

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000219



SITE DETAILS

Site: **Philip Morris Tutun Mamulleri Sanayi ve Ticaret Anonim Sirketi**

Address: 7 Eylül Mahallesi, Philsa Caddesi No: 32, 35860, Torbali, TURKEY

Contact Person: Yesim Aydin

AWS Reference Number: AWS-000153

Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Core

Date of certification decision: 2022-Aug-29

Validity of certificate: 2025-May-22

AUDIT DETAILS

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

Audit Type(s): Re-Certification Audit

Audit Start Date: 2022-Mar-30

Lead Auditor: Mia Antoni-Naidoo

Audit team participants:

Mia Antoni-Naidoo, Lead Auditor

Bekir Cetin, Local Auditor

Site Participants:

Yesim Aydin, Sustainability Specialist

Hulya Seven, Sustainability Manager

Suat Kurtbolay, Factory Engineer

Lidiie Hauthouske (Ukraine), Sustainability Manager

Ipek Giurbiliz, Sustainability Specialist

Seda Bingol, Sustainability Specialist

Ali Ates, Factory Engineer

Suleyman Anbarci, Factory Engineer

Yasemin Mert, PMI Leaf

Isaac Dias, Director

Suleyman Hancerli, Public Affairs

Zafer Yildiz, Manager Crop Agronomy

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ADDITIONAL INFO

Summary of Audit Findings: A total of 23 findings were raised during the re-certification audit, 6 major non-conformities, 12 minor non-conformities, and 5 observations. The major non-conformities were of sufficient concern to warrant the categorisation of the non-conformity as major and related to Important Water-Related Areas, the Water Stewardship Plan, and Disclosure. All major non-conformities must be sufficiently addressed and closed out in order for certification to be awarded.

CLOSURE OF NON-CONFORMITIES: The site has prepared a corrective action plan addressing all non-conformities and observations raised. The plan has been approved by WSAS. The major non-conformities have been successfully resolved and evidence has been submitted confirming closure of the finding. The implementation of the corrective action plan for all minor non-conformities will be assessed at the next surveillance audit.

Scope of Assessment: The scope of services covers the re-certification audit for assessing conformity of Philip Morris Tutun Mamulleri Sanayi ve Ticaret Anonim Sirketi - Turkey against the AWS International Water Stewardship Standard Version 2.

PMTM is located in the Küçük Menderes Basin. The basin has a series of lower basins and these are the following: Küçük Menderes 3.490,95 km² 50,1 % Tahtalı-Seferihisar 1.248,92 km² 17,9 % İzmir-Körfez 816,68 km² 11,7 % Çeşme-Karaburun 1.114,27 km² 16,0 % Kuşadası 292,43 km² 4,2 %.

Philip Morris Tütün Mamulleri Sanayi ve Ticaret A.Ş. (PMTM) is the manufacturing company of PMI in Turkey. Having started its operations towards the end of 1992, the plant located in the 7 Eylül Mahallesi, Philsa Caddesi No: 32, at Torbalı in Izmir, Turkey has become one of the largest manufacturing facilities of PMI in the world with its investment and export capacity increasing over the years with more than 1,000 employees.

The audit was conducted on-site from 30 March - 1 April 2022.

The on-site visit included the assessment of the water-related infrastructure of the factory, including, documentation and evidence supporting the conformity of the site the AWS Standard.

FINDINGS

NUMBER OF FINDINGS PER LEVEL

Observation	5
Minor	12
Major	6

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FINDING DETAILS

Finding No:	TNR-000471
Checklist Item No:	1.1.1
Status:	Closed
Finding level:	Observation
Checklist item:	The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including: <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.
Findings:	The map can improved by adding the locations of the wells and the discharge points.
Corrective action:	<ul style="list-style-type: none">• PMTM will provide a map illustrating the location of its water wells and discharge points
Finding No:	TNR-000433
Checklist Item No:	1.3.6
Status:	Closed
Finding level:	Minor
Due date:	2023-Mar-31
Checklist item:	On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.
Findings:	There are no IWRA identified on site but there are wells and irrigation ponds present. The identification of IWRAs on site should be re-evaluated, the process taken to reach that assessment should be recorded and should these areas not be considered IWRAs, justification should be provided.
Corrective action:	<ul style="list-style-type: none">• PMTM will provide an IWRA identification map to show location of identified catchment and site-based IWRAs. As suggested by the Auditor, the wells and irrigation ponds located on-site will be considered as such and included in the map.• PMTM will provide the definition of onsite IWRAs with the status defined in Criteria 1.5.5.
Evidence of implementation:	The Site has included a map with the identification of their IWRA on site: On-site green areas and irrigation pond On-site water wells The on-site IWRA have been included in their WSP.

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Finding No:	TNR-000485
Checklist Item No:	1.3.7
Status:	Closed
Finding level:	Minor
Due date:	2023-Mar-31
Checklist item:	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.
Findings:	There is no description or quantification of the social, cultural, environmental, or economic water-related value generated by the site provided in the document supplied by the site. This needs to be corrected.
Corrective action:	<ul style="list-style-type: none">• PMTM will provide 2 principle documents related to Criteria 1.3.7.:<ol style="list-style-type: none">1. The True Cost of Water document for the calculation of the 'true' cost of water (\$) per m3 used by the site. All activities directly or indirectly linked to water will be considered for this calculation (i.e. WWTP costs, general management costs, water In costs, IWRA project costs etc.)2. The Evaluation of the WS Strategy Plan (Criteria 4.1.2.) will illustrate the generated social, cultural, environmental and economic water-related values
Evidence of implementation:	Evaluation of Water Stewardship Strategy Plan which includes social and environmental value creation, and expected results (attached)

Finding No:	TNR-000486
Checklist Item No:	1.4.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Mar-31
Checklist item:	The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be identified.
Findings:	No identification or assessment has been made with regards to the water quality of the embedded water nor the level of water risk associated with it as is required by the indicator.
Corrective action:	<ul style="list-style-type: none">• PMTM will provide a tabulated list of its primary input suppliers (i.e. DIM materials and LEAF). The following details will be included::<ul style="list-style-type: none">- Name of supplier- Country of origin- Location (outside or inside PMTM's catchment territory)- Level of water-risk exposure- Evidence of communication to gather water quality and quantity-related information

NOTE: as per AWS Standard Guidance, the scope of this Criteria is limited to suppliers located in PMTM's catchment area only

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Finding No:	TNR-000434
Checklist Item No:	1.4.2
Status:	Closed
Finding level:	Observation
Due date:	2023-Mar-30
Checklist item:	The embedded water use of outsourced services shall be identified, and where those services originate within the site’s catchment, quantified.
Findings:	Not all outsourced services have been presented during the audit, the list is incomplete, only services which PMTM can directly control have been presented. The list needs to be cross referenced with procurement data and updated.
Corrective action:	<div>'• PMTM will provide a complete, tabulated list of its water-dependent outsourced services. The following details will be included:<ul style="list-style-type: none">- Name of outsource service- Location (outside or inside PMTM's catchment territory)- Quantification of water usage (only if located PMTM's catchment territory)- Evidence of communication to gather quantity-related information (only if located PMTM's catchment territory)</div>

