a license "L006727.2021.RH5A" with validity until 14th April 2026 for the WWTP effluents discharge.</p>
1.5.2	Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>They have a legal consultant "SIA" that provides a webportal "SIAWISE" with all the details applicable legislation. Additionally, RED-Online is implemented and in force. The site is certified to ISO 14001 (certificate validity: 22nd November 2022), so compliance evaluation is covered through this process.</p>

Clause	Details	Yes	No	Comments/Evidence
				The last regulatory requirements were made in July (5 th and 7 th), 2021. Environment, Health and Safety made by Siawise. The site also has a license "L006727.2021.RH5A" with validity until 14 th April 2026 for the WWTP effluents discharge. The license also requires the sending and maintenance of a dossier organized with the SDS of all dangerous substances and preparations used, in Portuguese, and the Organization should, if there are changes in the substances and / or preparations used, send the information again within 6 months.
1.5.3	The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Through the water risk filter tool, it was shown that the site is not in a water stress area. The site prepared a "Water Sankey" diagram, showing all the inputs and the outputs. They implemented projects for water efficiency and are considering further reductions (i.e. Consolab project – allowing to reduce water consumption and increase in water efficiency, increase water availability for other community uses and reduce water related costs).
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>The Tejo Catchment has a "catchment plan" available at the internet published by the APA (EPA of Portugal). For the Tejo sub-catchment there is the Regulation N°45/86 of 26 of September 1986. This regulation determines that the area is in risk of flooding due to urban occupation, and defines the protected areas for reducing the flooding risk. Therefore, in alignment to this regulation, the strategic actions of the site is to reduce the flow downstream its facilities.</p> <p>The beach of Santo Amaro, in the municipality of Oeiras is an urban beach of intensive use, being the largest beach of the county. This beach has hydrodynamics controlled by the tides and not by the flow of the Laje river, and it is worth noting that the Laje river can affect the water quality of the beach, as reported by the APA. Although it does not drain into Torre beach, the Laje stream can influence the quality of the bathing water on this beach. The Laje stream presents a history of poor water quality, which is mainly due to rainwater discharges of urban origin and clandestine discharges of domestic wastewater.</p> <p>In 2019 an expert consultant provided a powerpoint with a matrix called "Identified Important water related areas – Tejo Catchment". That includes the name of the area, description, location and evaluation for priority. This year Tabaqueira prepared the presentation, considering Water Risk Filter application, in June, 2020. In this presentation, they are included the maps of the catchment, sub-catchment and key locations.</p> <p>The 2 IWRAs associated to the site are:</p> <ul style="list-style-type: none"> • The beach of Santo Amaro & Torre beach. • The water streams that run through the factory, Ribeira do Marmelo, and several small affluents. <p>For the boundaries to identify IWRA's it has been used the Principle 3, criterion 3.1., of the EWS standard as Portugal is located in Europe. The EWA establishes a radio of 25km for HCV (high conservation value areas).</p> <p>According to the Portuguese Environment Agency, water monitoring is a measure of control of the state of water systems and of the effectiveness and efficiency of the measures implemented. It also allows the information collected to be made available to citizens and other entities, as an important contribution to participatory management and active citizenship. This monitoring is based on measurement networks, databases and mathematical models that simulate the state of the resources in the future. In assessing water, different quality indicators are considered: biological, chemical,</p>

