

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)



Audit Number: AO-000455

SITE DETAILS

Site: **RJRT - Winston-Salem**
Address: Whitaker Park, 27105, Winston-Salem, North Carolina, UNITED STATES
Contact Person: Janae Wells
AWS Reference Number: AWS-000397
Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Core
Date of certification decision: 2023-Jun-07
Validity of certificate: 2026-Jun-07

AUDIT DETAILS

Audited Service(s): AWS Standard v2.0 (2019)
Audit Type(s): Initial Audit
Audit Start Date: 2022-Nov-29
Lead Auditor: Warrick Stewart
Audit team participants:
Warrick Stewart, Lead Auditor
Kimberly Worsham
Site Participants:
Janae Wells, RJRT: Senior Environmental Engineer
Scott Koch, RJRT: Area Director
Brian Mathis, RJRT: Senior Area Manager Building 603-1
Angela Tilley, RJRT: Lead Manager Building 603-1
Scott Snow, RJRT: Environmental
Daniel Hackney, RJRT: Maintenance Manager

AUDIT TIMES

Dates	Audit from	Duration	Auditor	Description
2022-Nov-29	08:00:00 - 17:00:00	09:00	Warrick Stewart	
2022-Nov-30	08:00:00 - 17:00:00	09:00	Warrick Stewart	
2022-Dec-01	08:00:00 - 13:00:00	05:00	Warrick Stewart	

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ADDITIONAL INFO

Summary of Audit Findings: A total of 53 findings were raised during the certification audit, 9 major non-conformities, 38 minor non-conformities, and 6 observations. The major non-conformities were of sufficient concern to warrant the categorization of the non-conformity as major and related to all 5 AWS outcomes namely 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 09/03/2023.

The major non-conformities must be sufficiently addressed, and evidence submitted to WSAS within 90 days of receipt of the report by 09/04/2023.

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

The audit team recommends certification of the RJRT Winston-Salem (Whitaker Park) 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 RJRT Winston Salem (Whitaker Park) site against the AWS International Water Stewardship Standard Version 2.

The site is located at 4040 Reynolds Court, Building 603-1, in Winston Salem, North Carolina, U.S.A. The site implements a re-constituted tobacco process to enable total use of the tobacco leaf, that enables production of tobacco paper that is then cut for tobacco product manufacturing. Key infrastructure includes building 603-1 where the re-constituted tobacco process takes place; building 603-5 where product recovery operations (PRO) take place; 181 shed that is a reconstituted pallet plant and includes contractor operations, an R&D section, and recycling of material (i.e., tobacco waste to compost); and a steam plant.

The facility is located in the High Rock Lake Watershed.

The audit was conducted onsite on November 29 to December 1, 2022.

The onsite site visit included observation and assessment of the various facilities and activities described above, including associated infrastructure (e.g., storm water infrastructure, fuel storage, chemical stores etc.).

The following external stakeholders were interviewed during the audit: City of Winston-Salem: Bill Brewer (Director: Water Treatment Utilities) and Joel Freeman (Industrial Waste Supervisor); North Carolina Department of Environmental Quality: Lon Snider (Water Quality Regional Operations Section: Regional Supervisor) and Jenny Graznick (Water Quality Regional Operations Section: Assistant Regional Supervisor); and Yadkin Riverkeeper: Edgar Miller (Executive Director).

FINDINGS

WSAS

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

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NUMBER OF FINDINGS PER LEVEL

Observation	6
Minor	38
Major	9

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FINDING DETAILS

Finding No:	TNR-002329
Checklist Item No:	1.1.1
Status:	Closed
Finding level:	Major
Due date:	2023-Apr-02
Checklist item:	The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including: <ul style="list-style-type: none">- Site boundaries;- Water-related infrastructure, including piping network, owned or managed by the site or its parent organization;- Any water sources providing water to the site that are owned or managed by the site or its parent organization;- Water service provider (if applicable) and its ultimate water source;- Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies;- Catchment(s) that the site affect(s) and is reliant upon for water.
Findings:	<p>The physical scope of the site has been mapped to include the following features:</p> <ul style="list-style-type: none">- Roads, buildings, and water-related piping.- Potable water, storm drains, sanitary sewer, process sanitary sewer, irrigation system, condensate, alcohol, chilled water, chilled return water, natural gas, and fire protection. <p>However, the following features have not been mapped to date:</p> <ul style="list-style-type: none">- Clear delineation of the site boundaries;- 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.- Regulatory landscape- Zone of stakeholder interests.
Corrective action:	Figures were provided mapping the physical scope of the site, updated maps that includes the missing items from the finding will be provided.

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Finding No:	TNR-002327
Checklist Item No:	1.2.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Nov-29
Checklist item:	Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall: <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>Stakeholder consultation on water-related interests and challenges was undertaken primarily via desktop review, although telephonic consultation was undertaken with the Winston-Salem Water Utility and one farmer in the watershed.</p> <p>The site's stormwater leads to the Yadkin River, which is used for fishing and watersports. So those users could potentially be impacted by a potential major pollution event from the site into its stormwater system and ultimately to the Silas Creek, then muddy Creek, and then the Yadkin River. Downstream towns could potentially also be affected, particularly under severe drought and low flow conditions in the Yadkin River. The site identified six organisations/groups that are active in the watershed, but did not include them all in the site's stakeholder mapping process.</p> <p>However, many of the other stakeholders that were listed were very generic (e.g., property developers, watershed residents, local farmers (other than tobacco), wildlife in watershed and advocates, recreational users in watershed) and the specific groups were not identified.</p>
Corrective action:	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.

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Finding No:	TNR-002328
Checklist Item No:	1.2.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Nov-29
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:	<p>Water treated by the Winston-Salem Water Utility is taken from the local creek. The wastewater treated by the Utility is downstream of the site. However, the site has very limited understanding of the broader catchment context.</p> <p>The assessment was based on potential of stakeholder concerns resulting in the operation shutting down or reputationally. The impact of the site on stakeholders was based on the potential impact of the site in the short, medium and/or long-term on stakeholders (e.g., potential pollution event into the Silas Creek).</p> <p>The site did not consider identifying environmental organisations and/or interest groups over and above Audobon and Yadkin Riverkeeper that may have an interest in the site’s operations.</p>
Corrective action:	Stakeholders engagement is expanding. Details required to provide guidance toward actions and to meet indicator requirements is being provided. The information will be confirmed after engagement with site specific stakeholders.

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Finding No: TNR-002330
Checklist Item No: 1.3.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Nov-29
Checklist item: Existing water-related incident response plans shall be identified.
Findings: Tobacco Processing 603-1 Emergency Response Plan 2020 and Whitaker Park 603-5_PRO Emergency Response Plan 2020 both include measures for severe weather warnings and associated staff responses, but do not explicitly speak to water-related emergencies. They also do not pro-actively address the risk of flooding or a lack of water supply to the site.

RJRT_BCP_RECON_2022_09_13_V6.docx (Confidential, shown on screen) reflects key operational outcomes (key equipment outages) that the site needs to manage for, but this does not include any water-related risks/events that the site has identified and developed emergency responses for.
Corrective action: The BCP is 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, RJRT has requested the BCP (or like document) from Winston-Salem.

Finding No: TNR-002331
Checklist Item No: 1.3.2
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Nov-29
Checklist item: Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped
Findings: The site has mapped its site water balance including inflows, an estimate of embedded water in the site's product, and outflows.

However, losses have not been mapped, and the site has not mapped water through each part of its manufacturing operation to understand where the greatest water use and losses take place.
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.

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Finding No: TNR-002332
Checklist Item No: 1.3.3
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Nov-29
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: The site has not mapped and quantified the volumes of water through each part of its manufacturing operation to understand where the greatest water use takes place. The site also does not quantify losses.
Corrective action: Site team working on obtaining data to complete the water balance including inflows, losses, storage and outflows. This information will be used to understand where the greatest water losses may be occurring in the process and quantify those losses, as applicable.

Finding No: TNR-002333
Checklist Item No: 1.3.4
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Nov-29
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: Currently no sampling of the site's receiving water bodies is being undertaken by RJRT Winston-Salem.
Corrective action: Water quality data for source water, effluent, effluent discharge locations will be clarified. POTW effluent data will be provided. Additional publicly available data from the receiving body and ultimate effluent will be provided as requested.

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Finding No:	TNR-002334
Checklist Item No:	1.3.5
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Nov-29
Checklist item:	Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.
Findings:	The Tier II report specifies the location of the potential pollution sources on site, including the chemical description, types of containment (e.g., below ground storage tank), which building they are in, and the health and physical hazards of each. However, this has not been mapped yet. The "Section 1.3.5 Visual.doc" provides a process flow for the operation but does not explicitly specify the potential contaminants within the process.
Corrective action:	The site will provide a figure to include the requirements of the indicator.
Finding No:	TNR-002335
Checklist Item No:	1.3.7
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Nov-29
Checklist item:	Annual water-related costs, revenues, and a description or quantification of the social, cultural, environmental, or economic water-related value generated by the site shall be identified and used to inform the evaluation of the plan in 4.1.2.
Findings:	Costs have been quantified for water quality sampling, Stormwater Program, Wastewater Program, Oil Pollution Prevention, Permitting, Utilities, Water-related Site Infrastructure Improvements, Stakeholder Engagement, and Water-relation Donations. This collectively includes costs and a description or quantification of the social, cultural, environmental, or economic water-related value generated by the site. The site sells its product both externally and internally, but the site does not have these revenues readily available currently, although the corporate finance department does have these details but they weren't shared during the audit.
Corrective action:	RJRT will present a list of the types of annual water-related costs, which will be quantified per type. There are no revenues at the site directly related to water.

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Finding No: TNR-002337
Checklist Item No: 1.4.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Nov-29
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 site needs to include water quality data for the catchment related to its tobacco suppliers within the catchment.
Corrective action: 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 RJRT. The information is being requested and will be shared with the water stewardship team.

Finding No: TNR-002338
Checklist Item No: 1.4.2
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Nov-29
Checklist item: The embedded water use of outsourced services shall be identified, and where those services originate within the site’s catchment, quantified.
Findings: The site has identified and quantified embedded water use from outsourced services for the cardboard boxes it purchases and uses to package the tobacco sheets it manufactures. It has not yet quantified the embedded water use in the wooden pallets and chemicals the site purchases and uses. These wooden pallets and chemicals likely do not originate from within the catchment, but this has not been assessed and/or confirmed yet by the suppliers.
Corrective action: 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 RJRT. The information is being requested and will be shared with the water stewardship team.

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Finding No: TNR-002339
Checklist Item No: 1.5.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Nov-29
Checklist item: Water governance initiatives shall be identified, including catchment plan(s), water-related public policies, major publicly-led initiatives under way, and relevant goals to help inform site of possible opportunities for water stewardship collective action.
Findings: The site has an overview of Federal, State, Local, and watershed compliance initiatives. It is also aware of the Headwaters Muddy Creek Watershed Report.
The site is aware of initiatives by non-profit groups, but has not documented these.
Corrective action: The Site will review the Watershed Report and determine if additional information is required. Summarize government policy, state water stewardship, community programs.