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Finding No:	TNR-000490
Checklist Item No:	1.5.5
Status:	Closed
Finding level:	Major
Due date:	2022-Jul-19
Checklist item:	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.
Findings:	<p>PMTM have prepared an IWRA document and identified IWRAs, however no indication that the status of the IWRAs has been assessed was provided. It is a requirement of the standard that the status of the IWRAs is assessed through research, testing or consultation. If the status is not assessed no action can be planned or implemented for maintenance or improvement.</p>
Corrective action:	<ul style="list-style-type: none">• PMTM will provide an IWRA identification map to show location of identified catchment and site-based IWRAs• PMTM will execute an IWRA status assessment, in order to determine the status/current conditions for identified IWRAs. For the status evaluation, the following aspects will be taken into consideration:<ul style="list-style-type: none">- Relationship with PMTM (i.e. distance, analogous water sources etc.)- Photographic evidence- Water-related risks of relevance (i.e. contamination events, degraded ecosystems due to water scarcity events etc.)- Management plans of local Authorities responsible for IWRA governance- Legislative prescriptions of reference- Characteristics of interest or sensitive features of relevance <p>The current status of the IWRA will be described in quantitative terms on a scale ranging from 0 to 5 as follows:</p> <ol style="list-style-type: none">1. The site is in a severely degraded condition and will require considerable restoration.2. The site is in a somewhat degraded condition and will require some restoration.3. The site is in an acceptable condition, but its condition could be improved.4. The site is in good condition and will require little work.5. The site is in excellent condition, requires no work and is an example of a well-preserved site of that type. <p>Consequently to status evaluation, a priority rank will be provided in order to prioritize and focus mitigation actions to hotspots of interest.</p> <ul style="list-style-type: none">• As suggested by the Auditor, the wells and irrigation ponds located on-site will be considered as IWRA and included in the map. A dedicated action will be included in the Water Stewardship Strategy Plan (Criteria 2.3.2.) and consequently carried out by PMTM.

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Evidence of implementation: Document with the identification of 6 IWRA on the Catchment:
1)Fetrek Creek (included in their WSP)
2) Boz Mountain KBA
3) Nif Mountain KBA
4) Mahal Hills
5) Lesser Menderes Delta (Gebekirse lake national park)
6) Torbali Bayindir Aquifer
They include legislative prescriptions of reference, relationship with the site, description, water related risk and prioritization.

Finding No: TNR-000491

Checklist Item No: 1.5.6

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2023-Mar-31

Checklist item: Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.

Findings: The condition of the catchment based water -related infrastructure identified has not be assessed nor the potential exposure to extreme events.

Corrective action:

- PMTM will provide a dedicated map with the location of water-related infrastructures at catchment level.
- PMTM will successively provide an evaluation of:
 - potential exposure to extreme events (i.e. based on global data set tools or local risk maps)
 - current status or conditions of the infrastructure (i.e. based on stakeholder feedback and/or local site inspections)

Finding No: TNR-000438

Checklist Item No: 1.7.1

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2023-Mar-31

Checklist item: 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.

Findings: The document should include an understanding of potential or scaled costs of the risks and opportunities. This will facilitate the planning for implementation and or the transfer of the opportunities as actions in the Water Stewardship Plan.

Corrective action:

- PMTM will provide a water-related risk assessment using global and local data sets. For the assessment, the following aspects will be taken into consideration:
 - identification and prioritization of water-related risks based on their risk level
 - potential mitigation opportunities and costs
 - potential severity of impacts, likelihood of occurrence within a given time frame and costs

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Finding No:	TNR-000495
Checklist Item No:	1.8.3
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Mar-31
Checklist item:	Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.
Findings:	Although the site has provided two examples of actions taken towards water quality best practice no evidence was presented at the audit to suggest that the site had undertaken a process to identify water quality best practice within the catchment.
Corrective action:	<p>'• As per Criteria 1.8.3., PMTM will provide a tabulated list of catchment best practices focused on water quality.</p> <p>• Water quality-focused catchment best practices will be identified based on:</p> <ul style="list-style-type: none">- stakeholder feedback from local authorities, NGOs, minority groups of relevance etc.- local governance initiatives- environmental reports related to surface and groundwater quality- catchment plan(s), public policies- major publicly-led initiatives- potential, synergically opportunities for water stewardship collective action with other stakeholders

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Finding No:	TNR-000496
Checklist Item No:	1.8.4
Status:	Closed
Finding level:	Major
Due date:	2022-Aug-05
Checklist item:	Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.
Findings:	<p>The site has provided no evidence to suggest that Best Practice for maintaining IWRA's has been discussed and addressed. The evidence provided is not related to the IWRA's identified Step 1.5.5.</p>
Corrective action:	<ul style="list-style-type: none">• PMTM will provide a tabulated list of catchment best practices focused on the IWRA's previously identified in 1.5.5.• IWRA-focused catchment best practices will be identified based on:<ul style="list-style-type: none">- stakeholder feedback from local authorities, NGOs, minority groups of relevance etc.- local governance initiatives- catchment plan(s), public policies- major publicly-led initiatives- potential, synergically opportunities for water stewardship collective action with other stakeholders• Potential IWRA-focused best practices that PMTM is investigating on are as follows:<ul style="list-style-type: none">- tree planting campaign for deforested IWRA's- establishment of monitoring program to observe changes or impacts on IWRA- project support (either directly or via an NGO) to restore and improve a degraded or endangered IWRA- clean up event to improve a degraded IWRA due to anthropic, leisure-related activities (i.e. tourism, sporting activities)- public communication initiative to raise awareness and discourage negative actions by others
Evidence of implementation:	<p>Description of best practices of the 8 IWRA identified (including on site and in the Catchment; see attachment). The best practices described include : agricultural sector, industrial sector, site specific, domestic users and municipalities and governance authorities.</p> <p>The best practices described included the 1 IWRA in the catchment included in their WSP and the 2 IWRA for the site.</p> <p>Some supporting documents are attached such as Best Available Techniques (BAT) Reference Document for the Food, Drink and Milk Industries</p> <p>Nehir Havza Yönetim Planı Nihai Raporu</p> <p>İzmir Yeşil Şehir Eylem Planı</p>

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Finding No:	TNR-000497
Checklist Item No:	2.1.1
Status:	Closed
Finding level:	Observation
Checklist item:	<p>A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:</p> <ul style="list-style-type: none">- That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes- That the site implementation will be aligned to and in support of existing catchment sustainability plans- That the site's stakeholders will be engaged in an open and transparent way- That the site will allocate resources to implement the Standard.
Findings:	<p>The indicator requires the implementer to commit to disclose on progress for water stewardship program(s) to achieve improvements in AWS water stewardship outcomes, this is not the same as committing to disclose water-related information to relevant public. Compliance to the indicator requirement can be improved upon.</p>
Corrective action:	<ul style="list-style-type: none">• PMTM will provide a signed leadership commitment (by the senior-most management staff member) that explicitly commits the site to:<ul style="list-style-type: none">- supporting and implementing the 5 AWS outcomes- engagement of stakeholders in an open and transparent manner- striving to comply with legal and regulatory requirements related to water- respecting water-related rights, including ensuring appropriate access to safe water, sanitation and hygiene (WASH) for all workers in all premises under the site's control- supporting and coordinating with public sector agencies in the implementation of plans and policies- continually improving and adapting the site's water stewardship actions and plans- maintaining the organizational capacity necessary to successfully implement the AWS Standard, including ensuring that staff has the time and resources necessary to undertake the implementation- supporting water-related national and international treaties- disclosing material on water-related information to relevant audiences and stakeholders

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Finding No:	TNR-000498
Checklist Item No:	2.3.1
Status:	Closed
Finding level:	Minor
Due date:	2023-Mar-31
Checklist item:	A water stewardship strategy shall be identified that defines the overarching mission, vision, and goals of the organization towards good water stewardship in line with this AWS Standard.
Findings:	No evidence was produced to support that a Water Stewardship Strategy had been identified.
Corrective action:	'• PMTM will provide evidence in Criteria 2.3.2. Strategy column will be added to 2.3.2
Evidence of implementation:	The Site has send their WSP which includes a Strategy.

