

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000401



SITE DETAILS

Site: **American Snuff - Clarksville**

Address: 4583 Guthrie Highway, 37040, Clarksville, Tennessee, UNITED STATES

Contact Person: Garland Lee Smith

AWS Reference Number: AWS-000515

Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Core

Date of certification decision: 2023-May-08

Validity of certificate: 2026-May-08

AUDIT DETAILS

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

Audit Type(s): Initial Audit

Audit Start Date: 2022-Nov-09

Lead Auditor: Warrick Stewart

Audit team participants:

Warrick Stewart, Lead Auditor

Gisela Galan

Site Participants:

Lee (Garland) Smith, RJRT: Lead Manager EHS ASC (Clarksville)

Julie Fry, RJRT: EHS Specialist ASC (Clarksville)

Harold Doss, RJRT: Sr Director of Manufacturing ASC

Rae Mindock, Consultant

Steve Norman, RJRT: SVP Manufacturing ASC

Stephen Jones, BAT: Director ESG

Janae Wells, RJRT: Senior Environmental Engineer - Observer

William (Scott) Snow, RJRT: Environmental (Whitaker Park Site) - Observer

Ken Beauchamp, RJRT: Sr Manager EHS

Richard Stimpson, RJRT: Contract Engineer (Clarksville)

Rupert Kendrick, RJRT: Project Engineer

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AUDIT TIMES

Dates	Audit from	Duration	Auditor	Description
2022-Nov-09	08:00:00 - 17:00:00	09:00	Warrick Stewart	
2022-Nov-10	08:00:00 - 17:00:00	09:00	Warrick Stewart	
2022-Nov-11	08:00:00 - 13:00:00	05:00	Warrick Stewart	

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ADDITIONAL INFO

Summary of Audit Findings: A total of 49 findings were raised during the certification audit, 19 major non-conformities, 25 minor non-conformities, and 5 observations. The major non-conformities were of sufficient concern to warrant the categorisation of the non-conformity as major and related to Good Water Governance; Sustainable Water Balance; Good Water Quality Status; Important Water-Related Areas (IWRAs); and Safe Water, Sanitation, and Hygiene for All (WASH).

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 24/02/2023.

The major non-conformities must be sufficiently addressed, and evidence submitted to WSAS within 90 days of receipt of the report by 24/03/2023.

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

The audit team recommends certification of the American Snuff - Clarksville Site 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 resolved the major non-conformity and 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 the American Snuff - Clarksville site against the AWS International Water Stewardship Standard Version 2.

The American Snuff Company, LLC Clarksville facility that totals 186 acres in size is located at 4583 Guthrie Highway in Montgomery County, which is 12 miles north-east of downtown Clarksville, Tennessee, USA. The site produces smokeless tobacco products. The manufacturing facility includes silos, threshing machinery, dryers, humidors, fermenting barrels, rolling trays, a forklift area, rainwater storage tank, effluent and storm water infrastructure including an on-site detention pond, and related ancillary services. The site uses approximately 50% of its water for production and approximately 50% for sanitation for site staff. Primary manufacturing water use is in boilers for heat production used in product drying processes, facility maintenance/cleaning and hydration of tobacco.

The site receives water from the City of Clarksville, Clarksville Water System which sources surface water from the Cumberland River. The site does not provide additional treatment of municipal water, or site-specific monitoring. The factory effluent is discharged (piped) to the City of Clarksville, Clarksville Wastewater System which discharges to the Red River, a tributary to the Cumberland River.

The facility is located south of Spring Creek, a tributary of the Red River that ultimately flows into the Cumberland River. The American Snuff Company Clarksville Catchment (141.3 square miles) is within the Lower Cumberland-Red River basin and is defined as the Spring Creek sub-watershed (HUC 051302060603). The site is in the Spring Creek HUC 12 watershed.

The audit was conducted onsite on November 9 to 11, 2022.

FINDINGS

WSAS

2 Quality Street North Berwick, EH39 4HW, UNITED KINGDOM

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NUMBER OF FINDINGS PER LEVEL

Other	1
Observation	5
Minor	24
Major	19

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FINDING DETAILS

Finding No:	TNR-004330
Checklist Item No:	0.1.1.2
Status:	Open
Finding level:	Other
Checklist item:	The scope of the proposed certification shall be under the control of a single management system.

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Audit Number: AO-000401

Finding No:	TNR-002049
Checklist Item No:	1.1.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Nov-09
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>No water sources provide water to the site that are owned or managed by the site or its parent organization.</p> <p>The map of the potable water and wastewater treatment facilities does not reflect all the plants and their location, as well as potable inflows and sewer outflows.</p> <p>The fire tank and rainwater harvesting tank on site, the grease separator, and storm water channels/trenches have not been mapped.</p> <p>In the site map, reference is made to "detention and retention pond". However, there are only two on site. The others should be labelled as storm water channels or similar. Also, 1.1.1_FIGURE_Site_Location_Map shows one pond, but 1.1.1_Figure_2_-_SWPPP_American_Snuff_Clarksville-Industrial correctly shows two.</p>
Corrective action:	<p>Figures were provided mapping the physical scope including engineering drawing, figures from the SWPPP and SPCC. The figures were revised to include additional information.</p> <p>The locations of the water treatment plant and wastewater treatment plant are provided to show inclusion in the catchment. The lines are depicted on the utility diagram for the site. Off site locations of municipal piping is not publicly available.</p> <p>The site figures provided in the SWPPP and SPCC were revised to indicate the locations of the fire tank, rainwater collection system and stormwater related items.</p> <p>Figures in the SWPPP and SPCC were modified as required.</p>

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Finding No:	TNR-001924
Checklist Item No:	1.2.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Nov-09
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>All relevant representatives of the site’s ultimate water source and ultimate receiving water body or bodies were not identified.</p> <p>The role of each stakeholder and their water related challenge were not comprehensively identified.</p> <p>Influence, interest, and level of engagement was established for each stakeholder, however the basis for this ranking was not identified.</p>
Corrective action:	<p>Stakeholders have been identified and engagement has begun primarily through email and phone conversations. The site is also taking advantage of on-site meetings scheduled with various community members to provide high level updates of their water stewardship program and progress.</p> <p>The stakeholder list was reviewed, and additional details were provided. Shared water challenges are being revised to address site specific conditions. The level of engagement was evaluated to include the basis for the rankings.</p>

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Finding No:	TNR-001925
Checklist Item No:	1.2.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Nov-09
Checklist item:	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.
Findings:	The degree of influence was identified for each stakeholder, however, information regarding whether this influence is current or potential and the basis for this ranking was not specified. As the role of each stakeholder in the catchment was not specified, their degree of influence considering the site's ultimate water source and ultimate receiving water body couldn't be comprehensively established by the site.
Corrective action:	Stakeholders engagement is expanding. Details required to provide guidance toward actions and to meet indication requirements is being provided. The information is confirmed after engagement site specific stakeholders.
Finding No:	TNR-001991
Checklist Item No:	1.3.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Nov-09
Checklist item:	Existing water-related incident response plans shall be identified.
Findings:	The site's Business Continuity Plan reflects the risk of water supply outages, but not any mitigation measures. Flooding was not identified as a risk in the BCP, nor any responses considered.
Corrective action:	BCP scheduled to be updated beginning in April. The water stewardship team from multiple sites are in discussion with the BCP authors to include specifics on water related concerns. As the Municipality is responsive for extreme events, such as flooding, ASC has requested the BCP (or like document) from Clarksville.

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Finding No:	TNR-002472
Checklist Item No:	1.3.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Nov-09
Checklist item:	Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped
Findings:	The site inflows, losses, storage, and outflows are reflected in an excel document with data provided from January 2021 to May 2022.

Site process water flow has been mapped, but not in a manner that quantifies the volume of water as it enters the site and moves through the production process until discharge.

A fully accurate Water Balance currently isn't available, as new water meters have needed to be installed. Currently the effluent meter reading is greater than actual effluent output, which the site believes is likely due to a leak from storm water into the effluent line. This is currently being addressed as a priority action by the site.

In summary, the site water balance has been identified and mapped, but not accurately quantified, which should be in place by end 2022.

Corrective action:

Site team working on obtaining data to complete the water balance including inflows, losses, storage and outflows. This information is being used to present site water use with 1.3.3.

Additional details have been added to several of the maps to depict water as it moves through the facility.

The site has installed a metering system which includes collecting data from each of the process areas. In addition, the existing meter for the effluent has been replaced with a more accurate meter. The site continues to work to bring the meter on-line through the updated PLC system.

The site has provided estimates of water use at the boilers, several productions lines and maintenance use. Again, quantification (1.3.3) will be available once the PLC is operational.

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Finding No:	TNR-001932
Checklist Item No:	1.3.3
Status:	Closed
Finding level:	Major
Due date:	2023-Mar-23
Checklist item:	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.
Findings:	<p>Water consumption was presented in an excel document from January 2021 to May 2022, however a comprehensive water balance calculation was not provided.</p> <p>To identify water saving opportunities, boilers which are usually significant water consumers, should be accounted for separately and not as “others”. Water harvesting, included in the WSP as an ongoing activity, is not accounted for.</p> <p>The site data reflects substantial variability in water consumption in 2021 and 2022.</p> <p>Addition of incoming water meters minus sewage meter shows a delta of 347,600 gallons between May and March 2022.</p> <p>Data correlating the site's annual high and low variances with the variances of its water source have not collated to understand if there is a water-related challenge that would be a threat to good water balance for people or environment.</p>
Corrective action:	<p>A simple balance water was provided based on site metering including two meters tracking water in and one tracking wastewater. Storage of rain water collection and fire water was included. Additional details were provided based on metering at some locations and estimates based on boiler use. Meters have been installed at each process area, but are not operational at this time. The balance will be updated again when the meters are providing data. (Refer to Minor 1.3.2 for supporting information)</p> <p>Boiler water use was estimated based on energy consumption. Water harvesting was included in the water balance map. There was not enough rain to harvest water therefore no harvested water included.</p> <p>The site is aware of discrepancy and discussed with auditors prior to site visit. Meters are being installed to collect data for processes.</p> <p>There are site variances with water use primarily based on the seasonal Prizing process. A comparison between variation and availability (City of Clarksville) indicates there is not threat. This will be confirmed through stakeholder engagement with the City.</p>

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Finding No:	TNR-001936
Checklist Item No:	1.3.4
Status:	Closed
Finding level:	Major
Due date:	2023-Mar-23
Checklist item:	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.
Findings:	<p>Water quality of the site’s water source was quantified. It is not clear if the information regarding Dunbar Lake and Spring Creek represents the water quality of the two bodies of water or the effluent of the site. Based on the information presented in the SWPPP, it should represent the water quality of the two bodies of water. The source/s and date/s of this information were not referenced.</p> <p>Water quality of the effluent from Clarksville STP PTOW and Barkely Reservoir (ultimate water body which receives the effluent from the Clarksville STP PTOW) was not presented.</p> <p>Based on the information presented, it is not possible to determine if there is a water-related challenge that would be a threat to good water quality status for people or environment.</p>
Corrective action:	<p>Water quality data for source water (City of Clarksville), effluent (Clarksville POTW), effluent discharge locations (Dunbar Lake and Spring Creek) and will be clarified. POTW effluent requirements as defined in the Clarksville STP and Combined Sewer System permit will be provided. Additional data from the Barkley Reservoir (ultimate effluent) will be provided as requested.</p> <p>There are two site Outfalls 001 and 002. Outfall 002 which receives 90% of the flow is sampled per the SWPPP approved by the State of Tennessee.</p> <p>The source of the effluent data will be provided. POTW effluent requirements as defined in the Clarksville STP and Combined Sewer System permit will be provided. Information on the water quality of Barkley Reservoir will be provided.</p> <p>Water quality data is not a threat to the people and environment based on data and conformed through stakeholder engagement. Water quality was inadvertently identified as a shared water challenge based on the corporate level priorities.</p>