Finding No: TNR-002591
Checklist Item No: 1.5.3
Status: Closed
Finding level: Major
Due date: 2023-Apr-02
Checklist item: The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.
Findings: A Watershed Water Balance Calculation was undertaken by NCDEQ, although the calculation method is now outdated, and the results will be replaced by the SNAP 4.2 Draft Tool that is currently ready for beta-testing. However, this information was explained by the site, but not provided as evidence.
The catchment has not been identified as water scarce, with North Carolina not deemed a drought-prone State according to NOAA. However, the site evidence includes reference to the North Carolina Climate Risk Assessment and Resilience Plan (NCCRARP). The NCCRARP identified that in the past several decades that month long droughts have recorded higher temperatures which exacerbated the drought problem. Regarding water scarcity, these reports identified heightened risk of more intense droughts.
Corrective action: Evidence of this was provided by the site during the audit. Site will resend evidence of this. In the interim until the state data is available, Model My Watershed data will be used to meet the criteria.

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Finding No: TNR-002341
Checklist Item No: 1.5.5
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Nov-29
Checklist item: Important Water-Related Areas shall be identified, and where appropriate, mapped, and their status assessed including any threats to people or the natural environment, using scientific information and through stakeholder engagement.
Findings: The site has identified various creeks within and adjacent to the catchment. However, only Muddy Creek has been evaluated in terms of its status. The site has not evaluated any potential IWRAs in the catchment as to whether they qualify as IWRAs or not in terms of the AWS definition.
Corrective action: Provide updated information on evaluation of IWRAs and revised list of catchment IWRAs, if applicable.

Finding No: TNR-002343
Checklist Item No: 1.5.6
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Nov-29
Checklist item: Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.
Findings: The current status and nature of current and proposed upgrades to the Neilson WTP have been documented, but not the status of any of the other infrastructure.

The site has considered the North Carolina Climate Science Report (NCCSR), which is a scientific assessment of historical climate trends, and the NC Climate Risk Assessment and Resilience Plan (NCCRARP) that identified the increased risk of higher annual precipitation, heavier and more intense precipitation, dry seasons of the year expected to be hotter and drier, and heightened risk of more intense droughts. However, this has not been translated into the identification of exposure risks of the existing water-related infrastructure in the catchment.
Corrective action: The site will contact relevant stakeholders to assist in identifying exposure risks of the existing water-related infrastructure in the catchment.

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Finding No:	TNR-002344
Checklist Item No:	1.5.7
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Nov-29
Checklist item:	The adequacy of available WASH services within the catchment shall be identified.
Findings:	Physical risks and untreated water connections in the catchment were identified as being low using the Aqueduct Tool. However, this has not resulted in the identification of the adequacy of available WASH services within the catchment, nor the level of access to safe drinking water, sanitation, and water-related hygiene.
Corrective action:	The site will research the adequacy of available WASH services in the catchment and confirm through stakeholder engagement.
Finding No:	TNR-002345
Checklist Item No:	1.7.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Nov-29
Checklist item:	Water risks faced by the site shall be identified, and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.
Findings:	The site identified a suite of water risks to the organization, their potential impact, their likely frequency, and their priority, but did not determine the likelihood of these risks occurring.
Corrective action:	The site will review and identify site-specific risks and determine the likelihood of such risks occurring at the site. Updates will be included in the WSP.

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Finding No: TNR-002346
Checklist Item No: 1.7.2
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Nov-29
Checklist item: Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.
Findings: Water-related opportunities were identified, however the following was not undertaken:
- High level opportunities for participation were listed, but not appropriately described for each opportunity to clearly reflect how the site might implement such opportunities (e.g., Reducing water use; Recycling water).
- An assessment and prioritization of potential savings and business opportunities.

Relative Beneficial Impacts were rated and the positive impacts of such opportunities on stakeholders was identified, although these positive impacts should rather be specified as shared value creation under 1.3.6 and 4.1.2 in the future once implemented.
Corrective action: The comprehensive WSP will be updated to include the additional information regarding implementation and shared value creation.

Finding No: TNR-002347
Checklist Item No: 1.8.1
Status: Open
Finding level: Observation
Checklist item: Relevant catchment best practice for water governance shall be identified.
Findings: Reynolds identified a site of contributions to water governance. Some of these actions constitute best practice (e.g., Advocating for integrated water governance at the catchment level), whilst others (e.g., complying with local, state, and federal water related regulatory requirements) only constitute standard industry practice. The list of relevant catchment best practice for water governance does not need to include only actions that the site is implementing, but also actions that the site could potential be involved in.

Non-best practice opportunities should be removed from the list.

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Finding No: TNR-002348
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 also consider available new technologies to reduce water use and improve its water use efficiency and water balance.

Finding No: TNR-002349
Checklist Item No: 1.8.3
Status: Closed
Finding level: Major
Due date: 2023-Apr-02
Checklist item: Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.
Findings: The site identified that it uses water quality criteria established by the State of North Carolina. Reynolds meets all regulatory requirements for this site. However, meeting regulatory compliance obligations does not in itself constitute best practice.
Corrective action: AWS Guidance for best practice was reviewed with RJRT site personnel to propose updated best practice. Best practices have been updated and provided to RJRT for review and implementation.

Finding No: TNR-002350
Checklist Item No: 1.8.4
Status: Open
Finding level: Observation
Checklist item: Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.
Findings: Reynolds is committed to Adopt-A-Stream. As part of this commitment Reynolds quarterly sponsors volunteers to remove trash and other pollutants from Mill Creek [off-site].

The site should also identified other relevant catchment best practices for site maintenance of Important Water-Related Areas. This does not mean that the site has to be involved in such opportunities, but needs to be aware of them.

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Finding No:	TNR-002351
Checklist Item No:	1.8.5
Status:	Closed
Finding level:	Major
Due date:	2023-Apr-02
Checklist item:	Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.
Findings:	The site identified that it is committed to supplying safe drinking water for all employees. However, this is a legal requirement and does not constitute best practice at a sectoral or catchment level. The site needs to identify 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 RJRT site personnel to propose updated best practice. Best practices have been updated and provided to RJRT for review and implementation.

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Audit Number: AO-000455

Finding No:	TNR-002281
Checklist Item No:	2.1.1
Status:	Closed
Finding level:	Major
Due date:	2023-Apr-02
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:	Indications of a commitment PowerPoint was shared with a few stakeholders via email, with the commitment stated as: "All Reynolds American Sites are Committed to the Principles of the Alliance for Water Stewardship and are Actively Working on Creating the Internal Structure Required for a Successful Water Stewardship Plan". The PowerPoint needs to include the commitments more explicitly, be signed, and show evidence of being in a publicly-disclosed area. The company's website has some public disclosure on water stewardship goals, but there needs more explicit details of the commitment to water stewardship and the AWS standard, specifically as required in the sub-indicators of this indicator. There also needs to be a leadership signature attached to that commitment.
Corrective action:	The site prepared a Disclosure document which includes the indicator specific requirements. The document was signed and was posted at a prominent location on-site. The water stewardship team is working with RJRT to post on the corporate website.

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Finding No:	TNR-002295
Checklist Item No:	2.3.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Nov-29
Checklist item:	A water stewardship plan shall be identified, including for each target: <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>Water Stewardship Plan (WSP) includes measurements, target actions, general timeframes, estimated budgets for most, general information about responsibility, and lines to AWS Outcomes. However, the plan is missing quantified targets that can be measured over time, specified roles of those responsible for projects/actions, and the timeframes are not clearly timebound.</p> <p>The site has a Water Road Map with operational initiatives they'll be working on that should be incorporated into the Water Stewardship Plan to ensure the plan is looking at site AND catchment efforts.</p>
Corrective action:	The WSP will be revised to develop quantified targets when possible and establish time-frames other than on-going. The upgrades currently being installed at the site are dependent on parts and contractor availability.

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Audit Number: AO-000455

Finding No: TNR-002283
Checklist Item No: 2.4.1
Status: Closed
Finding level: Major
Due date: 2023-Apr-02
Checklist item: A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.

Findings: The site's "Emergency Response Plan" indicates responses to "severe weather", but does not explicitly indicate any particular events related to water risk.

The site's Business Continuity Plan (which is confidential) was shown on-screen and explained during the on-site audit. The document does not indicate information related to water supply availability (flooding, drought, etc.).

The site needs to create an explicit plan for identifying and adapting to water-related risks in consultation with the City of Winston-Salem. For example, if there is a reduction or stopping of water supply services, the site needs to indicate how it will respond, how it will respond if there is contamination of Silas Creek at the stormwater output that it shares with the property next to it. The site also needs to identify what water-related risks could occur, with clear responses and rectification measures.

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 additional the site has reached out to the local municipality to understand their plans for water related emergencies.

Finding No: TNR-002297
Checklist Item No: 3.1.1
Status: Open
Finding level: Observation
Checklist item: Evidence that the site has supported good catchment governance shall be identified.

Findings: The dates when RJRT joined these stakeholder groups and engaged with Adopt-A-Stream etc. has not been documented and evidence of participation has not been provided (e.g., emails, attendance registers and minutes of meetings, photographs of clean-ups). It is unclear from the documentation if RJRT was involved in these governance groups' publications.

The site has not indicated how their engagement in this catchment governance work is reflected and integrated into its WSP.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)



Audit Number: AO-000455

Finding No: TNR-002583
Checklist Item No: 3.1.2
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Nov-29
Checklist item: Measures identified to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be implemented.
Findings: The site has not identified any measures to respect the water rights of others.
Corrective action: There are no water rights associated with indigenous people in the area. The Site will identify measures and document to respect the water rights of others.

Finding No: TNR-002298
Checklist Item No: 3.2.2
Status: Closed
Finding level: Major
Due date: 2023-Apr-02
Checklist item: 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.
Findings: The site has not identified if water rights are part of legal and regulatory requirements. If applicable, it has not identified measures to respect the water rights of others.
Corrective action: Investigate if water rights are part of legal & regulatory requirements. Document investigation in this section of WSP.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000455

Finding No:	TNR-002299
Checklist Item No:	3.3.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Nov-29
Checklist item:	Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.
Findings:	<p>The site identified the following water balance targets and actions in its WSP:</p> <ul style="list-style-type: none">- Achieve AWS Certification and Develop system for Shorefair based on existing system at TVL and work performed by SCS for Clarksville location (however, this relates to a different site)(Target 1).- Reduce water usage by 35% by 2025 and Water usage reporting, 5-Year Plan, & BAT Water Road Map (Target 4)- Increase water metering capabilities of each area of site and Install metering in each area of facility (Target 5). <p>The site's Water Stewardship Tabular Plan states that "Since 2017, we have had a water reduction of XX%. Since 2014, we have reduced water consumption by XX%. Whitaker Park currently recycles XX% of the water consumed. To meet 2025 water reduction and recycling goals, the company has scoped out operational transformation and modernization projects that would result in both goals being achieved".</p> <p>4.1.1 Tabular Plan.xlsx reflects the status of progress towards achieving the above targets, but the action for Target 1 needs to be amended to be correct, Target 4 data relates to violations so is not correct in relation to the target and action set in the WSP, and the data for Target 5 speaks to water recycled and water use but not the installation of meters as per the action identified for Target 5 in the WSP. Also, data for Water Recycled and Water Use data is reflected, but incorrectly so under Target 5 instead of Target 4.</p>
Corrective action:	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.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000455

Finding No: TNR-002584
Checklist Item No: 3.3.2
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Nov-29
Checklist item: 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.
Findings: The WSP includes a goal under Target 4 to "Reduce water usage by 35% by 2025" and to "Recycle 30% of water by 2025".

