

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000427



SITE DETAILS

Site: **BAT Venezuela - San Diego**

Address: Avenida Lope Mendoza Goiticoa, Via San Diego, Zona Industrial Castillito., 2006, San Diego, VENEZUELA

Contact Person: Nadia Koubbe

AWS Reference Number: AWS-000512

Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Core

Date of certification decision: 2023-Jan-31

Validity of certificate: 2026-Jan-31

AUDIT DETAILS

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

Audit Type(s): Initial Audit

Audit Start Date: 2022-Nov-22

Lead Auditor: Ricardo Salas Colunga

Audit team participants:

Ricardo Salas Colunga, Lead Auditor

Site Participants:

Nadia Koubbe Karahbit, Analyst

Ángel Ñanez, Head of Leaf

David Yepez, Leaf Growing

Jormaris Torrealba, GLT

Ezequiel López, Sustentabilidad

William Martínez, Warehouse

Vicenzo Catalano, Engineering

Raquel Barreto, Analyst

Karina González, Proyect ejecutivo

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ADDITIONAL INFO

Summary of Audit Findings: A total of 10 findings were raised during the certification audit, 0 major non-conformities, 8 minor non-conformities, 2 observations.

The Client is requested to perform a root cause analysis and define corrective actions for each of the non-conformities and to submit these to WSAS within 60 days of receipt of the audit report by 13/03/2022.

The major non-conformities must be sufficiently addressed and evidence submitted to WSAS within 90 days of receipt of the report by 12/04/2023.

Minor non-conformities must be closed out by the time of the next annual audit.

The audit team recommends certification BAT Venezuela at Core level pending approval of the corrective actions plan and closure of the major non-conformities.

CLOSURE OF FINDINGS AND CORRECTIVE ACTION PLAN:

The Client has successfully submitted the corrective action plan addressing all findings. Proof of implementation has been requested for the Minors and this will be evaluated during the Surveillance Audit.

Scope of Assessment: The scope of services covers the Initial certification audit for assessing conformity of BAT Venezuela against the AWS International Water Stewardship Standard Version 2.

The AGROBIGOTT C.A. tobacco raw material plant is located in the Lope Mendoza Goiticoa Avenue, industrial zone of San Diego, San Diego municipality, Edo Carabobo, Venezuela. It consists of an area of 16 ha., The AgroBigott C.A. facilities are located in the basin of a small stream (called Quigua) in the middle basin of the Los Guayos River, which in turn is a tributary of Lake Valencia and includes a processing plant which performs incoming processing, leaf or GLT conditioning, including vein washing and DEER processing..

The audit was conducted onsite on 22 to 24 November 2022.

The onsite site visit included the assessment of the production facilities that were visited onsite as part of the audit.

FINDINGS

NUMBER OF FINDINGS PER LEVEL

Observation	2
Minor	8

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FINDING DETAILS

Finding No:	TNR-002740
Checklist Item No:	1.3.2
Status:	In Progress - CA plan approved
Finding level:	Observation
Checklist item:	Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped
Findings:	<p>The FMD-softened water flow diagram does not include data on the volumes used in this process.</p> <p>Missing information on water volumes for this process should be included in the diagram.</p>
Corrective action:	<p>Include in the plant flow diagram the values of water softened by FMD including data</p> <p>Include in the plant flow diagram the values of water softened by FMD including data on the volumes used in this process the volumes used in this process..</p>
Finding No:	TNR-002856
Checklist Item No:	1.3.3
Status:	In Progress - CA plan approved
Finding level:	Observation
Checklist item:	<p>Site water balance, inflows, losses, storage, and outflows, including indication of annual variance in water usage rates, shall be quantified.</p> <p>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.</p>
Findings:	<p>The Site shall include numeric information into their water balance sheet (definitivo_BH_Valencia)</p>
Corrective action:	<p>1. Include in the month of June 2023, the entire annual data quantifying the maximum and minimum annual variations, the water balance of the site, the inputs, losses, storage and outputs, including the indication of the annual variation of the rates of use of the Water.</p> <p>2. Identify the challenge and implement the necessary preventive actions, within the reach of sustainable water management, in relation to the water in the basin.</p>

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Finding No:	TNR-002469
Checklist Item No:	1.3.6
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Nov-22
Checklist item:	On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.
Findings:	The site should include as IWRA the greenhouse, green and recreational areas of the site, shall be identified and mapped, a description of their condition and environmental values shall be included.
Corrective action:	Include green and recreational areas located on-site in the IWRAs map called "Diagrama de las áreas importantes relacionadas com el agua".
Evidence of implementation:	The Site should send a Map with the 3 on-site IWRA (see comment) The description of their status is missing
Finding No:	TNR-002510
Checklist Item No:	1.5.6
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Nov-22
Checklist item:	Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.
Findings:	The Site should identify the water related infrastructure potential exposure to extreme events and identify the condition of the water infrastructure located in the micro-catchment.
Corrective action:	Prepare a database with the conditions and state of the public water supply infrastructure with the support of government entities.
Finding No:	TNR-002509
Checklist Item No:	1.5.7
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Nov-22
Checklist item:	The adequacy of available WASH services within the catchment shall be identified.
Findings:	The site should identify the percentage of the population in the catchment that has access to drinking water and sanitation services.
Corrective action:	Prepare a database with the percentage of the population in the basin that has access to drinking water and sanitation services with the support of government entities.

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Finding No: TNR-002864
Checklist Item No: 1.7.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Apr-11
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: 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.
Corrective action: Correct the "Factores de Riesgo y Oportunidad AWS" file.

Finding No: TNR-002528
Checklist Item No: 2.3.2
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Nov-22
Checklist item: A water stewardship plan shall be identified, including for each target:
- How it will be measured and monitored
- Actions to achieve and maintain (or exceed) it
- Planned timeframes to achieve it
- Financial budgets allocated for actions
- Positions of persons responsible for actions and achieving targets
- Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.
Findings: The Site should restructure it's WSP in a single document that is coherent and according to the requirements of the STD:
The site must submit a water stewardship plan that includes for each objective:
- How it will be measured and monitored;
- The measures to achieve and maintain (or exceed) it;
- The expected timescales for achieving it; The financial budgets allocated to the actions;
- The financial budgets allocated to the actions;
- The positions of those responsible for the actions and for the achievement of the objectives; and
- The relationship between each target and the achievement of best practice to help address shared water challenges and the 5 AWS outcomes (The WSP does not include objectives related to IWRA and WASH)
Easy to read and free of inconsistencies.
Corrective action: Update the sustainable water plan including the items and requirements requested in the audit report so that the documentary structure is easier to read and understand.