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Finding No:	TNR-000451
Checklist Item No:	2.3.2
Status:	Closed
Finding level:	Major
Due date:	2022-Jul-01
Checklist item:	<p>A water stewardship plan shall be identified, including for each target:</p> <ul style="list-style-type: none">- How it will be measured and monitored- Actions to achieve and maintain (or exceed) it- Planned timeframes to achieve it- Financial budgets allocated for actions- Positions of persons responsible for actions and achieving targets- Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.
Findings:	<p>The WS Plan requires to be improved upon to achieve full compliance to the indicator. Each target is required to have a metric associated with it to allow it to be measured and monitored for achievement. More future actions are required for the remainder of 2022. New and separate targets should be set for 2023 based on learnings from previous years. Future budgets should be calculated and reflect for future expenditure and not retrospectively calculated as cost. The targets should be linked back to shared water challenges. Out of 74 Targets set none of the them are relating to IWRAs, there should be targets set for all AWS outcomes.</p>

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Corrective action:

- PMTM will provide a responsive and resilient Water Stewardship (WS) Strategy Plan in an excel format. The WS Strategy Plan will be created in response to the water-related risks and challenges identified in Step 1.
- The WS Strategy Plan will include the following:
 - water-related risks and challenges that concern not only the site and its water supply, but the entire catchment territory previously identified in Step 1
 - Goals/targets (i.e. reduce potable water consumption on-site)
 - Strategy (i.e. implement water reduction technologies & recycle and/or reuse water and waste water)
 - SMART (Specific, Measurable, Achievable, Realistic and Time-based) actions that work towards improving all 5 water stewardship outcomes
 - Description
 - Stage leader (who is accountable for achieving the target)
 - Timeframe (i.e. start date and final implementation date)
 - Status (i.e. proposed idea, solution development, assessment etc.)
- The WS Strategy Plan will include both short and long-term actions focused of the water stewardship principle of continuous improvement, both on-site and in the catchment territory. For a better organization and visual representation, the actions will be divided into 2 groups (social & community and technological actions). Each action will be identified with a specific ID.
- PMTM will include and develop an action with relevant public-sector and infrastructure agencies (Criteria 2.4.1.)

NOTE: Aspects related to finances (i.e. Capex), measurement and monitoring modalities (i.e. directly or indirectly) and value creation will be included in 4.1.1.

IWRA Related plans will also be included and completed

Evidence of implementation:

The Site has described 44 Targets for social and community actions and 25 technological actions in their WSP and included measurement metrics of each target including estimated budgets, the WSP includes targets set for all AWS outcomes.

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Finding No:	TNR-000440
Checklist Item No:	2.4.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Mar-30
Checklist item:	A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.
Findings:	PMTM have not presented sufficient evidence to demonstrate that they have a plan to mitigate/adapt to water risk in co-ordination with relevant public sector agencies.
Corrective action:	<ul style="list-style-type: none">- PMTM will provide evidence in Criteria 2.3.2. Strategy plan will be improved to leverage risk mitigation actions in co-ordination with sector and infrastructure agencies.- PMTM has organized Regional Water Workshop , cleaning and tree planting activities on IWRA with the participation of governmental bodies, infrastructure agencies, suppliers and industrial companies
Finding No:	TNR-000578
Checklist Item No:	3.5.1
Status:	Closed
Finding level:	Minor
Due date:	2023-Mar-31
Checklist item:	Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.
Findings:	The site should amend the WS Plan to include a target to enhance IWRA onsite.
Corrective action:	<p>Strategy plan will be improved to leverage risk mitigation actions in co-ordination with sector and infrastructure agencies. PMTM will provide evidence in Criteria 2.3.2.</p> <p>In 2.3.2 - Onsite IWRA related below actions are already defined;</p> <ul style="list-style-type: none">- Onsite biodiversity attraction- Tree planting activity
Evidence of implementation:	<p>The Site has included in their WSP activities to enhance IWRA on site.</p> <p>In 2.3.2 - Onsite IWRA related actions:</p> <ul style="list-style-type: none">- Onsite biodiversity attraction- Tree planting activity

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Finding No:	TNR-000589
Checklist Item No:	3.7.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Mar-31
Checklist item:	Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.
Findings:	The site must provide evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.
Corrective action:	<ul style="list-style-type: none">• PMTM will provide, in its WS Strategy Plan (Criteria 2.3.2.), evidence of contact and engagement with relevant primary input suppliers (i.e. DIM materials and LEAF) located inside the catchment territory.• PMTM's target will be to increase understanding and awareness amongst local suppliers in relation to shared water-related risks and sustainable water practices.• Potential engagement modalities may include:<ul style="list-style-type: none">- Webinars, workshops and/or dedicated meetings for data sharing- Questionnaire disclosure for feedback and water-related data gathering- Service provider list for PMTM to be obtained and evaluated inline with the requirement. And applicable quantified targets will be defined.
Finding No:	TNR-000580
Checklist Item No:	3.7.2
Status:	Closed
Finding level:	Observation
Checklist item:	Evidence of engagement with suppliers and service providers, as well as, when applicable, actions they have taken in the catchment as a result of the site's engagement related to indirect water use, shall be identified.
Findings:	Evidence of engagement with supplies and service providers has been presented. It is not immediately evidenced which of these uses water on site (direct) and which uses water offsite (indirect). Response to this indicator could be improved.
Corrective action:	PMTM will provide evidence in Criteria 1.4.1. and 1.4.2. Files will be reorganized

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Finding No:	TNR-000441
Checklist Item No:	3.9.4
Status:	Closed
Finding level:	Major
Due date:	2022-Jun-30
Checklist item:	Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.
Findings:	No evidence has been provided demonstrate the Best Practice has been implemented to maintain and improve the status of the IWRA identified as Fetrek Creek (discharge point of PMTM) the are many more opportunities here for improvement.
Corrective action:	<ul style="list-style-type: none">• PMTM will provide evidence of action implementation related to the maintenance and/or improvement of IWRA status. New actions are defined for IWRA: <ul style="list-style-type: none">1- SC-Ext 2022_08 Clean-up and tree planting event alongside Fetrek Creek riverfront2- SC-Int 2022_07 On-site IWRA project - biodiversity attraction3- SC-Int 2022_06.01 Tree planting activity4- SC-Ext 2021_12 Discharge point extension into Fetrek Creek5 - SC-Int 2010_06 Tree saplings and compost donation to employees <ul style="list-style-type: none">• Evidence may include the following:<ul style="list-style-type: none">- Photographs- Videos- Technical meetings- Purchase Order(s) for specific interventions- Relevant communication exchange or written correspondence (i.e. emails)All evidence will be saved in a dedicated folder and successively shared.
Evidence of implementation:	<p>The Site has provided pictures of the area where their IWRA best practices have been implemented on site (tree planting and green grass) and in the catchment (Fetrek Creek)</p> <p>The Site has provided evidence of the Clean-up and tree planting event alongside Fetrek Creek riverfront (discharge point of the Site, defined as IWRA on the catchment). They have shown the before and after activities related with the best practise they implemented (2022).</p> <p>The Site has presented evidence of the cleaning of their IWRA on site project designated as biodiversity attraction. The Site has also publish pictures on they web related to their PMTM Environment week, where they have been planting olive trees, that they are planning to harvest in the future as evidence is possible to observe the videos (attached); the also offered tree samplings and compost donation to employees.</p>

