

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)



Audit Number: AO-000434

SITE DETAILS

Site: **BAT Uzbekistan Urgut GLT**

Address: 141600, Samarkand region, Urgut city, 10 Navoi Shoh street, 141600, Urgut, UZBEKISTAN

Contact Person: Ravshan Khasanboev

AWS Reference Number: AWS-000483

Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Core

Date of certification decision: 2023-Mar-30

Validity of certificate: 2026-Mar-30

AUDIT DETAILS

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

Audit Type(s): Initial Audit

Audit Start Date: 2022-Nov-21

Lead Auditor: Tanya Christensen

Audit team participants:

Inobat Allobergenova

Site Participants:

Bakhtiyor Melikov, Process Manager

Alisher Mirtashev, Leaf Sustainability

Shukrat Zakirov, Utilities Manager

Ravshan Khasanboev, Senior Manager EHS

Sofya Kim, Other

Darya Sinegubova, Other

Gurur Asi, Sustainability Manager

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ADDITIONAL INFO

Summary of Audit Findings: A total off 13 findings were raised during the certification audit: zero major non-conformities, 6 minor non-conformities, 7 observations. The major non-conformity was of sufficient concern to warrant the categorisation of the non-conformity as major and related to sustainable water balance.

The Client is requested to perform a root cause analysis and define corrective actions for each of the non-conformities and to sub these to WSAS within 60 days of receipt of the audit report by 27 May 2023.

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

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

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. The client is requested to upload evidence of implementation prior to the Surveillance Audit.

Scope of Assessment: The scope of services covers the Initial certification audit for assessing conformity of BAT Urgut Fermentation Plant (UFP, or Urgut site) against the AWS International Water Stewardship Standard Version 2.

The core business activity of Urgut site is to store Green Leaf, process it and ship to the BAT Samarkand Factory. Water is used to generate steam for processing and curing the tobacco, and water is used overall to condition tobacco before processing. The site runs an Agronomy Centre and works with 537 farmers and oversees 19 BAT farming technicians who support the farmers and monitor 100% of farms for child and forced labour. The seasonal patterns of curing and production (sorting and mixing the leaf/stems) last about 3 months each. The Leaf factory is active for 3 months with 400 seasonal workers, the site contains a hiring office and a farmers office. The tobacco is harvested within a 15km radius from the factory, as the tobacco (virginia) has to be loaded for curing on the same day. The UFP is located in the centre of Urgut town and around 45km from the Samarkand factory. It operates two on-site boreholes and only uses raw water, as it is so close to the source with low salination levels. The only water processing taking place, is some water softening for the boilers. There are two fire pools on-site with a 150m3 capacity each and the site operates the same onsite WWTP plant, as the Samarkand site. The Urgut region is the only area where tobacco is grown, near the border with Tajikistan. The Urgut district is in the eastern part of the Samarkand region, bordering with Tajikistan. The Zarafshan river is formed in the high mountains of Tajikistan entering Uzbekistan through Urgut district territory.

The audit was conducted onsite on the 23-24.11.2022
The onsite site visit included the assessment of the BAT UFP Production facilities and all relevant water-related infrastructure.

FINDINGS

NUMBER OF FINDINGS PER LEVEL

Observation	7
Minor	6

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FINDING DETAILS

Finding No:	TNR-003723
Checklist Item No:	1.1.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Nov-24
Checklist item:	<p>The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including:</p> <ul style="list-style-type: none">- Site boundaries;- Water-related infrastructure, including piping network, owned or managed by the site or its parent organization;- Any water sources providing water to the site that are owned or managed by the site or its parent organization;- Water service provider (if applicable) and its ultimate water source;- Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies;- Catchment(s) that the site affect(s) and is reliant upon for water.
Findings:	<p>a) The description of groundwater resources in the country refers that there are several major hydrogeological zones but it was not indicated which zone is the site located in (or which aquifer(s)), and what are the boundaries of the relevant aquifers/zones. Given that almost all water withdrawal for the site is from groundwater, better understanding of the specific groundwater layer(s)/aquifer(s) from which the groundwater is abstracted, is important.</p> <p>b) The piping plan indicates there's irrigation but this was not explained during the audit. More information about water use for irrigation is needed</p>
Corrective action:	<p>a) the specifications of the aquifer and zone information will be gathered from public reports. The boundaries of the aquifer will be mapped. the seasonal changes will be also undertood and will be added to the AWS strategical plan</p> <p>b) The irrigation process will be more clarified in the documentation, and the amount of irrigation will be added to the water quality and quantity follow-up list.</p>

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Finding No:	TNR-003660
Checklist Item No:	1.2.1
Status:	Open
Finding level:	Observation
Checklist item:	<p>Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall:</p> <ul style="list-style-type: none">- Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people;- Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies;- Provide evidence of stakeholder consultation on water-related interests and challenges;- Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups;- Identify the degree of stakeholder engagement based on their level of interest and influence.
Findings:	<p>The site identified shared water challenges common between the site and stakeholders. The site should also indicate water-related challenges of different relevant stakeholders when they are more specific or different from identified shared challenges, to give a more complete and comprehensive picture. E.g. if the challenge is water supply - is that about municipal water supply, from groundwater wells, or surface water for irrigation?</p>
Finding No:	TNR-003724
Checklist Item No:	1.3.2
Status:	Open
Finding level:	Observation
Checklist item:	<p>Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped</p>
Findings:	<p>Sankey diagram currently stops at the use of water in the different processes at the site, and the balance should be further clarified on what happens with water after the site's processes: discharged further (as effluent, or for irrigation), goes to a product, or evaporates or gets lost in other ways.</p>

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Finding No:	TNR-003572
Checklist Item No:	1.4.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Nov-24
Checklist item:	The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.
Findings:	It is unclear whether the three outsourced services within the catchment have embedded water use offsite.
Corrective action:	The site outsourced services - cleaning, cafeteria, etc.- do not have specific water usage activities, like washing the uniforms. But they are activities for serving the Urgut. Therefore their water usage awareness should be increased, and there are plans for it. The outsourced services and their water usage will be more detailed in the documentation and actions.
Evidence of implementation:	Corrective actions are acceptable
Finding No:	TNR-003657
Checklist Item No:	1.5.1
Status:	Open
Finding level:	Observation
Checklist item:	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.
Findings:	The site has identified a number of existing initiatives and provided their full text. Understanding of these initiatives is needed to help inform the site of possible opportunities for water stewardship collective action, and the site could demonstrate this understanding by making a summary of which elements of those initiatives are relevant to the site and how.