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Finding No:	TNR-002859
Checklist Item No:	2.4.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Nov-22
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:	The Site should identify a plan to mitigate or adapt to identified water risks developed in coordination with relevant public sector and infrastructure agencies
Corrective action:	Establish mechanisms and strategies to hold meetings with government entities in the first quarter of 2023 in order to develop a water risk mitigation plan.
Finding No:	TNR-002866
Checklist Item No:	3.5.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Nov-22
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 include objectives in their WSP, including best practices, to maintain and/or improve the site's or catchment Important Water-related Areas.
Corrective action:	Include objectives and best practices related to IWRA in the file "Objetivos de gestión sostenible del agua".
Finding No:	TNR-002863
Checklist Item No:	4.1.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Nov-22
Checklist item:	Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.
Findings:	The Site should evaluate performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes (IWRA & WASH).
Corrective action:	Include IWRA and WASH performance in the sustainable water plan.

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A handwritten signature in black ink, appearing to read 'M. Vaidya', is positioned above a horizontal line.

Signature WSAS

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Report Details

Report	Value
Report prepared by	Ricardo Salas Colunga
Report approved by	Claudia Jaime
Report approved on (Date)	12 January 2023

Surveillance

Proposed date for next audit
2023-Nov-08

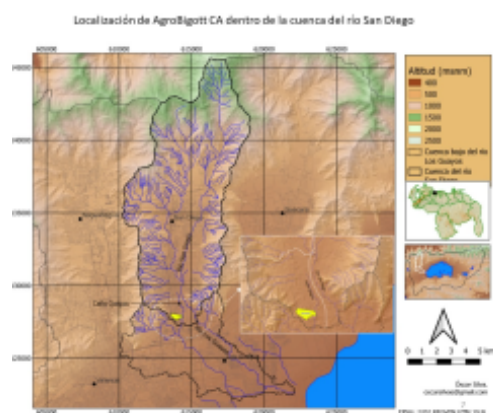
Stakeholder Announcements

Date of publication	Location
2022-Oct-14	https://watersas.org/stakeholder-announcements/
2022-Oct-13	https://a4ws.org/certification/stakeholder-announcements/ shared:https://www.bigott.com.ve/group/sites/BAT_9T2E9S.nsf/vwPagesWebLive/DO9T2ET7?opendocument
2022-Oct-14	WSAS and AWS Websites

Catchment Information

Catchment Information

In strict hydrological terms, the AgroBigott C.A. facilities are located in the basin of a small stream (called Quigua) in the middle basin of the Los Guayos River, which in turn is a tributary of Lake Valencia.



Localización de AgroBigott C.A. Venezuela.jpg

Client Description and Site Details

Client/Site Background

The site is the tobacco raw material plant AGROBIGOTT C.A., located in Lope Mendoza Goiticoa avenue, industrial zone of San Diego, San Diego municipality, Edo Carabobo, Venezuela. It consists of an area of 16 ha, which includes processing plant which performs processes of reception, conditioning of the leaf or GLT, including vein washing and DEER process.

Bigott is a member of British American Tobacco, a global group that owns 46 factories in 41 countries and whose headquarters are located in London. The British American Tobacco group, with more than 100 years of history, markets around 200 brands in 200 countries in which it actively participates and in total employs more than 57 thousand people worldwide, making it one of the most prestigious corporations in the world.

Bigott represents an important source of income for the National Treasury, as it is one of the leading taxpaying companies in the private sector.

Bigott has maintained its presence in the national context thanks to several factors: a portfolio of products whose quality satisfies the diverse preferences of the public, the collective effort of employees and suppliers, and the conviction to continuously improve each of the areas of the business, such as: Operations, Human Resources, Finance, Legal, Corporate Relations, Information Technology, Marketing, Trade Marketing and Distribution.

In Venezuela, Bigott has more than 80% market share thanks to the commercialization of its five brands: Belmont, Consul, Lucky Strike, Viceroy and Universal.

Decades of productivity distinguish the operations of Bigott, one of the oldest and most prestigious companies in the country, characterized by its great capacity for adaptation and modernization.

https://www.bigott.com.ve/group/sites/BAT_9T2E9S.nsf/vwPagesWebLive/DO9T2E55?opendocument

Summary of Shared Water Challenges

Summary of Shared Water Challenges

The Site identifies the following shared challenges:

- Increase the use of efficient irrigation systems.
- Promote awareness of the importance of good practices. Disseminate basic technical knowledge on watershed behaviour.
- Uniform criteria on the knowledge of the AWS 2.0 Standard, at the site.
- Establish a dynamic communication mechanism to reduce isolation by promoting participation in order to achieve joint water stewardship.
- Increase interest in companies in learning about modern water stewardship systems.
- Establish harmonious communication and coordination of activities related to water stewardship.
- Incorporation into the cooperation network or water resource management group of the San Diego river basin.
- Incorporate them in actions for the promotion and development of training and education programmes on water issues.
- Build a strategy with good communication skills in order to increase interest in the water management project and make them feel taken into account.

Additionally, the site identifies possible social impacts according to the analysis developed.

The increase in the population of the municipality of San Diego generates a negative impact related to:

Increased likelihood of contamination due to increased solid waste generation.

Increased illegal tapping affecting the general water supply Poor water supply (poor water quality) related to increased likelihood of disease incidence.

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0.1 General Requirements for Single Sites, Multi-Sites and Groups	
0.1.1	<i>Eligibility Criteria</i>
0.1.1.1	<i>The site(s) occupy one catchment OR an exception has been granted.</i>
Comment	<p>The AgroBigott C.A. facilities are located in the basin of a small stream (called Quigua) in the middle basin of the Los Guayos River, which in turn is a tributary of Lake Valencia See presentation Cuenca de San Diego Advance 1.1.1</p>
0.1.1.2	<i>The scope of the proposed certification shall be under the control of a single management system.</i>
Comment	<p>In hydrological terms, the facilities of BAT AgroBigott C.A. are located in the basin of a small stream (called Quigua) in the middle basin of the Los Guayos river, which in turn is a tributary of the Valencia Lake. Therefore, for the purposes of sustainable water use plans for these hydrological sectors, it is considered convenient to consider an integrated unit called the "San Diego river basin" (which, strictly speaking, is made up of the San Diego river basin itself and this hydrological sector called Caño Quigua). It occupies an area of 9443.4 ha.</p>
0.1.1.3	<i>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.</i>
Comment	<p>The scope of the proposed certification is homogeneous. The site focuses solely on the production of inputs for the production of cigars.</p>

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	<p><i>The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including:</i></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.
Comment	<p>The site features maps showing the physical extent of the site including:</p> <ul style="list-style-type: none"> - Site boundaries; - Water-related infrastructure, including the piped network, owned or managed by the site; <p>Any water sources supplying the site, owned or managed by the site or its parent organisation; Any water-related infrastructure, including the piped network, owned or managed by the site</p> <ul style="list-style-type: none"> - The site's water sources that are managed by the site; and - Authorisation for groundwater abstraction - Discharge points and location of the site's WWTP and the processes it uses and the final receiving water body; and - The watershed that the site affects and relies on for water. <p>The quality of the information provided, both scientific and technical, is remarkable.</p>
1.2	<i>Understand relevant stakeholders, their water related challenges, and the site's ability to influence beyond its boundaries.</i>
1.2.1	<p><i>Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall:</i></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 on their level of interest and influence.
Comment	<p>The site identifies stakeholders and their water-related challenges. presents the process used for stakeholder identification. This process:</p> <ul style="list-style-type: none"> - Includes all relevant stakeholder groups, including vulnerable people, women and minorities. The site indicates that there are no indigenous peoples in the region where the site is located. - The identified physical extent is considered, including stakeholders and water authorities responsible for abstraction and discharge concessions. - Provide evidence of stakeholder consultations on water-related interests and challenges; - The site assessed the capacity and/or willingness of stakeholders to participate. - The site identified the degree of stakeholder engagement based on their level of interest and influence.