Clause	Details	Yes	No	Comments/Evidence																																																																																																																																																																								
				<p>physical-chemical, and hydromorphological. In this way, for example, the quantity and presence of living things and some chemical elements, such as pollutants, are evaluated, as well as the shape of the basin, flow velocity, and other characteristics. The National Water Resources Information System (SNIRH) is the system that disseminates the data collected from the National Water Authority's water resources monitoring networks and makes information available. The Management Plan for the Tagus River Hydrographic Region (PGRH Tejo) is a planning instrument that aims identify the most relevant problems in the bodies of water, preventing the occurrence of future potentially problematic situations, as well as to define the strategic lines of water resources management through the elaborating a program of measures that ensures the pursuit of the objectives established in the Water Law. In this Plan, it is possible to evidence diverse information regarding the different bodies of water in the country, in particular, in the basin of the hydrographic region of the Tagus River. As the Tagus River makes its way to the edge of the estuary zone, the sub-basins on the right bank progressively show worse quality.</p> <p>(https://sniambgeoviewer.apambiente.pt/Geodocs/geoportaldocs/Planos/PGRH5-TEJO/RelatorioTecnico_CE%5C1_PGRHTejo_Rel_CE.pdf)</p> <table><thead><tr><th>Sub-basin</th><th>Excelente (Blue)</th><th>Bom (Green)</th><th>Razoável (Yellow)</th><th>Medíocre (Orange)</th><th>Mau (Red)</th><th>Não classificado (Grey)</th></tr></thead><tbody><tr><td>Rio Erges</td><td>3</td><td>9</td><td>2</td><td>0</td><td>0</td><td>0</td></tr><tr><td>Ribeira do Aravil</td><td>1</td><td>6</td><td>3</td><td>0</td><td>0</td><td>0</td></tr><tr><td>Rio Pónsul</td><td>0</td><td>17</td><td>7</td><td>2</td><td>0</td><td>0</td></tr><tr><td>Rio Ocreza</td><td>0</td><td>10</td><td>2</td><td>0</td><td>0</td><td>0</td></tr><tr><td>Rio Zêzere</td><td>16</td><td>39</td><td>7</td><td>2</td><td>2</td><td>16</td></tr><tr><td>Rio Almonda</td><td>0</td><td>1</td><td>0</td><td>0</td><td>1</td><td>0</td></tr><tr><td>Rio Alviela</td><td>0</td><td>1</td><td>0</td><td>0</td><td>1</td><td>0</td></tr><tr><td>Rio Maior</td><td>0</td><td>0</td><td>0</td><td>1</td><td>0</td><td>0</td></tr><tr><td>Rio Alenquer</td><td>0</td><td>0</td><td>0</td><td>1</td><td>0</td><td>0</td></tr><tr><td>Rio Grande da Pipa</td><td>0</td><td>0</td><td>0</td><td>1</td><td>0</td><td>0</td></tr><tr><td>Rio Trancão</td><td>0</td><td>0</td><td>0</td><td>0</td><td>1</td><td>0</td></tr><tr><td>Grande Lisboa</td><td>0</td><td>0</td><td>2</td><td>3</td><td>0</td><td>0</td></tr><tr><td>Rio Sever</td><td>0</td><td>3</td><td>3</td><td>0</td><td>0</td><td>3</td></tr><tr><td>Ribeira de Nisa</td><td>0</td><td>2</td><td>1</td><td>1</td><td>0</td><td>1</td></tr><tr><td>Vala de Alpiarça e Ribeira de Ulme</td><td>0</td><td>1</td><td>0</td><td>1</td><td>0</td><td>0</td></tr><tr><td>Ribeira de Muge</td><td>0</td><td>2</td><td>1</td><td>1</td><td>0</td><td>1</td></tr><tr><td>Ribeira de Magos</td><td>0</td><td>0</td><td>0</td><td>0</td><td>1</td><td>0</td></tr><tr><td>Rio Sorraia</td><td>0</td><td>54</td><td>15</td><td>12</td><td>2</td><td>39</td></tr><tr><td>Ribeiras Costeiras do Sul</td><td>0</td><td>1</td><td>1</td><td>0</td><td>1</td><td>0</td></tr><tr><td>Tejo Superior</td><td>0</td><td>28</td><td>3</td><td>0</td><td>0</td><td>0</td></tr><tr><td>Tejo Inferior</td><td>0</td><td>3</td><td>1</td><td>0</td><td>0</td><td>4</td></tr><tr><td>Estuário</td><td>0</td><td>0</td><td>4</td><td>5</td><td>5</td><td>5</td></tr><tr><td>Água Costeira do Tejo</td><td>0</td><td>1</td><td>0</td><td>3</td><td>0</td><td>0</td></tr></tbody></table> <p>Legend: Blue – Excelente; Green – Bom; Yellow – Razoável; Orange – Medíocre; Red – Mau; Grey – Não classificado.</p> <p>(Blue – Excellent; Green-Good; Yellow-Fair; Orange-Poor; Red-Bad; Grey-Non classified).</p>	Sub-basin	Excelente (Blue)	Bom (Green)	Razoável (Yellow)	Medíocre (Orange)	Mau (Red)	Não classificado (Grey)	Rio Erges	3	9	2	0	0	0	Ribeira do Aravil	1	6	3	0	0	0	Rio Pónsul	0	17	7	2	0	0	Rio Ocreza	0	10	2	0	0	0	Rio Zêzere	16	39	7	2	2	16	Rio Almonda	0	1	0	0	1	0	Rio Alviela	0	1	0	0	1	0	Rio Maior	0	0	0	1	0	0	Rio Alenquer	0	0	0	1	0	0	Rio Grande da Pipa	0	0	0	1	0	0	Rio Trancão	0	0	0	0	1	0	Grande Lisboa	0	0	2	3	0	0	Rio Sever	0	3	3	0	0	3	Ribeira de Nisa	0	2	1	1	0	1	Vala de Alpiarça e Ribeira de Ulme	0	1	0	1	0	0	Ribeira de Muge	0	2	1	1	0	1	Ribeira de Magos	0	0	0	0	1	0	Rio Sorraia	0	54	15	12	2	39	Ribeiras Costeiras do Sul	0	1	1	0	1	0	Tejo Superior	0	28	3	0	0	0	Tejo Inferior	0	3	1	0	0	4	Estuário	0	0	4	5	5	5	Água Costeira do Tejo	0	1	0	3	0	0
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1.5.5	Important Water-Related Areas shall be identified, and where appropriate, mapped, and their status assessed including any threats to people or the natural environment, using scientific information and through stakeholder engagement.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Percentage results of the state of the MA by sub-basin of RH5. Sub-basins sorted according to a north/south gradient, on the right and left banks of the Tagus River.</p> <p>The 2 IWRAs associated to the site are:</p> <ul style="list-style-type: none"> The beach of Santo Amaro & Torre beach.   <p>Watershed of Ribeira da Laje and land uses (source: Saraiva et al., undated) with a red cross indicating the location of Tabaqueira in the watershed. On the right is marked in green the mouth of the Ribeira da Laje near the Praia de Santo Amaro.</p> <ul style="list-style-type: none"> The water streams that run through the factory, Ribeira do Marmelo, and several small affluents (view map at point 1.1.1). <p>The Laje stream presents a history of poor water quality, which is mainly due to rainwater discharges of urban origin and clandestine discharges of domestic wastewater.</p>
1.5.6	Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Tejo catchment has several dams and water storage facilities. The most relevant for the site is the "Dam Castelo De Bode" which is also the main water source for Lisbon district to which the site belongs. The Laje sub-catchment is in residential area, and does not have any dam or storage areas. Also, Tabaqueira do not have shared water infrastructure. All the infrastructure is only of Tabaqueira (pipes, water tanks, WWTP, etc). The municipal water infrastructure is of SMASSintra which is a municipal company. "Dam Castelo de Bode" area is located in an area subject to several types of environmental risks that, in a more or less intense way, may influence the stability of the the</p>