4.1.1 Tabular Plan.xlsx reflects data for Water Recycled and Water Use data, but incorrectly under Target 5 instead of Target 4. However, both sets of data reflect generally negative trends, not improvements.

Also, the WSP states that there is "no significant challenge of water scarcity", but also that "the region rarely has seasonal droughts that pose some restrictions for crops in localized areas, but not to an extent that is affects the overall availability of water" and the NC Climate Risk Assessment and Resilience Plan (NCCRARP) provided in the site's evidence confirms this. These statements appear to be at least partially contradictory and require clarification and/or further explanation.

Corrective action: Review this section of the WSP & resolve the contradictory verbiage. Review & update the tabular plan to break out the targets and actions to reflect all actions being taken to reach goals. The WSP is being updated to include targets.

Finding No: TNR-002310
Checklist Item No: 3.4.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Nov-29
Checklist item: Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.
Findings: 4.1.1 Tabular Plan.xlsx (Target 3) reflects performance against the legal requirements but needs to be strengthened to clearly reflect which data relate to effluent versus stormwater. The data for stormwater could be strengthened by reflecting not only the lack of violations, but actual water quality results against the limits set per parameter in the permit requirements.

Corrective action: The WSP is being updated to include water quality targets as appropriate. The site will evaluate water quality targets based on site specific conditions. The WSP are being updated to include targets and document evidence towards goals.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)



Audit Number: AO-000455

Finding No:	TNR-002287
Checklist Item No:	3.4.2
Status:	Closed
Finding level:	Major
Due date:	2023-Apr-02
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:	<p>Water quality was identified as a shared water challenge. The AWS - Disclosure.ppt presentation indicates identified (and some quantified) actions including:</p> <ul style="list-style-type: none">- Aggressive target established for all Reynolds American Facilities to be Alliance for Water Stewardship (AWS) Certified by 2025- Aggressive target established to Decrease Water Usage by 35% by 2025- Aggressive target established to Increase the Amount of Water Recycled by 30% by 2025- Ensure the Farmers Used Abide by Good Agricultural Practices (GAP)- Regulatory Compliance Remains a Top Priority- Promote Good Stewardship by Actively Participating in Clean Up Efforts in Local Communities <p>However, the WSP only reflects legal compliance as the target set, which in the site's context does not constitute best practice.</p> <p>The site has recently had challenges maintaining TSS & BOD levels below legal limits.</p>
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 and site-specific targets. For example, water quality is often identified as a shared water challenge and is an interest as a high-level challenge. When evaluated at the site level, based on water quality data and discussions with stakeholders, water quality is not a site-specific shared water challenge.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000455

Finding No: TNR-002585
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's staff complement is currently 72 males and 8 females. A total of 8 toilets, 5 urinals and 2 showers are in place for men; and 8 toilets and 1 shower for women. Eye wash stations, 11 water stations (Bubble Coolers), 8 coffee areas with water source directly plumbed, 25 basins (sinks), 2 ice machines, 4 women's menstrual product stations have been provided.

However, a few of these facilities are very old and could benefit from upgrading.

Finding No: TNR-002586
Checklist Item No: 3.6.2
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Nov-29
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: The site has advised that it does not take actions that have a negative impact to the community water supplies. The water quality results reflect only minor periodic exceedances for (process) effluent that have not impinged on the human right to safe water and sanitation of communities, and that effective remedial actions are in place and have been implemented where this has not been the case.

However, the site has not provided any evidence that traditional access rights for local communities are being respected.
Corrective action: Stakeholders have been identified and calls are being conducted. Additional stakeholders are being identified during conversations. Evidence will be provided to support that traditional access rights for local communities are being respected.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)



Audit Number: AO-000455

Finding No:	TNR-002305
Checklist Item No:	3.7.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Nov-29
Checklist item:	Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.
Findings:	<p>Reynolds Good Agricultural Practices (GAP) Program ensures that all tobacco suppliers are compliant with best practices. If non-compliance is present, the program works with the supplier to improve practices to ensure compliance. Reynolds Procurement is working with each supplier encouraging them to improve their practices. Reynolds is supplied by tobacco inside and outside of the site's catchment; the GAP program works with all tobacco suppliers. Reynolds Procurement team works primarily with suppliers outside of the site's watershed.</p> <p>However, no indirect water use targets were set in the WSP and no evidence was provided of indirect water use performance.</p> <p>Also, the GAP program activities are not incorporated into the WSP.</p>
Corrective action:	<p>The RJRT 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.</p>

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)



Audit Number: AO-000455

Finding No:	TNR-002306
Checklist Item No:	3.7.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Nov-29
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:	<p>Reynolds Good Agricultural Practices (GAP) Program ensures that all tobacco suppliers are compliant with best practices. If noncompliance is present, the program works with the supplier to improve practices to ensure compliance. Reynolds Procurement is working with each supplier encouraging them to improve their practices. There are documents attached providing evidence of this. Reynolds is supplied by tobacco inside and outside of the site's catchment; the GAP program works with all tobacco suppliers. Reynolds Procurement team works primarily with suppliers outside of the site's watershed.</p> <p>However, no evidence was provided of the site engaging with suppliers and service providers, and if/when applicable actions they have taken in the catchment as a result of the site's engagement related to indirect water use.</p>
Corrective action:	<p>The RJRT 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.</p>

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Alliance for Water Stewardship (AWS)

Audit Number: AO-000455

Finding No: TNR-002587
Checklist Item No: 3.8.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Nov-29
Checklist item: Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.
Findings: The site advised that there are no current concerns that need to be addressed and that during periodic routine city inspections (wastewater and stormwater) the site uses that opportunity to engage regarding any issues or concerns. The site is proud of having and supporting a good relationship with the City of Winston-Salem Utilities (both water supply and WWTP).

However, the site shares a stormwater outlet, which discharges into the Muddy Creek, with their immediate neighbour to the north-west of the site. Consequently the potential exists for pollution from either site via stormwater into the Muddy Creek, which requires co-ordination to avoid and/or minimize potential impacts. The site has not implemented plan to engage with and notify this neighbour on this matter.

Corrective action: Stakeholders have been identified and calls are being scheduled and conducted. The site has engaged the City to discuss infrastructure needs and plans. Additional pertinent stakeholders engagement such as the neighboring stakeholder will continue to be identified. Engagement will be documented in the stakeholder outreach log.

Finding No: TNR-002290
Checklist Item No: 3.9.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Nov-29
Checklist item: Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.
Findings: To date, action 1 has been completed, action 2 has commenced, and action 3 has not taken place yet. This could be strengthened by describing how each of these actions will contribute towards better water governance.

Corrective action: The Site will review the actions and provide description of how each will contribute toward better water governance.

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Alliance for Water Stewardship (AWS)

Audit Number: AO-000455

Finding No: TNR-002307
Checklist Item No: 3.9.2
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Nov-29
Checklist item: Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.
Findings: The site is currently working on a sitewide project to implement water metering in each area of the facility to provide a more detailed understanding of water use throughout the facility. However, clear demonstration of the installation of water metering across the facility was not provided. The metering goals have not been made SMART, to inform whether they can be determined as best practices or not.

The Utilities Department also follows strict protocol regarding blowdowns and cycle calculations to ensure priority of high efficiency and water reduction.

The site, through its IWS continual improvement program, is training workers on how to improve efficiency in the work they do. The site also undertakes a leak detection program, followed up by actions to reduce leaks. However, a large number of leaks were detected during the on-site audit.
Corrective action: Best practices were reevaluated, including water quantity. Information will be provided demonstrating installation and/or installation timeline for meters; update metering goals to be SMART; review leak detection program for improvements and document / provide evidence of improvement as necessary.

Finding No: TNR-002291
Checklist Item No: 3.9.3
Status: Closed
Finding level: Major
Due date: 2023-Apr-02
Checklist item: Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.
Findings: The site identified legal compliance as the proposed action, but legal compliance within the context of the site does not constitute best practice. Also, the site has had exceedances above legal limits for effluent.

RJRT stated they voluntarily test their effluent monthly, which is more frequent than the quarterly compliance requirements. However, this has not been reflected in the WSP.
Corrective action: Best practices were re-evaluated, including water quality. The WSP will be updated as applicable to include the monthly voluntary effluent testing actions and targets.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000455

Finding No:	TNR-002383
Checklist Item No:	3.9.4
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Nov-29
Checklist item:	Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.
Findings:	An IWRA is not present on site.

The site identified the following actions for implementation in support of IWRAs in the catchment:

- Achieve AWS Certification and Develop system for Shorefair based on existing system at TVL and work performed by SCS for Clarksville location. However, this erroneously refers to a different site and does not constitute best practice).
- Engage, consult, and participate with local stakeholders and Attend Yadkin - Pee Dee Water Management group meetings and represent Industry on the Stakeholder Advisory Board.
- Comply with all permit requirements and Act upon any issues discovered during quarterly inspections. However, this does not constitute best practice.

To date the site has implemented the following actions, which need to be integrated into the WSP:

- Reynolds is 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].
- Reynolds is also committed to its stakeholders and routinely participates in stakeholder engagement, but this does not constitute best practice.

Corrective action: The site is taking actions that will address best practice requirements. These actions will be incorporated to update the WSP to include the targets.

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Alliance for Water Stewardship (AWS)

Audit Number: AO-000455

Finding No:	TNR-002309
Checklist Item No:	3.9.5
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Nov-29
Checklist item:	Actions towards achieving best practice related to targets in terms of WASH shall be implemented.
Findings:	<p>The site has advised that Reynolds is committed to supplying safe drinking water for all employees. Reynolds is supplied water from the city of Winston-Salem, which routinely provides safe drinking water in compliance with regulatory standards. Reynolds provides high standards for toilets and washrooms for all employees. Reynolds also provides showers in the workout facility for all employees. However, this does not constitute best practice.</p> <p>The site provided free access to menstrual products in the women's bathrooms, which is considered a best practice for WASH. This should be integrated into the WSP and reflected as best practice.</p> <p>The site should to consider how it can support WASH efforts in the catchment beyond the site's boundaries (e.g., for homeless individuals in the city). Again, this would need to be reflected in the WSP.</p>
Corrective action:	Best practices were reevaluated, including WASH. Quantifiable targets will be assessed if possible based on information that is available.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000455

Finding No: TNR-002314
Checklist Item No: 4.1.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Nov-29
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 evaluation was undertaken in the WSP Tabular Plan in Q4 2021, but not for all actions identified in the WSP.