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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	<p>The site identifies the degree of current and potential influence between the site and stakeholders, within the catchment and taking into account the final water source of the site and the final receiving water body of the wastewater.</p> <p>The site conducted a study that assessed potential participation according to shared risks, gender interest, by type of company and developed a statistical cluster analysis that allowed them to develop an in-depth analysis of stakeholders and their current and future interests.</p>	
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>	
1.3.1	<i>Existing water-related incident response plans shall be identified.</i>	 Yes
Comment	<p>The site identifies the following water-related incident response plans in place:</p> <ul style="list-style-type: none">-Chemical leakage with potential contamination of soil and water components.-Aquifer contamination from chemical spills.-Deviation in water potability parameters.-Failure of well extraction pump.-Lowering of the aquifer level. <p>In addition to the plans, it presents procedures related to:</p> <ul style="list-style-type: none">Wastewater treatment plant.Drinking waterWell cleaningWater leaks in general services	
1.3.2	<i>Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped</i>	 Obs.
Comment	<p>The site identifies and maps the water balance of the site, including inflows, losses, onsite water storage and outflows.</p> <p>The site presents diagrams and data related to its processes and water balance. It includes the flow diagram of the "deer" plant, the flow diagram of the softened water-FMD and the GLT process diagram.</p> <p>The FMD-softened water flow diagram does not include data on the volumes used in this process.</p> <p>The information can be found in the document, pages 6-10 "AWS Paso 1 Objetivo 1.3".</p>	
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>	 Obs.





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Comment	<p>The site quantifies the site's water balance, inflows, losses, storage and outflows, including an indication of the annual change in water use rates.</p> <p>The site identifies that there is no water-related challenge that poses a threat to the water balance for people or the environment.</p> <p>The site quantifies an estimate of annual maximum and minimum variations. The maximum variations are associated with the tobacco harvest, the minimum variations when the harvest season ends.</p> <p>During the audit the company's staff clearly described that the highest consumptions are related to the arrival of inputs from the tobacco leaf harvest.</p> <p>The information can be found in the document, pages 9-11 "AWS Paso 1 Objetivo 1.3". The site has not identified a water-related challenge at their catchment .</p>	
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	<p>The site quantifies the water quality of the site's water sources, receiving waters, effluents and water bodies.</p> <p>The site identifies that there is no water-related challenge that poses a threat to good water quality for people or the environment, as the assessed water quality parameters remain within the range established in the legal framework.</p> <p>The site presents some of the results of the analyses carried out where it is identified that none of the parameters measured exceed the permissible limits.</p> <p>See slides 12 and 13 of the presentation "AWS Paso 1 Objetivo 1.3" (See the document at 1.3.1)</p>	
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	<p>The site identifies and will map potential sources of contamination, including chemicals used or stored on site,</p> <p>The site also identifies potential contamination risks in the micro-watershed and nearby businesses.</p> <p>See slides 14 and 15 of the presentation "AWS Paso 1 Objetivo 1.3" (see document at 1.3.1)</p> <p>The site includes technical data sheets for all chemicals used.</p>	
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>	 in progress
Comment	<p>While the site has identified onsite IWRA's it has not identified potential IWRA's related to green areas and recreational areas, that are observed on the site boundary map (1.1.1), they are IWRA that are onsite.</p> <p>All water infrastructure that has economic relevance for the site such as water tanks, water treatment plant and other. Are relevant for the operation of the site and from that perspective it's expected that will be preserved for the Site.</p> <p>As an example a well could be considered as an IWRA is for public use; however is not consider if it is for private use.</p>	

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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>	 Yes
Comment	<p>The site identifies the annual water-related costs, as well as a description or quantification of the water-related social, cultural, environmental and economic value generated by the site.</p> <p>The site developed a comprehensive analysis of environmental, social and cultural values.</p> <p>The site carried out the quantification of the environmental economic value related to the water generated by the site.</p> <p>The site also identifies possible risks of contamination in the micro-basin and nearby companies, Includes the percentage of the planned budget year 2022 versus executed as of September, investments executed as of September of the Calderas area. and the percentage of investments executed as of September year Expert advice area and Percentage of investments executed as of September, area Wastewater treatment plant (WWTP).</p> <p>See slides 18 to 30 of the presentation "AWS Paso 1 Objetivo 1.3", (See document at 1.3.1)</p>	
1.3.8	<i>Levels of access and adequacy of WASH at the site shall be identified.</i>	 Yes
Comment	<p>The site identifies the levels of access and the adequacy of water, sanitation and hygiene (WASH) at the site. During site visit it was possible to observe drinking water stations available for all workers.</p> <p>The site presents information on the levels of access and adequacy of water, sanitation and hygiene (WASH) at the site, including diagrams of the site with WASH services.</p> <p>During the audit the information provided by the site and the good condition of all WASH services in the different areas of the site were verified.</p> <p>See slides 31 to 33 of the presentation "AWS Paso 1 Objetivo 1.3", (See document at 1.3.1).</p>	
1.4	<i>Gather data on the site's indirect water use, including: its primary inputs; the water use embedded in the production of those primary inputs the status of the waters at the origin of the inputs (where they can be identified); and water used in out-sourced water-related services.</i>	
1.4.1	<i>The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be identified.</i>	 Yes
Comment	<p>The site indicates that it has no input suppliers within the San Diego River micro-watershed. On page 6 of the "AWS Step 1 Objective 1.4 and 1.5" presentation, it identifies its service providers.</p>	
1.4.2	<i>The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.</i>	 Yes
Comment	<p>The site indicates that it has no input suppliers within the San Diego River micro-watershed. The site assessed the water consumption of its tobacco leaf suppliers and the results are presented on page 5 of the presentation "AWS Step 1 Objective 1.4 and 1.5", identifies its suppliers (see document at 1.4.1)</p>	
1.5	<i>Gather water-related data for the catchment, including water governance, water balance, water quality, Important Water-Related Areas, infrastructure, and WASH</i>	