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Finding No:	TNR-002474
Checklist Item No:	1.3.6
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Nov-09
Checklist item:	On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.
Findings:	<p>The site believes there are no natural features of environmental, cultural or community importance on site. A portion of a tributary of the creek is present on site, but the site believes it does not constitute an IWRA. However, the site has not provided an explanation as to why this tributary does not qualify as IWRAs.</p> <p>The site maps refer to a pond on site, but it is actually a riprap storm water ditch.</p>
Corrective action:	<p>Spring Creek is adjacent to site in the northeast near Outfall 01 and within property boundaries in the southwest. Spring Creek is recognized as an on-site IWRA and appropriate information will be provided.</p> <p>Site figures for the SWPPP and SPCC were revised to reflect the rip rap ditch.</p>
Finding No:	TNR-001992
Checklist Item No:	1.3.8
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Nov-09
Checklist item:	Levels of access and adequacy of WASH at the site shall be identified.
Findings:	<p>The levels of WASH have been assessed using the WBCSD Revised Self Assessment Tool, but these have not been quantified in terms of the different types of WASH in relation to the total number of staff and contractors. However, these were observed on site as being of a sufficient number and quantity in relation to staff and gender numbers.</p> <p>No information was provided regarding OSHA compliance or the provision of sex separated lockers and bathrooms, although these were observed on site as being of a sufficient number and quantity in relation to staff numbers and gender.</p>
Corrective action:	<p>The site updated the seven engineering drawings (plumbing fixtures) with statistics on the employee/restroom ratio. OSHA Requirements are mandatory in the US. The requirement for toilet facilities are described in 1910.141(c)(1) (I). Refer to employee/restroom ratios provided on the drawings (1.3.8).</p>

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Audit Number: AO-000401

Finding No:	TNR-001993
Checklist Item No:	1.4.1
Status:	Closed
Finding level:	Major
Due date:	2023-Mar-13
Checklist item:	The embedded water use of primary inputs, including quantity, quality and level of water risk within the site’s catchment, shall be identified.
Findings:	The primary input at the site is tobacco which is dried and processed, then transported to another facility for packaging.

The tobacco farms that supply tobacco to the site are being mapped to determine which are located within the catchment. Evidence of this hasn't been provided yet. The site to still to provide data on quantity, quality, and level of water risk within the site’s catchment.

Also, does the site uses wooden barrels, wooden crates, and cardboard packaging.

- The site has not:
- Provided a list of primary inputs (or all material inputs) with their associated annual (or better) water use and origin (country/region/catchment – as appropriate) as well as the origin’s level of water stress;
 - Provided a list of outsourced services that consume water or affect water quality and:
 - (A) If possible, obtain the water volume used by the outsourced service(s) (Mm3 or m3 per year or better);
 - (B) Estimate the site’s percentage of their business and extrapolate a value;
 - (C) Repeat (A) and (B) for water quality, focusing on water quality parameters of concern.

The site has not reviewed source locations to determine whether any water concerns are present in the catchment from which inputs are being sourced (e.g., is the water use sustainable, or are the basins stressed?).

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Corrective action:	<p>The water stewardship team has obtained information from the LEAF team based on growers' participation in the GAP program. Growers participating in GAP are required to retain data on water use, although the data is not shared with ASC. The information is being requested and will be shared with the water stewardship team.</p> <p>The locations of the farms within the catchment were provided in excel spreadsheet (ACS Growers in Spring Creek Catchment.xls). The catchment also includes the Dunbar Lake Red River Catchment and the Hurricane Creek Cumberland River Catchment, both of these catchments include the Clarksville urban area and no there are no growers within these catchments.</p> <p>The locations of the source of primary inputs have been obtained. WRI Aqueduct of WWF Risk Filter will be used to evaluate risk. Model My Watershed will be used to identify HUC 12 catchment.</p> <p>Two outsourced services, Aramark and Cintas, were identified and data will be collected as available.</p> <p>WRI Aqueduct or WWF Risk Filter will be used to evaluate risk in the catchment.</p>
Finding No:	TNR-001994
Checklist Item No:	1.4.2
Status:	Closed
Finding level:	Major
Due date:	2023-Mar-23
Checklist item:	The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.
Findings:	No identification or quantification was undertaken by the site.
Corrective action:	The outsourced services were identified, water use data has been requested from vendors.
Finding No:	TNR-001995
Checklist Item No:	1.5.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Nov-09
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:	Water governance initiatives are reflected in part, but should be more comprehensive identified for the Cumberland River catchment.
Corrective action:	Review Watershed Guide and determine if additional information is required. Summarize government policy, state water stewardship, community programs.

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Finding No:	TNR-002475
Checklist Item No:	1.5.2
Status:	Open
Finding level:	Observation
Checklist item:	Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.
Findings:	<p>Site did not provide a legal register, but the various applicable discharge permits were provided. The permits specify monitoring requirements, parameters and limits.</p> <p>The site should consider establishing a legal register, tracking the expiry dates of permits, and consider specifying "trigger" date for submission of renewal applications for these (and any future applicable) permits.</p>
Finding No:	TNR-001997
Checklist Item No:	1.5.3
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Nov-09
Checklist item:	The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.
Findings:	<p>The Catchment Water Balance provided reflects water availability, but not consumption or replenishment, and the current level of demand or stress. Consequently, scarcity hasn't been determined.</p> <p>Seasonal variance is reflected for availability, but not use.</p>
Corrective action:	<p>Model My Watershed or another watershed tool will be used to evaluate the catchment water balance. Additional information will be provided to demonstrate water scarcity is not a concern in the watershed.</p> <p>Data pertaining to seasonal variance for use will be obtained and provided, as applicable.</p>

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Finding No:	TNR-001998
Checklist Item No:	1.5.4
Status:	Closed
Finding level:	Major
Due date:	2023-Mar-23
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:	No water quality data for the Cumberland River, Spring Creek, and Red River was supplied. Effluent water quality data is available, but the sampling location/s and the source of the document are not specified.
Corrective action:	Additional water quality data was obtained and described including water quality data provided by the City of Clarksville. Spring Creek has been considered impaired by the TCEQ since 2014 because the levels of bacteria in the water exceed state standards, specifically for E. coli due to farming (animal) practices. The site does not have a source to contribute E coli.
Finding No:	TNR-002467
Checklist Item No:	1.5.5
Status:	Closed
Finding level:	Major
Due date:	2023-Mar-23
Checklist item:	Important Water-Related Areas shall be identified, and where appropriate, mapped, and their status assessed including any threats to people or the natural environment, using scientific information and through stakeholder engagement.
Findings:	<p>The site has mapped its location in relation to the Spring Creek catchment, the Dunbar Lake/Red River catchment, and the Hurricane Creek/Cumberland River catchment. However, the site has not identified any IWRAs within the catchment.</p> <p>No explanation was provided as to why none of the freshwater systems in the catchment qualify as IWRAs. If any do, they need to be identified, where appropriate mapped, and their status assessed including any threats to people or the natural environment, using scientific information and through stakeholder engagement.</p> <p>Site needs to provide an explanation as to why none of the freshwater systems in the catchment qualify as IWRAs, or if they do they need to be identified, where appropriate mapped, and their status assessed including any threats to people or the natural environment, using scientific information and through stakeholder engagement.</p>
Corrective action:	Additional IWRAs were identified and mapped within the catchment. Information on the status of the IWRAs is provided.

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Finding No: TNR-002468
Checklist Item No: 1.5.6
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Nov-09
Checklist item: Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.
Findings: A summary was provided on the potable and waste water treatment systems in the catchment.

However, the information does not fully reflect the site's ultimate water source, key potable water storage (e.g., dams and/or reservoirs) and treatment infrastructure, the major piping network, as well as bulk piping for waste water, key waste water treatment facilities, and associated discharge points of treated waste water. Information was also not provided on the condition of this infrastructure and its exposure to extreme events.

Corrective action: The locations of the water treatment plant and wastewater treatment plant are provided to show inclusion in the catchment. The water and sewer lines are depicted on the utility diagram for the site. Off-site locations of municipal piping is not publicly available.
The site will discuss the availability of additional information during stakeholder engagement with the City of Clarksville. Information on conditions of infrastructure and any stakeholder concerns will also be discussed and documented.

Finding No: TNR-001938
Checklist Item No: 1.6.1
Status: Closed
Finding level: Major
Due date: 2023-Mar-23
Checklist item: Shared water challenges shall be identified and prioritized from the information gathered.
Findings: A list of high-level shared water challenges was presented, but no link was made with the water challenges identified by the stakeholders. These challenges were also not prioritized. The site is not aware of any specific water challenges in the catchment, nor their relative priority.

Corrective action: Site specific shared water challenges will be provided. Initially high level corporate shared water challenges were used at the site. The shared water challenges will be refined to be specific to site conditions. There will be changes to the shared water challenges. For example, water quality is often identified as a shared water challenge and is an interest as a corporate high-level challenge. When evaluated at the site level, based on water quality data from the City of Clarksville and discussions with stakeholders, water quality is not a site-specific shared water challenge.

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Finding No:	TNR-002477
Checklist Item No:	1.6.2
Status:	Open
Finding level:	Observation
Checklist item:	Initiatives to address shared water challenges shall be identified.
Findings:	<p>The site should consider greater integration with their Leaf Division regarding water balance and quality outcomes via the GlobalG.A.P certification they require by tobacco suppliers.</p>
Finding No:	TNR-002002
Checklist Item No:	1.7.1
Status:	Closed
Finding level:	Major
Due date:	2023-Mar-23
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:	<p>The site used the Aqueduct Tool to spatially identify potential water quality, quantity and overall water risks in the site's catchment and surrounds.</p> <p>The risk of increased severity of extreme weather events such as cyclones and floods and changes in precipitation patterns and extreme variability in weather patterns were identified, but as risks applicable to the Reynold's Group across the U.S.A., not specifically for the site. These were then described, assessed in terms of their type (acute vs chronic), primary potential financial impact, time horizon, likelihood, magnitude of impact, potential financial impact figure, and cost of response to or mitigation of the risk. However, these risks were not prioritized.</p>
Corrective action:	Similar to 1.6, risks and opportunities were based on high level shared water challenges, therefore the risks and opportunities will be re-evaluated based on site level shared water challenges. The list will be prioritized.

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Audit Number: AO-000401

Finding No:	TNR-002003
Checklist Item No:	1.7.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Nov-09
Checklist item:	Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.
Findings:	Risks were identified by the Reynolds Group at a corporate level in the U.S.A. to ensure consistency across the different operations. Key risks identified were increased severity of extreme events (e.g., floods) and changes and variability in precipitation patterns. Opportunities identified relate to water withdrawal reduction and increased water recycling with associated targets, which are corporate global targets (goals). No site's specific opportunities are documented, which is particularly important as there are practical constraints to achieving these. At present warehousing is spread across multiple locations to reduce risk of product loss.
Corrective action:	Site specific shared water challenges, risks and opportunities will be evaluated. Initially high level corporate shared water challenges were used at the site. The shared water challenges, risks and opportunities will be refined to be specific to site conditions. There will be changes to the shared water challenges, risks and opportunities. For example, water quality is a often identified shared water challenge and is an interest as a high-level challenge. When evaluated at the site level, based on water quality data from the City of Clarksville and discussions with stakeholders, water quality is not a site-specific shared water challenge. Other risks and opportunities will be defined.
Finding No:	TNR-002025
Checklist Item No:	1.8.2
Status:	Open
Finding level:	Observation
Checklist item:	Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.
Findings:	The site should consider identifying other relevant sector and/or catchment best practice for water balance, to enable it to better understand potential opportunities.

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Alliance for Water Stewardship (AWS)

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Finding No: TNR-001943
Checklist Item No: 1.8.3
Status: Closed
Finding level: Major
Due date: 2023-Feb-08
Checklist item: Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.
Findings: Reynolds uses water quality criteria established in terms of permitting requirements by the State of Tennessee. However, compliance with effluent and storm water legal requirements within the State of Tennessee do not constitute best practice, only standard practice

The evidence provided does not speak to catchment best practices, only potential best practice at the site level, but the practices listed are standard practices not best practices.
Corrective action: AWS Guidance for best practice was reviewed with ASC site personnel to propose updated best practice. Best practices have been updated and provided to the ASC for review and implementation.