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Finding No:	TNR-002160
Checklist Item No:	1.5.3
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Nov-24
Checklist item:	The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.
Findings:	The site needs to undertake additional work to understand the catchment water balance. This was also raised as a major at the BAT Samarkand audit and UZBAT are engaging a consultant to develop a catchment water balance that will cover both sites.
Corrective action:	<p>Zeravshan River water balance will be done by external consultant. After finalizing water catchment balance the Zeravshan river will be visible, measurable. The information of the water balance, new legislation and identified further risks - if there is - will be reflect to the document by revising the risks and opportunities document as well.</p> <p>Groundwater base analysis methodology will be identified by measuring the water well's levels.</p> <p>Water Well's permit and parameters will be added to the data-gathering requirements and the trend of the parameters will be analyses periodically.</p>
Evidence of implementation:	<p>Please, see attached files:</p> <ol style="list-style-type: none">1. Plan of actions2. Communication with consultancy company

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Finding No:	TNR-003565
Checklist Item No:	1.5.4
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Nov-24
Checklist item:	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.
Findings:	The site has collected some information but not adequately identified or quantified water quality data for the catchment.
Corrective action:	<p>The public information will be gathered to understand the chemical quality of the catchment - contact with universities, local NGOs, and the government. AWS requirements regarding data gathering criteria will revisit, conditions will be more clarified, and the assessment results will be reflected in the AWS standard documentation and process</p> <p>The stakeholder availability will be regularly checked if there is a need for more information to fulfill the water quality in the catchment</p> <p>Water quality for the catchment will be identified by having a test after water treatment on the treated water. The catchment sample will also be analyzed for adequate water quality understanding.</p>
Finding No:	TNR-003658
Checklist Item No:	1.5.5
Status:	Open
Finding level:	Observation
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:	The site has provided good understanding of its main catchment IWRA - the Zarafshan State Reserve. There are also a couple of other areas, including water reservoirs and a water spring, that BAT will provide additional information on at future audits.

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Finding No:	TNR-002162
Checklist Item No:	1.5.6
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Nov-24
Checklist item:	Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.
Findings:	The site has not identified the condition of the infrastructure and its potential exposure to extreme events.
Corrective action:	<p>Emergencies that the infrastructure will impact will be identified and more detailed in Urgut's BCPs. The potential risks will be identified, like floods, earthquakes, breakdowns, etc., will be placed with preventive actions, and drills will be done.</p> <p>The study will be enhanced through the outside of the boundaries of the Urgut, and the infrastructure of the public piping, ditches, and treatment plant availability will be analyzed and embedded to the AWS standards, documents.</p>
Finding No:	TNR-003726
Checklist Item No:	1.6.1
Status:	Open
Finding level:	Observation
Checklist item:	Shared water challenges shall be identified and prioritized from the information gathered.
Findings:	The site has done a good groundwork on identifying shared water challenges, although their wording is currently rather generic. As the site improves its understanding of water balance and water quality (groundwater balance, surface water balance, their interaction, water quality challenges and what is driving them), the discussion on shared water challenges should also progress accordingly.
Finding No:	TNR-003659
Checklist Item No:	1.7.2
Status:	Open
Finding level:	Observation
Checklist item:	Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.
Findings:	The site should also conduct relevant assessment of those opportunities that are implemented outside the site - the sheet 'UFP_Risk&Opportunity Analysis' does not include assessment of potential savings and business opportunities.

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Finding No:

TNR-003725

Checklist Item No:

3.2.1

Status:

In Progress - CA plan approved

Finding level:

Minor

Due date:

2023-Nov-24

Checklist item:

A process to verify full legal and regulatory compliance shall be implemented.

Findings:

One of the requirements under the site's permit for water withdrawal is to monitor groundwater levels at the wells. The results of this monitoring were not demonstrated to the audit team and it is not clear if the site is monitoring this data.

Corrective action:

There is a permit for the well's water extraction level. The site will revisit the document and establish a proper follow-up methodology for the permits, licenses, etc.

Finding No:

TNR-003762

Checklist Item No:

3.4.1

Status:

Open

Finding level:

Observation

Checklist item:

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

Findings:

The site undertakes quarterly water quality tests and it is recommended that the site plots the data points on a table so they can track quality levels over the years and more clearly contextualise any outlier results.

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Report Details

Report	Value
Report prepared by	Tanya Christensen
Report approved by	Neringa Pumputyte
Report approved on (Date)	27 March 2023

Surveillance

Proposed date for next audit
2023-Nov-22

Stakeholder Announcements

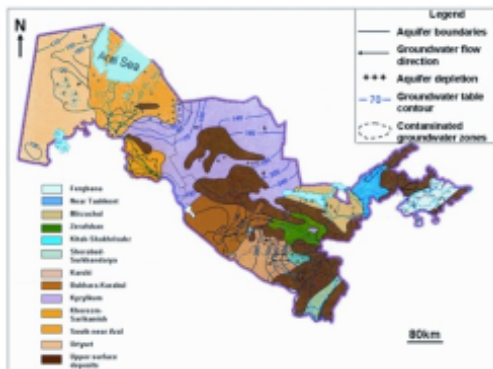
Date of publication	Location
11/10/2022	www.bst.uz website upload for Urgut announcement
11/10/2022	Mail-out to all farmers and growers that grow tobacco for UZBAT
26/10/2022	AWS Website
26/10/2022	WSAS Website

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Catchment Information



Hydrogeology map of Uzbekistan.jpg

Catchment Information

The BAT Urgut site sits within the same catchment as the BAT Samarkand site, and the 'catchment description' document applies to both UZBAT sites, explaining the surface and groundwater resources in Uzbekistan and their current status.

The main rivers of the Republic of Uzbekistan are: The Amu Darya, formed at the confluence of the Vakhsh and Pyandj Rivers; the Syr Darya, formed at the confluence of the Naryn and Karadarya Rivers; and the Chirchik near Tashkent. The Amu Darya basin includes the Surkhandarya, Sherabad, Kashkadarya, and Zarafshan rivers, but only the Kashkadarya and Sherabad are located entirely within Uzbekistan. In addition to the main rivers, there are more than 17.7 thousand natural watercourses in Uzbekistan.

The Samarkand Cigarette Factory and Urgut Leaf Factory are located within the Zarafshan River watershed. The Zerafshan River rises on the fringes of the Pamirs in Tajikistan, flowing due west for some 300 kilometres (190 mi), passing Penjikent before entering Uzbekistan, where it turns west-to-north-west, flowing past Samarkand, before turning west after Navoiy and further to the south-west, passing Bukhara before it is lost in the desert beyond the city of Qorakol (Karakul), not quite reaching the Amu Darya, of which it was formerly a tributary. The river is 800 km long, with 300 km running in Tajikistan. The annual average discharge is 161 m³/s and river flow observation has been carried out since 1913 at the gauging stations Dupuli and Saudji in Tajikistan. These were destroyed during regional conflict, and the flow is now recorded at the gauging station Ravatkhodja in Uzbekistan. River flow sharply increases in May-June and continues until July when there is flow peak. The river flow reduces from August till February-March.

The Zerafshan river basin supports large-scale irrigated farming, which is mostly based on a well-developed system of irrigation and drainage facilities. This includes all the tobacco farmers that supply the Urgut LEAF factory. The Samarkand province, which includes Urgut, contains 375K hectares of irrigated land. The root cause of all existing problems is the irrational use of shared water resources by sectors of the economy in irrigated agriculture. Overuse of water for irrigation generates an increase in the amount of highly mineralized drainage water, which, returning to the water source, pollutes surface and groundwater. The principal water delivery infrastructure of the Zerafshan river is located on the Uzbek territory, and consists of four hydro structures and two dams with water reservoirs.

Client Description and Site Details

Client/Site Background

The Urgut region is the only area where tobacco is grown, near the border with Tajikistan. The Urgut district is in the eastern part of the Samarkand region, bordering with Tajikistan. The Zarafshan river is formed in the high mountains of Tajikistan entering Uzbekistan through Urgut district territory. The BAT Urgut Fermentation Plant (UFP) is located in the centre of Urgut town, which has a centralized water supply system and centralized sewage water collectors that go to the town's WWTP.