1.5.1	<i>Water governance initiatives shall be identified, including catchment plan(s), water-related public policies, major publicly-led initiatives under way, and relevant goals to help inform site of possible opportunities for water stewardship collective action.</i>	 Yes
Comment	<p>The site identifies water governance initiatives, including the plan, water-related public policies, major ongoing public initiatives:</p> <p>The president of Venezuela incorporated the goals of Agenda 2030 in the Plan de la Patria 2019-2025, for integrated water management in Venezuela.</p> <p>Plan de la Patria: "Promote actions at the national and international level for the protection, conservation and sustainable management of strategic areas, such as freshwater sources and reservoirs (surface and groundwater), watersheds, biodiversity, seas, oceans and forests".</p> <p>On 27 April 2018, the Council of Hydrographic Region of Lake Valencia was installed and sworn in, several of the consultations have been made to the council the responses received are as follows:</p> <ul style="list-style-type: none"> - On 14/03/2022: Lawyer Leonel Ruiz, informed that they are currently in the process of visits and making collections based on the use of water and its discharge. - On 26/04/2022: Lic. Midfred Botello, Vicepresident of C.A. Hidrológica del Centro and Ing. Eduardo Bravo, informed that they are in the process of the guidelines regarding the integral management of surface and underground water. - 06/05/2022: Ing. Gerardo Hugett, Manager of Projects and Inspection, informed that he has not yet been given any guidelines related to the new competences to be assumed. <p>During the audit, Simón Serrano from the environmental division of the Mayor's Office of the Municipality of Valencia was interviewed and indicated that the municipality is very interested in collaborating with the site to improve water stewardship and would support the proposed initiatives.</p>	
1.5.2	<i>Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.</i>	 Yes
Comment	<p>The site identified applicable legal and regulatory requirements related to water, including legally defined customary water rights.</p> <p>The site presents a matrix with all applicable requirements of the country's laws and regulations.</p> <p>In the presentation "AWS Step 1 Objective 1.4 and 1.5" slide 10, it presents the process carried out by the site (see document at 1.4.1)</p> <p>The information is comprehensively presented in the document "MATRIX_TECNICO_LEGAL June_2022".</p>	
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	<p>The site contracts a specialist to prepare the water balance for the catchment, as government data are not reliable.</p> <p>The site identifies that there is no water scarcity in the catchment.</p> <p>It presents a comprehensive analysis of the hydrological and environmental situation of the catchment.</p> <p>See slides 11-13 of the presentation "AWS paso 1 Objetivo 1.4 y 1.5" (See document at 1.4.1)</p> <p>The site identifies watershed water balance: watershed water flows (surface and subsurface runoff, baseflow, aquifer recharge and water yield) using the SWAT+ model (Soil and Water Assessment Tool, SWAT+ 2022 interface).</p> <p>The site presents the technical characterisation of the hydrological processes in the catchment, including the annual hydrological balance of the micro-catchment.</p>	

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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	<p>The site identifies and quantifies the water quality, including the physical, chemical and biological status of the catchment.</p> <p>The site identifies that there is a surface water challenge that poses a threat to water quality for people. An estimate of annual maximum and minimum variations is not identified because the data presented is from a site-funded study and there is no government data on surface water quality variations.</p> <p>In relation to groundwater, which is the source of water used by the site, no risk to people or the environment was identified.</p> <p>See slide 14 of the presentation "AWS Paso 1 Objetivo 1.4 y 1.5".and page 54 document "Informe_cuenca_rio_San_Diego_(1)" (See document at 1.4.1)</p>	
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>	 Yes
Comment	<p>The site identifies and maps Important Water-related Areas.</p> <p>The site describes the "Areas Under Special Administration Regime" (ABRAES). Three ABRAES are declared in the San Diego river catchment:</p> <ol style="list-style-type: none">1) San Esteban National Park,2) Critical Area with Treatment Priority Valencia Lake Basin and3) Area for the Protection of the Public Works Gas Transmission System Altagracia - Morón. <p>In terms of environmental conservation and management, as well as the risk that environmental degradation can cause to humans & ecosystems, the first two ABRAES are of relevant importance. The National Park figure is the most restrictive in terms of environmental intervention of all the ABRAE. This should be considered positive in terms of the preservation of ecosystems and, consequently, of water flows in the mountain area.</p> <p>The figure of Critical Area with Priority Treatment for the Lake Valencia Basin provides elements of management and restriction of uses in order to regulate water flows towards Lake Valencia. Likewise, these can be positive for the sustainable management of the catchment's water resources by providing a legal basis for it.</p> <p>see presentation "Amenazas_ambientales_[Objective_1_5_5]".</p>	
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	<p>The site identifies existing and planned water-related infrastructure.</p> <p>The site is supplied by wells located on its facilities and they are protected, and there is limited water infrastructure in the micro-catchment where the site is located, so the risks to the infrastructure are low.</p> <p>The site identifies in the document "REPORT OF OBJECTIVE 1.7" the main risks under which the infrastructure is located in the micro-watershed where the site is located.</p> <p>The site does not identify the condition of the water infrastructure located in the micro-catchment..</p>	<p>Finding No: TNR-002510</p>
1.5.7	<i>The adequacy of available WASH services within the catchment shall be identified.</i>	 in progress
Comment	<p>The site partially identifies the adequacy of WASH services available within the catchment. It identifies drinking water and sanitation infrastructure.</p> <p>There is no information available on population access to drinking water and sanitation. Information related to the indicator is presented on page 19 of the document "Informe del objetivo1.6_(Revised)_2" (See document at 1.6.1)</p>	<p>Finding No: TNR-002509</p>

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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	<p>The site identifies and prioritises shared water challenges based on the information collected.</p> <p>The site identifies the following shared challenges:</p> <ul style="list-style-type: none">Increase the use of efficient irrigation systems.Promote awareness of the importance of good practices. Disseminate basic technical knowledge on watershed behaviour.Uniform criteria on the knowledge of the AWS 2.0 Standard, at the site.Establish a dynamic communication mechanism to reduce isolation by promoting participation in order to achieve joint water stewardship.Increase interest in companies in learning about modern water stewardship systems.Establish harmonious communication and coordination of activities related to water stewardship.Incorporation into the cooperation network or water resource management group of the San Diego river basin.Incorporate them in actions for the promotion and development of training and education programmes on water issues.Build a strategy with good communication skills in order to increase interest in the water management project and make them feel taken into account. <p>In addition, the site identifies possible social impacts according to the analysis developed. The increase in the population of the municipality of San Diego generates a negative impact related to:</p> <ul style="list-style-type: none">Increased likelihood of contamination due to increased solid waste generation.Increased illegal tapping affecting the general water supply Poor water supply (poor water quality) related to increased likelihood of disease incidence. <p>While the challenges are prioritised, they are all critical according to the analysis presented.</p> <p>During the audit staff were asked how they would address all the challenges identified as critical, they indicated that as far as possible they would address them simultaneously. It will be important to assess progress on this indicator in the next audit.</p> <p>The challenges are described and analysed in the document "REPORT_ON_OBJECTIVE_1.6_(Revised)_2", the presentation "AWS Step 1 Objective 1.6 1.7 and 1.8" a summary of the information on slides 4 and 5.</p>	
1.6.2	<i>Initiatives to address shared water challenges shall be identified.</i>	 Yes
Comment	<p>The site identifies initiatives to address shared water challenges. in the "WATER_CHALLENGES_IDENTIFICATION_MATRIX_150322".</p> <p>The site describes the opportunities and proposed actions to address the shared challenges.</p> <p>It includes an analysis of the opportunities in the document "REPORT_ON_OBJECTIVE_1.6_(Revised)_2", and also developed a SWOT analysis where it identifies strategies, targets, responsible parties.</p>	
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>	
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