Clause	Details	Yes	No	Comments/Evidence
				whole territory and, consequently, bring some risks associated with biodiversity loss. These risks may not only be associated with the actual loss of a floristic, faunistic element or an entire ecosystem, but also associated with imbalances that will lead to devastating changes of various kinds, such as social and economic, and often may have irreversible effects. Whatever the risk to the area of the Castelo de Bode dam, risk of erosion, fire, flooding and contamination of water lines, its greater or lesser intensity, manifestation, frequency and size, is strictly related to the various uses that are made on the territory. One of the main problems is essentially related to the loss of forested areas, mostly made up of maritime pine and common eucalyptus, the main cause of which is forest fires. (https://www.epal.pt/EPAL/docs/default-source/epal/biodiversidade/publica%C3%A7%C3%B5es/castelo-do-bode.pdf?sfvrsn=14).
1.5.7	The adequacy of available WASH services within the catchment shall be identified.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>During the site visit, it was confirmed that the workers, have access to safe water, sanitation and hygiene, as this is also a requirement of the national regulation for factories in Portugal and inside European Union.</p> <p>Also, there is a periodic test of potability conducted independently by a subcontracted operating in the Portuguese factory facilities and results were provided, and conclusions say it was compliant with the regulations (i.e. Canteen: Analysis report No. 2021_3372; Sample No.3372; Sample date: 11/03/2021; All parameters compliant with regulations and related thresholds; Analysis report No. 2021_6675; Sample No.6675; Sample date: 13/05/2021; All parameters compliant with regulations and related thresholds; Analysis report No. 2021_11647; Sample No.11647; Sample date: 30/07/2021; All parameters compliant with regulations and related thresholds).</p> <p>Also, an internal sampling plan is implemented "Sampling Plan 2022" where sampling points and periodicities are defined (accredited laboratory) and additional internal controls of TDGI are conducted (each 2 months when the water enters the tank the control of e.coli, coliform bacteria, free chlorine (local) is done) + Downstream of the tank they do monthly control of e.coli, coliform bacteria, free chlorine (local) (they also add hypochlorite). Canteen, headquarters, irrigation and WTP also make periodic controls to ensure that there are no problems of contamination of consumption. The collection points of the identified sites are done randomly to catch as much information as possible.</p>
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>In the presentation "Water Risk Filter-PMI Portugal Tabaqueira" in October – 2021, the shared water challenges identified by the site were revised considering the first audit in 2018, and the updated shared water challenges are now the following:</p> <ul style="list-style-type: none"> • Aridity (very low risk) • Water depletion (moderate risk) • Drought Frequency (moderate risk) • Surface Water Contamination (Very high risk) • Flood Occurrence (very low risk) • Baseline Water Stress (moderate risk) • Access to Sanitation (very low risk)

Clause	Details	Yes	No	Comments/Evidence
				Also, it was developed the AWS Master Plan 2022 to define and follow the water shared challenges, the associated stakeholders and projects, to be followed and updated during their execution. To address shared challenges and prioritized the information gathered, PMI implemented several actions, namely: AWS Teams space to become the only space to store information, Bi-weekly calls to follow up factory's certification, separate Bi-weekly calls to discuss tool developments and best practice sharing, continue to deliver the capabilities internally and Buddy Factories program.
1.6.2	Initiatives to address shared water challenges shall be identified.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>They have a matrix "Riscos e Oportunidades" that has the risks classified in physical / reputational / regulatory. It is also shown the actions to address the risks and opportunities identified.</p> <p>The risk evaluation is based on Probability and Impact.</p> <p>Preliminary, the consultant identified the following risks at their research and visit:</p> <ul style="list-style-type: none"> • Low flow from Spain in extremely dry years (despite treaty), drought risk is high. • FAO water stress level is low. • Overall flooding risk is low. • Incidents upstream from intakes (large paper industry and uncontrolled discharges), surface water contamination is high. • Competition from power generation in extremely dry years. <p>Matrix "AWS Master Plan 2022" proposes initiatives to address the challenges, which are: environment protection and awareness, reduction of specific consumption, river pollution or flooding, actions to improve water quality, awareness campaigns in seas and oceans, among others.</p>
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Locally, Tabaqueira has a document "Medidas de Autoproteção de segurança (Parte 4 – Plano de Emergência Interno, datado de julho de 2017)" that address natural extreme events, for example, floods, specific procedures for action in case of, hazardous product spills (guideline from PMI - EHS.D.404-ENV: Spill prevention de 12 de abril de 2019). There is also a global document (Manufacturing Sustainability – EHS.D.403-ENV: WATER STEWARDSHIP, 01/06/2020) that addresses several environmental issues, including water related.</p> <p>They have the document "AWS Master Plan" (Risk Evaluation) which is a matrix for water risks for the site. These are regarding: legal compliance, water pollution, water quality, wastewater quality, use of chemicals, waste to water bodies. Each of these risks is evaluated by frequency and impact, and controls effectiveness and actions need to be taken to address the subject. The "Water Resilience Plan" was conducted and addresses several water-related issues.</p>
1.7.2	Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>With the same document "<u>AWS Master Plan 2022</u>", they identify the Opportunities:</p> <ul style="list-style-type: none"> • AWS Maintenance • Improve company image • Supporting community • Monitor developments in the large Tejo catchment