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Finding No:	TNR-000448
Checklist Item No:	4.1.1
Status:	Closed
Finding level:	Major
Due date:	2023-Mar-30
Checklist item:	Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.
Findings:	As PMTM has not included measurement parameters in the WS Plan there is have been no evidence of evaluation of performance against the plan, nor has any analysis of performance been conducted.
Corrective action:	<ul style="list-style-type: none">• PMTM will provide an Evaluation of the WS Strategy Plan created in Step 2. This will be executed in excel format.• The Evaluation of the WS Strategy Plan will include the following:<ul style="list-style-type: none">- Name of action under evaluation- Stage Leader- Status- Capex (\$)- Evaluation period (i.e. 12 months)- Measurement and/or monitoring modalities (i.e. direct or indirect)- Savings (i.e. economic and/or in m3)- Value and/or benefit creation (i.e. social, environmental and economic)- KPIs to assess level of stakeholder engagement- AWS outcome achievement
Evidence of implementation:	An evaluation of the WS Strategy Plan was presented.
Finding No:	TNR-000581
Checklist Item No:	4.1.2
Status:	Closed
Finding level:	Minor
Due date:	2023-Mar-31
Checklist item:	Value creation resulting from the water stewardship plan shall be evaluated.
Findings:	There are three columns added to the WS Plan which discuss the created and shared value on social, environmental and economical value. This is a descriptive function. This should be evaluated in a financial water cost/benefit calculation.
Corrective action:	Cost/benefit evaluation of the actions was shared in 1.3.7. file. PMTM will provide evidence in Criteria 4.1.1. linked with 2.3.2 actions. Energy and maintenance costs are also taken into account within 4.1.1.
Evidence of implementation:	The Site WSP evaluation discusses the created and shared value on social, environmental and economical values are discussed. That has been evaluated in a financial water cost/benefit calculation. Water savings (in m3/year) have been recorded in the water budget spreadsheet.

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Finding No:	TNR-000501
Checklist Item No:	4.3.1
Status:	Closed
Finding level:	Observation
Checklist item:	Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.
Findings:	All engagement with stakeholders and annual disclosure of Water Stewardship activities should be conducted well before the audit is due to take place.
Corrective action:	PMTM will provide evidence in Criteria 5.2.1.
Finding No:	TNR-000449
Checklist Item No:	4.4.1
Status:	Closed
Finding level:	Minor
Due date:	2023-Mar-30
Checklist item:	The site's water stewardship plan shall be modified and adapted to incorporate any relevant information and lessons learned from the evaluations in this step and these changes shall be identified.
Findings:	PMTM did not produce any evidence to support that this indicator had been addressed by the site. The WS Plan requires improvement to obtain full compliance. Where achieving one target leads to further targets or improvements this needs to be reflected in the WS Plan.
Corrective action:	<ul style="list-style-type: none">• PMTM will provide evidence in Criteria 4.1.1.• PMTM will also provide evidence of stakeholder feedback gathering (i.e. via dedicated questionnaires disclosed during webinars, workshops and/or dedicated meetings). Relevant stakeholder feedback will be utilized to integrate and/or modify the WS Strategy Plan. <p>NOTE: as per AWS Standard Guidance, the WS Strategy Plan must be evaluated and updated at least annually. It is not mandatory to update it more often.</p> <p>* PMTM has already updated Strategy plan inline with audit results. * After the evaluation of workshop outcomes completed, additional actions will also be defined within 2.3.2 file</p>
Evidence of implementation:	Value creation assessment of the WSP actions including their social and environmental results for 25 actions.

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Finding No:	TNR-000450
Checklist Item No:	5.2.1
Status:	Closed
Finding level:	Major
Due date:	2022-Aug-05
Checklist item:	The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.
Findings:	The WS Plan showing contribution to AWS Outcomes was not shared with stakeholders.
Corrective action:	<ul style="list-style-type: none">• PMTM will divulgate and share the WS Strategy Plan with relevant stakeholders highlighting in particular the following:<ul style="list-style-type: none">- Main actions and/or project that contributed to the achievement of the 5 AWS Outcomes- Water-related risks and challenges detected in the local catchment territory- Future targets• All communication activities will be at a level of detail, language and format most appropriate to each relevant stakeholder (i.e. clear, comprehensible, in local languages and in a format that can be understood).• PMTM is evaluating the following communication modalities:<ul style="list-style-type: none">- Meetings, webinars or dedicated workshops- Water stewardship report- Internally via business updates, newsletters, led walls, info. points etc. <p>As per EA and law department evaluation, PMTM will only share the AWS summary with industrial stakeholders and the related employees. In case of any further info request, our internal and external communication procedure will be implemented.</p> <p>Summary will be shared with stakeholders in Turkish.</p>
Evidence of implementation:	List of attendance (63 people) including signatures Date: 28/07/2022 pictures of the event, the presentation of their WSP to relevant stakeholders.

Signature WSAS

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Report Details

Report	Value
Report prepared by	Mia Antoni-Naidoo
Report approved by	Claudia M. Jaime
Report approved on (Date)	04/05/2022

Surveillance

Proposed date for next audit
2023-Mar-30

Stakeholder Announcements

Date of publication	Location
2022-Feb-28	https://a4ws.org/certification/stakeholder-announcements/
2022-Feb-28	https://watersas.org/stakeholder-announcements/
Comment	The stakeholder announcement was published at AWS web page and WSAS web page.

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Catchment Information

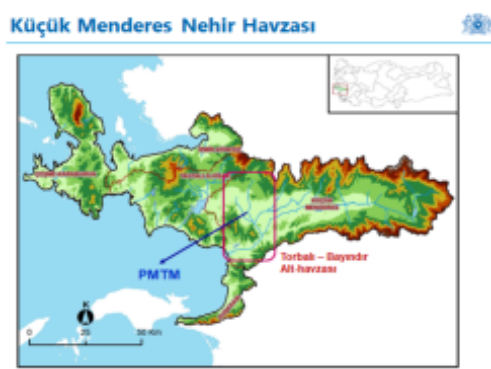
Catchment Information

PMTM is located in the Küçük Menderes Basin. The basin has a series of lower basins and these are the following: Küçük Menderes 3.490,95 km² 50,1 % Tahtalı-Seferihisar 1.248,92 km² 17,9 % İzmir-Körfez 816,68 km² 11,7 % Çeşme-Karaburun 1.114,27 km² 16,0 % Kuşadası 292,43 km² 4,2 %.