Action 1 was implemented and assessed. Action 2 was not implemented and was evaluated as N/A.

Action 3 and 4 were implemented and evaluated, including tracking of violations as the action was to "Maintain compliance through quarterly and semi-annual sample testing".

Action 5 the site did not implement any actions, but did evaluate its current performance.

Action 6 was not implemented and consequently wasn't evaluated.

Action 7, 8 and 9 were implemented, but not documented in terms of actions undertaken and not evaluated.
Corrective action: The WSP is being updated to include quantifiable targets and timeframes. The site will document evidence towards the goals.

Finding No: TNR-002315
Checklist Item No: 4.1.2
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Nov-29
Checklist item: Value creation resulting from the water stewardship plan shall be evaluated.
Findings: The site has quantified their water-related costs linked to water infrastructure improvement projects, but has not quantified the benefits although these have been described. The new version of "Section 4.1.2.xls" quantifies costs but not benefits.
Corrective action: The WSP is being updated to include opportunities for value creation, to identify projects and documents actions towards the goals at the site and within the catchment.

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Alliance for Water Stewardship (AWS)

Audit Number: AO-000455

Finding No: TNR-002316
Checklist Item No: 4.1.3
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Nov-29
Checklist item: The shared value benefits in the catchment shall be identified and where applicable, quantified.
Findings: Shared-Value Benefits have been identified at a high level, but not quantified. Water quality and water balance have been considered, but WASH was not reflected beyond high-level legal compliance.
Corrective action: The WSP is being updated to include the identified shared-value benefits and quantify based on available projects and document actions conducted towards the goals at the site and within the catchment.

Finding No: TNR-002386
Checklist Item No: 4.2.1
Status: Open
Finding level: Observation
Checklist item: 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.
Findings: The site had to evacuate on Monday January 31, 2022 until Friday February 4, 2022 due to a fire at a nearby fertilizer plant. The fire posed potential air quality, explosion, and downstream water quality impacts and risks. The company's regional group safety staff deal with such emergency incidents. The BCP response to the fertilizer plant fire was documented, reviewed, and Opportunities for Improvement identified. However, the rating of the site's emergency response was not explained and no description of effectiveness was provided in the review.

RJRT Whitaker Park has noted that it had two (2) NOV's issued for Wastewater Permit exceedances related to BOD & TSS. The first is from July sampling results and the second from August sampling results. However, these exceedances above permit conditions should not be deemed as emergency incidents.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000455

Finding No:	TNR-002293
Checklist Item No:	4.3.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Nov-29
Checklist item:	Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.
Findings:	<p>The disclosure information needs to be more comprehensive across the spectrum of WSP actions and associated performance.</p> <p>This indicator would be strengthened via the demonstration of greater ongoing conversations and with a broader suite of relevant stakeholders.</p>
Corrective action:	<p>The site will add site specific actions; how these relate to AWS outcomes; and site specific quantified performance.</p> <p>The site will review and update the stakeholder list to be more specific and add emails for those we currently do not have. The site is working to have the disclosure document added to the external website with an email with the link to ensure all interested parties can access the information.</p>
Finding No:	TNR-002385
Checklist Item No:	4.4.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Nov-29
Checklist item:	The site's water stewardship plan shall be modified and adapted to incorporate any relevant information and lessons learned from the evaluations in this step and these changes shall be identified.
Findings:	<p>The initial WSP was created in 2020. A gap assessment was undertaken in early 2021, but the WSP has not been modified or adapted yet (i.e., no changes made yet). The site has undertaken a high level review of the effectiveness of the plan and where improvements or updates may be needed, but this hasn't led to modifications or revisions to the WSP yet.</p> <p>No lessons learned have been documented from the evaluations undertaken for Step 4.</p> <p>The site should also specify the lifespan of the current plan and the frequency for revisions.</p>
Corrective action:	The WSP is being updated to document "lessons learned" from Step 4 evaluations, as well as lifespan of current plan and frequency for review/revisions

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Alliance for Water Stewardship (AWS)

Audit Number: AO-000455

Finding No:	TNR-002392
Checklist Item No:	5.1.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Nov-29
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:	<p>Slide 8 of AWS - Disclosure.pptx provides an organogram of the responsibilities, but only specifies positions not roles and responsibilities for compliance issues. The roles and responsibilities of the EHS team are described in Slide 7, but it is not clearly explained how this relates to the organogram in Slide 8.</p> <p>The presentation was emailed to City of Winston-Salem, Yadkin Riverkeeper, NC DEQ, Piedmond Environmental Alliance (PEANC), WatershedNow, Gateway Nature Preserve, NC Sierra Club Foothills Group, Piedmont Land Conservancy, and Forsyth Audubon. However, this was only sent to the site's key stakeholders for whom they currently have email addresses and not all the site's stakeholders. This information was also not made available to the public in general, so other stakeholders or interested or concerned parties would not have access to this information to understand these roles and responsibilities.</p>
Corrective action:	<p>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. The site continues to review and update the stakeholder list to be more specific and add emails for those we currently do not have. The disclosure document will be added to the external website with an email with the link to ensure all interested parties can access the information. The roles & responsibilities organizational chart will be modified to meet the AWS standards.</p>

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000455

Finding No:	TNR-002393
Checklist Item No:	5.2.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Nov-29
Checklist item:	The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.
Findings:	The site has shared a high-level overview of its AWS targets and proposed actions for RJRT sites across the USA. However, detail was not provided on actions identified in terms of the site's Water Stewardship Plan and how these relate to AWS outcomes.
Corrective action:	The AWS Overview was shared with several external stakeholders. Additional stakeholders have been identified and calls are being scheduled to disclose information. Site specific detailed actions & how they are related to AWS outcomes will be added to the existing disclosure document.
Finding No:	TNR-002394
Checklist Item No:	5.3.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Nov-29
Checklist item:	A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.
Findings:	The site has shared a high level overview of its AWS targets and proposed actions for RJRT sites across the USA. However, detail was not provided on actions identified in terms of the site's Water Stewardship Plan, how these relate to AWS outcomes, and has not shared any quantified performance information yet.
Corrective action:	The site will add site specific actions; how these relate to AWS outcomes; and site specific quantified performance.

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Alliance for Water Stewardship (AWS)



Audit Number: AO-000455

Finding No:	TNR-002395
Checklist Item No:	5.4.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Nov-29
Checklist item:	The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.
Findings:	The site has disclosed shared water challenges relevant to RJRT's sites across the USA, but not specific to Winston-Salem and the actions the site has undertaken or planned to implement to address these challenges.
Corrective action:	The site will replace the RJRT shared water challenges with site specific water challenges. Additional stakeholders have been identified and calls are being scheduled to disclose information.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000455

Report Details

Report	Value
Report prepared by	Warrick Stewart
Report approved by	Ruth Wandera
Report approved on (Date)	02/01/2023

Surveillance

Proposed date for next audit
2023-Nov-29

Stakeholder Announcements

Date of publication	Location
21/10/2022	AWS/WSAS Website
31/10/2022	https://twitter.com/RAI_News/status/1587148064527196162?s=20&t=xSZ1gwC0xYmgkE6vqXc4Lg
28/10/2022	https://www.reynoldsamerican.com/press/38erKYzeiHFFdBtak9ISj8

Catchment Information

Catchment Information

The facility is located in the High Rock Lake Watershed. The Silas Creek is located adjacent to the site. The Silas Creek flows into the Muddy Creek, then the Yadkin River, and then into High Rock Lake, which flows into the Pee Dee River that terminates in the ocean at Winyah Bay in Georgetown, North Carolina.

Client Description and Site Details

Client/Site Background

The site is located at 4040 Reynolds Court, Building 603-1, in Winston Salem, North Carolina, U.S.A. The site implements a re-constituted tobacco process to enable total use of the tobacco leaf, that enables production of tobacco paper that is then cut for tobacco product manufacturing. Key infrastructure includes building 603-1 where the re-constituted tobacco process takes place; building 603-5 where product recovery operations (PRO) take place; 181 shed that is a reconstituted pallet plant and includes contractor operations, an R&D section, and recycling of material (i.e., tobacco waste to compost); and a steam plant.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000455

Summary of Shared Water Challenges

Summary of Shared Water Challenges

- Key Shared Water Challenges in the watershed include:
- The rate of growth and development in the watershed
 - Reduced Water Quality (nutrients and sediments)
 - Excess nutrients from animal operations (cattle, hog, poultry)
 - Impact of Climate Change on Water Availability and Quality, and the impact of storms on Water Related Infrastructure
 - Agricultural run-off
 - Water Quality Compliance (point and non-point sources of pollution, and WASH.
 - Long-term future impacts such as scarcity (currently not defined as a potential problem for the foreseeable future) and increased cost of water due treatment costs.

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>	 Yes
Comment	The site occupies one catchment.	
0.1.1.2	<i>The scope of the proposed certification shall be under the control of a single management system.</i>	 Yes
Comment	The scope of the proposed certification is under the control of a single management system.	
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>	 Yes
Comment	The site is homogeneous with respect to its primary production system, water management, product range, and the main market structures.	

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)


Audit Number: AO-000455

1 STEP 1: GATHER AND UNDERSTAND

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

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

- 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.

 closed

Comment

Evidence:
Building 603-1 Water System PFD 12-1-2022.pdf (Confidential)
9068E1.PDF
9068E19.PDF
9068E20.PDF
9068E28.PDF
9068E29.PDF
9068E37.PDF
9068E38.PDF
9068E117.PDF


Assessment:
The physical scope of the site has been mapped to include the following features:
- Roads, buildings, and water-related piping.
- Potable water, storm drains, sanitary sewer, process sanitary sewer, irrigation system, condensate, alcohol, chilled water, chilled return water, natural gas, and fire protection.

However, the following features have not been mapped to date:
- Clear delineation of the site boundaries;
- 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.
- Regulatory landscape
- Zone of stakeholder interests.

Finding No: TNR-002329

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

Audit Number: AO-000455

- 1.2.1** *Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall:* in progress 
- Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people;
 - Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies;
 - Provide evidence of stakeholder consultation on water-related interests and challenges;
 - Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups;
 - Identify the degree of stakeholder engagement based on their level of interest and influence.