Clause	Details	Yes	No	Comments/Evidence
				<ul style="list-style-type: none"> Communication channels <p>At “AWS Master plan - 2022”, the actions to be implemented are detailed and their status is followed-up. At the end of the plan, there are 3 columns for the generation of the “Environmental / social / economic value”.</p>
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>They have prepared the document “Plano de Segurança – Medidas de Autoproteção” from July 2017. This is the document that describes the emergency response plan. It mentions the action plan in case of flooding.</p> <p>They also prepared the document “Tabaqueira EIT S.A. Business Continuity Plan «Report – Phase 1» (16/03/2017) tracking number IMPTECG01/Rev.1, regarding to the potable water utility, identifying the following deviations with actions:</p> <ul style="list-style-type: none"> Lack of potable water due to pipe rupture inside the Plant site. Lack of potable water supply due to pipe rupture on the potable water line located on the exterior of Tabaqueira’s facility (buried pipe). Public potable water network contamination. Potable water contamination due to Water Storage Tank contamination. <p>In case of failure of the treatment plants of Tabaqueira’s Wastewater Station, it was implemented a bypass system that addresses, if necessary, the effluent to be treated for the existing municipal collectors, since Tabaqueira drainage system is parallel to the municipal drainage system managed by SMAS Sintra, allowing the final effluent not to be left untreated in case of contingency. Tabaqueira designed a damping basin and it was constructed in June 2019 to reduce the speed of water in winter (when precipitation occurs with greater intensity) that enters naturally in its treatment systems. This may influence the quality of the water that is later discharged in the Ribeira do Marmelo and that influences the quality of the water downstream, in Ribeira da Laje and Beach of Santo Amaro de Oeiras.</p> <p>Tabaqueira also conducts periodic public disclosures of water use and water quality data for others to use (i.e. WATER PERFORMANCE REPORT 2021, WATER PERFORMANCE REPORT 2020), and has a comprehensive water stewardship plan that is well-implemented, routinely reviewed and updated. Additionally, their connection with different and relevant stakeholders (internal and external) allows them to engage with peer organizations and stakeholders to promote water stewardship (i.e. AWS Stakeholders and Challenges matrix), which also includes support for good water governance and stewardship with appropriate authorities. Water stewardship strategy & plan is in place and will be periodically updated with new actions and initiatives; AWS Commitment signed and published both internally and externally; Divulcation and engagement with employees on principles of water stewardship and information disclosure in order to raise awareness and better inform communities of the local catchment; and engagement with external stakeholders (i.e. local meetings and events) to promote water stewardship, disclose benefits, gather information and feedback related to water-related topics and shared challenges.</p>
1.8.2	Relevant sector and/or catchment best practice for water balance (either through water efficiency or			<p>Tabaqueira has a detailed knowledge and monitorization plan implemented regarding water consumption and how water is used in the organization (i.e. Water monitoring for consumption & quantity flows is in place + KPI for daily tracking), when and what for (as an extension of the water balance assessment of 1.3.2) that helps them to prioritize</p>

Clause	Details	Yes	No	Comments/Evidence
	less total water use) shall be identified.			where to focus water efficiency efforts or installation of water efficient technology (i.e. Water efficient technologies have/are being implemented and water-saving settings are in place/under investigation for future implementation).
1.8.3	Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.			Water quality control strategies are in place for incoming water (i.e. water quality monitoring procedures) and for outgoing wastewater, including the performance of a second analysis of the same effluent/sample by another entity contracted for this purpose and with accredited laboratory tests. Additionally, an emergency response plan is in place considering water-related incidents, including a list of emergency-related incidents and mitigation measures available. Hazardous substances and material are mapped, confined to proper and adequate storage locations (as verified during the on-site visit) and secured via containment basins.
1.8.4	Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.			Tabaqueira developed an awareness campaign and a clean-up event to reduce litter in Sintra National Park with GNR. The best practice in the tobacco sector is to compare best practices from different countries of the same company and benchmark with the tobacco industry. The factories of the sector and/or catchment conduct water tests for quality of the groundwater and of the municipal water. Usually, they have WWTP for the effluents to comply with the local regulation. The best practice for maintenance / improvement of IWRAS would be to protect an area on-site, and/or to support the protection of areas in the catchment.
1.8.5	Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.			The sites best practice in the sector and the catchment is to provide WASH services within their facilities. The LEAF department remembered the “Sustainable Tobacco Program” that is under implementation worldwide in collaboration with most of the tobacco companies. This is the best practice for the tobacco industry regarding to tobacco producers. Additionally, a new strategy with more concrete targets will be soon developed. Manage water resources and address related risks to minimize environmental impact and provide WASH services by 2030 (Goal); Implement sound water stewardship strategies in all at-risk growing areas. They want to have targets to be achieved in 2025 – no negative impacts. And 2030 – positive impacts. Doing global water risk assessment – doing it globally. Awareness activities related to the importance of water and WASH provision were carried out (i.e. raising awareness of water consumption and making disinfectant available on-site and externally to charitable institutions).
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: - That the site will implement and disclose progress on water stewardship program(s) to	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Tabaqueira (Philip Morris Portugal) has a “Compromisso de Gestão Sustentável da Água (AWS) published at 01/06/2020 in their website and internally at the facility. It is signed by Matteo Zompa who is the Operations Director who is the most-senior manager at the site. The content includes all the requirements of the AWS criteria of 2.1.1. The commitment is in English and in Portuguese. So, the signed version is in English, and in the webpage is available the Portuguese version as it is for the public. Commitment at Global PMI webpage (in English): https://www.pmi.com/sustainability/pmi-and-the-environment

Clause	Details	Yes	No	Comments/Evidence
	<p>achieve improvements in AWS water stewardship outcomes</p> <ul style="list-style-type: none"> - That the site implementation will be aligned to and in support of existing catchment sustainability plans - That the site's stakeholders will be engaged in an open and transparent way - That the site will allocate resources to implement the Standard. 			<p><u>PMI Environmental Commitment v1.09/24.09.2018</u></p> <p>The global commitment was communicated to all PMI affiliates by the Global Environmental and Sustainability Manager, Jens Rupp, the 28th September 2018 and then forwarded by the European Management to all the European Affiliates, including Portugal.</p> <p>Commitment at Portuguese market webpage (in Portuguese): https://www.pmi.com/markets/portugal/pt/news/details/compromisso-para-uma-boia-gestao-da-agua</p> <p>Commitment of Tabaqueira published at social media (facebook, linkedin and twitter): In social media, there is an overview of the commitment in portuguese, and a link to the Tabaqueira webpage for the full commitment.</p> <p>Commitment at Integrated Management System (IMS) Manual (in portuguese): Clause 5.1 of the manual, indicates that the top management is committed with the responsible water resources management, water quality, legal compliance and protection of relevant environmental areas (such as IWRAs).</p> <p><u>AWS Commitment statement (in portuguese):</u> This statement was prepared covering all the requirements of clause 1.1 of the standard. It is signed by the Operations Director for the factory at Rio de Mouro I and issued on the 1st June 2020, signet by Matteo Zompa, Operations Manager. It was publicly available at the entry/lobby of the factory site where the public can access and online: https://www.pmi.com/resources/docs/default-source/portugal-market/tabaqueira---compromisso-de-gest%C3%A3o-da-%C3%A1gua.pdf?sfvrsn=8b9106b4_2</p> <p>The Manual is available at the internal OMSP (Operation Management System Portal) used for document control.</p> <p>The EHS Policy includes: "Responsible water use, transparency with stakeholders, and the 5 outcomes"</p> <p>Commitment at the factory (in portuguese): It is at the factory entrance, at the panel boards and as communication on the TabTVs in resting room. The AWS audit, sustainability alert...etc.</p> <p>Commitment at communication panels posted within the factory (in portuguese): The <u>communication page</u> includes an overview of the AWS standard, the benefits and the process of certification.</p>