PMTM is located in the Küçük Menderes lower basin. The total catchment area of the basin is 6,963 km² and it is the smallest basin with Turkey's total rainfall. The average annual precipitation is approximately 727 mm, average annual flow rate is 17.16 m³ / s and 0.54 hm³, the annual average flow height is 693 mm, the annual average yield is 2.4 L / s / km² participation rate is determined as 0.29 (MFWW, 2010). To the west of the Küçük Menderes Basin, near the location where the Küçük Menderes River flows into the sea, there are the Gebekirse and Çatal lakes with a surface area of approximately 75 ha with element swamp covering an area of approximately 1.500 hectares. The Lake Gebekirse is included in the Ramsar Convention as being part of the Küçük Menderes Delta in 2006 at the Zeytinköy Mevkii. It is located in 839 ha area. With regards to the groundwater mass, PMTM is located in Torbalı Bayındır area (601.07 km²).



1.1.1._Kucuk_Menderes_Water_Scope.jpg



1.1.2._Catchment_MAP.jpg

Comment

Several maps have been attached with catchment information as well as the Basin Management Plan.

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Client Description and Site Details

Client/Site Background

Philip Morris International is a company that manufactures tobacco related products, with more than 80,000 employees. It has operations world-wide and Philip Morris Tütün Mamulleri Sanayi ve Ticaret A.Ş. (PMTM) is the manufacturing company of PMI in Turkey. Having started its operations towards the end of 1992, the plant located in the 7 Eylül Mahallesi, Philsa Caddesi No: 32, at Torbali in Izmir, Turkey has become one of the largest manufacturing facilities of PMI in the world with its investment and export capacity increasing over the years with more than 1,000 employees.

Summary of Shared Water Challenges

Summary of Shared Water Challenges

PMTM has developed a list of the main challenges of shared with other stakeholders in the basin with regards to water. To do so, they have established an order of priority ranging from 1 to 4, justifying with reviews the reasons for the assigned priority and the reasons for what are considered to be of importance for both the estate and the other actors of the basin.

The main issues the basin is facing with regards to a shared and sustainable management of water resources, are summarised as follows:

1. Increased Water Stress
2. Reduced Water Quality
3. Ecosystem Vulnerability
4. Enforcement Related Problems in respect of Water Regulations
5. Risk of Drought

A more detailed presentation of shared water challenges identified by PMTM has been uploaded to the Platform and is used as evidence for 1.6.1.

0.1 General Requirements for Single Sites, Multi-Sites and Groups

0.1.1 Eligibility Criteria

0.1.1.1 The site(s) occupy one catchment OR an exception has been granted.

✓
Yes

0.1.1.2 The scope of the proposed certification shall be under the control of a single management system.

✓
Yes




0.1.1.3 The scope of the proposed certification shall be homogeneous with respect to primary production system, water management, product or service range, and the main market structures.

✓
Yes

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1	STEP 1: GATHER AND UNDERSTAND	
1.1	<i>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.</i>	
1.1.1	<i>The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including:</i> <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.	 Obs.
Comment	The site presented a site map for the factory showing the Incoming water, and the water treatment plant (before use) and waster water treatment plant (after use) along with the irrigation pond. A second map shows the routing of rain water on the site, which is not allowed to be added to the treatment plant but is not captured in any way for re-use. A third factory map was provided showing the location of the oil separator. A catchment map was provided which included the locations of the government managed waste water treatment works.	
1.2	<i>Understand relevant stakeholders, their water related challenges, and the site's ability to influence beyond its boundaries.</i>	
1.2.1	<i>Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall:</i> <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 on their level of interest and influence.	 Yes
Comment	Stakeholders are well defined, documented and have been physically mapped by PMTM. The stakeholder document contains a section which identifies the degree of engagement and level of influence and interest.	
1.2.2	<i>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.</i>	 Yes
Comment	Stakeholders are well defined, documented and have been physically mapped by PMTM. The stakeholder document contains a section which identifies the degree of engagement and level of influence and interest.	
1.3	<i>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.</i>	

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1.3.1	<i>Existing water-related incident response plans shall be identified.</i>	✓ Yes
Comment	PMTM does not have one document dedicated to water-related incidents on site, there are several documents which cover this topic. A Manufacturing Incident Investigation & Reporting Matrix was provided as evidence of how incidents are handled on site. The site also produced a Global Water Stewardship manufacturing sustainability document which applies to all PMI sites around the world. There is available a general emergency response procedure for the site which does cover water. As this is a water scarce area there is no risk of flooding. There is a water management procedure which addresses, water consumption, WWTR, rain water control, sewer control etc.	
1.3.2	<i>Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped</i>	✓ Yes
Comment	The Site's water balance was presented by the engineering department, and all inflows, storage, losses and outflows were identified and mapped. Site Balance data is collated in a spreadsheet which is maintained by the Engineering Department. 38% of all water withdrawn during 2021 was discharged to Fetrek Creek. The site water balance has been mapped graphically and with data. The water balance for 2021 and 2020 was reviewed visually and attached as evidence for 2021. There was a significant decrease in wastewater generated in 2020 which is associated with covid, both plant production was reduced as was staff attendance on site.	
1.3.3	<i>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.</i>	✓ Yes
Comment	PMTM does track annual variance in water usage rates, both consumption of incoming water the creation of outgoing water and at various stages and forms throughout the plant. Monthly management meeting PDCA with explanations of deviations from targets if they occur. Three screenshots have been provided as evidence to show these parameters are tracked.	
1.3.4	<i>Water quality of the site's water source(s), provided waters, effluent and receiving water bodies shall be quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be quantified.</i>	✓ Yes
Comment	Effluent is tested every three months by an external laboratory. They are required to test for pH, COD, Fish biotoxicity, and then voluntarily they test for Ammonium and oil and grease. Incoming water from the well is sand filtered and then tested for ecoli, physical and chemical analysis as well as some metals. Well water is tested every three months for limited parameters and annually for all parameters.	
1.3.5	<i>Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.</i>	✓ Yes
Comment	Chemical list for PMTM and also IFMS (integrated facility management services) contractor has been provided. Each is itemized and also mapped in the chemical department map.	
1.3.6	<i>On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.</i>	✓ closed
Comment	No IWRA's have been identified on site but there are wells and irrigation ponds present. Finding No: TNR-000433	
1.3.7	<i>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.</i>	✓ closed

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Comment Water-related costs have been tabled for the treatment of both incoming and outgoing water as well as costs for all other water-related activities. There is no description or quantification of the social, cultural, environmental, or economic water-related value generated by the site provided in the document. There is a column which is titled Other data (how many people impacted/benefit) and this provides a quantification of the number of people which have benefited.

Finding No: TNR-000485

1.3.8 Levels of access and adequacy of WASH at the site shall be identified.



Yes

Comment WASH facilities onsite were visually recognised, toilets, wash stations, showers, sanitisers were all provided. Every second month an internal consultative committee meets with staff through to senior staff to discuss health and safety issues including access to WASH facilities. Levels of access were observed to be high. H&S committee meets every two months and WASH is on the agenda and discussed. There is no statistical analysis available on access to WASH.

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.



in progress

Comment PMTM has gathered the information from their tobacco suppliers and major packaging supplier on their water use, using the submissions to CDP. They have gathered water use data for the tobacco suppliers (x3). The embedded water use has been quantified via this process, however, quality and risk have not been addressed.