Finding No: TNR-001944
Checklist Item No: 1.8.4
Status: Closed
Finding level: Major
Due date: 2023-Feb-08
Checklist item: Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.
Findings: The site identified that the Tennessee Department of Environment & Conservation promotes the "Watershed Management Approach", which includes protection of IWRAs. The document specifies the management plans developed by TDEC for each catchment, as well as available tools for watershed management including the Tennessee Department of Environment and Conservation's extensive program to monitor and assess water quality in each of the state's 55 watersheds. However, this evidence does not specify catchment best practices for site maintenance of Important Water-Related Areas.
Corrective action: AWS Guidance for best practice was reviewed with ASC site personnel to propose updated best practice. Best practices have been updated and provided to the ASC for review and implementation.

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Audit Number: AO-000401

Finding No:	TNR-001942
Checklist Item No:	1.8.5
Status:	Closed
Finding level:	Major
Due date:	2023-Feb-08
Checklist item:	Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.
Findings:	The site cited the "WBCSD WASH Tool" as a method to evaluate catchment best practice for WASH. However, this is a tool not a relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services.
Corrective action:	AWS Guidance for best practice was reviewed with ASC site personnel to propose updated best practice. Best practices have been updated and provided to the ASC for review and implementation.
Finding No:	TNR-002004
Checklist Item No:	2.1.1
Status:	Closed
Finding level:	Major
Due date:	2023-Feb-10
Checklist item:	A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments: <ul style="list-style-type: none">- That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes- That the site implementation will be aligned to and in support of existing catchment sustainability plans- That the site's stakeholders will be engaged in an open and transparent way- That the site will allocate resources to implement the Standard.
Findings:	The site provided its EHS Policy and the Reynolds Strategy and Commitment as evidence, but they do not address the requirements of this indicator in terms of including a specific commitment: <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.
Corrective action:	The site prepared a Disclosure document which includes the indicator specific requirements. The document was signed by Plant Manager and was posted at a prominent location on-site. The water stewardship team is working with ASC to post on the corporate website.

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Audit Number: AO-000401

Finding No:	TNR-002005
Checklist Item No:	2.3.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Nov-09
Checklist item:	<p>A water stewardship plan shall be identified, including for each target:</p> <ul style="list-style-type: none">- How it will be measured and monitored- Actions to achieve and maintain (or exceed) it- Planned timeframes to achieve it- Financial budgets allocated for actions- Positions of persons responsible for actions and achieving targets- Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.
Findings:	<p>Targets and actions are specified in the Water Stewardship Plan (WSP), but quantified targets were not set for the majority of actions. Time-frames were also not quantified for all actions (e.g., "ongoing" does not enable assessment of performance in relation to clear time-frames).</p>
Corrective action:	<p>The WSP will be revised to develop quantified targets when possible and establish time-frames other than on-going. The upgrades currently beginning installed at the site are dependent on parts and contractor availability.</p>
Finding No:	TNR-002479
Checklist Item No:	2.3.2
Status:	Open
Finding level:	Observation
Checklist item:	<p>A water stewardship plan shall be identified, including for each target:</p> <ul style="list-style-type: none">- How it will be measured and monitored- Actions to achieve and maintain (or exceed) it- Planned timeframes to achieve it- Financial budgets allocated for actions- Positions of persons responsible for actions and achieving targets- Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.
Findings:	<p>The site should consider adding columns indicating % completion and estimated starting and ending dates.</p>

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Finding No:	TNR-002480
Checklist Item No:	2.4.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Nov-09
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:	<p>The BCP plan identifies flooding as a risk but does not establish what to do in the event of an emergency.</p> <p>The city provides potable and wastewater treatment services to the site, but the site does not have an emergency plan in the event of interruptions in service. The site believes that another potable water plant in the Country could provide this service as a back-up, but the site did not provide confirmation of this.</p>
Corrective action:	The BCP is scheduled to be revised in April. The site water stewardship team has already initiated discussions at a corporate level to address specific water related risks. In addition the site has reached out to the local municipality to understand their plans for water related emergencies.
Finding No:	TNR-002006
Checklist Item No:	3.2.1
Status:	Closed
Finding level:	Major
Due date:	2023-Feb-10
Checklist item:	A process to verify full legal and regulatory compliance shall be implemented.
Findings:	<p>No evidence was provided. However, the EPA page shows that ASC Clarksville is in compliance with the environmental regulations.</p> <p>ASC Clarksville proposed a call with their legal team to discuss the site's legal register, but this did not take place during the on-site audit.</p>
Corrective action:	<p>ASC updated the compliance calendar with pertinent information to document legal compliance. Annual compliance can be confirmed at EPA ECHO (Enforcement and Compliance History Online).</p> <p>The ASC Team worked with their legal team to update the compliance calendar.</p>

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Finding No:	TNR-002007
Checklist Item No:	3.3.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Nov-09
Checklist item:	Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.
Findings:	<p>New electronic water metering has been installed, but the electronic reading functionality is not operational yet. Manual metering has commenced in the interim using the new meters.</p> <p>Rainwater collection has been installed on the maintenance shed and will be used for equipment washing.</p> <p>However, the status of progress towards meeting water balance targets set in the water stewardship plan has not been documented.</p>
Corrective action:	<p>The WSP is being updated to include quantifiable targets toward the water balance. Until the metering system PLC is operational, the site will estimate values or manual metering when possible.</p> <p>The rainwater collection system is in place and the site will monitor volume of water collected during monthly inspections. The system has not been used as sufficient rainwater has not been collected.</p> <p>The site has developed a basic water balance and is continuing to make improvements to quantify water use. Water balance targets will be established based on the level of information available through estimates or metering.</p>

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Finding No:	TNR-002008
Checklist Item No:	3.4.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Feb-24
Checklist item:	Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.
Findings:	<p>The site identified the following water quality targets in its WSP:</p> <ul style="list-style-type: none">- Comply with all permit requirements via quarterly sampling of wastewater to analyze for contaminants- Prevent spills and pollution into stormwater drains. Undertake sampling of stormwater to analyze for contaminants (pH, BOD, TSS, signs of oil & grease) to check compliance through quarterly and semi-annual sampling. <p>Water quality monitoring for TSS is undertaken annually and results were provided for 2022.</p> <p>The site purchased carbon credits that involved investment in reforestation located in Bluesource-Doe Mountain Improved Forest Management in Tennessee, but this is not located within the Spring Creek, Red River, or Cumberland River catchments.</p> <p>The site planted 7,500 trees on site.</p> <p>However, the status of progress towards meeting water quality targets set in the water stewardship plan has not been documented.</p>
Corrective action:	<p>The WSP is being updated to include water quality targets as appropriate. As water quality is not a site-specific shared water challenge, the reduction of the use of potable water will be considered when other water sources are available and appropriate. The site will document evidence towards the goals. The site will continue with its sustainability efforts with an attempt to focus on actions within the catchment. The site believes actions outside of the catchment provide value.</p>

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Finding No:	TNR-002009
Checklist Item No:	3.4.2
Status:	Closed
Finding level:	Major
Due date:	2023-Mar-23
Checklist item:	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.
Findings:	Various stakeholders identified water quality (principally due to agricultural run-off) as a shared water challenge in the catchment. However, the site has not monitored for any parameters beyond their legal permit requirements for TSS. No site-based systems are currently in place or actions are being implemented to improve water quality leaving the site.
Corrective action:	Stakeholders have been identified and calls are being conducted. Additional stakeholders are being identified during conversations. Site based systems are not required based on operations and confirmed through TDEC permitting process.
Finding No:	TNR-002481
Checklist Item No:	3.6.1
Status:	Open
Finding level:	Observation
Checklist item:	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.
Findings:	The site assessed its provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers onsite using the WBCSD Pledge for Access to Safe Water, Sanitation and Hygiene (WASH): Self-assessment tool. However, the levels of access and adequacy were not quantified. Also, no information was provided regarding OSHA compliance regarding WASH.

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Finding No:	TNR-002010
Checklist Item No:	3.6.2
Status:	Closed
Finding level:	Major
Due date:	2023-Mar-23
Checklist item:	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.
Findings:	<p>According to the site, there are no water rights associated with indigenous people in the area, which has been confirmed via online information from the EPA.</p> <p>The site's water quality monitoring data reflects data for TSS but not any other parameters.</p> <p>However, the site has not provided any evidence that they have not impinging on the human right to safe water and sanitation of communities through their operations beyond TSS, that remedial actions are in place where this is not the case, and that these are effective.</p> <p>The site should consider comparing their storm water and waste water discharge quality with the quality of the receiving water bodies.</p>
Corrective action:	Water quality data will be provided. In addition, risk maps specific to WASH will be provided to demonstrate the community is not impacted by the site. The site is operating within permitted requirements for effluent discharge. Remedial actions are not required, again as demonstrated by the site-specific plans approved by the State of Tennessee. Water quality of the receiving water bodies is provided in 1.3 and 1.5.
Finding No:	TNR-002011
Checklist Item No:	3.7.1
Status:	Closed
Finding level:	Major
Due date:	2023-Feb-10
Checklist item:	Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.
Findings:	Indirect water use targets were not set in the water stewardship plan and indirect water use has not been quantified.
Corrective action:	The ASC LEAF team is attempting to obtain information from growers participating in the GAP program on water use. Once the information is obtained, targets can be established. Initial targets may need to be developed addressing the percentage of growers who will provide the information.

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Finding No:	TNR-002012
Checklist Item No:	3.7.2
Status:	Closed
Finding level:	Major
Due date:	2023-Feb-10
Checklist item:	Evidence of engagement with suppliers and service providers, as well as, when applicable, actions they have taken in the catchment as a result of the site's engagement related to indirect water use, shall be identified.
Findings:	No evidence was provided and no engagement has taken place with suppliers regarding their indirect water use.
Corrective action:	The ASC LEAF team communicates with growers as part of the GAP program. Communication will be expanded to include water stewardship team and information on water use will be attempted to be obtained. The water stewardship team has reached out to service providers and documentation will be provided via email communications.
Finding No:	TNR-002013
Checklist Item No:	3.8.1
Status:	Closed
Finding level:	Major
Due date:	2023-Mar-23
Checklist item:	Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.
Findings:	No evidence was provided. To date not interaction has been undertaken by the site and all shared water-related infrastructure has not been identified and its condition reflected, to understand potential risks and concerns (e.g., supply capacity versus current and future demand).
Corrective action:	Stakeholders have been identified and calls are being scheduled and conducted. The site has engaged the City Water & Sewer department to discuss infrastructure needs and plans. Additional pertinent stakeholders are continuing to be identified. Engagement will be documented in the stakeholder outreach log.

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Finding No:	TNR-002024
Checklist Item No:	3.9.3
Status:	Closed
Finding level:	Major
Due date:	2023-Mar-23
Checklist item:	Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.
Findings:	None of the actions set in the WSP regarding water quality constitute best practice and none of the actions implemented address this requirement. Also, targets in the WSP should be quantified where possible.
Corrective action:	Best practices were re-evaluated, including water quality. The site uses alternative water supplies to match water quality will intended purpose, with the rainwater collection system. Quantifiable targets will be assessed, if possible, based on availability of rainwater.
Finding No:	TNR-002015
Checklist Item No:	4.1.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Nov-09
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 undertook an annual evaluation of high-level performance in terms of its AWS objectives, but not of its performance against the targets in its WSP.
Corrective action:	All major findings under Steps 4 and 5 were downgraded to minors, based on a recent policy decision by AWS that these steps and their indicators should only be assessed as minors at most during Initial Certification Audits. The WSP is being updated to include quantifiable targets and timeframes. The site will document evidence towards the goals.
Finding No:	TNR-002016
Checklist Item No:	4.1.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Nov-09
Checklist item:	Value creation resulting from the water stewardship plan shall be evaluated.
Findings:	No evidence was provided.
Corrective action:	The WSP is being updated to include opportunities for values creation, to identify projects and document actions towards the goals at the site and within the catchment.