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Comment

The site identifies and prioritises the water-related risks faced by the site, including the likelihood and severity of impact within a given period, the potential costs and the impact on the business.

The site identifies the following risks:

Management of the current legal framework

- Non-compliance with current legal framework associated with water use
- Non-compliance with water quality controls
- Non-compliance with notification or control of unplanned spills

Infrastructure and equipment maintenance management

- Lack of maintenance of piping network
- Chemical spills
- Lack of well maintenance

Management for good governance

- Failure to identify stakeholders that can impact the sustainable water stewardship system.
- Bias in collegial decision making in conjunction with stakeholders.
- Failure to respect the status of different stakeholders' rights associated with meeting their needs for water quality and sufficient access to water.
- Stakeholders do not demonstrate accountability for their potentially water polluting activities.

Sustainable Water Balance Management

- The hydrological balance of the watersheds where off-site primary input suppliers' operations are located is not known.
- The hydrological balance of the catchment where the site is located is not known.
- The water balance of the site is not known.

Management of significant water-related areas

- Lack of a plan to maintain or improve the important water-related areas of the site
- Lack of a plan to maintain or improve important water-related areas of the basin
- Failure to identify catchment-related best practices for the maintenance of important water-related areas
- Lack of an assessment of the status of waters in the catchment and threats to people or the environment.

WASH management

Absence of adequate WASH infrastructure and facilities

Lack of sufficient supplies of safe drinking water for all workers, taking into account all their needs.

Lack of showers for workers who may not have adequate provision in their own homes.

Lack of training of workers affecting their families on good hygiene practices applicable in their community.

The document "FOPS-0126_Factores_de_Riesgo_y_Oportunidad_AWS_072022" develops the analysis of the most important risks identified by the site.

Conclusion:

The Site has submitted a risk analysis document that results in a high risk regarding compliance with:

- Non-compliance with current legal framework associated with water use
- Non-compliance with water quality controls
- Non-compliance with notification or control of unplanned spills

This is inconsistent with the evidence presented in other indicators of the standard. A risk analysis with reliable and verifiable data will be necessary.

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1.7.2

Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.



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Comment The site identifies water-related opportunities, including how the site can intervene, assessment and prioritisation of potential savings and business opportunities.
The site identifies the following opportunities:
Management of the current legal framework
- Compliance with the current legal framework associated with water use
- Compliance with established wastewater quality parameters
- Compliance with reporting on discharge control and any unplanned discharges
Infrastructure and equipment maintenance management
- Maintenance of piping network
- Proper handling of chemicals
- Well maintenance
Good governance management
- Identify and liaise with stakeholders who can impact the sustainable water stewardship system within a 1km radius of the site
- Pursuing collegial decision-making in conjunction with stakeholders
- Respect for the status of different stakeholders' rights associated with meeting their needs for water quality and sufficient access to water.
- Stakeholders demonstrate interest and responsibility in their activities to prevent water pollution.
Sustainable Water Balance Management
- The hydrological balance of the catchments where off-site primary input suppliers' operations are located is known.
- The hydrological balance of the catchment in which the site is located is known.
- The water balance of the site is known
Manage important water-related areas
- Make a plan to maintain or improve important water-related areas of the site
- Recommend the implementation of a plan to maintain or improve the important water-related areas of the catchment
- Identify catchment-related best practices for the maintenance of important water-related areas in the catchment
- Conduct an assessment of the status of waters in the catchment and potential effects on people or the environment.
WASH management
- Adequate WASH infrastructure and facilities
- Provide sufficient supplies of safe drinking water for all workers, taking into account all their needs.
- Sufficient shower rooms for workers who may not have an adequate supply in their own homes.
- Train workers to extend to their families on good hygiene practices, applicable in their community.

The document "FOPS-0126_Factores_de_Riesgo_y_Oportunidad_AWS_072022" develops the analysis of the most important risks identified by the site.

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.*



Yes

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Comment	<p>The site identifies the following best practices related to good governance:</p> <ul style="list-style-type: none">- Implement the Sustainable Water Management Plan for the site, which will be reviewed annually to evaluate objectives and targets related to governance.- Disseminate knowledge about AWS STD V2.0 among site personnel, prioritizing the team with the greatest influence.- Promote activities with stakeholders to advance coordinated progress on shared water challenges.- Identify opportunities to increase water use efficiency (governance) <p>Presentation "AWS Paso 1 Objetivo 1.6 1.7 y 1.8" page 12.</p>	
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	<p>The site identifies best practices regarding water balance in the relevant sectors and/or catchment (either through water efficiency or less total water use). or lower overall water use).</p> <p>The site identifies the following good practices related to water balance:</p> <p>Keep record of source of supply:</p> <ul style="list-style-type: none">. Average flow L/S. Maximum daily flow L/S. Maximum Hourly Flow L/S. Water Balance. <p>Maintain updated monthly records associated with water balance, in order to obtain more reliable and real databases to identify the areas with the highest water demand and manage them sustainably.</p> <p>Every 6 months establish continuous and reliable records to identify and calculate the water balance for each sub-process of the site.</p> <p>Verify compliance with maintenance plans for critical services associated with sustainable water stewardship. Water Balance</p> <p>Include technologically advanced equipment, such as meters with stored memory, modern taps, water-saving products in toilets, sinks, dishwashers, showers, irrigation systems, which allow significant water savings. Water balance</p> <p>Presentation "AWS Paso 1 Objetivo 1.6 1.7 y 1.8" slide 13.</p>	
1.8.3	<i>Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.</i>	 Yes
Comment	<p>The site identifies the following best practices related to water quality</p> <ul style="list-style-type: none">- Communicate about the importance of water care and the risks of contaminating it. Water quality.- Inspect and keep well water filters clean to minimize deviations in physicochemical measurements of water quality.. Water quality- Use of catalysts or reducers in the WWTP in case of high nitrite and manganese values. Water quality- Establish monitoring and control mechanisms for the operation of the well. Water quality- Monthly monitoring program of treated and stored water quality.. Water quality <p>Presentation "AWS Paso 1 Objetivo 1.6 1.7 y 1.8" slide 14.</p>	
1.8.4	<i>Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.</i>	 Yes