Finding No: TNR-000486

1.4.2 The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.



closed

Comment Outsourced warehousing services are evaluated on a quarterly basis through an in-house service division. Only one out of two are assessed. The cafeteria and trucking companies all use water on the site and are tracked by PMTM but this is reported under PMTM consumption. No assessment has been presented as evidence that these are the only outsourced services.

Finding No: TNR-000434

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.



Yes

Comment Water Initiatives have been put into the WS Plan as targets and action. PMTM engages with government/companies/industries on water and sustainability issues in meetings/forums/seminar/webinar actively but has not necessarily documented in a list. Water governance initiatives have also been identified in the Shared Water Challenges document.

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










Yes

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Comment	PMTM have a legal register where appears the legal requirements for the waste water discharge and other water regulations. Permits for the 4 well was presented as evidence of legal compliance. The permits have issue dates and withdrawal limits (in tons) but do not have expiry dates.	
1.5.3	<i>The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.</i>	 Yes
Comment	Using the Reference: Ministry of Agriculture and Forest- Catchment Action Management Plan, Feb 2019 the site presented the data on the catchment water balance and included a presentation showing annual and seasonal variances.	
1.5.4	<i>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.</i>	 Yes
Comment	The Department of Agriculture and Forestry Ministry have prepared the data on the quality of surface and underground water and PMI has provided the presentation with this information.	
1.5.5	<i>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.</i>	 closed
Comment	PMTM have prepared an IWRA document and identified IWRAs, however no evidence was provided to suggest that the status of the IWRAs has been assessed.	
	Finding No: TNR-000490	
1.5.6	<i>Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.</i>	 in progress
Comment	PMTM has identified the water related infrastructure in the document in the Basin Management Plan document provided. The condition of the infrastructure has not been assessed nor the potential exposure to extreme events.	
	Finding No: TNR-000491	
1.5.7	<i>The adequacy of available WASH services within the catchment shall be identified.</i>	 Yes
Comment	Catchment WASH data has been provided from Turkey National Statistics Institute which collects data and publishes in government report. Access to clean water and sewerage system is documented on a national level.	
1.6	<i>Understand current and future shared water challenges in the catchment, by linking the water challenges identified by stakeholders with the site's water challenges.</i>	
1.6.1	<i>Shared water challenges shall be identified and prioritized from the information gathered.</i>	 Yes
Comment	Shared Water Challenges have been identified under the Risks document. Prioritisation has been done and PMI have included a section on the relevance of the challenge to stakeholders and to the site.	
1.6.2	<i>Initiatives to address shared water challenges shall be identified.</i>	 Yes
Comment	Initiatives to address shared water challenges have been put into the WS Plan as targets.	
1.7	<i>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.</i>	

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1.7.1	<i>Water risks faced by the site shall be identified, and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.</i>	 in progress
Comment	Water risks have been identified under the tab of risk in the WS Plan. They have prioritised the risk, the likelihood, and severity of impact, but no costs have been provided. Finding No: TNR-000438	
1.7.2	<i>Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.</i>	 Yes
Comment	Opportunities have been identified by the site, an assessment into the costs and potential savings has been presented under the tab "Saving Projects"	
1.8	<i>Understand best practice towards achieving AWS outcomes: Determining sectoral best practices having a local/catchment, regional, or national relevance.</i>	
1.8.1	<i>Relevant catchment best practice for water governance shall be identified.</i>	 Yes
Comment	PMTM has an External Affairs Manager who has responsibility for implementing and leading engagement with stakeholders related to AWS stewardship plan and standard. As water scarcity is significant issue in the area PMTM has initiated several projects which raise awareness of water issues within the catchment. They conduct webinars/forums/meetings and seminars to share best practice in water management they have implemented on site. In a similar manner meetings are held with the local governors/mayors and directorate to motivate for water scarcity and water use issues. Meetings with Global PMI team and share practices on catchment related activities, water brain storming sessions with other factories within PMI.	
1.8.2	<i>Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.</i>	 Yes
Comment	PMTM has identified and implemented many water reduction or re-use projects in the plant which have resulted in improvement of the water balance. See attached document.	
1.8.3	<i>Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.</i>	 in progress
Comment	Two water-oil separator systems were installed in the rainwater collection systems by PMTM to prevent contamination of water on site. The site tests outgoing water for an extra two parameters than legally required. Finding No: TNR-000495	
1.8.4	<i>Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.</i>	 closed
Comment	The site has provided evidence of tree planting and provision of water aerators as evidence of Best Practice in site maintenance of IWRAs. Finding No: TNR-000496	
1.8.5	<i>Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.</i>	 Yes
Comment	PMI has also provided information on WASH Studies conducted by PMI Leaf with the tobacco suppliers which are located in and outside the catchment. PMI believes that education on WASH topics plays a great role in spreading awareness.	

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2 STEP 2: COMMIT & PLAN - Commit to be a responsible water steward and develop a Water Stewardship Plan	
2.1	Commit to water stewardship by having the senior-most manager in charge of water at the site, or if necessary, a suitable individual within the organization head office, sign and publicly disclose a commitment to water stewardship, the implementation of the AWS Standard and achieving its five outcomes, and the allocation of required resources.
2.1.1	<p>A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:</p> <ul style="list-style-type: none"> - That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes - That the site implementation will be aligned to and in support of existing catchment sustainability plans - That the site's stakeholders will be engaged in an open and transparent way - That the site will allocate resources to implement the Standard.
Comment	PMTM has prepared a Statement of Commitment for the site which commits to alignment with catchment plans, open and transparent stakeholder engagement and to allocate resources for AWS Implementation. The site commits to disclosing material information relating to water for the relevant public.
2.2	Develop and document a process to achieve and maintain legal and regulatory compliance.
2.2.1	<p>The system to maintain compliance obligations for water and wastewater management shall be identified, including:</p> <ul style="list-style-type: none"> - Identification of responsible persons/positions within facility organizational structure - Process for submissions to regulatory agencies.
Comment	There is a monthly report which is generated by a consultant (legal) and uploaded to the Ministry of Environment. Regulatory follow up list, document. There is a portal for by which the reports are uploaded. There is a spreadsheet which documents all regulatory requirements.
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	<p>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.</p>
Comment	<p>There is no separate Water Stewardship strategy provided by the site. The strategy is considered to be communicated through the goals in the Water Stewardship Plan. There is an overarching PMTM masterplan not unique to AWS, nor water nor environmental.</p> <p>Finding No: TNR-000498</p>
2.3.2	<p>A water stewardship plan shall be identified, including for each target:</p> <ul style="list-style-type: none"> - How it will be measured and monitored - Actions to achieve and maintain (or exceed) it - Planned timeframes to achieve it - Financial budgets allocated for actions - Positions of persons responsible for actions and achieving targets - Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.