Clause	Details	Yes	No	Comments/Evidence
				PMI global updated their “INTEGRATED MANAGEMENT SYSTEM POLICY (Global for Manufacturing Division)” in 5 th February 2019 approved by the Vice President of Manufacturing based in Headquarters in Switzerland. This was translated to Portuguese as well for local use. Additionally, it is available the local Environmental Policy (ISO 14001 management system) signed by Matteo Zompa.
2.2	Develop and document a process to achieve and maintain legal and regulatory compliance.			
2.2.1	The system to maintain compliance obligations for water and wastewater management shall be identified, including: - Identification of responsible persons/positions within facility organizational structure - Process for submissions to regulatory agencies.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	They have a legal consultant “SIA” that provides a webportal “SIWISE” with all the details applicable legislation and “Red-on-Line”. The site is certified to ISO 14001, so compliance evaluation is covered through this process. It also has a system for verifying compliance using life questions and with the ability to upload evidences. It also has a system for verifying compliance using life questions and with the ability to upload evidences. Furthermore, a yearly internal legal compliance audit to the site is conducted. This is also a requirement of ISO 14001.
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	They have the framework “OGSM” Objectives, Goals, Strategies and Measurements for all sites. This document is the business strategy and is personalized for the local site. Their <u>AWS Strategy and action plan</u> contains: The targets were reviewed and they are SMART. The actions planned and the names of individuals responsible for each are detailed. It includes the costs of each action and the benefits. The content of the action plan was reviewed and there were benefits related to the 5 outcomes. Then, <u>AWS Master plan 2022</u> includes challenges, risks/opportunities and site responses.
2.3.2	A water stewardship plan shall be identified, including for each target: - How it will be measured and monitored - Actions to achieve and maintain (or exceed) it - Planned timeframes to achieve it	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The document AWS Master Plan 2022 developed includes: <ul style="list-style-type: none"> • water challenges of the catchment • water risks & opportunities • goals • actions • results expected • persons responsible and • timeframe

Clause	Details	Yes	No	Comments/Evidence
	<ul style="list-style-type: none"> - Financial budgets allocated for actions - Positions of persons responsible for actions and achieving targets - Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes. 			<ul style="list-style-type: none"> • costs <p>At this AWS strategic plan, there are columns for value creation, which includes a column for each of the 3 pillars: environmental, social and economic. Additionally, in the Relatório e Contas 2021 there were evidence of financial budgets allocated for different actions regarding AWS related projects.</p> <p>The document “AWS Master Plan - 2022”, is AWS action plan. For each target, it specifies:</p> <ul style="list-style-type: none"> • Water-related risks to mitigate • Goal • Strategy • Action • Description • Responsible • Term • Resources • Status • Relationship with AWS Objectives <p>Each of the targets is associated with their respective shared water challenge / risk or opportunity. The content of the action plan was reviewed and there were clear benefits for water stewardship. The ultimate goal is to engage meaningful individual and collective actions that benefit people and nature and a collective goal of promoting responsible use of freshwater that is socially, economically and environmental beneficial for all. The actions proposed are aligned to the shared water challenges / risks and opportunities. The content of the action plan was reviewed and there were clear benefits for water stewardship and keeps the history of the previous.</p>
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>They have prepared the document “<u>Plano de Segurança – Medidas de Autoproteção</u>” from July 2017. This is the document that describes the emergency response plan. It mentions the action plan in case of flooding and it has been created in order to mitigate and responded quickly and positively to water-related events and/or risks.</p> <p>Emergency Response Plan Incident in place to demonstrate responsiveness to water-related incidents and risk with immediate actions i.e. chemical spills, contamination events etc.</p> <p>They also prepared the document “<u>Tabaqueira EIT S.A. Business Continuity Plan «Report – Phase 1»</u>” tracking number IMPTECG01/Rev.1, regarding to the potable water utility, identifying the following deviations with actions:</p> <ul style="list-style-type: none"> • Lack of potable water due to pipe rupture inside the Plant site.