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Comment	<p>The site identifies the following best practices related to important water-related areas:</p> <ul style="list-style-type: none">- Measure water consumption in gardening and nursery areas, which consume more water during the dry season.- Monitoring to identify causes of interruption in water supply to the Site.- Reforest in the main catchments related to tobacco producing areas. <p>Presentation "AWS Paso 1 Objetivo 1.6 1.7 y 1.8" slide 15.</p>	
1.8.5	<p><i>Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.</i></p>	<div> Yes</div>
Comment	<p>The site identifies the following best practices related to WASH:</p> <ul style="list-style-type: none">- Promote among internal and external stakeholders practices based on adequate access to WASH- Place posters, banners, billboards or signs promoting water efficiency tips in offices, bathrooms and others to ensure adequate access to WASH on Site. <p>Presentation "AWS Paso 1 Objetivo 1.6 1.7 y 1.8" slide 16.</p>	

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	<p>The site presents a strategic plan that includes a signed and publicly disclosed site statement from the organisation.</p> <p>The Site presents its commitment to maintain sustainable water management and implementation of the AWS version 2.0 standard where it mentions that:</p> <p>The Site will implement and disclose the progress of the AWS sustainable water management plans.</p> <p>Site implementation will be aligned with and in support of the watershed sustainability plans.</p> <p>Stakeholders will be engaged in an open and transparent manner.</p> <p>The Site will allocate resources to implement the standard.</p> <p>The commitment signed by the head of lead Venezuela and is published on their website. (See slide 4 & 5)</p>
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	<p>The site presents a system for maintaining compliance with obligations for water and wastewater stewardship, including:</p> <ul style="list-style-type: none"> - The identification of responsible persons/positions within the organisational structure of the institution; and - The procedures established by the site for submission to regulatory bodies of applicable legal 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	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.
Comment	<p>The site presents a strategic plan for sustainable water stewardship that includes the organisation's mission, vision and overall objectives towards good sustainable water stewardship in accordance with the AWS Standard.</p> <p>Documents:</p> <p>Misión_y_Visión_AWS.docx</p> <p>Plan_Estratégico_AWS-GLT_V2.docx</p> <p>Objetivos_de_gestión_sostenible_del_agua_octubre_2022</p>

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*
- *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.*



in progress

Comment

The site presents a sustainable water stewardship plan, which includes for each objective:

- How it will be measured and monitored;
- The measures to achieve and maintain (or exceed) it;
- The timeframes foreseen to achieve it;
- The financial budgets allocated to the actions;
- The positions of those responsible for the actions and for achieving the objectives;
- And the relationship between each target and the achievement of best practice to help address shared water challenges and 5AWS outcomes.

Sources:

Sustainable_Water_Management_Plan_AWS_102022

Sustainable_water_management_goals_October_2022

AWS Step 2 Objective 2.3 page 12

Conclusion

The site presents a sustainable water stewardship plan, which has some inconsistencies in terms of the number of objectives and expected results.

The water stewardship objectives are presented in a separate sheet.

The site structured its plan in steps, one per excel sheet, then includes the overall budget allocated to the different water-related activities.

The site WSP has inconsistencies between the steps, budgets and objectives, is not easy to read and none of the objectives focus on IWRA or WASH.

This structure leads to inconsistencies in the content and makes it difficult to read.

Finding No: TNR-002528

2.4

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.



in progress

Comment

The Site identifies that it has initiated initial steps to generate a plan to mitigate or adapt to the identified water risks, developed in coordination with relevant public sector and infrastructure agencies.

The site has identified some risks associated with the water balance. However, as of the date of the initial audit for certification to the AWS standard, they have not been able to establish a plan to mitigate the associated water risks identified, as the Site is in the early stages of establishing contact with the relevant public sector and infrastructure agencies. The Site has an activity is planned for the first quarter of 2023 to present the objectives and risk and opportunity matrices in order to establish concrete activities in which relevant public sector and infrastructure could participate.

- A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies was not provided.

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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 identifies evidence of support for good catchment governance:
During the audit the Site has presented exhibits of the progress in implementing the sustainable water stewardship plan.
The Site has also demonstrate progress on the planned schedule and budget for water quality testing.
Stakeholder identification matrix for catchment governance, communications, joint actions, working meetings.
The Site presents evidence of communications, surveys, outreach brochures and photographs.

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

The Site does not limit the right of access to water of others.
The water concession is approved by MINEC.
No indigenous populations are reported in the area surrounding the site.

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 implements a process to verify full legal and regulatory compliance.
The site presents as evidence its technical legal matrix in which it incorporates the applicable laws and the articles of the laws that apply to its activity; the matrix is updated on a regular basis.

3.2.2 *Where water rights are part of legal and regulatory requirements, measures identified to respect the water rights of others including Indigenous peoples, shall be implemented.*



Yes

Comment

The Site identifies water rights as part of legal and regulatory requirements.
The site complies with all applicable laws of the country.
The Site does not limit the right of access to water of others.
The water concession is approved by MINEC.
No indigenous populations are reported in the area surrounding the site.

3.3 *Implement plan to achieve site water balance targets.*

3.3.1 *Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.*








Yes

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Comment	<p>The status of progress towards meeting the water balance objectives set out in the sustainable water management plan has been identified.</p> <p>The site has two objectives related to water balance on the site.</p> <p>Progress on one of them is 100%, the other started in the third quarter of 2022 and has 0% progress.</p> <p>In the presentation "AWS Step 3 Objective 3.3" slide 4, progress against the water stewardship plan is described. (see document at 3.3)</p> <p>See "Plan_Estratégico_AWS-_GLT_08112022_Seguimiento_y_Evaluación_de_desempeño.docx"</p>	
3.3.2	<i>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.</i>	 Yes
Comment	<p>The site implements annual targets to improve the site's water use efficiency to reduce total volumetric use.</p> <p>In the presentation "AWS Step 3 Objective 3.3" pages 5-9, progress against the water stewardship plan is described.</p> <p>One of the most significant advances is the reduction of water use by eliminating the Burley vein washing process with a reduction of over 1,800 cubic metres of water representing 9% of the site's total consumption.</p>	
3.3.3	<i>Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.</i>	 Yes
Comment	<p>The site identifies legally binding documents, where appropriate, for the reallocation of water to social, cultural, environmental needs.</p> <p>In the evidence provided by the site it indicates the reallocation of water for social needs and describes the donation actions it has undertaken.</p> <p>During the audit, the legal expert was consulted and indicated that only the country's government can reallocate water, and what the company does are donations.</p>	
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	<p>The status of progress towards meeting the water quality objectives set out in the water management plan is identified.</p> <p>The Site has one objective related to water quality at the site.</p> <p>This will start in the third quarter of 2022 and is 0% progress.</p>	
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	<p>The site identifies surface water quality as a shared challenge.</p> <p>The site will quantify continuous improvements to achieve best practice in relation to the site's best practice to effluent from the site.</p> <p>The site submits evidence of the maintenance of its WWTP, water quality analyses of its discharges and the water quality of the stream where it discharges, demonstrating that the quality of the treated water (slide 13) is better than that carried in the stream (slide 14).</p>	
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>	 in progress
Comment	<p>The Site has not include ojectives in the WSP related to IWRA</p>	