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Finding No: TNR-002017

Checklist Item No: 4.1.3

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2023-Nov-09

Checklist item: The shared value benefits in the catchment shall be identified and where applicable, quantified.

Findings: No evidence was provided.

Corrective action: The WSP is being updated to include opportunities for values creation, to identity projects and document actions towards the goals at the site and within the catchment.

Finding No: TNR-002018

Checklist Item No: 4.3.1

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2023-Nov-09

Checklist item: Consultation efforts with stakeholders on the site’s water stewardship performance shall be identified.

Findings: Consultation efforts with (external) stakeholders on the site’s water stewardship performance was not undertaken.

Corrective action: Disclosure to internal stakeholders within BAT did not relate to performance, only explaining the site's AWS journey.

Stakeholders have been identified and calls with external stakeholders are being scheduled. Additional internal stakeholders have been identified through the AWS Audit process and are being included in discussions. Disclosure materials are being updated to share water stewardship performance.

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Finding No:	TNR-002019
Checklist Item No:	5.1.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Nov-10
Checklist item:	The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.
Findings:	The ASC AWS Overview overview specifies the EHS Manager as responsible for compliance of water related regulations and lead water related activities on site. However, this hasn't been disclosed to external stakeholders in any form.
Corrective action:	The Disclosure presentation has been shared during on-site meetings with external community stakeholders. Additional stakeholders have been identified and calls are being scheduled to disclose information.
Finding No:	TNR-002020
Checklist Item No:	5.2.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Nov-09
Checklist item:	The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.
Findings:	No disclosure has taken place for the water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes.
Corrective action:	The AWS Overview was shared several with external stakeholders. Additional stakeholders have been identified and calls are being scheduled to disclose information.
Finding No:	TNR-002021
Checklist Item No:	5.3.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Nov-09
Checklist item:	A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.
Findings:	No disclosure has taken place to show a summary of the site's water stewardship performance, including quantified performance against targets.
Corrective action:	The AWS Overview was shared with internal and external stakeholders. Additional stakeholders have been identified and calls are being scheduled to disclose information.

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Finding No: TNR-002022
Checklist Item No: 5.4.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Nov-09
Checklist item: The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.
Findings: No disclosure has taken place for the site's shared water-related challenges and efforts made to address these challenges.
Corrective action: The Disclosure presentation has been shared during on-site meetings with external community stakeholders. The AWS Overview has been shared internally. Additional stakeholders have been identified and calls are being scheduled to disclose information.

Finding No: TNR-002023
Checklist Item No: 5.4.2
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Nov-09
Checklist item: Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.
Findings: No disclosure has taken place of the efforts made by the site to engage stakeholders and coordinate and support public-sector agencies.
Corrective action: The Disclosure presentation and AWS Summary has been shared with public sector agencies. Calls are being scheduled to discuss the information in more detail with appropriate officials.

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Report Details

Report	Value
Report prepared by	Warrick Stewart
Report approved by	Ruth Wandera
Report approved on (Date)	24 December 2022

Surveillance

Proposed date for next audit
2023-Nov-08

Stakeholder Announcements

Date of publication	Location
04/10/2022	WSAS & AWS Website
21/10/2022	https://twitter.com/RAI_News/status/1583526592059703297
19/10/2022	https://www.reynoldsamerican.com/press/21964SxbWBS8k5gUkCStjZ

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Catchment Information



Drainage line from stormwater detention pond outfall to the nearby stream.jpg



Stormwater detention pond outfall and site water quality monitoring location.jpg

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Overflow weir of stormwater detention pond.jpg



Canalized channel of nearby stream (N and NE) leading into Spring Creek.jpg

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Stormwater outfall from adjacent property into drainage line running from the site stormwater detention pond outfall.jpg



Site stormwater detention pond.jpg

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Tributary of nearby stream (NE) leading from adjacent waste management facility before the canalized section.jpg



Site stormwater outfall into the seasonal stream on site (in south-west of the site).

Site stormwater outfall into the seasonal stream on site.jpg

Catchment Information

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The American Snuff Company Clarksville Catchment (141.3 square miles) is within the Lower Cumberland-Red River basin and is defined as the Spring Creek sub-watershed (HUC 051302060603). The source of water and discharge facility are located within the catchment. The site is in the Spring Creek HUC 12 watershed.

Potable water is provided by the City of Clarksville, which is sourced from the Cumberland River. The city publishes a Water Quality Report for Clarksville, TN (see cityofclarksville.com). The water inlet at the Cumberland River is located within the Hurricane Creek-Cumberland River (HUC 12 Sub watershed). Water quality data for the Cumberland River is provided at <https://www.waterqualitydata.us/provider/NWIS/USGS-TN/USGS-03431500/>.

The site has a permit for stormwater discharge (ultimate discharge to Spring Creek) but no other direct point-source discharges to surface water. The defined catchment extends several miles downstream of the site discharge points (per criteria would capture the needed water quality information. Stormwater data per NPDES permit is available on site, 1.3.4).

Spring Creek is a tributary to Red River. The Red River primary catchment is captured for the WWTP – Dunbar Lake-Red River HUC 12. We did not include the catchments in between as they would encompass areas not impacted by the site and any downstream impact from discharge to Spring Creek is captured in Red River catchment at same point as WWTP effluent discharge area, followed by continued flow to the Hurricane Creek-Cumberland River catchment (following actual flow path of water).

The source water treatment plant is located in the Hurricane Creek-Cumberland River HUC 12. This catchment is contiguous to the Dunbar Lake-Red River Catchment.

Client Description and Site Details

Client/Site Background

The American Snuff Company, LLC Clarksville facility that totals 186 acres in size is located at 4583 Guthrie Highway in Montgomery County, which is 12 miles north-east of downtown Clarksville, Tennessee, USA. The site produces smokeless tobacco products. The manufacturing facility includes silos, threshing machinery, dryers, humidors, fermenting barrels, rolling trays, a forklift area, rainwater storage tank, effluent and storm water infrastructure including an on-site detention pond, and related ancillary services. The site uses approximately 50% of its water for production and approximately 50% for sanitation for site staff. Primary manufacturing water use is in boilers for heat production used in product drying processes, facility maintenance/cleaning and hydration of tobacco.

The site receives water from the City of Clarksville, Clarksville Water System which sources surface water from the Cumberland River. The site does not provide additional treatment of municipal water, or site-specific monitoring. The factory effluent is discharged (piped) to the City of Clarksville, Clarksville Wastewater System which discharges to the Red River, a tributary to the Cumberland River.

The facility is located south of Spring Creek, a tributary of the Red River that ultimately flows into the Cumberland River. The American Snuff Company Clarksville Catchment (141.3 square miles) is within the Lower Cumberland-Red River basin and is defined as the Spring Creek sub-watershed (HUC 051302060603). The site is in the Spring Creek HUC 12 watershed.

Summary of Shared Water Challenges

Summary of Shared Water Challenges




Shared Water Challenges in the catchment include:

- Urbanization and population growth, with resulting increased water demand
- Impact of climate change on rainfall patterns
- Reduced water quality impacting freshwater ecosystems (e.g. rivers and creeks)
- Need for protection of water quality for recreational use in freshwater systems.


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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	The site occupies one catchment, namely the Lower Cumberland-Red River basin, and is defined as the Spring Creek sub-watershed (HUC 051302060603). Yes
0.1.1.2	<i>The scope of the proposed certification shall be under the control of a single management system.</i> 
Comment	The site is under the control of a single management system. No
Finding No: TNR-004330	
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	The site's primary production system, water management, product range, and the main market structures are homogenous. Yes

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1	STEP 1: GATHER AND UNDERSTAND	
1.1	<i>Gather information to define the site’s physical scope for water stewardship purposes, including: its operational boundaries; the water sources from which the site draws; the locations to which the site returns its discharges; and the catchment(s) that the site affect(s) and upon which it is reliant.</i>	
1.1.1	<i>The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including:</i> <ul style="list-style-type: none">- Site boundaries;- Water-related infrastructure, including piping network, owned or managed by the site or its parent organization;- Any water sources providing water to the site that are owned or managed by the site or its parent organization;- Water service provider (if applicable) and its ultimate water source;- Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies;- Catchment(s) that the site affect(s) and is reliant upon for water.	<div> No</div>

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Comment

Evidence:

1.1.1_Physical_Scope_Description.pdf
1.1.1_FIGURE_Site_Location_Map.pdf
1.1.1_Figure_1_-_American_Snuff_Site_Map_R_2.pdf
1.1.1_Figure_2_-_SWPPP_American_Snuff_Clarksville-Industrial.pdf
1.1.1_FIGURE_Relevant_Catchments_Map.pdf
1.1.1_FP1_Plumbing.pdf
1.1.1_FP2_Plumbing.pdf
1.1.1_Overall_Utility_Plan_CON-C-034_C.pdf
1.1.1_PZG_C_Piping.pdf
1.1.1_PZG_C_Toilets.pdf
1.1.1_Site_Description_Expanded.pdf
1.1.1_TST_B_Floor_Plan.pdf
1.1.1_TST_Enlarged_Plans_Toilet_Rooms.pdf
1.1.1_UGR_E_Plumbing.pdf
1.1.1_UGR_F_Plumbing.pdf
1.1.1_UGR_D_Plumbing.pdf
1.1.1_TST_A_Floor_Plan.pdf
FIGURE_Relevant_Catchments_Map.pdf
FIGURE_Site_Location_Map.pdf

Assessment:

The physical scope of the site has been mapped, including the regulatory landscape and zone of stakeholder interests, including:

- Site boundaries;
- Water service provider (if applicable) and its ultimate water source (Cumberland River);
- Water-related infrastructure, including piping network, owned or managed by the site;
- Discharge points, waste water treatment service provider, and ultimate receiving water body or bodies (Spring Creek and Cumberland River);
- Stormwater flow directions and outfalls to Spring Creek;
- The catchment that the site is located in, affects, and is reliant upon for water.

No water sources provide water to the site that are owned or managed by the site or its parent organization.

The map of the potable water and wastewater treatment facilities does not reflect all the plants and their location, as well as potable inflows and sewer outflows.

The fire tank and rainwater harvesting tank on site, the grease separator, and storm water channels/trenches have not been mapped.

In the site map, reference is made to "detention and retention pond". However, there are only two on site. The others should be labelled as storm water channels or similar. Also,

1.1.1_FIGURE_Site_Location_Map shows one pond, but

1.1.1_Figure_2_-_SWPPP_American_Snuff_Clarksville-Industrial correctly shows two.

Finding No: TNR-002049

1.2

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

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000401

1.2.1

Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall:

- *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.*


No

Comment

Evidence:

1.2_Stakeholder_Mapping_ASC_Clarksville
1.2_AWS__Stakeholder_Outreach_ASC_Clarksville.xlsx

Assessment:

Regulators were identified based on the site's permitting requirements.

Montgomery County has a permit for discharge of treated effluent, so ASC is not responsible to address this issue.

The site has a storm water discharge permit, which specifies TSS water quality parameters.

ASC is a member of the City's Chamber of Commerce, who are engaged at a senior management level.

Non-profits with an interest in the management of the site's ultimate water source (Cumberland River) and ultimate receiving water body or bodies (Spring Creek, Dumbar, and Barkely Reservoir) were not identified.

The company that manages the train tracks on and adjacent to the site, the landfill adjacent to the site, and users of the Barkely Reservoir (ultimate body of water that receives the Public Own Treatment Water (POTW) effluent) were not identified as stakeholders.

Cumberland Electric Membership Corporation who keeps generators inside the Site has not been identified as a stakeholder. They are mentioned in the SPCC, pg 15, but not in the stakeholder list and mapping. However, the site advised that the generators are now owned and operated by ASC and this will be amended in the stakeholder list.

The role of each stakeholder has not been identified, and where identified, their water related challenges have not been comprehensively documented.

Influence, interest, and level of engagement was established for each stakeholder, however the basis for this ranking was not identified.