The core business activity of UFP is to store Green Leaf, process it, and ship to the BAT Samarkand Factory. Water is used to generate steam for processing and curing the tobacco, and water is used overall to condition tobacco before processing. The Virginia GLT line can process 4t/hr, and the Oriental line can process 6t/hr. The FCV Curing complex processes 1300t/season. The site runs an Agronomy Centre and works with 537 farmers and oversees 19 BAT farming technicians who support the farmers and monitor 100% of farms for child and forced labour. The seasonal patterns of curing and production (sorting and mixing the leaf/stems) last about 3 months each. The water efficiency rates for the growing of tobacco in 2020 were 4,545 m3/ha.

The Urgut plant works closely with the surrounding tobacco growers, establishing a drinking water project in 2007. The project has repaired and rehabilitated 33 artesian wells (boreholes) to date. It is important to distinguish between growers and farmers; as the contract with BAT is with the farmer and the grower works the fields. There are two types of tobacco grown:

- Virginia, which has bigger leaves and a higher yield, but requires watering throughout the growing season, and is a high maintenance crop. It has to be cured once harvested, which is done at the Urgut site.
- Oriental, which has a smaller leaf and only requires watering 4 times over the growing season. It can be dried in the sun post-harvest and does not require resource intensive curing.

BAT uses a 15 different tobacco grades classification system, but Uzbekistan has 6 grades for tobacco and BAT pays the growers according to that scale. Then they reclassify the crop into 15 traceability bar codes when the batch is through the factory door. The site works closely with the local tobacco growing community, offering access to agronomists and farming workshops, as well as the irrigation programme. The irrigation programme is only aimed at virginia growers, as drip-irrigation is not required on the oriental variety. The farmers do not use the boreholes for irrigation - only pumped water from the surrounding canals. The borehole rehabilitation programme that BAT undertakes, is to secure a drinking supply for residents.

The Leaf factory is active for 3 months with 400 seasonal workers, the site contains a hiring office and a farmers office. The tobacco is harvested within a 15km radius from the factory, as the tobacco (virginia) has to be loaded for curing on the same day. UZBAT is unique, in that they cure the tobacco onsite instead of the farmers being responsible for it. The onsite curing boxes can process about 8-9K kg of leaf per curing box with the boilers ensuring that a controlled burn takes place over 160 hrs. The moisture content is lowered from 90% to about 16% as the temperature is slowly raised to 72 degrees Celsius. The curing boxes use steam for the curing process, this is a closed-loop water process using heat exchangers. The final moisture content of smoking grade tobacco is 5-6%, and this is achieved at the Samarkand factory during the processing stage.

The site operates two on-site boreholes (BH): BH1 at a depth of 190m with a 8m3/hr capacity, and BH2 at 250m depth with a 6m3/hr capacity, feeding into 750 and 250 m3 holding tanks. The site has outsourced their borehole maintenance. The site only uses raw water, as it is so close to the source with low salination levels (200-400mg/litre). In comparison salination levels are at 1000mg/litre when the water reaches Samarkand. The only water processing taking place, is some softening for the boilers. There are two fire pools on-site with a 150m3 capacity each.

The site operates the same onsite WWTP as in Samarkand, built in 1996. It consists of three-stages: mechanical filtering, sedimentation (sludge collected and liquid pumped to next stage) and biological treatment with bacteria. The sludge is pressed and collected by farmers and the treated wastewater is discharged into the municipal wastewater network. Stormwater is directed onto the field where the WWTP is located, which in effect acts as a flood plain.

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Summary of Shared Water Challenges

Summary of Shared Water Challenges

- Poor quality of drinking water,
- Water supply interruptions
- Channel overflow of treated water (distribution of sewage network)

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

Comment The site occupies a single catchment.

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


Yes

Comment The scope of certification is under the control of a single management system.

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

Comment The site has a homogenous primary production system.

1 STEP 1: GATHER AND UNDERSTAND

1.1 *Gather information to define the site's physical scope for water stewardship purposes, including: its operational boundaries; the water sources from which the site draws; the locations to which the site returns its discharges; and the catchment(s) that the site affect(s) and upon which it is reliant.*

1.1.1 *The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including:* 🚩 in progress

- 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 The Urgut GLT site is located 25km from the Zaravshan river and 42km south-east of Samarkand. The site has prepared a Yandex map that shows all water-related infrastructure on the site as well as the physical scope. Also the municipal WWTP operated by the municipal water supplier Suv Ta'minoti is indicated. The map has been expanded to include the origin of the Zaravshan river in Tajikistan, demonstrating that the site understands their catchment origin.

The site has prepared a 'water catchment and physical scope' presentation and it provides an overview of the physical scope of the site, an overview of water-related infrastructure on the site, piping network (fresh water), contract for Suv Ta'minoti to receive treated waste water from the site, and the contract for the site to receive bottled water. The site's effluent is sent for treatment at the Urgut WWTP operated by Suv Ta'minoti. The treated wastewater is then discharged to Yangi Ariq canal that leads to the river Zaravshan.

The 'piping plan' presentation is a site schematic, showing the piping network. This should be seen alongside the 'water scheme' spreadsheet, which contains a more readable water schematic of the site, including the location of water meters (1-31). The site installed additional meters in April 2022 and conduct daily manual readings of water meters. They are working towards digitalising water meter readings. The piping plan indicates there's irrigation but this was not explained during the audit.

The site refers to itself as the Urgut Fermentation Plant (UFP) and the abbreviated form is used throughout the site's AWS documentation. They have prepared a very useful 'UFP Water Scope' paper, which sets out the hydrogeological landscape in Uzbekistan, before honing in on the Urgut plant. This is supported by academic articles, such as 'Water Resources Use in the Uzbek Segment of the Zarafshan River Basin'. The description of groundwater resources in the country refers that there are several major hydrogeological zones but it was not indicated which zone is the site located in (or which aquifer(s)), and what are the boundaries of the relevant aquifers/zones. Given that almost all water withdrawal for the site is from groundwater, better understanding of the specific groundwater layer(s)/aquifer(s) from which the groundwater is abstracted, is important.

The site also has a contract in place for supplying drinking water onsite in 19l bottles by Venzellium services and there are 23 water units distributed across the site.

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1.2 *Understand relevant stakeholders, their water related challenges, and the site's ability to influence beyond its boundaries.*