Comment

Evidence:

1.2 Stakeholder_Mapping RJRT Whitaker Park.xlsx
Watershed Report - Headwaters Muddy Creek - Includes Stakeholder Groups - Copy.pdf

Assessment:

Stakeholders and their water-related challenges were identified. including

- Stakeholder Type, Stakeholder (Spatial) Level (e.g., national, regional, local) Level, Influence/power of Stakeholder, Interest of Stakeholder, Quadrant: Stakeholder Power, Influence Engagement, Stakeholder Influence on Site, Reynolds Influence on Stakeholder, Quadrant: Stakeholder Influence Engagement, Methods of Influence, Water Related Challenges of Concern to Stakeholder, Water Challenge Affecting Others.

This was undertaken over the course of the last 18 to 24 months.

The process used for stakeholder identification included:

- Noting the ability and/or willingness of stakeholders to participate varied/s across the relevant stakeholder groups.
- Identification of the degree of stakeholder engagement based on their level of interest and influence.

Residential Neighbours were identified, but there weren't any deemed within close proximity of the site as the immediate Neighbours are all industrial. The Residential Neighbours are all some distance from the site. There aren't any vulnerable groups, women, minorities, or Indigenous people that are in close proximity to the site who might be affected by the operation or specifically have an interest in the operation.

Stakeholder consultation on water-related interests and challenges was undertaken primarily via desktop review, although telephonic consultation was undertaken with the Winston-Salem Water Utility and one farmer in the watershed.

Suppliers were identified as potential stakeholders, but none of them were identified as priorities for consultation. Tobaccoville is a key supplier of the scrap tobacco that is processed by the site. The Winston-Salem Water Utility is also a key stakeholder.

The site's stormwater leads to the Yadkin River, which is used for fishing and watersports. So those users could potentially be impacted by a potential major pollution event from the site into its stormwater system and ultimately to the Silas Creek, then muddy Creek, and then the Yadkin River. Downstream towns could potentially also be affected, particularly under severe drought and low flow conditions in the Yadkin River. The site identified six organizations/groups that are active in the watershed but did not include them all in the site's stakeholder mapping process.

However, many of the other stakeholders that were listed were very generic (e.g., property developers, watershed residents, local farmers (other than tobacco), wildlife in watershed and advocates, recreational users in watershed) and the specific groups were not identified.

Finding No: TNR-002327

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000455

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.* 🚩 in progress

Comment Evidence:
1.2 Stakeholder_Mapping RJRT Whitaker Park.xlsx

Assessment:
Stakeholders and their water-related challenges were identified, including
- Stakeholder Type, Stakeholder (Spatial) Level (e.g., national, regional, local) Level, Influence/power of Stakeholder, Interest of Stakeholder, Quadrant: Stakeholder Power, Influence Engagement, Stakeholder Influence on Site, Reynolds Influence on Stakeholder, Quadrant: Stakeholder Influence Engagement, Methods of Influence, Water Related Challenges of Concern to Stakeholder, Water Challenge Affecting Others.

The process used for stakeholder identification included:
- The current and potential degree of influence between site and stakeholder, within the catchment.

Water treated by the Winston-Salem Water Utility is taken from the local creek. The wastewater treated by the Utility is downstream of the site. However, the site has very limited understanding of the broader catchment context.

The assessment was based on potential of stakeholder concerns resulting in the operation shutting down or reputationally. The impact of the site on stakeholders was based on the potential impact of the site in the short, medium and/or long-term on stakeholders (e.g., potential pollution event into the Silas Creek).

The site did not consider identifying environmental organisations and/or interest groups over and above Audobon and Yadkin Riverkeeper that may have an interest in the site's operations.

Finding No: TNR-002328

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.* 🚩 in progress

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000455

Comment Evidence:
 2022 Whitaker Park IUP Permit(3014) -Effective July 1 2022 - June 30 2027.pdf
 NCG060000-General-Permit-20210630-DEMLR-SW (1).pdf
 NCG060080_Renewal COC_20210701.pdf
 RJRT Whitaker Park 2021 SWPPP 10-18-21.pdf
 RJRT Whitaker Park SPCC Plan_090121 (1).pdf
 Tobacco Processing 603-1 Emergency Response Plan 2020V1.doc
 Whitaker Park 603-5_PRO Emergency Response Plan 2020V1.doc
 WP Air Permit 00339-TV-36 (1).pdf
 RJRT_BCP_RECON_2022_09_13_V6.docx (Confidential, shown on screen)

Assessment:
 The site has the following plans in place:
 - Stormwater Pollution Prevention Plan (SWPPP) Sept, 2021, which includes a NON-STORMWATER DISCHARGE ASSESSMENT AND CERTIFICATION, STORMWATER MANAGEMENT PLAN, SPILL PREVENTION AND RESPONSE PROCEDURE (SPRP), GOOD HOUSEKEEPING PROGRAM, and PREVENTATIVE MAINTENANCE.
 - SPCC Plan, including HISTORY OF SPILL EVENTS, PREDICTION OF POTENTIAL SPILLS, SPILL PREVENTION, CONTROL AND COUNTERMEASURE METHODS, and SPILL CONTINGENCY PLAN

* No spills from fuel tanks, chemical stores/storage containers, forklift maintenance etc. on site known by the environmental staff.

* The site believes that Silas Creek may be a catchment IWRA.

- Tobacco Processing 603-1 Emergency Response Plan 2020 and Whitaker Park 603-5_PRO Emergency Response Plan 2020 both include measures for severe weather warnings and associated staff responses, but do not explicitly speak to water-related emergencies. They also do not pro-actively address the risk of flooding or a lack of water supply to the site.

- RJRT_BCP_RECON_2022_09_13_V6.docx (Confidential, shown on screen) reflects key operational outcomes (key equipment outages) that the site needs to manage for, but this does not include any water-related risks/events that the site has identified and developed emergency responses for.

Finding No: TNR-002330

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

Comment Evidence:
 WP Process General Process Flow.pdf
 WP 2021 Water Totals From CR360.xls

Assessment:
 The site has mapped its site water balance including inflows, an estimate of embedded water in the site's product, and outflows. However, losses have not been mapped. There is no large-scale storage of water on site. Fire suppression is via potable water lines, not on-site storage.

The site has measured the volume of water it receives, uses in processing and staff facilities (consumption), and discharges to the municipal wastewater treatment works (Muddy Creek WWTP) as effluent (process and ablutions). It also measures Water intensity (Group, m3/MCE) as M3 per Millions cigarettes.


However, it has not mapped water through each part of its manufacturing operation to understand where the greatest water use and losses take place.

Finding No: TNR-002331

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000455

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.* in progress 


Comment Evidence:
WP Process General Process Flow.pdf
WP 2021 Water Totals From CR360.xls
CR360 data shown on screen values_2022-11-29_19-17.xls
WP Process Flow-Water Balance.pdf

Assessment:
The site has measured the volume of water it receives, uses in processing and staff facilities (consumption), and discharges to the municipal wastewater treatment works (Muddy Creek WWTP) as effluent (process and ablutions). It also measures Water intensity (Group, m3/MCE) as M3 per Millions cigarettes.

Water usage data is captured on a monthly basis and is also plotted to reflected trends in CR360. There are no major trends in water usage, as the tobacco supply to the site is continuous. Lower values for a month relate to site operational stoppages.

However, it has not mapped and quantified the volumes of water through each part of its manufacturing operation to understand where the greatest water use takes place. The site also does not quantify losses.

Finding No: TNR-002332

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.* in progress 

Audit Number: AO-000455

Comment Evidence:
2020 Water Quality Report
2021 Water Quality Report
City of Winston-Salem-Quality of Water Provided 2019 - Copy
SWAP Report for WINSTON-SALEM, CITY OF
2018-NC-Integrated Report.pdf
NC_2020_DRAFT_INTEGRATED_REPORT.pdf
Watershed Report - Headwaters Muddy Creek - Includes Stakeholder Groups - Copy.pdf
1.3.4 WP Water Quality Results and Inspections.docx
WP TSS BOD and WP Nic TSS BOD reports 2021 and 2022: Waste Water Testing
DMR files: Stormwater Testing

Assessment:
Each year Forsyth County develops a water quality report, based on sampling it undertakes for potable water supply.

The site has its effluent leaving the site tested monthly for TSS and BoD by PACE as an external party.

The Winston-Salem Water Utility undertakes sampling of the site's effluent water quality every 3 months for 3 consecutive days. Exceedances were encountered due to daytime shutdown of operations, which were abnormal to typical operations. Controls were then put in place to address this.

TSS on 14 July 2021 was elevated above legal limits due to abnormal operational activities, which have been rectified. The result was 4,600 mg/L versus the legal limit of 4,200.

On 13 and 14 July 2021, and 28 July and 11 August 2022 BoD was also elevated above legal limits. The latter exceedances were due to new operational activities that the site had to learn to manage, but this was addressed by the 2nd sampling round. The BoD exceedances varied from 8,286 to 7,577 to 6,730 and 5,976 against the legal limit of 3,500 mg/L.

The site reports quarterly on its stormwater discharge to NC DEQ including pH, TSS, oil and grease as per the permit requirements. Visual observations are also undertaken of the outfalls.

Currently no sampling of the receiving water bodies is being undertaken by the site.

Finding No: TNR-002333

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

in progress

Comment Evidence:
1.3.5 Narrative.docx
CPW WP Tier II (2021).pdf
Whitaker Park Tier II Report RY21.pdf
WP NCRTK (2021) - Corrected.pdf
WP TRI RY 2020 Facility eReceipt.pdf
1.3.5 Cradle to Grave - Revised August 2013 - Memo for Record.doc
Section 1.3.5 Visual.doc

Resource:
The Tier II report specifies the location of the potential pollution sources on site, including the chemical description, types of containment (e.g., below ground storage tank), which building they are in, and the health and physical hazards of each. However, this has not been mapped on-site yet. The "Section 1.3.5 Visual.doc" provides a process flow for the operation but does not explicitly specify the potential contaminants within the process.

The site has provided evidence of how it's used oil and other related waste is disposed of appropriately by Noble Oil Services.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000455

Finding No: TNR-002334

1.3.6 *On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.* ✔ Yes

Comment Evidence:
1.3.6 Whitaker Park IWRA.docx

Assessment:
No IWRAs are present on site, which is an industrial site with no natural areas or cultural features.

The site is located within the High Rock Lake Watershed. The state of North Carolina provides an annually updated list of impaired and impacted water streams.

The Western North Carolina Vitality Index, a non-profit organization, lists the closest cultural landmark to Whitaker Park being in Mt Airy [the historic celebration/music hall]. The state of North Carolina does not list a historic landmark near the site.

There is not a tribal community within Forsyth County, as declared by the state of North Carolina Indian Affairs

There is no water body within the site boundaries, as shown in the provided map.

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.* 🚧 in progress

Comment Evidence:
1.3.7 WP Water Related Costs Spreadsheet.xlsx

Assessment:
Costs have been quantified for water quality sampling, Stormwater Program, Wastewater Program, Oil Pollution Prevention, Permitting, Utilities, Water-related Site Infrastructure Improvements, Stakeholder Engagement, and Water-relation Donations. This collectively includes costs and a description or quantification of the social, cultural, environmental, or economic water-related value generated by the site. The site sells its product both externally and internally, but the site does not have these revenues readily available currently, although the corporate finance department does have these details, but they weren't shared during the audit.