Clause	Details	Yes	No	Comments/Evidence
				<ul style="list-style-type: none"> Lack of potable water supply due to pipe rupture on the potable water line located on the exterior of Tabaqueira's facility (buried pipe). Public potable water network contamination. Potable water contamination due to Water Storage Tank contamination. <p>In case of failure of the treatment plants of Tabaqueira's Wastewater Station, it was implemented a bypass system that addresses, if necessary, the effluent to be treated for the existing municipal collectors, since Tabaqueira drainage system is parallel to the municipal drainage system managed by SMAS Sintra, allowing the final effluent not to be left untreated in case of contingency.</p> <p>Engagements with numerous stakeholders in order to raise awareness on water-related issues.</p>
3	IMPLEMENT			
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>The "AWS Master Plan 2022" was an inclusive research, that identified all stakeholders of the catchment. Water quality was one of the key topics as it affects availability for the people, particularly in the community near the factory site.</p> <p>The site has also actively engaged with relevant stakeholder groups in order to support and contribute to good catchment governance. Evidence of engagement and active outreach (i.e. uthorities, companies, water-demanding companies, service providers, employees etc.).</p> <p>As there is no catchment council established for the Laje river, the efforts have been to meet with the relevant stakeholders in individual meetings. In view of PMI/Tabaqueira's sustainability strategy they will create the Sustainability Council of Tabaqueira, while working on the roadmap to 2025, they will work together on this council and on these themes where they will include a Living Lab on Carbon Neutrality and on the Energy/Water/Carbon nexus.</p> <p>Additionally a Sustainability commitment is developed, including relevant objectives for water stewardship:</p> <p><i>All members will receive a regular update on ongoing sustainability topics. Members in functions related to key priority topics and the factory will meet every four weeks with the purpose of:</i></p> <p><i>i) Align on new initiatives and guidance from the sustainability central team and develop and highlight local areas where significant synergies and impact can be made;</i></p> <p><i>ii) Roll out and further development of sustainability global focus areas (youth access prevention; anti-cigarette butt littering);</i></p> <p><i>iii) To assess and develop potential high local impact areas (for example, factory);</i></p> <p>19 actions defined for 2021, 14 achieved and 5 postponed.</p> <p>(SMILE - Sintra Motion & Innovation for Low Emissions). Among other activities, they will develop a rainwater harvesting system, water saving through technologies, composting goes to school, repair coffee, energy literacy, etc.). Tabaqueira will be part of the advisory board of this LivingLab and combining its roadmap of carbon neutrality will develop in partnership this project positively influences the locality where they are inserted and in its own sphere of close action.</p>

Clause	Details	Yes	No	Comments/Evidence
				Tabaqueira E.I.T. was also invited to participate in the ODS Portugal Alliance (Global compass) in the Coordination Commission.
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	N/A. Portugal is a country where this section is not necessary to justify.
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Regarding to the water quality, Tabaqueira have an action plan, to assure the monitorization of water quality in several places: 1. Water sub-catchment from SMAS Sintra and Water Reservoir; 2. Canteen; 3. Headquarters; 4. Irrigation; 5. Water Treatment Plant; 6. Fire network; 7. Showers; 8. Water cooling towers; 9. Chiller cooling system; 10. Water refrigeration collector; 11. HVAC (Air Treatment Unit & Fresh Air Treatment Unit) and 12. Waste Water System; 13. Substation; 14. Coruche: Irrigation and water sub-catchment.</p> <p>The discharged effluent complies with all analyzed parameters, considering that all the values are lower than the respective discharge limits comparing with the license of discharge of Tabaqueira mentioned above. Several analysis reports were consulted during the site visit, to water and wastewater quality data that if used to verify compliance and all of the parameters observed were above legal thresholds.</p> <p>Additionally, Tabaqueira outsourced a service from the company TEKBOX to do a monthly auto control of water quality that enter in their WWTP and the one that left the facilities (discharged to Ribeira do Marmelo and the one that is recirculated to garden irrigation). Therefore, a monthly report is available regarding to the three different types of water.</p> <p>Monthly, Tabaqueira continued to report the self-management program, regarding to water consumption and water quality from the discharged effluent, like requested in the "Licença de utilização de recursos hídricos para rejeição de águas residuais, emitida nos termos do Decreto-Lei n.º 226-A/2007, de 31 Maio; "L006727.2021.RH5A" with validity until 14th April 2026 for the WWTP effluents discharge.</p> <p>It is also important to mention that Tabaqueira E.I.T has evidences of water-related legal and regulatory compliance, in following documents in place: ISO 14001 and ISO 45001; Water legal register for regular compliance checks at Site level (updated to 2022) and register of responsible personnel for water-related legal compliance.</p>
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>N/A</p> <p>There are no specific requirements where water rights are part of legal and regulatory requirements, measures identified to respect the water rights of others indigenous peoples to be identified.</p>
3.3	Implement plan to achieve site water balance targets.			
3.3.1	Status of progress towards meeting water balance targets set	<input checked="" type="checkbox"/>	<input type="checkbox"/>	A detailed water balance study has been updated recently (civil year 2021). Therefore, there are targets already achieved and some that are in progress still. This is tracked at the action plan related with AWS topics. Especially, there was automatization of the cooling towers, implementation of the "green card code", stop production in a high-

Clause	Details	Yes	No	Comments/Evidence
	in the water stewardship plan shall be identified.			<p>water consuming operation, alerts when consumption is higher than the average (until last surveillance audit). During the last year with the installation of additional flowmeters, along with a more autonomous and interconnected system, it is now possible to establish an alarm system in real time, considering the reading of actual consumption. Additionally, water balance is updated almost in real time because there is a system implemented related with water control and alarm that allows to follow and monitor, with installed flowmeters on-site.</p> <p>Also, there are daily, weekly and monthly targets and according to these they define monthly actions, do a GAP Analysis, where they define an "ACT/REACT for the following month. There is a definition and prioritization of actions, root causes and execution status are identified. The situations detected are reflected in monthly indicators and are evaluated. Therefore, there are targets already achieved and some that are in progress still. This is tracked at the action plan. Especially, there was automation of water consumption systems and new alerts when consumption is higher than the average, so that PMI can act accordingly. The following water balance improvement activities, included in the responsive and resilient AWS Master Plan, have been implemented by Tabaqueira, E.I.T. to improve water balance targets, i.e., reuse of greywaters in cleaning processes, implementing more water efficient processes in order to reduce use of potable water and metering production sections in order to reduce losses/leakages.</p>
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	As illustrate, there is no water scarcity situation detected.
3.3.3	Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	N/A. The organization does not have a mechanism, legal or otherwise, to reallocate water.
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	They have a document "Plano de Monitorização das Águas na Tabaqueira - 2022" which is a monitoring and measurement matrix with details about location, frequency and analysis/testing to be undertaken. Site currently guarantees optimum water quality, in accordance to legal limits and targets like efficient water monitoring & quality control strategy executed on-site, among other activities (Evidence of these actions are summarized in dedicated presentation in 3.1).
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3.5	Implement plan to maintain or improve the site's and/or catchment's Important Water-Related Areas.			