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. 	Q Obs.
Comment	<p>UZBAT has developed an AWS Stakeholders spreadsheet 'SMC 2022 AWS' that covers both the Samarkand and Urgut site. The 'AWS Stakeholder SWOT' spreadsheet captures all relevant stakeholders and their water-related challenges. The BAT Urgut site works with the local farming community and have different stakeholders to the Samarkand site, these include:</p> <ul style="list-style-type: none"> - Alliance of Farmers in Urgut District - Municipal water supplier/treatment. - Central Park of Urgut - Urgut Department of Water Resources - Mahalla Dostlik <p>In terms of contractual relations, the site has a contract in place with farmers, who own the land, and growers are paid by the farmer in accordance with the grade of the tobacco that they deliver to site/</p> <p>Shared water-related challenges were then identified for later indicators. The site should also indicate water-related challenges of different relevant stakeholders when they are more specific or different from identified shared challenges.</p>	
1.2.2	<p><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></p>	✓ Yes
Comment	<p>The site has mapped all their stakeholders on a 'water risk assessment HEATMAP' which reviews and classifies the potential degree of influence between the site and their stakeholders.</p>	
1.3	<p><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></p>	
1.3.1	<p><i>Existing water-related incident response plans shall be identified.</i></p>	✓ Yes
Comment	<p>Urgut has a 'BCP Recovery Plan - 2022' in place, including a Crisis Management Team (Gold) and a Function Team (Silver) and includes a specific water-related emergency response plan. The possible incidents identified are appropriate for the site and the responses outlined likewise.</p> <p>The 'System Risk Management' procedure has been amended and now contains a requirement that a 'revision of the risk register for water resources management according to AWS takes place once a year by senior management'.</p>	
1.3.2	<p><i>Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped</i></p>	Q Obs.
Comment	<p>The site water balance was subject to repeated review during the audit, with the site supplying several iterations for review, as they gained a deeper understanding of their data sources and inconsistencies in their calculation. The latest version of the site water balance identifies all inflows, losses, storage and outflows. The site also supplied a water schematic of the site, in support of the water balance. The Sankey Diagram presents the water balance as a flow diagram.</p>	

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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	<p>The site has an extremely seasonal water consumption pattern, this is evidenced in the 'water balance UFP' spreadsheet, showing the water balance in the off and on season. The site has undertake work on verifying the quantitative data in the water balance, which now balances. The calculation is based on data from December 2020 to November 2021.</p> <p>There was 20K m3 unaccounted for, likely from steam generated from the boiler and water, managing the moisture content in the product and the curing tanks. The site had a water pipe leaking under the factory with the pumps going flat out even during the off season, this was initially detected from the pumps continuing operation and then a water meter was installed for further analytics. The site has therefore improved the data available to undertake the water balance calculations.</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 has developed a 'water quality' presentation, that identifies the water quality checkpoints on the site and example test reports for fresh water and effluent, outlining the test parameters for both test types. The site also supplied an example submission form to the Environmental Committee, which contains the most recent test reports (third-party testing) for the boreholes and the effluent discharged from the site.</p> <p>The site sends all their effluent to a municipal WWTP for secondary treatment, who also conduct water quality tests, that they share with the site. An example report was made available during the audit. The site supplied a number of additional documents post-audit, but these were photographs of pages and could not be translated using software. The site's operations are seasonal and their operation does not present a water-related challenge, that is a threat to good water quality status for the immediate environment.</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 has identified and mapped potential sources of pollution in the Yandex map (indicator 1.1.1) and in the 'potential pollution sources' presentation. They have identified 11 potential sources of pollution and the 'water pollution points' spreadsheet identifies the chemicals stored at the pollution sources and how they are managed operationally. The site also supplied the training slides for staff, outlining procedure for managing oil spills and chemical spills.</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>	 Yes
Comment	<p>The site has one onsite IWRA, which is the factory garden and trees. There are a total of 547 trees onsite, that have to be counted annually. The fire pools are open, but do not support any environmental or ecological purpose.</p> <p>The BAT Agronomy Centre has produced 2000 tree seedlings, 1300 have been sent for planting. They have grown the local species Tuya and juniper trees.</p> <p>The site has plans to encourage forestation in the community, including 2500 mulberry trees for the cotton larvae cocoons and 10K poplars. This will be monitored at future audits.</p>	
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

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Comment Like at Samarkand, the site has prepared a 'water costs' spreadsheet, which has collated data from 2020 - 2022 on any operational water-related costs associated with activities at the Urgut site. There were £35K set aside in CAPEX for 2022 to install additional water meters onsite, 18 have been installed in total. Support for local residents, IWRA etc was set at £21K and the site spent this at activities with the Zeravshan National Park.

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



Yes

Comment The site has developed a 'WASH Access' presentation which provides picture evidence for the various WASH elements, and includes a map of the site where WASH facilities have been identified. The site has developed a spreadsheet collating the number of facilities onsite, against the national legal requirements. The site supplied both male and female showers, particularly used by workers in the processing plant. Numerous documents were uploaded post-audit.

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.



Yes

Comment The 'Impact on the same catchment' spreadsheet, contains the review of the sites suppliers and outsourced services, and whether they are located in the same water catchment. The only supplier within the catchment of the Urgut site is the farming community that grows the tobacco, sold to the processing plant. UZBAT is very involved in supporting the local tobacco growers, providing agronomical support and looking at achieving water efficiencies in the growing process. The site has prepared a presentation on the water use of the growers (embedded water use), outlining the water requirements of the crop e.g. virginia requires watering 11 times per growing season whereas the oriental variety only requires 3, explains agronomical advice and sets water efficiency and water for irrigation targets for 2025.

The farmers only use seasonal surface water for growing tobacco, whereas the boreholes are used for drinking water. so it does not impact water scarcity linked to groundwater depletion.

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



in progress

Comment There are three identified outsourced services for the site and all of them are based within the catchment. They provide the following services: cleaning, maintenance of explosives equipment and water supply services. In addition the site supplied a spreadsheet, containing a record of 'volume of water washing cars for 2021' and some certificates. it is unclear whether the services only use water from the site to deliver their activities, or whether there is some off-site embedded use to the activities.




Finding No: TNR-003572

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.



Obs.

Comment	<p>The site has identified a number of water governance initiatives:</p> <ul style="list-style-type: none"> - Concept and strategy for development of water management in Uzbekistan 2020-2030, based on the Decree of the President No UP-6024. Covering the 3 main rivers in Uzbekistan, none of which originate in UZB. The water-related infrastructure in the country and introducing 'smart meters' for water use, moving from analogue to digital metering, in order to encourage water efficiency. Water is currently cheap, even though UZB is becoming increasingly water stressed. - Zarafshan water district improvement project in UZB - Zarafshan river report (UNDP) strategy for potable water supply and improvement of wastewater treatment within the river basin - BAT Water Usage Roadmap- self-assessment tool, mainly for engineering department. 	
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 legal department at Samarkand is responsible for monitoring all legal and regulatory requirements and will update the relevant departments. WSAS had view of their September-October mailout from the Legal Dept. The site submits quarterly reporting to the Samarkand Environmental Committee, which includes the water quality test reports from boreholes and the WWTP. One of the quarterly reports was supplied for review.</p> <p>The site's 'special water use' permit (Ref:22086305), for extracting water from the onsite boreholes. Ministry of Geology, Zarafshan Department of Hydrogeology. The site is permitted to extract 124.1 m3 per day and 44,678 m3 pr annum. There are three conditions set by the permit: water meter instalment, keep the well area clean and monitoring of groundwater levels. The permit is for 2020-2025 and it expires on the 14.09.2025; the site pays quarterly compensation for extraction. The site is not required to report back on extraction rates, but the Department can undertake spot checks to review records.</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>	 in progress
Comment	<p>The site supplied the same catchment evidence for the BAT Urgut site, as UZBAT submitted for the BAT Samarkand site. There is some unique evidence for Urgut, consisting of the monthly extraction rates for the two on-site boreholes.</p> <p>The site has provided several documents, including:</p> <ul style="list-style-type: none"> - Screenshots from Aqueduct tool that indicate extremely high water stress in the area. - Published paper 'Water Quantity and Quality in the Zerafshan River Basin: Only an Upstream Riparian Problem?' - Document called 'AWS_Zeravshan_River_water_balance_and_risks' that compiles information from Wikipedia and from unknown sources. The compilation is not referenced and although some quantitative data is provided, there is no clear water balance. - Spreadsheet with catchment water consumption calculations that derives a positive water balance, in contrast to the considerable water stress indicated in other studies and sources. Calculation in this spreadsheet is not appropriate for establishing the water balance, including the following errors: it is assumed that all precipitation equals available water, without accounting for evapotranspiration or groundwater recharge; industrial use is not considered in the calculation of water consumption; a theoretical water use is calculated without an indication if actual water use information is available. <p>Finding No: TNR-002160</p>	
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>	 in progress

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Comment The site has used the WWF Water Risk Filter to assess and identify the water quality in their area. The Water Risk Filter is a useful tool, but also very broad and not very site specific. The site supplied an academic article titled 'Water quality, potential conflicts and solutions - an upstream-downstream analysis of the transnational Zarafshan River' (2013). There is seasonal data available for the Zarafshan River within the report, and although it is old, it is still a benchmark for the site in this initial certification cycle.