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Comment	<p>The WS Plan has been presented, it has included the goals and targets, the responsible people have been noted, there are planned timeframes for achieving this, however all targets and actions are retrospective, there are only 2 targets after April 2022. There is a cost function which has been added but again this is retrospective cost and not future allocated budget.. They have not linked to shared water challenges but have got environmental, social value to the company. There are no metrics identified for each target, it is not apparent how each one is measured or monitored.</p> <p>Finding No: TNR-000451</p>
2.4	<p><i>Demonstrate the site’s responsiveness and resilience to respond to water risks</i></p>
2.4.1	<p><i>A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.</i></p> <p>Finding No: TNR-000440</p>
Comment	<p>There is no plan presented as evidence during the audit. PMTM indicated that aspect have been covered in BCP, the Business Continuity Plan has one section to say that if the wells are compromised they can switch to Municipal Water.</p> <p>Finding No: TNR-000440</p>

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3 STEP 3: IMPLEMENT - Implement the site's stewardship plan and improve impacts		
3.1	Implement plan to participate positively in catchment governance.	
3.1.1	Evidence that the site has supported good catchment governance shall be identified.	✓ Yes
Comment	The site provided as presentation with explanation and photos of activities demonstrating the support of good catchment governance. One such example was the Forestry project implemented to support the Ministry of Agriculture. Evidence provided for 1.5.1 also applies.	
3.1.2	Measures identified to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be implemented.	✓ Yes
Comment	PMTM is in an industrial zone and local communities are relatively far away. They are not using municipal water and using underground water. So are not competing directly with them but have the possibility to impact the water table indirectly. Underground water usage rights are regulated by government. In case of any medium and serious drouth problem, government has allocation plans for the distribution of groundwater via prioritization of water intended for human consumption.	
3.2	Implement system to comply with water-related legal and regulatory requirements and respect water rights.	
3.2.1	A process to verify full legal and regulatory compliance shall be implemented.	✓ Yes
Comment	The site indicated that the same evidence for 1.5.2., 1.3.4 and 2.2.1 be used for this indicated as these are all indicators around legal compliance. The site has procedures and documented lists/spreadsheet to track legal compliance.	
3.2.2	Where water rights are part of legal and regulatory requirements, measures identified to respect the water rights of others including Indigenous peoples, shall be implemented.	✓ Yes
Comment	Water withdrawal from underground wells are controlled online by governmental bodies, and automated control systems as per pre-defined consumption limits are in place.	
3.3	Implement plan to achieve site water balance targets.	
3.3.1	Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.	✓ Yes
Comment	The status of progress is included as a column in the WS Plan. The status is either marked as "ongoing" or "achieved".	
3.3.2	Where water scarcity is a shared water challenge, annual targets to improve the site's water use efficiency, or if practical and applicable, reduce volumetric total use shall be implemented.	✓ Yes
Comment	The site has demonstrated that water scarcity is a shared water challenge and that there are many interventions implemented on site to address the issue and to continually improve the site's water use efficiency. It is tracked on monthly and annual basis by the site. Screenshots upload demonstrate the water use tracking.	
3.3.3	Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.	✓ Yes

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Comment	Governmental bodies are responsible for re-allocation of water and site has information on the allocation plans. In case of any re-allocation, government will be officially informing.	
3.4	<i>Implement plan to achieve site water quality targets</i>	
3.4.1	<i>Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.</i>	 Yes
Comment	Compliance with legal requirements in respect of water quality targets is monthly followed by external consultant by regularly testing the water and tracking the results. Further, due to covid, the site has implemented higher quality standards for chlorine levels and internally controls it on frequent basis.	
3.4.2	<i>Where water quality is a shared water challenge, continual improvement to achieve best practice for the site's effluent shall be identified and where applicable, quantified.</i>	 Yes
Comment	There is a complete water treatment plant and water is tested, when the nitrogen levels were too high the oxygen levels were adjusted to counter this. The COD levels are considered low. PMTM are testing additional parameters to allow for continual improvement. There are inline monitors and COD tests performed twice per week. There are two chlorination points in the treatment works where previously there was only one. This is an improvement post covid to destroy the virus before releasing the water.	
3.5	<i>Implement plan to maintain or improve the site's and/or catchment's Important Water-Related Areas.</i>	
3.5.1	<i>Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.</i>	 closed
Comment	There are no IWRAs identified on site, despite the presence of wells and an irrigation dam. The site should amend the WS Plan to include a target to enhance IWRAs onsite. Finding No: TNR-000578	
3.6	<i>Implement plan to provide access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers at all premises under the site's control.</i>	
3.6.1	<i>Evidence of the site's provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers onsite shall be identified and where applicable, quantified.</i>	 Yes
Comment	There is adequate drinking water observed to be provided to all staff members. There are showers, many toilets provided. Bottled water is provided free of charge to all staff members as is sanitiser, masks and PPE.	
3.6.2	<i>Evidence that the site is not impinging on the human right to safe water and sanitation of communities through their operations, and that traditional access rights for indigenous and local communities are being respected, and that remedial actions are in place where this is not the case, and that these are effective.</i>	 Yes
Comment	Water consumption is controlled by government and site water consumption is in between the defined limits. Also site has wastewater treatment plant where the treated waste water is discharged after disinfection.	
3.7	<i>Implement plan to maintain or improve indirect water use within the catchment:</i>	
3.7.1	<i>Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.</i>	 No

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Comment	The site provided the sustainability plan as evidence, however the water use in this plan is direct water use and not indirect. There was no evidence provided that any indirect water use targets were set.	
		Finding No: TNR-000589
3.7.2	<i>Evidence of engagement with suppliers and service providers, as well as, when applicable, actions they have taken in the catchment as a result of the site's engagement related to indirect water use, shall be identified.</i>	Q Obs.
Comment	Evidence of engagement with supplies and service providers has been presented. It is not immediately evidence which of these uses water on site (direct) and which uses water offsite (indirect).	
	Water reduction programmes have been put in place for the suppliers. Actions taken have been identified.	
3.8	<i>Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have.</i>	
3.8.1	<i>Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.</i>	✓ Yes
Comment	Aegen Region Chamber of Industry organized a meeting where the Ministry of Agriculture and Forestry made various presentations and brief participants on river basin action plan, water allocation plan, and drought action plan. PMTM and some of its stakeholders attended to this meeting and had the opportunity to discuss water-related issues.	
3.9	<i>Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.</i>	
3.9.1	<i>Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.</i>	✓ Yes
Comment	PMTM have taken part in Industry comparisons for Best Practice. The site has provided a presentation which details all the actions taken to demonstrate best practice in water governance. PMI Global has an AWS working group and they benchmark against one another in terms of Best Practice.	
	Best Practice is uploaded Enablon, internal platform for PMI where all best practice can be shared.	
3.9.2	<i>Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.</i>	✓ Yes
Comment	PMTM has developed a Building management system integrated with cooling towers and have managed to achieve 8% water saved through engineering changes. The automatic metering system throughout the plant helps to manage the water balance. The data in the water balance is updated on a daily basis. Daily checks are made on the water data. Meters are calibrated once a year in the factory.	
3.9.3	<i>Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.</i>	✓ Yes
Comment	There is a water testing frequency which is linked to legal and permit requirements. The site tests a further two parameters over an above that and has recently added further chlorinators on site. Continual improvement to this system is expected going forward.	
3.9.4	<i>Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.</i>	✓ closed

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Comment	There is no evidence to support any actions of Best Practice to the identified IWRAs has been implemented. The site tests discharge water going into Fetrek Creek but this a legal requirement and not Best Practice.	
		Finding No: TNR-000441
3.9.5	Actions towards achieving best practice related to targets in terms of WASH shall be implemented.	 Yes
Comment	Within in the site there are more than adequate provision of drinking water, good hand wash practices, the showers provided are tested for Legionella. See response to previous WASH indicators.	