Clause	Details	Yes	No	Comments/Evidence
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>The IWRA's identified in the catchment area are illustrated in 1.5. All the activities related to IWRA actions/project implementation are described in the AWS Master Plan, and since the last follow-up audit, several were implemented (i.e. see 3.1.1) and for example:</p> <ul style="list-style-type: none"> • Improve water balance and identify system losses, to prevent scarcity (Improve the Sankey diagram (more detail on the streams that are not measured directly such as steam) after installation of new meters inside the factory); • Mitigate Pollution in the river (Marmelo , Lages, Beach Sto Amaro oiras) ("Awareness campaign to reduce litter that passes into sewage gutter, goes to rivers and seas Paintings with alert messages "" O Mar Começa Aqui"" (Earth Day 22 April)); • Mitigate Pollution in the river Sintra national park – seaside (Clean Up day - Participation with GNR and ONG in seaside, Sintra National Park cleaning); • Anti-littering and collect cigarette butts; • Among others.
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Tabaqueira, E.I.T., ensures access and adequacy of WASH to all workers on-site in accordance to international and national standards. They conduct periodic water quality tests (see 3.2.1) of the water input which is the only source used for human consumption at the site. Records were kept in databases and showed during the surveillance audit.</p> <p>During the site visit, it was confirmed that the workers, have access to safe water, sanitation and hygiene, as this is also a requirement of the national/european regulation for factories in Portugal.</p> <p>Water Sankey.</p>
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	N/A. Portugal is a country where this section is not necessary to justify. The local communities mostly have access to safe drinking water and sanitation either with effluents to the public.

Clause	Details	Yes	No	Comments/Evidence
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Outsourced service providers have been identified and listed as internal stakeholders. Evidence of engagement and notifications is illustrated in the Communication evidence.
3.7.2	Evidence of engagement with suppliers and service providers, as well as, when applicable, actions they have taken in the catchment as a result of the site's engagement related to indirect water use, shall be identified.			<p>Tabaqueira, E.I.T., raw material (LEAF) suppliers have been mapped and information on their water use has been requested.</p> <p><u>LEAF Sustainable Agriculture Program – Environment H20 (LEAF meeting):</u> The main goals are managed water resources and address related risks to minimize environmental impact and provide WASH services by 2030. The strategy consists in implement water stewardship in all at risk growing areas, including farmers/workers with access to safe drinking water, sanitation and hygiene (WASH). PMI LEAF 2030 VOLUMETRIC WATER TARGET: "We commit to reducing our water-related impact and to becoming an environmental service provider through context-specific projects in our agricultural activities and in the watersheds where we operate. In doing so, between 2019 and 2030 PMI will optimize 10 million cubic meters of water across our tobacco growing areas by identifying and reducing shared water challenges."</p> <p>WASH Project in Malawi and Mozambique in 2019 included:</p> <ul style="list-style-type: none"> • In 2019, with the support of our Leaf Suppliers, PMI sponsored WASH projects: drilling of 13 solar-pump boreholes and 30 hand-pump boreholes in Central Malawi & 60 hand-pump boreholes in Tete Province, Mozambique • In 2020, we drilled 47 new boreholes in MW and 50 in MZ and in 2021, we have continued focusing on building boreholes in MW & MZ and also starting to focus on borehole rehabilitation. • These boreholes directly benefit more than 3.500 tobacco farmers and their families and are estimated to benefit 80.000 community members • In 2021 we have created water quality and water availability guidelines and revised our WASH monitoring guidelines.
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	They have the canteen; it is a water-related infrastructure. In March 2019, before the certification process, they did a campaign to raise awareness in the water consumption from tap, reducing bottled water. This was made with Eurest, they defined a document with recipes to share with the other peers to appeal to the water tap consumption. This year the water sankey was updated considering this input and the raising awareness campaigns continue due to several communications and initiatives promote internally by Tabaqueira. Additionally, later 2022 the replacement of the canteen washing machine with a more efficient one was done and an awareness campaign is planned for Q3/Q4 in the AWS Master Plan 2022.

Clause	Details	Yes	No	Comments/Evidence
				
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>The site provided different campaigns with different stakeholders, including workers at the factory, with the main aim: raising awareness to the water protection (see detailed actions listed in 2.3.1 in this report – AWS Master Plan 2022). The sustainability report from Tabaqueira. E.I.T has a specific highlight for AWS standard and related outcomes. The AWS Master Plan 2022 has detailed information about the objectives with which the actions are related, but also the categories of the “good practices” achieved by delivering the five outcomes from the AWS standard (i.e. sustainability alerts mentioned in 1.3.1. and 1.3.2.).</p>
3.9.2	Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.			
3.9.3	Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.			
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.			
3.9.5	Actions towards achieving best practice related to targets in terms of WASH shall be implemented.			