The channel that the municipal WWTP discharges into is the Yangiariq irrigation channel and the site has an internal normative document that states the water quality levels that their onsite WWTP must discharge water at, in order for the municipal plant to accept it. The site has approached the municipal WWTP for their own discharge data into the irrigation channel, but do not have access to the data at the moment. It was discussed that this could be incorporated into the site's WSP. The Zarafshan National Park also monitors the river, in terms of water quality, and there could be third-party verified data available from them that the site can access.


The site supplied the 'Third Environmental Performance Review (EPR) of Uzbekistan. (2020) which is produced by the UN, but it is unclear what elements of the report contribute towards the requirements of this indicator. A weblink to 'Monitoring of Environmental Pollution of the Republic of Uzbekistan' was supplied, but it can't be uploaded: <https://monitoring.meteo.uz/ru/menu/informatsionnye-spravki1?ysclid=lauxlcjp324998373>. This appears to be a useful link but the site has not extracted and presented the relevant information, that applies to the Urgut site.

Finding No: TNR-003565

1.5.5 *Important Water-Related Areas shall be identified, and where appropriate, mapped, and their status assessed including any threats to people or the natural environment, using scientific information and through stakeholder engagement.*  **Obs.**


Comment The site is aligned with the Samarkand Cigarette Factory, as they are both located in the same surface water catchment, and catchment data is very similar. As with Samarkand, the Zarafshan State Reserve (National Park or ZNP) has been identified as their main catchment IWRA. The ZNP is divided into sections and its status has been assessed as 'somewhat degraded and will require some restoration'. The presentation presents evidence to demonstrate the environmental degradation of the area, deforestation and unauthorised sand/gravel extraction from the riverbanks for concrete production.

There are water reservoirs near Urgut that appear seasonally for irrigation purposes, such as the Kamongaron reservoir. There is also a water spring in the Khujayduk settlement named "Shirdok ota", which is popular among the local population and has spiritual value. It is visited during religious holidays and BAT will provide additional information on these potential catchment IWRAs for Urgut at future audits.

1.5.6 *Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.*  **in progress**

Comment The site has an understanding of existing and planned water-related infrastructure in their immediate catchment, such as Zarafshan Basin plan for the management of the irrigation system for the surrounding farmers. The presentation contains some images of the irrigation system, but it does not provide an explanation of their condition. The site uploaded a number of documents for this indicator post-audit, but it was difficult to ascertain their relevance to the requirements. A summary of the documents that were uploaded would have been welcome, in order to contextualise the evidence.

Finding No: TNR-002162

1.5.7 *The adequacy of available WASH services within the catchment shall be identified.*  **Yes**

Comment The site has compiled a presentation with information on catchment WASH services, with the data mainly being obtained from UNICEF, in addition to the Aqueduct water risk filter. Access to safe drinking water is a very low risk and access to sanitation is also a very low risk.

1.6 *Understand current and future shared water challenges in the catchment, by linking the water challenges identified by stakeholders with the site's water challenges.*

1.6.1 *Shared water challenges shall be identified and prioritized from the information gathered.*

Q
Obs.

Comment As with the Samarkand location, the site has prepared an 'AWS current and future shared water challenges' and have utilised the WWF Water Risk Filter. This identified: water scarcity, water quality and deterioration of water stress in the area. UZBAT is focussing on water withdrawal reduction and water recycling within the plant. Urgut also has targets in place for their interactions with farmers, to increase drip-irrigation of Virginia plants and increase the amount of hectares planted with oriental - this reflects the challenges identified by the farmers.

The Urgut site had a meeting with the Mahalla, farmers and the municipal plant. The presentation from the event was shared and the final slide lists shared water challenges. In the minutes from the meeting, the stakeholders have identified 4 water challenges:

1. the groundwater levels are declining
2. improvement of storm water discharge channels
3. sponsorship of artesian wells (boreholes) for drinking water
4. the farmers field pumps are outdated, sponsorship of renovation and installation of pumps.

Good feedback from stakeholders regarding shared water challenges and these have been incorporated into the 'shared water challenges' spreadsheet and it is noted that stakeholders are approaching UZBAT to address water challenges that they are facing. The shared water challenges are: poor quality of drinking water, water supply interruptions and channel overflow of treated waters.

1.6.2 *Initiatives to address shared water challenges shall be identified.*

✓
Yes

Comment The 'Shared Water Challenges' spreadsheet, contains a column on the initiatives that the site is undertaking to address the identified shared water challenges. The 'ESG & EHS Update' presentation outlines some of the site's water reduction efforts, which also address the shared water challenges.

1.7 *Understand the site's water risks and opportunities: Assess and prioritize the water risks and opportunities affecting the site based upon the status of the site, existing risk management plans and/or the issues and future risk trends identified in 1.6.*

1.7.1 *Water risks faced by the site shall be identified, and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.*

✓
Yes

Comment The site's water risks and opportunities have been identified and prioritised in the 'AWS Stakeholders SWOT and R&Os' spreadsheet', The 'Risk process analysis' tab. It reviews specific risks for the Urgut site, including the likelihood and severity of impact.

The 'System Risk Management' procedure has been amended and now contains a requirement that a 'revision of the risk register for water resources management according to AWS takes place once a year by senior management'.

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

Q
Obs.






Comment Please see 1.7.1. Opportunities are identified. Potential savings are assessed for actions at the site. The site should also conduct relevant assessment of those opportunities that are implemented outside the site - the sheet 'UFP_Risk&Opportunity Analysis' does not include assessment of potential savings and business opportunities.