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4		STEP 4: EVALUATE - Evaluate the site's performance.
4.1	<i>Evaluate the site's performance in light of its actions and targets from its water stewardship plan and demonstrate its contribution to achieving water stewardship outcomes.</i>	
4.1.1	<i>Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.</i>	 closed
Comment	As PMTM has not included measurement parameters in the WS Plan there no evidence of evaluation of performance against the plan, nor has any analysis of performance been conducted, action are classified only as ongoing or achieved. <p style="text-align: right;">Finding No: TNR-000448</p>	
4.1.2	<i>Value creation resulting from the water stewardship plan shall be evaluated.</i>	 closed
Comment	There are three columns added to the WS Plan which discuss the created and shared value on social, environmental and economical value are discussed. This is a descriptive function. This should be evaluated in a financial water cost/benefit calculation. <p style="text-align: right;">Finding No: TNR-000581</p>	
4.1.3	<i>The shared value benefits in the catchment shall be identified and where applicable, quantified.</i>	 Yes
Comment	There is a column in the WS Plan which is called Achieved Results which, have been quantified where possible, and the shared value benefit have been identified.	
4.2	<i>Evaluate the impacts of water-related emergency incidents (including extreme events), if any occurred, and determine the effectiveness of corrective and preventative measures.</i>	
4.2.1	<i>A written annual review and (where appropriate) root-cause analysis of the year's emergency incident(s) shall be prepared and the site's response to the incident(s) shall be evaluated and proposed preventative and corrective actions and mitigations against future incidents shall be identified.</i>	 Yes
Comment	There is an incident management tool online, Initial Problem Solving (IPS) used for Safety, and there have been no environmental incidents in the last 2 years.	
4.3	<i>Evaluate stakeholders' consultation feedback regarding the site's water stewardship performance, including the effectiveness of the site's engagement process.</i>	
4.3.1	<i>Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.</i>	 Obs.
Comment	The day before the audit PMTM site issued and email requesting feedback on the sites AWS action report which is detailing the AWS activities conducted on the site during 2020 and 2021.	
4.4	<i>Evaluate and update the site's water stewardship plan, incorporating the information obtained from the evaluation process in the context of continual improvement.</i>	
4.4.1	<i>The site's water stewardship plan shall be modified and adapted to incorporate any relevant information and lessons learned from the evaluations in this step and these changes shall be identified.</i>	 closed
Comment	PMTM have implemented many changes and improvements to the site but have not linked these to actions/targets set in the WS Plan. The plan presented after the audit has only two targets which extend beyond the date of the audit.	

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Finding No: TNR-000449

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5	STEP 5: COMMUNICATE & DISCLOSE - Communicate about water stewardship and disclose the site's stewardship efforts	
5.1	<i>Disclose water-related internal governance of the site's management, including the positions of those accountable for legal compliance with water-related local laws and regulations.</i>	
5.1.1	<i>The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.</i>	✓ Yes
Comment	The email to the stakeholders disclosing water performance includes identification of positions for those accountable for water-related compliance.	
5.2	<i>Communicate the water stewardship plan with relevant stakeholders.</i>	
5.2.1	<i>The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.</i>	✓ closed
Comment	Water performance was shared with stakeholders but not the WS Plan. Finding No: TNR-000450	
5.3	<i>Disclose annual site water stewardship summary, including: the relevant information about the site's annual water stewardship performance and results against the site's targets.</i>	
5.3.1	<i>A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.</i>	✓ Yes
Comment	The summary showing site's water stewardship performance, was been shared with stakeholders.	
5.4	<i>Disclose efforts to collectively address shared water challenges, including: associated efforts to address the challenges; engagement with stakeholders; and co-ordination with public-sector agencies.</i>	
5.4.1	<i>The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.</i>	✓ Yes
Comment	Same document as 5.3.1.	
5.4.2	<i>Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.</i>	✓ Yes
Comment	Pg 27 of the document supplied for 5.3.1 shows the site to have engaged with stakeholders and supported public-sector agencies.	
5.5	<i>Communicate transparency in water-related compliance: make any site water-related compliance violations available upon request as well as any corrective actions the site has taken to prevent future occurrences.</i>	
5.5.1	<i>Any site water-related compliance violations and associated corrections shall be disclosed.</i>	✓ Yes
Comment	There are no water-related violation for PMTM in two years.	
5.5.2	<i>Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.</i>	✓ Yes
Comment	No corrective actions required	

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5.5.3	Any site water-related violation that may pose significant risk and threat to human or ecosystem health shall be immediately communicated to relevant public agencies and disclosed.	 Yes
Comment	No violations experienced by the site	

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Photographic Evidence from Audit



Example of seedling watering

Tobabbo seedlings2.jpg



Image of one of the chemical stores onsite

chemical store.jpg



Process for removing water from sludge

sludge removal.jpg

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Image of Well 5

Well 5.jpg



Each well has a meter for recording water withdrawal
well meter.jpg



The fence around the well demonstrating restricted access.
well security.jpg

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Water tank used to store water for testing field irrigation.
Water storage for irrigation.jpg



Example of a typical water meter used to monitor withdrawals
Water meter.jpg

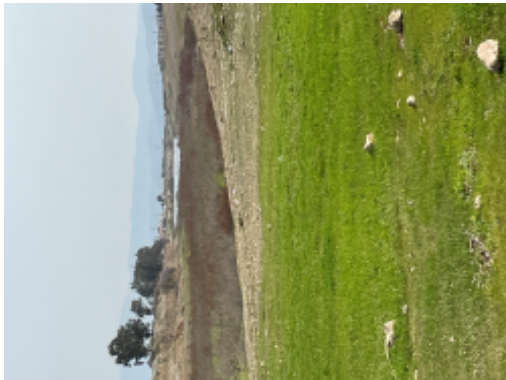


Yes

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Fetrek Creek downstream from PMI
downstream from discharge.jpg



Example of staff shower
staff showers.jpg



Image of the dam wall at Fetrek Creek
dam wall at fetrek creek.jpg

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Riparian Zone of Fetrek Creek
banks of fetrek creek.jpg



Example of staff wash area
Staff ablutions.jpg



Image of Fetrek Creek from PMI Discharge point
fetrek creek.jpg

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Photo graph of a well used to withdraw water.

Well.jpg



Effluent Treatment Ponds

WWTR (2).jpg



Front of the dam wall

Dam Wall.jpg

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Dried sludge from the WWTW.
solid waste from WWTR.jpg



The point at which water from the treatment plant (incoming) is discharged into the Fetrek Creek riparian zone
WTP Discharge Pt.jpg



Water Treatment Plant discharge into the Fetrek Creek Riparian Zone
WTP water discharge to Fetrek creek.jpg

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Process for removing solids waste from WWTW
sludge press.jpg



Inside the tobacco seedling nursery
T1obacco seedlings.jpg



Image of dam

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dam at fetrek creek.jpg



Image of the WWTW.

WWTR.jpg



View of WWTW with the Fetrek Creek Dam in the background.

WWTR 3.jpg



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Olive trees planted throughout the factory provide olive oil to employees once a year.

olive grove.jpg



Effluent Discharge point from PMI into Fetrek Creek riparian zone

WWTR discharge.jpg



Landed where test tobacco is grown

tabacco test grow area.jpg



Example of basin for washing hands

Staff basin.jpg

Previous Findings

All non-conformities raised in the previous audit have been satisfactorily closed.



N/A

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