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Clause	Details	Yes	No	Comments/Evidence
4.1.3	The shared value benefits in the catchment shall be identified and where applicable, quantified.			<p>They have annually an <u>Integrated Management Review Meeting</u> which is for AWS and also for ISO 14001. Last one was conducted in 2021. This included the water related topics. The status of the actions for the "Value Generated" were evaluated in the "AWS Master Plan 2021". A column was added for this purpose.</p> <p>Implement strategic plan to maintain AWS certification – objective of the management review. Update on EHS Policy in 2022: Including Safe water sanitation and hygiene for all, according to AWS 2.0 version. Changes in internal/external interested parties. Observations raised during AWS Audit included in the Integrated Management Review 2020. Defined water KPI (compliance) – EHS Objectives and Performance. 25th February 2021 – Performed by Sustainability Team and globally presented.</p> <p>It is reflected a net cost to the benefit of reducing risk (and avoiding unexpected higher costs), to achieving longer term water security, resulting in (Support utilities accruals 2022 file) showing the water consumption decreasing and a benefit on the water cost control.</p> <p>Improved water efficiency will result in some costs savings – implemented the Consolab project. Consolab project reflects the benefits (to the catchment and/or catchment stakeholders, with quantified contributions under update):.</p> <p>Observation 1: Tabaqueira E.I.T. should list the targets for action and improvement from its water stewardship plan, and report on to what extent they are being, or have been met. It should also report on how it has contributed to achieving each of the five AWS Outcomes. The rate at which targets are achieved should be compared with timelines given in the water stewardship plan in a more clear way.</p> <p>On the last day of the audit, Tabaqueira E.I.T. team were kind enough to reformulate the contents of the document "Evaluation of water stewardship strategy plan", including a clear and unambiguous reading of the effective contribution (in %) of the implemented actions, since 2019 and until 2021 for each of the "outcomes" of the AWS Standard. Therefore, this is an implemented observation.</p> <p>Observation 2: There is a need for Tabaqueira E.I.T. to report more fully, on the benefit that its actions originate for the watershed, in its sphere of influence, whether this is a financial benefit or not, with quantified contributions. It can also be a qualitative benefit, such as improving the natural capital and services of surrounding ecosystems, or improving water security.</p>
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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Incidents and status of corrective / preventive action are reviewed at the annual <u>Integrated Management Review Meeting</u> . No significant water-related emergency incident (i.e. spills, leakages, natural disasters such as gulfloods or droughts that have disrupted the water infrastructures and water availability etc.) has been recorded to date.

Clause	Details	Yes	No	Comments/Evidence
	against future incidents shall be identified.			
4.3	Evaluate stakeholders' consultation feedback regarding the site's water stewardship performance, including the effectiveness of the site's engagement process.			
4.3.1	Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Consultation efforts with stakeholders were also reviewed at the annual <u>Integrated Management Review Meeting</u> . The site has proven evidence of communication efforts towards various stakeholders and interest groups and it will continue to involve stakeholders in the future in order to share and review water stewardship performance and outcomes. Feedback and comments from the stakeholders have also been reported.
4.4	Evaluate and update the site's water stewardship plan, incorporating the information obtained from the evaluation process in the context of continual improvement.			
4.4.1	The site's water stewardship plan shall be modified and adapted to incorporate any relevant information and lessons learned from the evaluations in this step and these changes shall be identified.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The site's water stewardship plan was updated for 2022 (AWS Master Plan 2022) as a result of the learning process and considering the several affiliates experiences and sharing information. This is a site's responsive and resilient plan that is evaluated and updated periodically in order to ensure positive progress and regular data collection and monitoring. Therefore, monthly meetings take place remotely between PMI affiliates, considering AWS certification and best practice sharing.
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>The roles and responsibility of those accountable for water related emergencies and compliance in water-related matters is available in 1.3.a.</p> <p>Tabaqueira's management team responsible for compliance with legal requirements with regard to water management is led by the Director of Plant Operations. This team includes two Operations managers, one for Sustainability and the other for Engineering, in addition to the specialists who report to them in these areas. This is publicly disclosed at: https://www.pmi.com/resources/docs/default-source/portugal-market/relat%C3%B3rio-aws_2020.pdf?sfvrsn=c21c44b7_2</p> <p>Additionally, a summary of how water-related issues at the site are governed at the site level is disclosed internally in "TP-EHS-1 Manual EHS", dated 1st of June 2020. Additionally it is disclosed in the public commitment from Tabaqueira (https://www.pmi.com/resources/docs/default-source/portugal-market/tabaqueira---compromisso-de-gest%C3%A3o-da-%C3%A1gua.pdf?sfvrsn=8b9106b4_2).</p>

Clause	Details	Yes	No	Comments/Evidence
5.2	Communicate the water stewardship plan with relevant stakeholders.			
5.2.1	The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Tabaqueira E.I.T. actions, projects and best-practices, illustrated in Water Stewardship Strategy Plan, have been shared with internal stakeholders during monthly meetings dedicated to AWS topic within different affiliates, considering a best-practice of sharing relevant informations and in the internal channels of communication; considering external stakeholders, the organization shared this information in the RELATÓRIO DE DESEMPENHO DA ÁGUA 2021 and at the Sustainability Report 2021 (see 3.9).
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	As done for other PMI sites, Tabaqueira, E.I.T., has disclosed its water stewardship performance, targets and implemented best practice actions for 2022 in a dedicated and publically available Water Stewardship Report (RELATÓRIO DE DESEMPENHO DA ÁGUA 2021 TABAQUEIRA, PORTUGAL SUBSIDIÁRIA DA PHILIP MORRIS INTERNATIONAL).
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The site has provided information to the stakeholders regarding shared water-related challenges and risks common to the catchment territory. The challenges are linked with stakeholders, and the result of this actions are communicated in water performance report (see 5.1.1). The above-mentioned efforts have been performed to engage stakeholders and public-sector.
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	There were none water-related compliance violations since last AWS follow-up audit. Tabaqueira site has gone "above and beyond" compliance through the completion of the AWS Standard. The format of making the compliance violation is available and is appropriate for interested parties (i.e. in local languages and in a format that is understood), considering the public "Relatório de desempenho da água 2021 – Tabaqueira, Portugal"). During 2021 there have been no violations compliance.
5.5.2	Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	No corrective actions have been necessary to prevent future compliance violations.

Clause	Details	Yes	No	Comments/Evidence
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	N/A. There was no water-related violation that may pose significant risk and threat to human or ecosystem at the moment.