1.8 *Understand best practice towards achieving AWS outcomes: Determining sectoral best practices having a local/catchment, regional, or national relevance.*

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1.8.1	<i>Relevant catchment best practice for water governance shall be identified.</i>	 Yes
Comment	<p>The site has summarised best practice activities in the 'Best Practices List UFP' against the 5 AWS outcomes. Under good water governance, the site has listed the Drip Irrigation projects that it undertakes with their community of tobacco growers. It should be noted that Urgut staff also participate in the Zaravshan National Park projects, in the clean-up days. The impact of the drip irrigation projects was explored through stakeholder interviews and it was clear that their water catchment partners, understood the AWS standard and the water challenges they were addressing with the UZBAT team.</p> <p>As highlighted in the BAT Samarkand report, UZBAT (Samarkand & Urgut) have set up a multi-disciplinary project team, to develop AWS standard system processes and engage with catchment stakeholders.</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 has identified a number of best practice activities for water balance in the best practice spreadsheet. This includes reducing water consumption from operations and the '5 year water savings plan' demonstrates how the site is implementing them. Training staff and contractors on water efficiency issues is seen as key to changing behaviours and UZBAT have developed training material to implement behavioural change.</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 has identified the supply of water dispensers onsite as best practice for water quality. WSAS is also mindful that having an onsite industrial WWTP should be considered best practice in Uzbekistan and conducting quarterly third-party testing of their wastewater.</p>	
1.8.4	<i>Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.</i>	 Yes
Comment	<p>The site has identified the drip irrigation projects as a best practice project to support IWRA's, but in terms of the on-site IWRA, the site maintains their 537 trees. The site conducts an annual tree inventory of all trees onsite, as these are protected by law. Reforestation is considered critical to increasing the probability of rainfalls and water recharging across Uzbekistan. Although not identified by the Urgut site, staff participate in environmental improvement actions at the Zaravshan National Park.</p>	
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	<p>The site has identified the following best practices for site provision of WASH facilities: supplying filtered water across the site, installing solar thermal systems to support the hot water requirements from the showers. In terms of catchment best practice, the site has repaired 33 artesian wells for drinking water in kishlaks (villages) within the Urgut District. Newly repaired wells provide drinking water for more than 66 580 people.</p>	

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2	STEP 2: COMMIT & PLAN - Commit to be a responsible water steward and develop a Water Stewardship Plan	
2.1	<i>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.</i>	
2.1.1	<i>A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:</i> <ul style="list-style-type: none"> <i>- That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes</i> <i>- That the site implementation will be aligned to and in support of existing catchment sustainability plans</i> <i>- That the site's stakeholders will be engaged in an open and transparent way</i> <i>- That the site will allocate resources to implement the Standard.</i> 	 Yes
Comment	The site has a Water Stewardship Commitment in Russian, Uzbek and English. It is posted on their site's website and signed by Pavel Vereshak (Head of Samarkand Branch/Factory Director) on the 19.11.22. Zavarjon Ubaydov (Head of Leaf) also signed it for Urgut plant.	
2.2	<i>Develop and document a process to achieve and maintain legal and regulatory compliance.</i>	
2.2.1	<i>The system to maintain compliance obligations for water and wastewater management shall be identified, including:</i> <ul style="list-style-type: none"> <i>- Identification of responsible persons/positions within facility organizational structure</i> <i>- Process for submissions to regulatory agencies.</i> 	 Yes
Comment	The responsibility for monitoring compliance obligations sits within Legal and Corporate Relations, and is the same for both BAT Uzbekistan sites. The Sustainability Team is responsible for submitting reports to the Environmental Committee. Dealing with AWS related issues is highlighted in the 'IMS Manual SCF' and is the responsibility of the leadership team (LDR). The site uploaded a range of documents, including job descriptions, which were not applicable to this indicator.	
2.3	<i>Create a water stewardship strategy and plan including addressing risks (to and from the site), shared catchment water challenges, and opportunities.</i>	
2.3.1	<i>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.</i>	 Yes
Comment	The Urgut site has a site specific 'AWS Strategic Plan' which defines the mission, vision and goals within it. It clearly contains a water stewardship strategy but also goes beyond that and should be read alongside the WSP.	
2.3.2	<i>A water stewardship plan shall be identified, including for each target:</i> <ul style="list-style-type: none"> <i>- How it will be measured and monitored</i> <i>- Actions to achieve and maintain (or exceed) it</i> <i>- Planned timeframes to achieve it</i> <i>- Financial budgets allocated for actions</i> <i>- Positions of persons responsible for actions and achieving targets</i> <i>- Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.</i> 	 Yes

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Comment The site has developed a Water Stewardship Plan, which contains 29 Actions, over 7 Objectives. The WSP is bilingual (Russian & English) and is well structured for an initial plan. Some of the actions contain SMART targets and can more readily be measured. There are timeframes for all actions, but it was discussed that the site could consider an annual WSP that would make it easier to complete Step 4 & Step 5. All actions are linked to an AWS outcome and responsible positions have been identified in the 5-year plan. WSAS notes that BAT Urgut supplied a much more detailed WSP against indicator 3.3.1. that lists actions against each of the AWS standard indicators, which can also be located in the AWS strategy spreadsheet as the 'Urgut AWS Strategic Plan'.

The site also supplied a '5 year water saving plan' spreadsheet, which provides more detail on 6 actions, that are also listed in the WSP, and includes budgets and water savings/volumes arising from the action.

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. ✔
Yes

Comment The site has a water related emergency response plan within the Business Continuity Plan.(Recovery Plan 2022, v.2), this includes point 3: failure of water treatment plants. The site does not depend on external public-sector infrastructure, but relevant adaptation strategies have been identified. The site has consulted with relevant public sector and infrastructure agencies to identify shared water challenges.

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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 ran a 'Drinking Water' project from 2007-2021 for villages in the Urgut District and have repaired 33 drinking water wells in that time period. The 'Irrigation Project' saw 23 water wells repaired between 2018-2019, rehabilitating irrigation infrastructure, and the site has successfully completed a drip irrigation field test, over 10ha. The 'Drip Irrigation 2022' presentation summarises the outcome of the field test and the site will continue to promote the benefits to farmers and growers. The water savings are significant, with traditional methods requiring 6,500m³ compared to 3,600m³ by drip irrigation, saving 2900m³/ha.

The BAT Urgut plant houses an Agronomy Centre, with 19 BAT Field Technicians working with 530+ farmers. They provide agronomical support, monitoring of crops, and visit the growers 5 times over the growing season. They also monitor any use of child or forced labour. The farmers, growers and field technicians use the 'Farmers Sustainability Management Portal' and a screenshot of the dashboard has been supplied.

The site conducted a stakeholder meeting at the Urgut factory on the 21.09.22 and supplied the attendance register, presentation and pictures from the event. All of these activities are underpinned by the UZBAT 'Environmental Policy Statement'.

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 is actively ensuring the water supply of local villages in the Urgut District, having repaired 33 artesian wells for drinking water in the period 2007-2021.

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.*



in progress

Comment

Please reference indicator 2.2.1 for an explanation of the compliance process. An example quarterly report has been uploaded, including the site's EHS log and compliance management procedure. It is worth noting that the Urgut site's contract with their tobacco farmers also stipulates that they have to follow all relevant legal and regulatory requirements and the water that they have to supply growers with.

One of the requirements under the site's permit for water withdrawal is to monitor groundwater levels at the wells. The results of this monitoring were not demonstrated to the audit team and it is not clear if the site is monitoring this data.

Finding No: TNR-003725

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





This site is actively promoting the water rights of the local villages, through the artesian wells restoration project, ensuring access to safe drinking water.