The degree of stakeholder engagement, based on their level of interest and influence, was identified.

Finding No: TNR-001924

1.2.2

Current and potential degree of influence between site and stakeholder shall be identified, within the catchment and considering the site's ultimate water source and ultimate receiving water body for wastewater.


No

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000401

Comment Evidence:
1.2_Stakeholder_Mapping_ASC_Clarksville
1.2_AWS__Stakeholder_Outreach_ASC_Clarksville.xlsx

Assessment:
The degree of influence was identified for each stakeholder, however, information regarding whether this influence is current or potential and the basis for this ranking was not specified. As the role of each stakeholder in the catchment was not specified, their degree of influence considering the site's ultimate water source and ultimate receiving water body couldn't be comprehensively established by the site.

Finding No: TNR-001925

1.3 *Gather water-related data for the site, including: water balance; water quality, Important Water-Related Areas, water governance, WASH; water-related costs, revenues, and shared value creation.*

1.3.1 *Existing water-related incident response plans shall be identified.*


No

Comment Evidence:
1.3.1 American Snuff SPCC - Nov 2021 - FINAL.pdf
1.3.1 American Snuff SWPPP - 2021 - FINAL.pdf
2.4.1_American Snuff SPCC - Nov 2021 - FINAL.pdf
2.4.1_American Snuff SWPPP - 2021 - FINAL.pdf
1.3.1 SWPP Plan Excerpts.pdf
Clarksville Processing - Business Continuity Plan

Assessment:

A SWPPP was provided, including a description of the site, potential sources of pollution, and Annual Comprehensive Site Inspection and Monitoring requirements. The plan was updated in 2021, and has to be submitted to EPA only when requested. See

<https://www.epa.gov/sites/default/files/documents/spccbluebroch.pdf>

Note: EPA requires that a licensed professional engineer should develop the SWPPP if the site has more than 1,320 gallons of oil storage capacity above ground. ASC hired a Professional Engineer to ensure the plan was tailored to its operations. The licensed Professional Engineer certified that the document was prepared in accordance with good engineering practices, including consideration of applicable industry standards and the required regulations.

The SPCC (section 12.7 (a) SPCC page 11) states that the secondary containment of the fuel overflow goes to the retention pond (basin) and then to the creek. The Auditee showed WSAS auditors the collection point for this overflow and stated that it is not connected to any basin, it is drained by a third party for proper disposal. ASC advised that they will update the SPCC to accurately reflect the operation.

Page 37 of the SPCC indicates that, if any spills occurred, this will not shut down any public drinking water intake.

Floods and droughts: The site's Business Continuity Plan reflects water supply outages as a risk, but not any mitigation measures. Flooding was not identified as a risk in the BCP, nor any responses considered.

The Site has not received inspections from any authority in the last 3 years.

Finding No: TNR-001991

1.3.2 *Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped*


No

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000401

Comment

Evidence:

1.3.2_Boiler_Room_1_GRA-MP-102-MP102 / non material
1.3.3_2022CGWBillsandUsageDetails_
1.3.2 Clarksville Water Use Diagram rev 3.pdf
1.3.2 Moisture Ranges.msg
1.3.3_2022CGWBillsandUsageDetails_.xlsx

Assessment:

The site inflows, losses, storage, and outflows are reflected in an excel document with data provided from January 2021 to May 2022.

Site process water flow has been mapped, but not in a manner that quantifies the volume of water as it enters the site and moves through the production process until discharge.

A fully accurate Water Balance currently isn't available, as new water meters have needed to be installed. Currently the effluent meter reading is greater than actual effluent output, which the site believes is likely due to a leak from storm water into the effluent line. This is currently being addressed as a priority action by the site.

In summary, the site water balance has been identified and mapped, but not accurately quantified, which should be in place by end 2022.

Finding No: TNR-002472

1.3.3

Site water balance, inflows, losses, storage, and outflows, including indication of annual variance in water usage rates, shall be quantified. Where there is a water-related challenge that would be a threat to good water balance for people or environment, an indication of annual high and low variances shall be quantified.


No

Comment

Evidence:

1.3.3_2022CGWBillsandUsageDetails_.xlsx

Assessment:

Water consumption was presented in a excel document from January 2021 to May 2022, however a comprehensive water balance calculation was not provided.

To identify water saving opportunities, boilers which are usually significant water consumers, should be accounted for separately and not as "others". Water harvesting, included in the WSP as an ongoing activity, is not accounted for.

The site data reflects substantial variability in water consumption in 2021 and 2022.

Addition of incoming water meters minus sewage meter shows a delta of 347,600 gallons between May and March 2022.

Data correlating the site's annual high and low variances with the variances of its water source have not collated to understand if there is a water-related challenge that would be a threat to good water balance for people or environment.

Finding No: TNR-001932

1.3.4

Water quality of the site's water source(s), provided waters, effluent and receiving water bodies shall be quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be quantified.


closed

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000401


Comment Evidence:
1.3.4_2021_Annual_Drinking_Water_Quality_Report_(standard)_pg1-4_(FINAL) – Site's water source
1.3.4_Dunbar_Lake_Basin_Effluent_Water_Quality – water body who receives outfall 002
1.3.4_Spring_Creek_Basin_Effluent_Water_Quality – water body who receives outfall 001
1.3.4 Clarksville Water System Overview REV 2020 October.pdf

Assessment:
Water quality of the site's water source was quantified. It is not clear if the information regarding Dunbar Lake and Spring Creek represents the water quality of the two bodies of water or the effluent of the site. Based on the information presented in the SWPPP, it should represent the water quality of the two bodies of water. The source/s and date/s of this information were not referenced.

Water quality of the effluent from Clarksville STP PTOW and Barkely Reservoir (ultimate water body which receives the effluent from the Clarksville STP PTOW) was not presented.

Based on the information presented, it is not possible to determine if there is a water-related challenge that would be a threat to good water quality status for people or environment.


Finding No: TNR-001936

1.3.5 *Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.*  **Yes**

Comment Evidence:
1.3.5 CAS System Screenshot.JPG
1.3.5_Location_of_Chemical_and_Tanks_ASC_Clarksville
1.3.5_Location_of_Chemicals_ASC_Clarksville (1)

Assessment:
Potential sources of pollution were identified and mapped, including chemicals used or stored on site. The site does not need a permit for materials stored.

A CAS System is used to inventory all chemicals stored on site.


1.3.6 *On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.*  **No**

Comment Evidence
1.3.5_Location_of_Chemical_and_Tanks_ASC_Clarksville

Assessment
There site believes are no natural features of environmental, cultural or community importance on site. A portion of a tributary of the creek is present on site, but the site believes it does not constitute an IWRA. However, the site has not provided an explanation as to why this tributary does qualify as IWRAs.

The site maps refer to a pond on site, but it is actually a riprap storm water ditch.

Finding No: TNR-002474

1.3.7 *Annual water-related costs, revenues, and a description or quantification of the social, cultural, environmental, or economic water-related value generated by the site shall be identified and used to inform the evaluation of the plan in 4.1.2.*  **Yes**

Comment

Evidence:

1.3.7__Water_Costs_Shared_Value_ASC_Clarksville
1.3.7_Clarksville_Water_and_Sewer_Industrial_Rates / non material
1.3.7 Water recycle costs.msg
1.3.7 Water Related Costs Spreadsheet.xlsx
1.3.7_2022CGWBillsandUsageDetails .xlsx

Assessment:

ASC presented a list of their types of annual water-related costs, which were also quantified per type.

There are no revenues at the site directly related to water.

Environmental water-related value was created through the planting of 7,500 trees at the site for Arbor Day, which helps to control runoff water and consequently protects Spring Creek.

Environmental value is also created through the recycling of 12 million pounds annually of unused tobacco stem as organic fertilizer (compost) by Corn Silk Farms.

1.3.8

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



in progress

Comment

Evidence:

1.3.8_Area_1_Plumbing_Plan_GRA-MP-101-MP101 / Diagram 1
1.3.8_Hand_Sanit_Station_Details_PZG-MP-112-AREA_C / Diagram 2
1.3.8_Toilet_Rooms_Example_PZG-MP-503-AREA_C / Diagram 3
1.3.8_Toilet_Rooms_and_Break_Room_TST-MP-111-AREA_B / Diagram 4
1.3.8_WBCSD Revised Self Assessment Tool-ASC Clarksville.xls

Assessment:

ASC presented four diagrams:

Diagram 1. Shows area to change dirty clothes and clean clothes and a unisex bathroom.

Diagram 2. Presents a hand sanitizer station (ADA compliance) and another bathroom presented in detail in Diagram 3.

Diagram 3. Detail of bathrooms, shower, stool with door, and a separate bathroom with stool, urinal and sink. Seems that ASC provides two identical facilities but it is not clear.

Diagram 4. Toilet room in Area B with break room area for lunch.

The levels of WASH have been assessed using the WBCSD Revised Self Assessment Tool, but these have not been quantified in terms of the different types of WASH in relation to the total number of staff and contractors. However, these were observed on site as being of a sufficient number and quantity in relation to staff and gender numbers.

Amenities provided in the break room were not specified, but these were identified on site as adequate.

Separate male and female showers are accessible to all staff respectively.

Drinking water dispensers are located across the facility.

Taps with motion-sensors are in place, as a water-efficiency measure.

No information was provided regarding OSHA compliance or the provision of sex separated lockers and bathrooms, although these were observed on site as being of a sufficient number and quantity in relation to staff numbers and gender.




A separate dedicated room is in place for nursing mothers.

Finding No: TNR-001992

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Alliance for Water Stewardship (AWS)

Audit Number: AO-000401

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>	 closed
Comment	<p>Evidence: 1.4.1_1.4.2_ Indirect Water_ASC Clarksville.docx 1.4.1 2022 GAPC Certification Compliance Guide.pdf 1.4.1 2022 GAPC Certification Paper Application.pdf 1.4.1 2022 GAPC Self Assessment.pdf 1.4.1 ASC Growers in Spring Creek Catchment.xlsx</p> <p>Assessment: The primary input at the site is tobacco which is dried and processed, then transported to another facility for packaging.</p> <p>The tobacco farms that supply tobacco to the site are being mapped to determine which are located within the catchment. Evidence of this hasn't been provided yet. The site is still to provide data on quantity, quality, and level of water risk within the site's catchment.</p> <p>Also, does the site use wooden barrels, wooden crates, and cardboard packaging.</p> <p>The site has not:</p> <ul style="list-style-type: none">• Provided a list of primary inputs (or all material inputs) with their associated annual (or better) water use and origin (country/region/catchment – as appropriate) as well as the origin's level of water stress;• Provided a list of outsourced services that consume water or affect water quality and: (A) If possible, obtain the water volume used by the outsourced service(s) (Mm3 or m3 per year or better); (B) Estimate the site's percentage of their business and extrapolate a value; (C) Repeat (A) and (B) for water quality, focusing on water quality parameters of concern. <p>The site has not reviewed source locations to determine whether any water concerns are present in the catchment from which inputs are being sourced (e.g., is the water use sustainable, or are the basins stressed?).</p> <p style="text-align: right;">Finding No: TNR-001993</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>	 closed
Comment	<p>Evidence: 1.4.1_1.4.2_ Indirect Water_ASC Clarksville.docx</p> <p>Assessment: No identification or quantification was undertaken by the site.</p> <p style="text-align: right;">Finding No: TNR-001994</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>	 No

CERTIFICATION REPORT


Alliance for Water Stewardship (AWS)

Audit Number: AO-000401

Comment Evidence:
1.5.1 TN watershed-guide.pdf

Assessment:
Water governance initiatives are reflected in part, but should be more comprehensive identified for the Cumberland River catchment.


Finding No: TNR-001995

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

Comment Evidence:
1.5.2 Clarksville STP NPDES Permit 2016_contains details.pdf
1.5.2 Clarksville STP NPDES Permit 2021_info.pdf
1.5.2 Clarksville STP NPDES Permit 2021_reissued.pdf
1.5.2 Clarksville Water Plant Permit_TDEC.pdf

Assessment:
Site did not provide a legal register, but the various applicable discharge permits were provided. The permits specify monitoring requirements, parameters and limits.