Finding No: TNR-002335

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

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)


Audit Number: AO-000455

Comment	<p>Evidence: 1.3.8 Narrative.docx 1.3.8 Narrative updated.docx 2021 Water Quality Report.pdf</p> <p>Assessment: The City of Winston Salem public water is required to maintain the water provided to the site and ensure that it meets the required standards. Each year a water report is generated by them that outlines the current conditions of the water.</p> <p>All RJRT facilities as per OSHA and standard building codes have the required amount of water access points (sinks; toilets; drinking water). Water coolers are provided throughout the facilities as well to ensure there is no lack of water available to personnel.</p> <p>Staff complement is 72 males and 8 females. A total of 8 toilets, 5 urinals and 2 showers are in place for men; and 8 toilets and 1 shower for women. Eye wash stations, 11 water stations (Bubble Coolers), 8 coffee areas with water source directly plumbed, 25 basins (sinks), 2 ice machines, 4 women's menstrual product stations have been provided.</p>
1.4	<p><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></p>
1.4.1	<p><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></p> <p style="text-align: right;"> in progress</p>
Comment	<p>Evidence: 1.4 EmbeddedWater.xlsx FW Embedded water in a C48 box used at 603.msg</p> <p>Assessment: Embedded water has been quantified from suppliers both within and outside the catchment (watershed) for tobacco. Water risks both inside and outside the catchment/s were determined using the WRI Water Risk Atlas.</p> <p>The site needs to include water quality data for the catchment related to its tobacco suppliers within the catchment.</p> <p style="text-align: right;">Finding No: TNR-002337</p>
1.4.2	<p><i>The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.</i></p> <p style="text-align: right;"> in progress</p>
Comment	<p>Evidence: 1.4 EmbeddedWater.xlsx FW Embedded water in a C48 box used at 603.msg</p> <p>Assessment: The site has identified, and quantified embedded water use from outsourced services for the cardboard boxes it purchases and uses to package the tobacco sheets it manufactures. It has not yet quantified the embedded water use in the wooden pallets and chemicals the site purchases and uses. These wooden pallets and chemicals likely do not originate from within the catchment, but this has not been assessed and/or confirmed yet by the suppliers.</p> <p style="text-align: right;">Finding No: TNR-002338</p>
1.5	<p><i>Gather water-related data for the catchment, including water governance, water balance, water quality, Important Water-Related Areas, infrastructure, and WASH</i></p>

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000455

1.5.1 *Water governance initiatives shall be identified, including catchment plan(s), water-related public policies, major publicly-led initiatives under way, and relevant goals to help inform site of possible opportunities for water stewardship collective action.* in progress 

Comment

Evidence:

1.5.1 Water_Governance.docx

Watershed Report - Headwaters Muddy Creek - Includes Stakeholder Groups - Copy.pdf

futurewaterresourcesplanningscenarios_ypdwmg.pdf

Yadkin Peedee Water Management Group Stakeholder Advisory Committee Meeting Sept 21 2021.docx

Yadkin-Pee Dee Water Management Group Stakeholder Advisory Committee Meeting _5.msg

Yadkin-Pee Dee Water Resources Plan Stakeholder Advisory Committee.msg

YPDWMG 1 Pager.pdf

YPDWMG_Stakeholder-Advisory-Committee-Framework_20200317.pdf


YPDWMG_W.Kerr.Scott_OperationalAlternativesDRAFT_8.16.21.pdf

Assessment:

The site has an overview of Federal, State, Local, and watershed compliance initiatives. It is also aware of the Headwaters Muddy Creek Watershed Report.

The site is aware of initiatives by non-profit groups but has not documented these.

Finding No: TNR-002339

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

Comment

Evidence:

2022 Whitaker Park IUP Permit(3014) -Effective July 1 2022 - June 30 2027.pdf

1.5.2 EF-02A RJRT EHS Legal and Other Requirements.xlsx

NCG060000-General-Permit-20210630-DEMLR-SW (1).pdf

NCG060080_Renewal COC_20210701.pdf


RJRT Whitaker Park 2021 SWPPP 10-18-21.pdf

RJRT Whitaker Park SPCC Plan_090121 (1).pdf

Assessment:

The Legal and Other Requirements Register specifies the legal requirements for the site (and all other RJRT sites in the USA). This includes the expiry date, tickler/trigger date for renewal submissions, Compliance Status, Associated EHS Aspects/Hazards, Applicability Trigger, General Description of Requirements, and the (Site's) Compliance Program.

Integrity test results and NOV tracker (including parameters the site needs to comply with) are also documented.

1.5.3 *The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.* 
closed

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)


Audit Number: AO-000455

Comment Evidence:
 1.5.3 Watershed Water Balance Calculation.xlsx from NC DEQ (explained but still to be provided by the site)
 AGENDA 12-2-2022.docx
 NSAB Meeting Notes 10-7-2022 draft.docx
 1.5.6_Water_Related_Infrastructure_&_Climate_Change.docx

Assessment:
 A Watershed Water Balance Calculation was undertaken by NCDEQ, although the calculation method is now outdated, and the results will be replaced by the SNAP 4.2 Draft Tool that is currently ready for beta-testing. However, this information was explained by the site, but not provided as evidence.

The catchment has not been identified as water scarce, with North Carolina not deemed a drought-prone State according to NOAA. However, the site evidence includes reference to the North Carolina Climate Risk Assessment and Resilience Plan (NCCRARP). The NCCRARP identified that in the past several decades that month long droughts have had recorded higher temperatures which exacerbated the drought problem. Regarding water scarcity, these reports identified heightened risk of more intense droughts.


Finding No: TNR-002591

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.* 
Yes

Comment Evidence:
 1.5.4 Water Quality.docx
 2021 Water Quality Report.pdf
 SWAP Report for WINSTON-SALEM, CITY OF.pdf
 Water_Quality of Streams in Forsyth County Report 2017.pdf
 Watershed Information.docx
 Watershed Report - Headwaters Muddy Creek - Includes Stakeholder Groups.pdf
 2018-NC-Integrated Report.pdf
 Barkers Creek _ NCDEQ Stream Data Downstream of Tobaccoville Plant.xlsx
 NC_2020_DRAFT_INTEGRATED_REPORT.pdf

Evidence:
 The Muddy Creek Waterbody Report provided by the EPA shows specific information regarding the water quality and status of water quality improvement plans (which is none). The information can be found at [https://mywaterway.epa.gov/waterbody-report/21NC01WQ/NC12-94-\(0.5\)b1/2018](https://mywaterway.epa.gov/waterbody-report/21NC01WQ/NC12-94-(0.5)b1/2018)

The data includes physical parameters that have elevated levels and the biological status of the freshwater system, including the condition of aquatic life and human health. This data does not include seasonal or annual variances, which would need to be provided by the EPA.

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.* 
in progress

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000455

Comment	<p>Evidence: 1.5.5 List of IWRAs in Watershed.docx 1.5.5 Narrative.docx Watershed Report - Headwaters Muddy Creek - Includes Stakeholder Groups - Copy.pdf 2018-NC-Integrated Report.pdf Barkers Creek _ NCDEQ Stream Data Downstream of Tobaccoville Plant.xlsx NC_2020_DRAFT_INTEGRATED_REPORT.pdf</p> <p>Assessment: The site has identified various creeks within and adjacent to the catchment. However, only Muddy Creek has been evaluated in terms of its status. The site has not evaluated any potential IWRAs in the catchment as to whether they qualify as IWRAs or not in terms of the AWS definition.</p> <p style="text-align: right;">Finding No: TNR-002341</p>
1.5.6	<p><i>Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.</i></p> <p style="text-align: right;"> in progress</p>
Comment	<p>Evidence: 1.5.6 Water Related Infrastructure & Climate Change.docx 2020-Climate-Risk-Assessment-and-Resilience-Plan.pdf City of Winston-Salem Water Treatment System.pdf futurewaterresourcesplanningscenarios_ypdwmg - Copy.pdf NC-Climate-Science-Report_Plain_Language_Summary_Final_September2020_smaller.pdf NorthCarolina-StateClimateSummary2022.pdf WWTP Flow.pdf</p> <p>Assessment: The site identified the following existing water-related infrastructure: - W. Kerr Scott Reservoir is located in the Yadkin River Valley - Swann WTP 25 MGD built in 2004 - Thomas WTP 18 MGD built in 2011 - Neilson WTP 48 MGD originally built in 1961 at 24 MGD. - City of Winston-Salem Water Treatment System - Archie Elledge and Mudd Creek Wastewater Treatment Plants</p> <p>The current status and nature of current and proposed upgrades to the Neilson WTP have been documented, but not the status of any of the other infrastructure.</p> <p>The site has considered the North Carolina Climate Science Report (NCCSR), which is a scientific assessment of historical climate trends, and the NC Climate Risk Assessment and Resilience Plan (NCCRARP) that identified the increased risk of higher annual precipitation, heavier and more intense precipitation, dry seasons of the year expected to be hotter and drier, and heightened risk of more intense droughts. However, this has not been translated into the identification of exposure risks of the existing water-related infrastructure in the catchment.</p> <p style="text-align: right;">Finding No: TNR-002343</p>
1.5.7	<p><i>The adequacy of available WASH services within the catchment shall be identified.</i></p> <p style="text-align: right;"> in progress</p>
Comment	<p>Evidence: 1.5.7 WASH.docx Reg and Reputational Risk.docx</p> <p>Assessment: Physical risks and untreated water connections in the catchment were identified as being low using the Aqueduct Tool. However, this has not resulted in the identification of the adequacy of available WASH services within the catchment, nor the level of access to safe drinking water, sanitation, and water-related hygiene.</p>

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000455

Finding No: TNR-002344

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.*


Yes

Comment

Evidence:

1.6 water challenges.xlsx
futurewaterresourcesplanningscenarios_ypdwmg.pdf
YPDWMG_W.Kerr.Scott_OperationalAlternativesDRAFT_8.16.21.pdf

Assessment:

The following shared water challenges were identified, described, prioritized by the site:

- Climate Change
- Protection of river's water quality and biodiversity
- Rapid population growth affecting drinking water supplies
- Sustainable agricultural production
- Protection of environment & water quality
- Protection of quality of water & recreational use

Each of the site's key stakeholders were listed and these challenges allocated to each stakeholder based on their interest/s and/or impact/s. The site then identified the current stakeholder initiatives to address these challenges and Reynolds' current and proposed initiatives to address these challenges.

The site is aware of the contents of the Yadkin-Pee Dee Water Management Group (YPDWMG) Water Resources Plan. The YPDWMG incorporated a detailed analysis of future modelling and desktop analysis efforts to evaluate future "what-if" scenarios and their impact on the region's available water supply and water quality within the Yadkin-Pee Dee River Basin. As part of this effort, HDR collected survey responses through direct correspondence with YPDWMG members and an online survey to select the planning scenarios for detailed analysis as part of the Water Resources Plan.