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

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3.3.1	<i>Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.</i>	 Yes
Comment	<p>The site has set a range of targets for achieving sustainable water balance, and progress is being monitored. The 'water stewardship detailed plan' lists a range of water balance targets under indicator 3.3, with progress recorded against them. The Sustainability AWS presentation (indicator 2.3.2) lists 'water withdrawal reduction and recycling' actions, what has been completed, as well as the next steps that both the Samarkand and Urgut sites will undertake.</p> <p>The target water ratio per day is 1.95 m3/t and the site tracks it on a daily basis, and this is recorded on the DDS system, The site shared a screenshot of their water monitoring capabilities.</p> <p>UZBAT have developed KPI's for water recycled and reused (m3) and recycling rates (%) which are recorded in the supplied KPI spreadsheet, showing data from December 2021 - September 2022 for both sites.</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>Water scarcity has been identified as a shared water challenge by the site's stakeholders and the site has set water efficiency targets for their own water use. Actions identified include installation of water meters on production equipment and upgrading tobacco humidifiers in curing barns and installing high-pressure water pumps. The '5 year water saving plan' lists water saving actions undertaken and planned by the site and their corresponding water savings in volume and savings. The DDS screenshots demonstrate how the site monitors their water use in real time, and the ESG Glidepath figures for water use record annual data.</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>Some water is redistributed at the 'buying points' where the site previously bought the tobacco bales from the farmers, whereas that activity now takes place at the factory. There is a borehole at each of the buying points that the site has kept open and available, so the local population can extract drinking water. This is a good example of good redistribution project, as the site has maintained the boreholes and report against the extraction permits. WSAS would welcome supporting evidence for this action, if the site intends to continue maintaining the boreholes.</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>	 Obs.

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Comment The site has set a water quality objective in their WSP, please reference the 'water stewardship detailed plan Urgut' and there are 4 actions under that objective:


- To conduct a laboratory monitoring of wastewater quality (incoming and outgoing treatment) to assess the environmental impact and to determine the effectiveness of the treatment facilities
- To equip Spill Kits at potential pollutant spill points
- To train employees on spill response and the handling of Spill Kits
- Installation of equipment for UV water treatment

Progress is recorded in the 'Urgut AWS Strategic Plan tab in the spreadsheet. The site supplied evidence for Well water quality; water from the wells is only used for production and not for drinking water. The site had an anomaly test result from the wells: nitrates came back as 66.9 ml/l which is too high for drinking water, the level for which is 45 mg/m3. The site experiences seasonal water quality due to rainfall patterns, less rain means mineralisation and salination of water. It is recommended that the site tracks their water quality results, to better understand outliers. The water is being used as technical water and not for drinking water - the drinking water is being supplied by an external supplier. The site also supplied water quality test reports for their waste water.

3.4.2 *Where water quality is a shared water challenge, continual improvement to achieve best practice for the site's effluent shall be identified and where applicable, quantified.*  **Yes**


Comment Poor quality of drinking water has been identified as a shared water challenge and the site is undertaking projects in the community to improve the quality of drinking water in the villages. The site is unique in terms of industrial sites in Uzbekistan, in that it has an onsite WWTP. There is a programme in place of conducting quarterly treated wastewater quality tests and the site has supplied test reports to evidence this. Both the Samarkand and Urgut sites are working towards installing new WWTPs at their sites, with the Samarkand site having entered the design stage.

3.5 *Implement plan to maintain or improve the site's and/or catchment's Important Water-Related Areas.*

3.5.1 *Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.*  **Yes**

Comment On March 26, 2022, BAT Uzbekistan held the environmental event "Big Things Day" in the Zeravshan National Natural Park. In degraded areas of the national park, a team of 150 employees (Tashkent, Samarkand, Urgut) planted more than 1,000 seedlings of trees, such as elm, poplar, plane tree, and figs. This initiative in the future will help improve the microclimate of the reserve, prevent erosion and improve the water retention capacity of the park. The site also conducted litter picking around the Teshiktosh (heart stones) natural monument, photos were seen during the audit. The site is working on a forestation project and the Agronomy Centre is currently growing tree seedlings to eventually plant out in the community. The site is expanding their list of catchments IWRAs and will expand their activities in the coming years

3.6 *Implement plan to provide access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers at all premises under the site's control.*

3.6.1 *Evidence of the site's provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers onsite shall be identified and where applicable, quantified.*  **Yes**





Comment The site has benchmarked all their WASH facilities on site against national regulations. The WASH presentation contains pictures from onsite facilities as well as cleaning schedules, and drinking water dispenser locations. The site supplied evidence of WASH facilities being maintained through water quality testing and being under contractual obligations from suppliers e.g. water dispensers.

The site has extended this into surrounding villages by running project 'Drinking Water', rehabilitating artesian wells for drinking water in villages.

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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	This site has been running project 'Drinking Water' to reinstate artesian wells in local villages, ensuring access to safe drinking water.	
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	<p>The more relevant targets for working with farmers and improving their indirect water use are set against criteria 3.1 in the WSP, rather than 3.7. But this does not detract from the significant work that BAT Urgut undertakes with the tobacco growers and farmers around the factory site. The site has set water efficiency and water for irrigation (total) targets for 2025, based on 2020 benchmark data. Please reference the 'water for irrigation - farmers' presentation for a description of the targets.</p> <p>To improve the quality of green leaf yield, the site distributes a number of technical leaflets 'SRP Best Practice' e.g., Seedbed Disease. Information around irrigation and chemical use to keep water sources safe. The site also delivers tobacco harvesting seminars, to introduce best practice to their community of growers.</p>	
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 target set in the WSP is to conduct water efficiency training with onsite contractors and the site supplied evidence of the training for cleaning & canteen services, garden services and employees. The training slides and evidence of the training being delivered has been uploaded as evidence.	
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	<p>The site has supplied a number of letters to support this indicator:</p> <ul style="list-style-type: none">- Letter to the Water Supplier stating that they will be planting tobacco, the letter list all the pumps, hectares and breaks down the volume of water that will be required across different times of the growing season.- Response from the Minister of Water Resources, acknowledging the letter and the site's request for water- Letter to the Minister of Water Resources, requesting additional water for farmers, signed by acting GM.- Letter (15.0722) from the Suv Tamiaoti - they informed the site that their WWTP's current capacity is 1000m3 per day and information of future plans of a new WWTP nearby for 10K m3. <p>The site regularly communicates with the municipal WWTP. They asked for water quality data for the channel, they said they have the data but can't share it until they get permission from the manager, the site will now write a formal letter to request the information.</p>	
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	The site has collated best practice information for step 1.8 and the 'Best Practice List' spreadsheet also records whether actions have been implemented against the AWS Outcome. Please reference indicator 1.8.1 for an outline of implementation activities.	
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 '5 year water savings plan' demonstrates how the site is implementing best practice in water balance, by delivering water efficiency actions. The actions include: Installation of pump station for irrigation after water treatment, sensor mixers in shower rooms, water tank (300 m3) for accumulation in winter time, and high pressure cleaners for production equipment.</p> <p>The site has also trained staff and contractors on water efficiency issues, to encourage behavioural change.</p>	
3.9.3	<i>Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.</i>	 Yes
Comment	The site supplies filtered water through dispensers onsite, which has been identified as best practice. Operating an onsite industrial WWTP is considered best practice in Uzbekistan and this is maintained through quarterly third-party testing of their wastewater. The Urgut plant is planning to update the WWTP in due course.	
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 conducts an annual tree inventory of all trees onsite, as these are protected by law, and reforestation is considered critical to increasing the probability of rainfalls and water recharging across Uzbekistan. The site is building on this by developing a reforestation project and the Urgut Agronomy Centre have produced 2000 tree saplings in 2022. These will support the national reforestation push and will also be used on the locality.</p> <p>UZBAT are undertaking a number of environmental projects with the Zaravshan National Park, and Urgut staff participate in those activities. The site has also reinstated 33 artesian wells for drinking water in the Urgut District, since 2007.</p>	
3.9.5	<i>Actions towards achieving best practice related to targets in terms of WASH shall be implemented.</i>	 Yes
Comment	The site has repaired 33 artesian wells for drinking water in kishlaks (villages) within the Urgut District. Newly repaired wells provide drinking water for more than 66 580 people.	