The site should consider establishing a legal register, tracking the expiry dates of permits, and consider specifying "trigger" date for submission of renewal applications for these (and any future applicable) permits.


1.5.3 *The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.* 
No

Comment Evidence:
1.5.3 FIGURE Relevant Catchments Map.pdf
1.5.3 ASC Clarksville_Catchment_Water_Balance.xlsx

Assessment:
The Catchment Water Balance provided reflects water availability, but not consumption or replenishment, and the current level of demand or stress. Consequently, scarcity hasn't been determined.

Seasonal variance is reflected for availability, but not use.

Finding No: TNR-001997

1.5.4 *Water quality, including physical, chemical, and biological status, of the catchment shall be identified, and where possible, quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be identified.* 
closed

Comment Evidence:
1.5.4 DNA_RareSpecies_Status_and_Ranks.pdf
1.5.4 Dunbar Lake Basin Effluent Water Quality.csv
1.5.4 Rare Species By Tennessee Watershed.xlsx
1.5.4 Spring Creek Basin Effluent Water Quality.csv
1.5.4 Hurricane Creek Cumberland Basin Effluent Water Quality.csv


Assessment:
No water quality data for the Cumberland River, Spring Creek, and Red River was supplied. Effluent water quality data is available, but the sampling location/s and the source of the document are not specified.

Finding No: TNR-001998

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Alliance for Water Stewardship (AWS)

Audit Number: AO-000401

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.*  closed

Comment

Evidence:

1.5.5 FIGURE IWRA Locations Map.pdf


1.5.5 Clarksville Location IWRAs.docx

Assessment:

The site has mapped its location in relation to the Spring Creek catchment, the Dunbar Lake/Red River catchment, and the Hurricane Creek/Cumberland River catchment. However, the site has not identified any IWRAs within the catchment.

No explanation was provided as to why none of the freshwater systems in the catchment qualify as IWRAs. If any do, they need to be identified, where appropriate mapped, and their status assessed including any threats to people or the natural environment, using scientific information and through stakeholder engagement.

Finding No: TNR-002467

1.5.6 *Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.*  No

Comment

Evidence:

1.5.6 Clarksville Wastewater System Facts.pdf

1.5.6 Clarksville Water System Facts.pdf

1.5.6 Clarksville Water System Overview REV 2020 October.pdf


1.5.6 Clarksville WP Planned New Plant Article 2021.pdf

Assessment:

A summary was provided on the potable and waste water treatment systems in the catchment.

However, the information does not fully reflect the site's ultimate water source, key potable water storage (e.g., dams and/or reservoirs) and treatment infrastructure, the major piping network, as well as bulk piping for waste water, key waste water treatment facilities, and associated discharge points of treated waste water. Information was also not provided on the condition of this infrastructure and its exposure to extreme events.

Finding No: TNR-002468

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

Comment

Evidence:


1.5.7 Aqueduct Map_Reg and Reputational Risk.PNG

1.5.7 WASH_WRI Aqueduct Link.docx

Assessment:

The site's Baseline Regulatory & Reputational Risk (based on the WRI Aqueduct Tool) reflects drinking water and sanitation risks/status.




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.*  closed

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Alliance for Water Stewardship (AWS)




Audit Number: AO-000401

Comment	<p>Evidence 1.6_Shared_Water_Challenges_ASC_Clarksville wr-ws_watershed-plan-upper-cumberland-2007.pdf</p> <p>Assessment: A list of high-level shared water challenges was presented, but no link was made with the water challenges identified by the stakeholders. These challenges were also not prioritized. The site is not aware of any specific water challenges in the catchment, nor their relative priority.</p> <p>Finding No: TNR-001938</p>	
1.6.2	<i>Initiatives to address shared water challenges shall be identified.</i>	 Obs.
Comment	<p>Evidence: 1.6_Shared_Water_Challenges_ASC_Clarksville wr-ws_watershed-plan-upper-cumberland-2007.pdf</p> <p>Assessment: Initiatives to address shared water challenges were identified, however no link was made between them and the challenges identified in 1.6.1.</p> <p>The site identified the opportunity for water recycling and rain water use. Recently the site installed 24,000 gallon capacity for rainwater capture for the washing of forklifts and vehicles on site, to reduce their water supply requirements from the City of Clarksville.</p> <p>The evidence reflected an investigation to reduce water use at ASC's site in Memphis, which is not relevant.</p> <p>The site should consider greater integration with their Leaf Division regarding water balance and quality outcomes via the GlobalG.A.P certification they require by tobacco suppliers.</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>	 closed
Comment	<p>Evidence: 1.7.1_1.7.2_Risks and Opportunities Mapping-v11.xlsx Aqueduct Overall Water Risks Map.PNG Aqueduct Water Quality Risks Map.PNG Aqueduct_Water_Quantity_Risks_Map.PNG</p> <p>Assessment: The site used the Aqueduct Tool to spatially identify potential water quality, quantity and overall water risks in the site's catchment and surrounds.</p> <p>The risk of increased severity of extreme weather events such as cyclones and floods and changes in precipitation patterns and extreme variability in weather patterns were identified, but as risks applicable to the Reynold's Group across the U.S.A., not specifically for the site. These were then described, assessed in terms of their type (acute vs chronic), primary potential financial impact, time horizon, likelihood, magnitude of impact, potential financial impact figure, and cost of response to or mitigation of the risk. However, these risks were not prioritized.</p> <p>Finding No: TNR-002002</p>	
1.7.2	<i>Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.</i>	 No

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Alliance for Water Stewardship (AWS)



Audit Number: AO-000401

Comment	<p>Evidence: 1.7.1_1.7.2_Risks and Opportunities Mapping-v11.xlsx Aqueduct Overall Water Risks Map.PNG Aqueduct Water Quality Risks Map.PNG Aqueduct_Water_Quantity_Risks_Map.PNG</p> <p>Assessment: Risks were identified by the Reynolds Group at a corporate level in the U.S.A. to ensure consistency across the different operations. Key risks identified were increased severity of extreme events (e.g., floods) and changes and variability in precipitation patterns. Opportunities identified relate to use of more efficient production and distribution processes (specifically water withdrawal reduction and increased water recycling with associated targets), which are corporate global targets (goals). However, this has not been translated into practically implementable opportunities at a site level, which is particularly important as there are practical constraints to achieving these.</p> <p>Warehousing is spread across multiple locations to reduce risk of product loss.</p> <p>Finding No: TNR-002003</p>	
1.8	<i>Understand best practice towards achieving AWS outcomes: Determining sectoral best practices having a local/catchment, regional, or national relevance.</i>	
1.8.1	<i>Relevant catchment best practice for water governance shall be identified.</i>	 Yes
Comment	<p>Evidence: 1.8 Best Practices _ASC Clarksville.docx</p> <p>Assessment: The site identified the following best practices recommended by Tennessee Department of Environment & Conservation to promote the "Watershed Management Approach": 1) identifying and prioritizing water quality challenges in the watershed, 2) developing increased public involvement, 3) coordinating activities with other agencies, and 4) measuring success through increased and more efficient monitoring and other data gathering.</p> <p>Permitting, planning and monitoring are included, but this is not deemed as best practices, only standard or good practice.</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>	 Obs.
Comment	<p>Evidence: 1.8 Best Practices _ASC Clarksville.docx</p> <p>Assessment: Reynolds uses the global software tool "Goal Setting File" to track environmental performance indicators including water use. The tool is completed quarterly and shared with the management team. The site uses CR360 to track its data and performance.</p> <p>The site should consider identifying other relevant sector and/or catchment best practice for water balance, to enable it to better understand potential opportunities.</p>	
1.8.3	<i>Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.</i>	 closed

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Alliance for Water Stewardship (AWS)




Audit Number: AO-000401

Comment	<p>Evidence: 1.8_Best_Practices__ASC Clarksville No Exposure Certification 2018 Gis</p> <p>Assessment: Reynolds uses water quality criteria established in terms of permitting requirements by the State of Tennessee. However, compliance with effluent and storm water legal requirements within the State of Tennessee do not constitute best practice, only standard practice</p> <p>The evidence provided does not speak to catchment best practices, only potential best practice at the site level, but the practices listed are standard practices not best practices.</p> <p>Finding No: TNR-001943</p>	
1.8.4	<p><i>Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.</i></p>	 closed
Comment	<p>Evidence: 1.8_Best_Practices__ASC_Clarksville 1.5.1_TN_watershed-guide.pdf</p> <p>Assessment: The site identified that the Tennessee Department of Environment & Conservation promotes the "Watershed Management Approach", which includes protection of IWRAs. The document mentions the management plans developed by TDEC for each catchment, as well as available tools for watershed management including the Tennessee Department of Environment and Conservation's program to monitor and assess water quality in each of the state's 55 watersheds. However, this evidence does not specify catchment best practices for site maintenance of Important Water-Related Areas.</p> <p>Finding No: TNR-001944</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>	 closed
Comment	<p>Evidence: 1.8_Best_Practices__ASC_Clarksville</p> <p>Assessment: The site cited the "WBCSD WASH Tool" as a method to evaluate catchment best practice for WASH. However, this is a tool not a relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services.</p> <p>Finding No: TNR-001942</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	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.  in progress</p> <p>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>Evidence:</p> <p>2.1.1 EHS Policies Signed_ASC_Clarksville.pdf Reynolds_StrategyandCommitment_2.1.1_2.3.1.pdf (shown on screen during the audit)</p> <p>Assessment:</p> <p>The site provided its EHS Policy and the Reynolds Strategy and Commitment as evidence, but they do not address the requirements of this indicator in terms of including a specific commitment:</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. <p>Finding No: TNR-002004</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:  N/A</p> <ul style="list-style-type: none">- Identification of responsible persons/positions within facility organizational structure- Process for submissions to regulatory agencies.
Comment	<p>Evidence:</p> <p>2.2.1_Water_Related_Internal_Governance_Hierarchy_ASC_Clarksville 2022 TMSP Final Permit.pdf American Snuff CGP Permit Information.pdf American Snuff TMSP Permit Information.pdf</p> <p>Assessment:</p> <p>A hierarchy of water related internal governance was presented, but the role of each position was not specified. The site EHS staff handle permit renewals, review, and act as a liaison with the regulators. The site explained that the Senior Vice President (SVP) is in charge of compliance and has the authority to sign all reports. However, the process for submissions to regulatory agencies is not documented.</p>
2.3	Create a water stewardship strategy and plan including addressing risks (to and from the site), shared catchment water challenges, and opportunities.
2.3.1	<p>A water stewardship strategy shall be identified that defines the overarching mission, vision, and goals of the organization towards good water stewardship in line with this AWS Standard.  Yes</p>

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Evidence:

2.3.1__Water_Stewardship_Strategy_ASC_Clarksville
Reynolds_StrategyandCommitment_2.1.1_2.3.1.pdf

Assessment:

The site's Water Stewardship Strategy specifies an overarching mission, and the following goals:

- Good Water Governance
- Sustainable Water Balance
- Good Water Quality Status
- Important Water Related Areas
- Safe Water, Sanitation, and Hygiene for All (WASH).

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.*



No

Comment

Evidence:

2.3.2_Water_Stewardship_Tabular_Plan_ASC_Clarksville
2.3.2_Water_Stewardship_Tabular_Plan_ASC_Clarksville GIS

Assessment:

Targets and actions are specified in the Water Stewardship Plan (WSP), but quantified targets were not set for the majority of actions. Timeframes were also not quantified for all actions (e.g., "ongoing" does not enable assessment of performance in relation to clear timeframes).

The site advised that budgetary data specified as USD 0 was due to a financial system cut over and the costs will be added as soon as the financial department is able to extract this data.

The site should consider adding columns indicating % completion and estimated starting and ending dates.

Finding No: TNR-002005

Finding No: TNR-002479

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.