The site is also aware of the Roadmap for Increased Public Water Supply Reliability for the W. Kerr Scott Reservoir, developed by the Yadkin-Pee Dee Water Management Group. This included an analysis of potential operational changes at the W. Kerr Scott Dam and Reservoir.

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


Yes

Comment

Evidence:

1.6 water challenges .xlsx
futurewaterresourcesplanningscenarios_ypdwmg.pdf
YPDWMG_W.Kerr.Scott_OperationalAlternativesDRAFT_8.16.21.pdf

Assessment:

The site identified a suite of shared water challenges in the catchment and then identified the current stakeholder initiatives to address these challenges and Reynolds' current and proposed initiatives to address these challenges.

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

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


in progress

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Comment Evidence:
1.7 Water Risk & Opportunities.xlsx

Assessment:
The site identified the following water risks to the organization, which were assessed in terms of their potential impact and their likely frequency, and then prioritized:

- Sudden Water Infrastructure Failure (Breaks/Leaks)
- Water contamination outbreak in Supply
- Water Supply Disruption
- Vulnerability to extreme weather: Earthquakes (indirect on water)
- Vulnerability to extreme weather: Severe Cold (indirect on water)
- Vulnerability to extreme weather: Drought
- Exceeding IUP permit limits
- Exceeding Stormwater permit limits
- Causing pollution of water source
- Public awareness of any regulatory breach
- Perceived cause of negative impacts on other water users and/or the natural water environment
- Perception that the sites uses too much water adversely impacting the "social license to operate".

However, the site did not determine the likelihood of these risks occurring.

Finding No: TNR-002345

1.7.2 *Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.* 
No

Comment Evidence:
1.7 Water Risk & Opportunities.xlsx

Assessment:
The following water-related opportunities were identified:

- Reduce water consumption by 35% by 2025 (absolute volume not intensity)
- Recycle 30% of water by 2025
- Addressing shared water challenge: Stakeholder Engagement Activities.


High level opportunities for participation were listed, but not appropriately described for each opportunity to clearly reflect how the site might implement such opportunities (e.g., reducing water use, recycling water).

Relative Beneficial Impacts were rated and the positive impacts of such opportunities on stakeholders was identified, although these positive impacts should rather be specified as shared value creation under 1.3.6 and 4.1.2 in the future once implemented.

An assessment and prioritization of potential savings and business opportunities was not undertaken.

Finding No: TNR-002346




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

1.8.1 *Relevant catchment best practice for water governance shall be identified.* 
Obs.

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Comment	<p>Evidence: 1.8. Best Practices.docx</p> <p>Assessment: Reynolds identified the following contributions to water governance:</p> <ol style="list-style-type: none"> 1. Advocating for integrated water governance at the catchment level <ol style="list-style-type: none"> a. Reynolds is a board member on the Stakeholder Advisory Committee for Integrated Water Resources Plan within the Yadkin–Pee Dee Water Management Group 2. Engaging with peer organizations and stakeholders to promote water stewardship <ol style="list-style-type: none"> a. Sponsoring local stakeholders and contributing to volunteering with our stakeholders 3. Demonstrating support for good water governance and stewardship with authorities <ol style="list-style-type: none"> a. The Yadkin – Pee Dee Water Management Group is a Public-Private partnership b. Complying with local, state, and federal water related regulatory requirements 4. Internal monthly reporting of water use; discharge; and recycle that is submitted to corporate ESG for review. <p>Some of these actions constitute best practice (e.g., Advocating for integrated water governance at the catchment level), whilst others (e.g., Complying with local, state, and federal water related regulatory requirements) only constitute standard industry practice.</p>	
1.8.2	<p><i>Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.</i></p>	 Obs.
Comment	<p>Evidence: 1.8. Best Practices.docx</p> <p>Assessment: The site identified the following relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use):</p> <ol style="list-style-type: none"> 1. Training workers on how to improve efficiency in the work they do, and on basic daily activities, such as switching off taps. <ol style="list-style-type: none"> a. IWS [Integrated Work System] – Continual Improvement Program 2. Implementing leak detection activities to reduce losses 3. Utilities follows strict protocol regarding blowdowns and cycle calculations to ensure priority of high efficiency and water reduction. <p>The site should also consider available new technologies to reduce water use and improve its water use efficiency and water balance.</p>	
1.8.3	<p><i>Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.</i></p>	 closed
Comment	<p>Evidence: 1.8. Best Practices.docx</p> <p>Assessment: The site identified that it uses water quality criteria established by the State of North Carolina. Reynolds meets all regulatory requirements for this site. However, meeting regulatory compliance obligations does not in itself constitute best practice.</p> <p style="text-align: right;">Finding No: TNR-002349</p>	
1.8.4	<p><i>Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.</i></p>	 Obs.

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Comment	<p>Evidence: 1.8. Best Practices.docx</p> <p>Assessment: Reynolds is committed to Adopt-A-Stream. As part of this commitment Reynolds quarterly sponsors volunteers to remove trash and other pollutants from Mill Creek [off-site].</p> <p>The site should also identified other relevant catchment best practices for site maintenance of Important Water-Related Areas. This does not mean that the site has to be involved in such opportunities but needs to be aware of them.</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.docx</p> <p>Assessment: The site identified that it is committed to supplying safe drinking water for all employees. Water is supplied from the City of Winston-Salem, which routinely provides safe drinking water in compliance with regulatory standards. Backflow prevention devices are periodically inspected per regulation. However, this is a legal requirement and does not constitute best practice at a sectoral or catchment level.</p> <p>The site needs to identify relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services.</p>	

Finding No: TNR-002351

Audit Number: AO-000455

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 *A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:*

- That the site will implement and disclose progress on water stewardship program(s) to 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.*



closed

Comment

Evidence:
AWS - Disclosure.ppt
RJRT Alliance for Water Stewardship Annual Disclosure.pdf
www.BAT.com/principles
2.1 EHS Policy & ESG Reporting.doc

Assessment:
Indications of a commitment PowerPoint was shared with a few stakeholders via email, with the commitment stated as: "All Reynolds American Sites are Committed to the Principles of the Alliance for Water Stewardship and are Actively Working on Creating the Internal Structure Required for a Successful Water Stewardship Plan". The PowerPoint needs to include the commitments more explicitly, be signed, and show evidence of being in a publicly-disclosed area.

The company's website has some public disclosure on water stewardship goals, but there needs more explicit details of the commitment to water stewardship and the AWS standard, specifically as required in the sub-indicators of this indicator. There also needs to be a leadership signature attached to that commitment.

Finding No: TNR-002281

2.2 *Develop and document a process to achieve and maintain legal and regulatory compliance.*

2.2.1 *The system to maintain compliance obligations for water and wastewater management shall be identified, including:*

- Identification of responsible persons/positions within facility organizational structure*
- Process for submissions to regulatory agencies.*



Yes

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Comment Evidence:
2022 Whitaker Park IUP Permit(3014) -Effective July 1 2022 - June 30 2027.pdf
NCG060080_Renewal_COC_20210701.pdf
NCG060000-General-Permit-20210630-DEMLR-SW_(1).pdf
1.5.2 EF-02A RJRT EHS Legal and Other Requirements.xlsx
2.2 Achieving Compliance.doc
Compliance Reports2022-01 WP IUP Flow Results Data.pdf
Compliance Reports2022-02 WP IUP Flow Results Data.pdf
Compliance Reports2022-03 WP IUP Flow Results Data.pdf
Compliance Reports2022-04 WP IUP Flow Results Data.pdf
Compliance Reports2022-05 WP IUP Flow Results Data.pdf
Compliance Reports2022-06 WP IUP Flow Results Data.pdf
Compliance Reports2022-07 WP IUP Flow Results Data.pdf
Compliance Reports2022-08 WP IUP Flow Results Data.pdf
Compliance Reports2022-09 WP IUP Flow Results Data.pdf
Compliance ReportsQ1 20222022 Q1 DMR WP Submitted.pdf
Compliance ReportsQ1 20222022 Q1 DMR WP Signed.pdf
Compliance ReportsQ1 20222022 Q1 Pace WP Report.pdf
Compliance ReportsQ1 20222022 Q1 Whitaker Park SDO Forms.pdf
Compliance ReportsQ2 20222022 WP 2022 Q2 Stormwater NPDES Permit Discharge Monitoring Report.pdf
Compliance ReportsQ2 20222022 Q2 DMR Signed.pdf
Compliance ReportsQ2 20222022 Q2 DMR.pdf
Compliance ReportsQ3 2022RJR Whitaker Park SDO Forms.pdf
Compliance ReportsQ3 2022WP Lab Report 92628657_frc.pdf
Compliance ReportsQ3 20222022 Q3 WP DMR Submission.pdf
Compliance ReportsQ3 20222022 Q3 WP DMR.pdf
Compliance ReportsQ3 20222022 Q3 WP Signed DMR.pdf
RJRT WP July 2021 to August 2022.pdf
WP Process Flow-Water Balance.pdf
RJRT Whitaker Park 2021 SWPPP 10-18-21.pdf
RJRT Whitaker Park SPCC Plan_090121 (1).pdf
WP 2021 Water Totals From CR360.xls
RJRT - Whitaker Park SW (Pace Project # 92606743).msg

Assessment:

2.2 Achieving Compliance.doc indicates: "Reynolds' Whitaker Park location has a long historical record of environmental compliance with a handful of instances throughout the years where there was a reading that exceeded limits. Current permits held by the facility include Title V air permit; General Stormwater Permit; Wastewater IUP Permit. Reynolds communicates regularly with local regulatory agencies to ensure a good working relationship and continued compliance. Any changes in Whitaker Park's current business if they affect local authorities must approve waste/water/air before the change. Environmental, Health, and Safety must review any new projects before starting to ensure there are no potential issues.


"Whitaker Park IUP Permit" indicates the industry permit for RJRT, the permit modification history, and the effluent requirements to maintain compliance (with monitoring requirements), though it does not indicate responsible parties to maintain compliance. Similarly, for stormwater discharge permits.

The Legal and Other Requirements Register specifies the legal requirements for the site (and all other RJRT sites in the USA). This includes the expiry date, tickler/trigger date for renewal submissions, Compliance Status, Associated EHS Aspects/Hazards, Applicability Trigger, General Description of Requirements, and the (Site's) Compliance Program. This also reflects the actions the site is implementing. Integrity test results and NOV tracker (including parameters the site needs to comply with) are also documented. The specific job titles of those accountable and responsible for compliance efforts were not specified, but the current version has reflected the three teammates responsible for all compliance for the site.