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Finding No: TNR-002866

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	The site presents evidence of access to toilets and hand-washing facilities and the frequency with which they are cleaned. During the tour of the facilities, access to drinking water, showers and hand-washing facilities was identified. According to the evidence the site largely complies with the provisions of: Regulation of hygiene and safety conditions at work in Venezuela.	
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	Under Venezuelan law the state grants concessions for the construction of wells and the extraction of water from the aquifer. The site has a concession for the use of groundwater. The company Agrobica also benefits from this concession and has on occasion donated water to the fire brigade of the city of Valencia. According to the evidence presented by the site, its effluents do not affect the right to use the water or the sanitation of any interested party. The Presentation "AWS Step 3 Objective 3.6 and 3.7" presents evidence of water quality of discharges from the site and water voluntarily delivered for social needs.	
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>	 Yes
Comment	The site has no suppliers or service providers within the catchment.	
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>	 Yes
Comment	The Site has no suppliers or service providers within the catchment.	
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	The Site shares the use of their well water with Agrobica. The company with which the Site shares its well water mentioned during the interview that they maintain open communication and contribute to the maintenance of the well. The site presents evidence of the identified proof of compromise and key messages transmitted with acknowledgment. They were sent a survey and communications to inform them of the preparation that the site developed to achieve AWS certification.	
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>	

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3.9.1	<i>Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.</i>	 Yes
Comment	<p>The site identifies actions implemented to achieve best practice, related to water governance:</p> <p>The site identifies the following best practices related to good governance:</p> <ul style="list-style-type: none">- Implement the Sustainable Water Management Plan for the site, which will be reviewed annually to evaluate objectives and targets related to governance. 95% progress- Disseminate knowledge about AWS STD V2.0 among site personnel, prioritizing the team with the greatest influence. 139 staff members- Promote activities with stakeholders to advance coordinated progress on shared water challenges. 169 internal and external stakeholders- Identify opportunities to increase water use efficiency (governance) 100% <p>Evidence can be found in the final part of the presentation "AWS_Step_3_Objective_3.8_and_3.9". "Report on objective 1.8". Mailings and information leaflet</p>	
3.9.2	<i>Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.</i>	 Yes
Comment	<p>The site identifies best practices regarding water balance in the relevant sectors and/or catchment (either through water efficiency or less total water use). or lower overall water use).</p> <p>The site identifies the following good practices related to water balance:</p> <p>Keep record of source of supply:</p> <ul style="list-style-type: none">. Average flow L/S. Maximum daily flow L/S. Maximum Hourly Flow L/S. Water Balance. <p>0%</p> <p>Maintain updated monthly records associated with water balance, in order to obtain more reliable and real databases to identify the areas with the highest water demand and manage them sustainably. 100%</p> <p>Every 6 months establish continuous and reliable records to identify and calculate the water balance for each sub-process of the site. 100%</p> <p>Verify compliance with maintenance plans for critical services associated with sustainable water stewardship. Water Balance 100%</p> <p>Include technologically advanced equipment, such as meters with stored memory, modern taps, water-saving products in toilets, sinks, dishwashers, showers, irrigation systems, which allow significant water savings. Water balance 50%</p> <p>Evidence can be found in the final part of the presentation "AWS_Step_3_Objective_3.8_and_3.9". "Report on objective 1.8". Mailings and information leaflet</p>	

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3.9.3	<i>Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.</i>	 Yes
Comment	<p>The site identifies the following best practices related to water quality</p> <ul style="list-style-type: none">- Communicate about the importance of water care and the risks of contaminating it. Water quality. 139 people- Inspect and keep well water filters clean to minimize deviations in physicochemical measurements of water quality.. Water quality 100%- Use of catalysts or reducers in the WWTP in case of high nitrite and manganese values. Water quality 0%- Establish monitoring and control mechanisms for the operation of the well. Water quality 100%- Monthly monitoring program of treated and stored water quality.. Water quality 50% <p>Evidence can be found in the final part of the presentation "AWS_Step_3_Objective_3.8_and_3.9". "Report on objective 1.8". Mailings and information leaflet</p>	
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>	 Yes
Comment	<p>The site identifies the following best practices related to important water-related areas:</p> <ul style="list-style-type: none">- Measure water consumption in gardening and nursery areas, which consume more water during the dry season. 0%- Monitoring to identify causes of interruption in water supply to the Site. 100%- Reforest in the main catchments related to tobacco producing areas. 60% <p>Evidence can be found in the final part of the presentation "AWS_Step_3_Objective_3.8_and_3.9". "Report on objective 1.8". Mailings and information leaflet</p>	
3.9.5	<i>Actions towards achieving best practice related to targets in terms of WASH shall be implemented.</i>	 Yes
Comment	<p>The site identifies the following best practices related to WASH:</p> <ul style="list-style-type: none">- Promote among internal and external stakeholders practices based on adequate access to WASH. 50%- Place posters, banners, billboards or signs promoting water efficiency tips in offices, bathrooms and others to ensure adequate access to WASH on Site. 100% <p>Evidence can be found in the final part of the presentation "AWS_Step_3_Objective_3.8_and_3.9". "Report on objective 1.8". Mailings and information leaflet</p>	

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4 STEP 4: EVALUATE - Evaluate the site's performance.