No

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Evidence:

2.4.1_American Snuff SPCC - Nov 2021 - FINAL.pdf
2.4.1_American Snuff SWPPP - 2021 - FINAL.pdf
AmericanSnuff_EmergencyActionPlan.pdf
ASC Clarksville Business Continuity Plan (shown on screen as it is confidential)
EAP-01 Clarksville Emergency Action Plan.pdf

Assessment:

AmericanSnuff_EmergencyActionPlan specifies risks such as leaks, oil and hazardous materials spills, fires, flood, earthquakes etc. Associated responses and responsible parties for emergency actions are specified. The Action Plan includes revision requirements, details of the Emergency Response team. No actions were identified for flooding due to the location and gradient of the site.

Only hazardous materials spill risks relate to hydraulic oil, which are food grade, and will be contained and cleaned-up in the operational area, so will never constitute an emergency scenario.

None of the actions were identified in consultation with stakeholders or government emergency response agencies (e.g., fire department). However, the USA regulations are very clear on exactly what the legal requirements are and how they must be addressed by the site from a risk and safety perspective, so consultation wasn't required to ensure appropriate and coordinated responses to emergencies.

The Site is located outside the boundaries of the city of Clarksville; therefore, the Fire Department is limited to a group of volunteers. In case of fire, ASC employees will do their best to control the situation. If it can't be done the plant will be evacuated.

The Site has designated shelter points for tornados which occur approximately once a year. When this happens, power is lost but water access is maintained. Operations are halted until the power is restored.

The BCP plan identifies flooding as a risk, but does not establish what to do in the event of an emergency.

The city provides potable and wastewater treatment services to the site, but the site does not have an emergency plan in the event of interruptions in service. The site believes that another potable water plant in the Country could provide this service as a back-up, but the site did not provide confirmation of this.

Finding No: TNR-002480

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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

Evidence:

3.1 Good Catchment Governance_ASC Clarksville.docx

Assessment:

As part of building internal confidence in water governance, all members of the EHS function are participating in BAT sponsored AWS training. Based on the level of involvement and timeline for certification, individuals progressively take the AWS training (Foundation, Advanced, or Specialist).

Additionally, all managers have been required to complete BAT environmental sustainability foundational training that includes a module on water stewardship.

The site has also created an ESG Team (lead manager production, senior manager technical support, lead manager R&D, safety specialist, lead manager EHS, engineer, and production associates) to facilitate employee education and spearhead sustainability initiatives.

The employees spent time engaging in the increased volunteer activities related to water stewardship. As part of the company's commitment to contribute time and local communities, all employees are given two full workdays to contribute the volunteerism. A total of 7,500 trees were planted by the site and the site is planning an event with the Tennessee Riverkeepers.

The former two actions are not reflected in the WSP, but the latter is.

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

Evidence:

3.1_Good_Catchment_Governance_ASC_Clarksville.docx / Non material
Toxic Release Inventory no water discharges since 2012 Gis

Assessment:

There are no water rights associated with indigenous people in the area.

The site sources its water and wastewater services from the City of Clarksville and its storm water is retained in ponds prior to discharge into Spring Creek.

No violations have been identified/published by the EPA that could indicate that they are or have been out of compliance regarding water quality. Consequently, the site advised that measures to respect the water rights of others are not deemed necessary, but the site aims to ensure compliance with its legal obligations regarding water quality.

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.*




closed

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Comment	<p>Evidence: 3.9.1 Clarksville STP Compliance status Jul 2019 - Jul. 2022.csv</p> <p>Findings: No was evidence provided. However, the EPA page shows that ASC Clarksville is in compliance with the environmental regulations.</p> <p>ASC Clarksville proposed a call with their legal team to discuss the site's legal register, but this did not take place during the on-site audit.</p> <p style="text-align: right;">Finding No: TNR-002006</p>	
3.2.2	<i>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.</i>	 Yes
Comment	<p>Evidence: 3.1_Good_Catchment_Governance_ASC_Clarksville</p> <p>Assessment: According to the site, water rights are not part of any legal or regulatory compliance for the Site. The EPA page states that there are no indigenous people in the catchment.</p> <p>Water rights are not part of any legal or regulatory compliance requirements for the site, but the site does implement a suite of contamination and water quality controls to respect the rights of other water users in the catchment.</p>	
3.3	<i>Implement plan to achieve site water balance targets.</i>	
3.3.1	<i>Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.</i>	 No

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Comment	<p>Evidence:</p> <p>3.3.1 Dry Snuff Processing Area.pdf 3.3.1 Dry Snuff Twist Processing Area.pdf 3.3.1 Meters.xlsx 3.3.1 Moist Snuff Area.pdf 3.3.1 Prizing Area.pdf 3.3.1 Rainwater Collection.pdf 3.3.1 Tobacco Storage Area.pdf Dry Snuff Processing Area.pdf Dry Snuff Twist Processing Area.pdf Meters - Junction Boxes - IDFs.xlsx Moist Snuff Area.pdf Prizing Area.pdf 2.3.2_Water_Stewardship_Tabular_Plan_ASC_Clarksville.xlsx</p> <p>Assessment:</p> <p>The site identified the following activities in its WSP:</p> <ul style="list-style-type: none">- Reduce water usage by 35% by 2025 and to recycle 30% of water by 2025, to be reflected in Water usage reporting, 5-Year Plan, & BAT Water Road Map.- Increase water metering capabilities of each area of site, with metering to be installed in each area of the facility. <p>New electronic water metering has been installed, but the electronic reading functionality is not operational yet. Manual metering has commenced in the interim using the new meters.</p> <p>Rainwater collection has been installed on the maintenance shed and will be used for equipment washing.</p> <p>However, the status of progress in reducing water usage and recycling in relation to the targets set by the site has not been documented.</p> <p style="text-align: right;">Finding No: TNR-002007</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>Evidence:</p> <p>Aqueduct_Water_Quantity_Risks_Map.PNG</p> <p>Assessment:</p> <p>Water scarcity is not a shared water challenge in the catchment.</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>Evidence:</p> <p>None</p> <p>Assessment:</p> <p>There is no legal requirement for re-allocation of water to social, cultural or environmental needs.</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>	 No

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Comment	<p>Evidence</p> <p>3.4.1 2022 GAPC Self Assessment.pdf - Non material ASC Carbon neutral journey 2.pptx (see slide 13) and https://www.bluesource.com/wp-content/uploads/projects/Doe%20Mountain.pdf ASC - Annual Monitoring Report 02.22.2022 - DRAFT.pdf FW Smith Garland (Lee) L shared Clarksville Team Works Together to Plant 7500 Trees with you.msg 2.3.2_Water_Stewardship_Tabular_Plan_ASC_Clarksville.xlsx</p> <p>Assessment:</p> <p>The site identified the following water quality targets in its WSP:</p> <ul style="list-style-type: none">- Comply with all permit requirements via quarterly sampling of wastewater to analyze for contaminants- Prevent spills and pollution into stormwater drains. Undertake sampling of stormwater to analyze for contaminants (pH, BOD, TSS, signs of oil & grease) to check compliance through quarterly and semi-annual sampling. <p>Water quality monitoring for TSS is undertaken annually and results were provided for 2022.</p> <p>The site purchased carbon credits that involved investment in reforestation located in Bluesource-Doe Mountain Improved Forest Management in Tennessee, but this is not located within the Spring Creek, Red River, or Cumberland River catchments.</p> <p>The site planted 7,500 trees on site.</p> <p>However, the status of progress towards meeting water quality targets set in the water stewardship plan has not been documented.</p> <p>Finding No: TNR-002008</p>	
3.4.2	<p><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></p>	 closed
Comment	<p>Evidence</p> <p>3.4.2 Env Improvements_ASC Clarksville.pdf - Non material</p> <p>Assessment:</p> <p>Various stakeholders identified water quality (principally due to agricultural run-off) as a shared water challenge in the catchment. However, the site has not monitored for any parameters beyond their legal permit requirements for TSS. No site-based systems are currently in place or actions are being implemented to improve water quality leaving the site.</p> <p>Finding No: TNR-002009</p>	
3.5	<p><i>Implement plan to maintain or improve the site's and/or catchment's Important Water-Related Areas.</i></p>	
3.5.1	<p><i>Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.</i></p>	 Yes
Comment	<p>Evidence:</p> <p>No evidence provided.</p> <p>Assessment:</p> <p>No IWRAs are present on site.</p> <p>SITE MUST UPDATE SITE MAP TO CHANGE THE NAME "RETENTION POND"</p>	
3.6	<p><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></p>	

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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>	 Obs.
Comment	<p>Evidence:</p> <p>1.3.4_2021_Annual_Drinking_Water_Quality_Report_(standard)_pg1-4_(FINAL)</p> <p>3.6.1 Drinking Water Catchment.JPG</p> <p>3.6.1 WASH Catchment.JPG</p> <p>3.6.1 WBCSD Revised Self Assessment Tool-ASC Clarksville.xlsx</p> <p>2.3.2_Water_Stewardship_Tabular_Plan_ASC_Clarksville.xlsx</p> <p>Assessment:</p> <p>ASC sources its potable and process water from the City of Clarksville.</p> <p>Amenities provided in the break room (hot water) were not specified, but these were identified on site as adequate. Hygienic areas for food and drink consumption are present in each major building.</p> <p>Separate male and female showers are also accessible to all staff respectively.</p> <p>The site has tampon dispensers installed at all restrooms.</p> <p>Mothers nursing room is also available and accessible.</p> <p>The site assessed its provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers onsite using the WBCSD Pledge for Access to Safe Water, Sanitation and Hygiene (WASH): Self-assessment tool. However, the levels of access and adequacy were not quantified.</p> <p>Also, no information was provided regarding OSHA compliance regarding WASH.</p>	
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>	 closed
Comment	<p>Evidence:</p> <p>3.1_Good_Catchment_Governance_ASC_Clarksville</p> <p>No evidence was provided.</p> <p>Assessment:</p> <p>According to the site, there are no water rights associated with indigenous people in the area, which has been confirmed via online information from the EPA.</p> <p>The site's water quality monitoring data reflects data for TSS but not any other parameters.</p> <p>However, the site has not provided any evidence that they have not impinging on the human right to safe water and sanitation of communities through their operations beyond TSS, that remedial actions are in place where this is not the case, and that these are effective.</p> <p>The site should consider comparing their storm water and waste water discharge quality with the quality of the receiving water bodies.</p> <p style="text-align: right;">Finding No: TNR-002010</p>	
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>	 closed

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Comment	<p>Evidence: 3.7.1 2022 GAPC Self Assessment.pdf</p> <p>Assessment: Indirect water use targets were not set in the water stewardship plan and indirect water use has not been quantified.</p> <p>Finding No: TNR-002011</p>	
3.7.2	<p><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></p>	 closed
Comment	<p>Evidence: No evidence was provided and no engagement has taken place with suppliers regarding their indirect water use.</p> <p>Assessment: No evidence was provided and no engagement has taken place with suppliers regarding their indirect water use.</p> <p>Finding No: TNR-002012</p>	
3.8	<p><i>Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have.</i></p>	
3.8.1	<p><i>Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.</i></p>	 in progress
Comment	<p>Evidence: No evidence was provided.</p> <p>Assessment: No evidence was provided. To date not interaction has been undertaken by the site and all shared water-related infrastructure has not been identified and its condition reflected, to understand potential risks and concerns (e.g., supply capacity versus current and future demand).</p> <p>Finding No: TNR-002013</p>	
3.9	<p><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></p>	
3.9.1	<p><i>Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.</i></p>	 Yes