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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>  Yes
Comment	<p>There are weekly UZBAT AWS team meetings, that are joint between Samarkand and Urgut. A number of example emails were seen, that contained the minutes from the previous meeting and highlighted key actions, including who is responsible for implementing it. The 'August action Plan for SCF & Urgut' is supplied, demonstrating how the sites continuously evaluate performance against the water stewardship plan.</p> <p>Reviewed the last 'SMK - Urgut Action Plan - November 17th 2022' - this was the last pre-audit preparation meeting, with over 50 actions for both teams.</p> <p>Quarterly Steering Committee meetings are held where progress towards AWS certification is reviewed and if needed WSP is amended to reflect issues. This is attended by the leadership team and engineering. Minutes were seen from the meeting conducted on 17.07.2022.</p>
4.1.2	<i>Value creation resulting from the water stewardship plan shall be evaluated.</i>  Yes
Comment	<p>The Urgut plant has a 'AWS 5-year Water Saving Plan' in place and it contains actions and projects that have already been approved (evidence uploaded against 2.3.1). The spreadsheet contains a column on the volume and value of the water saved, in addition to the cost savings that have already been identified. The EHS Steering Committee minutes and the AWS Action Plan for the Samarkand and Urgut sites, gives you an overview of the project development work that went into realising the Water Savings Plan.</p>
4.1.3	<i>The shared value benefits in the catchment shall be identified and where applicable, quantified.</i>  Yes
Comment	<p>The Urgut site has engaged in a number of improvements in their catchment, including activities in the Zeravshan National Park. The 'Drip Irrigation 2022' project slides demonstrate the shared value benefits to the farmers for utilising drip irrigation, the benefits have been both identified and quantified. The restoration of artesian wells in the Urgut District, for drinking water, are good examples of projects providing shared value benefits to the local community.</p>
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	<p>There have been no water-related emergency incidents at the site for the last year. This was confirmed by email by the Security Manager for the site Shuhrat Rustamov on the 23.11.22</p>
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

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Comment

The site has had initial stakeholder meetings, to identify shared water challenges and inform them of the AWS standard and actions in their WSP. Stakeholders have been extensively consulted to benchmark the site's initial water stewardship performance and to identify water challenges. This is the initial certification audit and the site has established the structures for consulting their stakeholders on their water stewardship performance.

UZBAT also issued a questionnaire for all UZBAT staff (internal stakeholders) at Samarkand and Urgut on the AWS process, including asking for potential IWRAs in the catchment and how the site currently performs on water related issues. There were nine questions in total and 32 staff members responded.

4.4

Evaluate and update the site’s water stewardship plan, incorporating the information obtained from the evaluation process in the context of continual improvement.

4.4.1

The site’s water stewardship plan shall be modified and adapted to incorporate any relevant information and lessons learned from the evaluations in this step and these changes shall be identified.


Yes

Comment

The UZBAT team continuously reviews the WSP through weekly AWS team meetings. The WSP is amended as the projects develop and there is an AWS Action Plan in place on the delivery of the AWS system across both sites. The WSP has actions across all indicators and they are amended as an issue progresses through planning. Please refence the attached minutes and Action Plan.

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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>	
Comment	<p>The 'AWS Mini Training' booklet for Urgut has been produced in Uzbek and Russian and contains targets for the site. It is widely distributed externally and internally and as discussed in the Samarkand audit, it would be the ideal location for adding some information on the site's water-related internal governance. The site has now added a page on the 'EHS Pillar Team Charter' that consists of an organisational chart, identifying the team members that deliver the AWS system. Sofya Kim is responsible for compliance with water-related laws and regulations.</p> <p>The 'Integrated Management System Manual SCF' outlines the site's governance structure and includes AWS elements. The manual contains the OPS LDR Team that all have an input on the AWS process. The site has disclosed AWS elements to stakeholders at events. The UZBAT team intends to use the booklet as their annual disclosure tool in line with indicator.</p>	
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>	
Comment	<p>Stakeholders were issued with the 'AWS mini training' booklet, it covers: the AWS outputs, how the AWS works, what the site is doing, next steps, water efficiency activities everyone can take, and why it's important for everyone. In addition, everyone was also supplied with the 'AWS Strategic Plan'. The internal TVs run slides on the AWS process, as observed by the audit team during the certification audit.</p>	
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>	
Comment	<p>The 'AWS mini training' booklet is the summary of the site's very initial water stewardship performance. There is also a statement on the UZBAT website that the site is engaging with the AWS process (www.bat.uz) and the booklet will be made available on the website as well. The site prepared a video with UZReport TV and it reports on the Urgut plant's first crop using drip irrigation. The site also supplied a newspaper article on the site underaking the AWS process.</p>	
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>	
Comment	<p>The site has disclosed their efforts to address shared water challenges in the 'AWS mini training booklet'. The booklet is a very accessible format and does not go into any details, but it ensures that water stewardship information is broadly available across stakeholder groups. The 'ESG & EHS Update - Uzbekistan' presentation, provides a more detailed outline of activities undertaken by UZBAT.</p>	

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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	The site explained their efforts to communicate with the water agency, to ensure sufficient water is available to all tobacco growers. The site supplied some evidence post-audit, but this was not translatable due to the format it was provided in. The efforts made by the site to engage stakeholders was however confirmed through the stakeholder interviews. The site conducted a stakeholder meeting onsite on the 21st September, and evidence and pictures of the meeting have been uploaded against the relevant indicators.	
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 have been no water-related emergencies onsite and email evidence to this effect was supplied by the site.	
5.5.2	<i>Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.</i>	 Yes
Comment	See above 5.5.1.	
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	See 5.5.1	

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Photographic Evidence from Audit



UFP Borehole 1.jpg



UFP WWTP.jpg

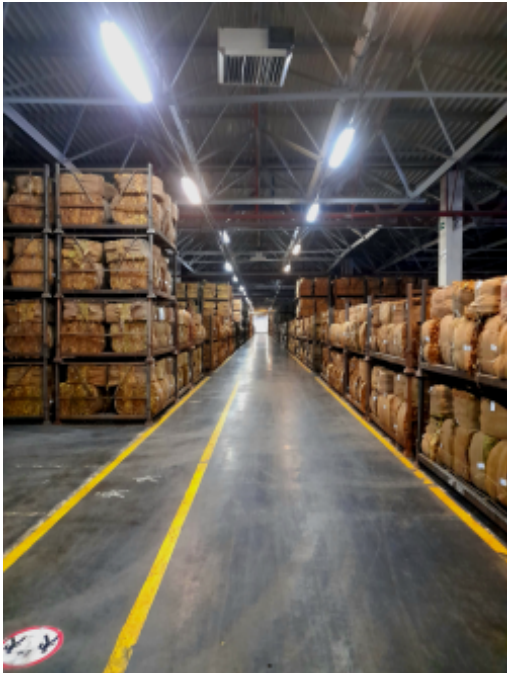
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UFP Leaf sorting line.jpg



UFP tobacco bales.jpg



Yes