4.1 *Evaluate the site's performance in light of its actions and targets from its water stewardship plan and demonstrate its contribution to achieving water stewardship outcomes.*

4.1.1 *Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.*



in progress

Comment The site assessed its performance against the objectives of the site's sustainable water stewardship plan and contribution to the achievement of sustainable water stewardship outcomes.
Performance was assessed at each step and its relationship to the sustainable water stewardship plan.
During the audit it was possible to verify compliance with several of the sustainable water stewardship objectives in relation to various stakeholders, government, businesses, producers, evidence of performance is presented in:
"AWS_Paso_4"
"Plan_de_Gestión_Sostenible_del_Agua_AWS_102022"
"Plan_Estratégico_AWS-_GLT_08112022_Seguimiento_y_Evaluación_de_desempeño"
"Correo_divulgativo_gestion_sostenible_del_agua_AWS"
"Correo_folleto_divulgativo_partes_interesadas_externas"
"Comprobante_de_recibido_del_folleto_y_lista_de_participación"

Conclusion:
The Site has not include targets in their WSP related to 2 outcomes: IWRA and WASH (see 2.3.2); when their WSP is completed they must evaluate performance against the 2 outcomes missing (IWRA & WASH)

Finding No: TNR-002863

4.1.2 *Value creation resulting from the water stewardship plan shall be evaluated.*



Yes

Comment The site assessed the value creation from the sustainable water stewardship plan: Describes and quantifies the economic value creation resulting from the sustainable water stewardship plan.
The Benefits of shared value in the watershed. describes the method used to assign a value in bolivars to the environmental benefits.
See document "AWS paso 4" (See document at 4.1)

4.1.3 *The shared value benefits in the catchment shall be identified and where applicable, quantified.*



Yes

Comment The site identifies and quantifies the benefits of shared value in the catchment from the sustainable water stewardship plan:
The site presents the economic value quantified along with the methods and criteria used for this assessment.
The study conducted assigns value by direct, indirect use.
It includes Legacy Value, Non-use Value, and Existence Value.
With these values it determines the total value of the benefits social generated.




See document "AWS Paso 4" (See document at 4.1)

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.*

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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	The site mentioned that there have not been emergency events during 2022 that require root cause analysis, response assessment, preventive and corrective actions.	
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>	 Yes
Comment	<p>The site identifies stakeholder consultation efforts on the site's sustainable water management performance.</p> <p>The site developed a study on the degree of stakeholder engagement based on their level of interest and influence, characterised the stakeholders defined influence and interest of each through surveys and interviews.</p> <p>Stakeholders were consulted on their interest in participating in groups working in favour of water management in the San Diego river basin.</p> <p>Develop a matrix of interest and influence of nearby businesses.</p> <p>Present evidence of communications with stakeholders, the questionnaires used to carry out the surveys and evidence of meetings and forums in which the site was involved.</p> <p>See presentation "AWS Paso 4" (See document at 4.1)</p>	
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>	 Yes
Comment	The site identifies that the water management plan should be adapted and modified according to the identified non-conformities and changes occurring in the water management of the site and the catchment as this is an initial audit there is no history of the water management plan so no lessons have been generated that can be identified and incorporated.	

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5 STEP 5: COMMUNICATE & DISCLOSE - Communicate about water stewardship and disclose the site's stewardship efforts	
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. ✓ Yes
Comment	<p>The site discloses the site's internal water governance, including the positions of those responsible for compliance with water laws and regulations.</p> <p>During the audit it showed the website where all information related to the AWS standard is published and related documents accessible to the public.</p> <p>The site shared the internal governance included in the presentation "Leaf Org Chart".</p> <p>https://www.bigott.com.ve/group/sites/BAT_9T2E9S.nsf/vwPagesWebLive/DO9T2ET7?opendocument</p>
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. ✓ Yes
Comment	<p>The site presents evidence of communication with relevant stakeholders on the sustainable water management plan, including how the sustainable water management plan contributes to the outcomes of the AWS Standard.</p> <p>The "AWS Step 5" submission includes evidence of communications sent and received in relation to the sustainable management plan.</p> <p>https://www.bigott.com.ve/group/sites/BAT_9T2E9S.nsf/vwPagesWebLive/DO9T2ET7?opendocument</p>
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. ✓ Yes
Comment	<p>The site provides evidence of disclosure during 2022 of a summary of the site's sustainable water management results, including quantified results against targets.</p> <p>The site presents its results in documents available on its website.</p> <p>In the presentation "AWS step 5" it presents the evidence of the communications made</p> <p>The Site plans to publish its WSP annual summary on its website.</p> <p>https://www.bigott.com.ve/group/sites/BAT_9T2E9S.nsf/vwPagesWebLive/DO9T2ET7?opendocument</p>
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. ✓ Yes

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Comment	<p>The site presents evidence of disclosure of the site's shared water challenges and the efforts made to address these challenges.</p> <p>The site presents evidence of communication on the shared challenges and outreach efforts undertaken.</p> <p>Evidence of these efforts is included in the "AWS Step 5" (slide 17) presentation and documents related to the shared challenges outreach efforts are posted on the site's webpage.</p> <p>https://www.bigott.com.ve/group/sites/BAT_9T2E9S.nsf/vwPagesWebLive/DO9T2ET7?opendocument</p>	
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	<p>The site presents evidence of efforts made to engage stakeholders and to coordinate and support public sector agencies.</p> <p>The site presents as evidence communications with different stakeholders.</p> <p>During the audit, stakeholders interviewed indicated that they found the site's efforts to engage them in understanding shared challenges and the actions they could take together very noteworthy.</p> <p>The representative of the municipality indicated that the site is the first company to approach this authority seeking to collaborate in water management, which for its part has every interest in developing joint actions.</p> <p>See "AWS Paso 5" (slides 18-20) Matriz_de_buenas_Prácticas_Gestión_Sostenible_Agua_102022 Comprobante_de_recibido_del_folleto_y_lista_de_participación Plan_Estratégico_AWS-GLT_08112022_Seguimiento_y_Evaluación_de_desempeño.docx</p>	
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	Any site water-related compliance violations and associated corrections shall be disclosed.	
5.5.2	<i>Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.</i>	 Yes
Comment	The Site did not have any water-related compliance violations.	
5.5.3	<i>Any site water-related violation that may pose significant risk and threat to human or ecosystem health shall be immediately communicated to relevant public agencies and disclosed.</i>	 Yes
Comment	The Site did not have any water-related compliance violations.	

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Photographic Evidence from Audit

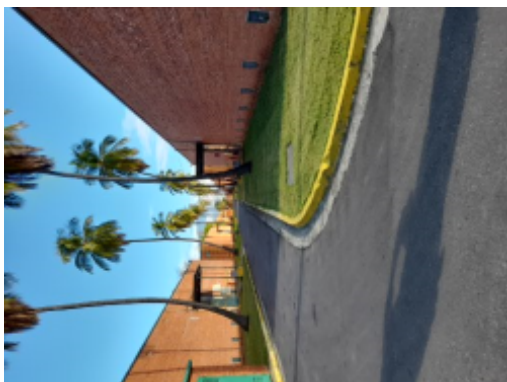
✓
Yes



storage area for lubricants used at BAT GLT Venezuela
20221123_090852.jpg



Well for water supply at the BAT GLT Venezuela site
20221123_082853.jpg



Appearance of the BAT GLT Venezuela facilities.
20221123_081310.jpg

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Poster with AWS certification information, several of these posters were observed during the tour of the facility.

20221123_082245.jpg



Entrance to the WWTP

20221123_084017.jpg



WASH facilities for input suppliers, transporters and producers

20221124_085258.jpg

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Greenhouse for the reproduction of local species

20221123_094009.jpg