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Comment	<p>Evidence:</p> <p>3.9.1 Stormwater monitoring report 2021 DWR-TNR058088-Monitoring Report-20210301-2366 Gis</p> <p>3.9.1 Governance DWR-TNR245982-Notice of Coverage (NOC)-20220526-2366 Gis</p> <p>3.9.1 Compliance status jul 2019 - jul 2022</p> <p>Assessment:</p> <p>The site identified the following catchment best practices:</p> <ol style="list-style-type: none">1) identifying and prioritizing water quality challenges in the watershed,2) developing increased public involvement,3) coordinating activities with other agencies, and4) measuring success through increased and more efficient monitoring and other data gathering. <p>Tree planting and reforestation was undertaken to address 1, reached out to Tennessee Riverkeepers to seek to partner on initiatives, no actions were undertaken for 3, water metering is being implemented to assist site in improving its water balance and total water withdrawal.</p> <p>The site has also implemented the following actions:</p> <ul style="list-style-type: none">- All members of the EHS function are participating in BAT sponsored AWS training, based on level of involvement and timeline for certification.- Managers have been required to complete BAT environmental sustainability foundational training that includes a module on water stewardship.- All employees receive two full workdays to give their time to volunteerism.- The site is a stakeholder member of the Stakeholder Advisory Committee for the Integrated Water Resources Plan with the Yadkin – Pee Dee Water Management Group (a collective of public and private organizations). The site is a board member of the Integrated Water Resources Plan, where it advocates for water governance.- Reynolds engages monetarily and through volunteerism to promote water stewardship with, and sponsors, local stakeholders.- EHS Roadmap is routinely evaluated.- ESG Teams have been developed and implemented at each manufacturing site to facilitate employee education and engagement. During the audit, the team observed several computers accessible to the workers to facilitate constant training on demand.- Employees can present complaints and ideas anonymously via a QR Code.	
3.9.2	<p><i>Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.</i></p>	 Yes
Comment	<p>Evidence:</p> <p>Pictures</p> <p>Assessment:</p> <p>The site identified the following activities related to best practice for targets for water balance in its WSP:</p> <ul style="list-style-type: none">- Reduce water usage by 35% by 2025, and Recycle 30% of water by 2025.- Install metering in each area of facility <p>Tree planting and reforestation was undertaken, to facilitate increased rainfall percolation and decreased surface run-off, leading to increase surface water retention in the catchment.</p> <p>The site installed a rainwater harvesting system for its maintenance shed. The water will be used to wash equipment.</p> <p>Water meters have been installed across all aspects of its operation where water is consumed; and is in the process to having software and digital reporting in place.</p> <p>The site uses a system called CR360, which includes an alarm to alert the site if water consumption changes more than 7% that will trigger an evaluation.</p>	

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3.9.3 *Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.*  in progress

Comment

Evidence:
No Exposure Certification 2018
No exposure cert form 2018 NR058516.NOEX.10-JAN-18


Assessment:
Tree planting and reforestation was undertaken on site and off-site through a carbon offset in Tennessee. Based on the site visit, there may have been substantial die-off after planting on-site

A No Exposure Certificate was obtained. A condition of no exposure exists at an industrial facility when all industrial materials and activities are protected by a storm resistant shelter to prevent exposure to rain, snow, snowmelt, and/or runoff.

However, none of the actions set in the WSP regarding water quality constitute best practice and none of the actions implemented address this requirement.

Also, targets in the WSP should be quantified where possible.

Finding No: TNR-002024

3.9.4 *Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.*  Yes

Comment

Evidence:
The site has specified that no IWRAs are present on site.
See the site photographs.

Assessment:
The site has specified that no IWRAs are present on site.


The site has identified the following actions in its WSP for IWRAs:
- Reduce water use through rainwater collection via installation of a rainwater collection system.

The site installed a rainwater harvesting system for its maintenance shed. The water will be used to wash equipment. However, it is unclear whether this level of reduction in water use will have a positive impact on IWRAs in the catchment.

The site planted 7,500 trees on site, however their planting and/or maintenance is not part of the WSP. Based on the site visit, there may have been substantial die-off after planting. The area where the trees were planted was observed during the audit, however they are still young and covered by grass.

Reynolds is also committed to the Adopt-A-Stream program. As part of this commitment Reynolds quarterly sponsors volunteers to remove trash and other pollutants from Mill Creek [off-site, within the watershed]. This should be added to the WSP under IWRAs, as it is currently only linked to Good Water Governance in the WSP.

The site should seek to identify additional best practices regarding the site's maintenance of Important Water-Related Areas.

3.9.5 *Actions towards achieving best practice related to targets in terms of WASH shall be implemented.*  Yes

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Comment

Evidence:

Picture of nursing area to be uploaded by The Site.
Bathroom Audit (maintenance checklist).xlsx

Assessment:

The site identified "Maintain current levels of WASH facilities" as its target, which it implements via regular maintenance.





The site has tampon dispensers installed at all restrooms.

The site has installed a nursing facility for mothers in alignment with the BAT policy regarding legal requirements, although this was undertaken in 2017. Water sensors for water taps were installed in 2012. These both constitute best practice (although the latter relates to water balance), but pre-date the site's commencement of its AWS journey and the identified of WSP targets.

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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>	 No
Comment	<p>Evidence: 4.1.1 Annual Evaluation of Water Stewardship Plan.xlsx</p> <p>Assessment: The site undertook an annual evaluation of high level performance in terms of its AWS objectives, but not of its performance against the targets in its WSP.</p> <p>All major findings under Step 4 and 5 were downgraded to minors, based on a recent policy decision by AWS that these steps and their indicators should only be assessed as minors at most during Initial Certification Audits.</p> <p style="text-align: right;">Finding No: TNR-002015</p>	
4.1.2	<i>Value creation resulting from the water stewardship plan shall be evaluated.</i>	 No
Comment	<p>Evidence: No evidence was provided.</p> <p>Assessment: No evidence was provided.</p> <p style="text-align: right;">Finding No: TNR-002016</p>	
4.1.3	<i>The shared value benefits in the catchment shall be identified and where applicable, quantified.</i>	 No
Comment	<p>Evidence: No evidence was provided.</p> <p>Assessment: No evidence was provided.</p> <p style="text-align: right;">Finding No: TNR-002017</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>Evidence: 2.4.1_American Snuff SPCC - Nov 2021 - FINAL.pdf 2.4.1_American Snuff SWPPP - 2021 - FINAL.pdf</p> <p>Assessment: No emergency incidents have taken place during the last year or since the commencement of implementation of the WSP.</p>	

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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>	 No
Comment	<p>Evidence: 4.3.1_ AWS Clarksville - Disclosure.msg No other evidence provided.</p> <p>Assessment: Consultation efforts with (external) stakeholders on the site's water stewardship performance was not undertaken.</p> <p>Finding No: TNR-002018</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	<p>Evidence: 2.3.2_Water_Stewardship_Tabular_Plan_ASC_Clarksville.xlsx 4.4.1__Annual_Evaluation_of_Water_Stewardship_Plan.xlsx</p> <p>Assessment: The current version was the first official version for implementation. Implementation commenced in September 2022.</p>	

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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.	 No
Comment	<p>Evidence: 5.1 AWS Clarksville - Disclosure (3).pptx 5.1.1 .ASC_AWS Overview_2022.pdf</p> <p>Assessment: The ASC AWS Overview overview specifies the EHS Manager as responsible for compliance of water related regulations and lead water related activities on site. However, this hasn't been disclosed to external stakeholders in any form.</p> <p style="text-align: right;">Finding No: TNR-002019</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.	 No
Comment	<p>Evidence: No Evidence was provided.</p> <p>Assessment: No disclosure has taken place for this indicator.</p> <p style="text-align: right;">Finding No: TNR-002020</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.	 No
Comment	<p>Evidence: No Evidence was provided.</p> <p>Assessment: No disclosure has taken place for this indicator.</p> <p style="text-align: right;">Finding No: TNR-002021</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.	 No
Comment	<p>Evidence: No Evidence was provided.</p> <p>Assessment: No disclosure has taken place for this indicator.</p>	

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Finding No: TNR-002022


5.4.2 *Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.*  No

Comment Evidence:
No Evidence was provided.

Assessment:
No disclosure has taken place for this indicator.

Finding No: TNR-002023


5.5 *Communicate transparency in water-related compliance: make any site water-related compliance violations available upon request as well as any corrective actions the site has taken to prevent future occurrences.*

5.5.1 *Any site water-related compliance violations and associated corrections shall be disclosed.*  Yes

Comment Evidence:
5.5.1 Detailed_Facility_Report___ECHO___US_EPA.pdf

Assessment:
The Detailed Facility Report disclosed by the EPA and available on the EPA's website reflects that the site had no violations in the last quarter. Refer to page 4 where "CWA" indicates compliance with the Clean Water Act.


The site has confirmed that it has not had any water-related compliance violations and associated corrections.

5.5.2 *Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.*  Yes

Comment Evidence:
5.5.1 Detailed_Facility_Report___ECHO___US_EPA.pdf

Assessment:
The Detailed Facility Report disclosed by the EPA and available on the EPA's website reflects that the site had no violations in the last quarter. Refer to page 4 where "CWA" indicates compliance with the Clean Water Act.

The site has confirmed that it has not had any water-related compliance violations and associated corrections.

5.5.3 *Any site water-related violation that may pose significant risk and threat to human or ecosystem health shall be immediately communicated to relevant public agencies and disclosed.*  Yes

Comment Evidence:
5.5.1 Detailed_Facility_Report___ECHO___US_EPA.pdf

Assessment:
The Detailed Facility Report disclosed by the EPA and available on the EPA's website reflects that the site had no violations in the last quarter. Refer to page 4 where "CWA" indicates compliance with the Clean Water Act.

The site has confirmed that it has not had any water-related compliance violations and associated corrections.

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Photographic Evidence from Audit



Diesel storage tank indoors.jpg



Flow meter for effluent leaving the site in sanitary sewer.jpg

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Location of tree planting area within the site.jpg



Container where general waste was being stored prior to disposal with minor leachate leaking out despite liner inside.jpg

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Eye wash station.jpg



Tobacco stored in cardboard boxes on wooden pallets.jpg

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Stormwater detention pond under development in new construction area.jpg



Tobacco drier.jpg

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Handwash basin and soap dispenser.jpg

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Forklift yard with dedicated internal pollution control measures.jpg



Rock lined (rip) stormwater drainage channel from detention pond under development in new construction area.jpg

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Bunding at fuel storage and dispensing area.jpg



Wooden barrels used to store and transport tobacco and packaging on site.jpg

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Tobacco humidifiers (sweat boxes).jpg



Male bathroom with urinals and toilets.jpg

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Fuel storage tank with bunding photo 2.jpg



Production chemicals on spill trays.jpg

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Handwash basin with motion sensors.jpg



Drinking water dispenser.jpg

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Water fountain.jpg



Spill trays for chemicals used in the manufacturing process.jpg

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Dedicated mothers room.jpg



Shower facility.jpg

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Small-scale chemicals placed on a spill tray.jpg

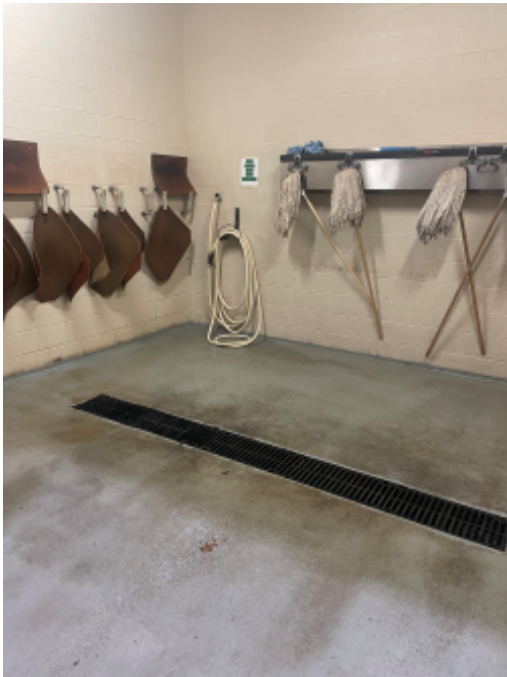


Fuel storage tank with bunding.jpg

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Cleaning area for tobacco twist mats.jpg



Sanitary sewer maintenance hole where effluent leaving the site is metered for flow.jpg



Yes

Comment Specific photographs were taken on-site by ASC at the auditors request that reflect key site infrastructure and site performance regarding water stewardship.

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Wooden barrels used to store and transport tobacco.jpg