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- 2.3** *Create a water stewardship strategy and plan including addressing risks (to and from the site), shared catchment water challenges, and opportunities.*
- 2.3.1** *A water stewardship strategy shall be identified that defines the overarching mission, vision, and goals of the organization towards good water stewardship in line with this AWS Standard.* 
Yes


Comment Evidence:
2.3 Water_Stewardship_Strategy.doc

Assessment:
The site's Water Stewardship Strategy identifies the mission, vision, and goals of RJRT for good water stewardship.
- 2.3.2** *A water stewardship plan shall be identified, including for each target:*
 - How it will be measured and monitored
 - Actions to achieve and maintain (or exceed) it
 - Planned timeframes to achieve it
 - Financial budgets allocated for actions
 - Positions of persons responsible for actions and achieving targets
 - Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.
in progress

Comment Evidence:
Water Stewardship Tabular Plan.xls
Whitaker Park H1 2022 Water Roadmap .xlsx

Assessment:
Water Stewardship Plan (WSP) includes measurements, target actions, general timeframes, estimated budgets for most, general information about responsibility, and lines to AWS Outcomes. However, the plan is missing quantified targets that can be measured over time, specified roles of those responsible for projects/actions, and the timeframes are not clearly timebound.

The site has a Water Road Map with operational initiatives they'll be working on that should be incorporated into the Water Stewardship Plan to ensure the plan is looking at site and catchment efforts.

Finding No: TNR-002295
- 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.* 
closed

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Audit Number: AO-000455

Comment

Evidence:

Tobacco_Processing_603-1_Emergency_Response_Plan_2020V1.doc
2020-Climate-Risk-Assessment-and-Resilience-Plan.pdf
RJRT_Whitaker_Park_SPCC_Plan_090121_(1).pdf
WP_TRI_RY_2020_Facility_eReceipt.pdf
RJRT_Whitaker_Park_2021_SWPPP_10-18-21.pdf
Business Continuity Plan (not shared) --> RJRT_BCP_RECON_2022_09_13_V6.docx
2.4 Whitaker Park Industrial User Permit Notification Requirements Training.docx
2.4 603-1 QWP IUP Notification read and understand.pdf

Assessment:

The site's "Emergency Response Plan" indicates responses to "severe weather", but does not explicitly indicate any particular events related to water risk.

The site provided the "North Carolina Climate Risk Assessment and Resilience Plan", but it does not indicate that RJRT had any role in its development.

The site's SPCC speaks to chemical-related water risk mitigation and adaptation.

The TRI Facility Form indicates who are responsible for toxic release inventories only.

The site's Business Continuity Plan (which is confidential) was shown on-screen and explained during the on-site audit. The document does not indicate information related to water supply availability (flooding, drought, etc.).

The site needs to create an explicit plan for identifying and adapting to water-related risks in consultation with the City of Winston-Salem. For example, if there is a reduction or stopping of water supply services, the site needs to indicate how it will respond, how it will respond if there is contamination of Silas Creek at the stormwater output that it shares with the property next to it. The site also needs to identify what water-related risks could occur, with clear responses and rectification measures.

Finding No: TNR-002283

Audit Number: AO-000455

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.*


Obs.

Comment

Evidence:

Feedback from YRK- RE_ RJRT Alliance for Water Stewardship Annual Disclosure.pdf
3.1 Good Catchment Governance (1).doc
8-19-2021 Adopt A Stream Clean Up Day.doc
2022 GAPC Certification Compliance Guide_V10 FINAL.pdf
futurewaterresourcesplanningscenarios_ypdwmg.pdf

Assessment:

Evidence was provided that the site received feedback on water stewardship from catchment stakeholders. Also, the documentation reflects that the site is an active participant in catchment governance in the watershed, including participating in the Yadkin Pee Dee and Lumber Combined Hydrologic Model process and the Yadkin – Pee Dee Water Management Group Stakeholder Advisory Board (where the site represents a sub-group of Industry and Economic Development) during the development of a water resources plan for the catchment. RJRT also states it is actively engaged with the Keep Winston-Salem Beautiful (KWSB) initiative, and participates in Adopt-A-Stream with KWSB for Mill Creek, which includes at least 3 annual clean-ups. Through RJRT's Leaf Division, the company also implements good governance activities and the GAP program for good agricultural practices for tobacco farming, but this does not relate directly to site operations at Winston-Salem

The dates when RJRT joined these stakeholder groups and engaged with Adopt-A-Stream etc. have not been documented and evidence of participation provided (e.g., emails, attendance registers and minutes of meetings, photographs of clean-ups) was not provided. It is unclear from the documentation if RJRT was involved in these governance groups' publications.

The site has not indicated how their engagement in this catchment governance work is reflected and integrated into its WSP.

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.*


in progress

Comment

Evidence:

3.1 Good Catchment Governance (1).doc
1.3.6_Whitaker_Park_IWRA.docx

Assessment:

Document states that the site and local stakeholders are unaware of any indigenous people in the area. The site advised that there is not a tribal community within Forsyth County, as declared by the state of North Carolina Indian Affairs (<https://ncadmin.nc.gov/about-doa/divisions/commission-of-indian-affairs>). It is also illustrated in Figure 4 of 1.3.6_Whitaker_Park_IWRA.do that that Forsyth County does not have a tribal community present.

However, the site has not identified any measures to respect the water rights of others.




Finding No: TNR-002583

3.2 *Implement system to comply with water-related legal and regulatory requirements and respect water rights.*

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- 3.2.1** *A process to verify full legal and regulatory compliance shall be implemented.* 
Yes
- Comment Evidence:
RJRT_Whitaker_Park_2021_SWPPP_10-18-21.pdf
1.5.2 EF-02A RJRT EHS Legal and Other Requirements.xlsx
3.2 EF-02A RJRT EHS Legal and Other Requirements.xls
- Assessment:
The site's Stormwater Pollution Prevention Plan indicates its regulatory obligations for pollution prevention through stormwater management systems.
- The site has a system to verify legal compliance. Column K through M in the spreadsheet speaks to these processes - the new version (3.2 EF-02A RJRT EHS Legal and Other Requirements.xls) indicates evidence of the documentation they have to share (ex: annual reports for monitoring stormwater) for compliance to indicate evidence of implementation.
- 3.2.2** *Where water rights are part of legal and regulatory requirements, measures identified to respect the water rights of others including Indigenous peoples, shall be implemented.* 
closed
- Comment Evidence:
1.5.2 EF-02A RJRT EHS Legal and Other Requirements.xlsx
- Assessment:
The site has not identified if water rights are part of legal and regulatory requirements. If applicable, it has not identified measures to respect the water rights of others.
- The site has provided evidence that there are no indigenous groups in the catchment.
Finding No: TNR-002298
- 3.3** *Implement plan to achieve site water balance targets.*
- 3.3.1** *Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.* 
in progress

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Audit Number: AO-000455

Comment Evidence:
 Water Stewardship Tabular Plan.xls
 3.3 Water Balance Targets.doc
 4.1.1 Tabular Plan.xlsx

Assessment:
 The site identified the following water balance targets and actions in its WSP:
 - Achieve AWS Certification and Develop system for Shorefair based on existing system at TVL and work performed by SCS for Clarksville location (however, this relates to a different site)(Target 1).
 - Reduce water usage by 35% by 2025 and Water usage reporting, 5-Year Plan, & BAT Water Road Map (Target 4)
 - Increase water metering capabilities of each area of site and Install metering in each area of facility (Target 5).

The site's Water Stewardship Tabular Plan states that "Since 2017, we have had a water reduction of XX%. Since 2014, we have reduced water consumption by XX%. Whitaker Park currently recycles XX% of the water consumed. To meet 2025 water reduction and recycling goals, the company has scoped out operational transformation and modernization projects that would result in both goals being achieved".

4.1.1 Tabular Plan.xlsx reflects the status of progress towards achieving the above targets, but the action for Target 1 needs to be amended to be correct, Target 4 data relates to violations so is not correct in relation to the target and action set in the WSP, and the data for Target 5 speaks to water recycled and water use but not the installation of meters as per the action identified for Target 5 in the WSP. Also, data for Water Recycled and Water Use data is reflected, but incorrectly so under Target 5 instead of Target 4.

Finding No: TNR-002299

3.3.2 *Where water scarcity is a shared water challenge, annual targets to improve the site's water use efficiency, or if practical and applicable, reduce volumetric total use shall be implemented.* 🚩

Comment Evidence:
 Water Stewardship Tabular Plan.xls
 1.6_water_challenges.xls
 WP 2021 Water Totals From CR360.xls
 3.3 Water Balance Targets.doc
 3.3 Utility Expenditures & Results.xls
 1.5.6_Water_Related_Infrastructure_&_Climate_Change.docx

Assessment:
 The WSP includes a goal under Target 4 to "Reduce water usage by 35% by 2025" and to "Recycle 30% of water by 2025".

4.1.1 Tabular Plan.xlsx reflects data for Water Recycled and Water Use data, but incorrectly under Target 5 instead of Target 4. However, both sets of data reflect generally negative trends, not improvements.

Also, the WSP states that there is "no significant challenge of water scarcity", but also that "the region rarely has seasonal droughts that pose some restrictions for crops in localized areas, but not to an extent that is affects the overall availability of water" and the NC Climate Risk Assessment and Resilience Plan (NCCRARP) provided in the site's evidence confirms this. These statements appear to be at least partially contradictory and require clarification and/or further explanation.

Finding No: TNR-002584



3.3.3 *Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.* ✅

Yes

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Comment	<p>Evidence: 3.3 Water Balance Target.doc</p> <p>Assessment: The site does not reallocate water savings to other parties or areas.</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>	 in progress
Comment	<p>Evidence: 3.4 Water Quality Targets (1).doc 4.1.1 Tabular Plan.xlsx Water Stewardship Tabular Plan.xlsx 2021 01 WP TSS BOD.pdf to 2022 Q3 WP Signed DMR (1).pdf 2020 Water Quality Report .pdf 2021 Water Quality Report.pdf City of Winston-Salem-Quality of Water Provided 2019 - Copy.pdf SWAP Report for WINSTON-SALEM, CITY OF.pdf</p> <p>Assessment: The site does not discharge directly to a water body, but to the city of Winston-Salem wastewater treatment plant. Treatment limits are set to ensure that the wastewater treatment plant effluent meets state and federal water quality criteria. The site's target is to "Comply with all permit requirements" (Target 3 in the WSP) and to "Act upon any issues discovered during quarterly inspections". The site has advised that its discharges are well below the threshold of the parameters for effluent pre-treatment. However 4.1.1 Tabular Plan.xlsx reflects that there have been (process) wastewater quality exceedances due to operational upset conditions, but none of these have constituted violations.</p> <p>The site operates under a general stormwater permit issued by the state that requires analytical monitoring to ensure effluent does not exceed the specified benchmark values. The benchmark values are set as an indicator of discharge water quality based largely on EPA aquatic life criteria. The site has advised that it has not exceeded these benchmark limits.</p> <p>4.1.1 Tabular Plan.xlsx (Target 3) reflects performance against the legal requirements, but needs to be strengthened to clearly reflect which data relate to effluent versus stormwater. The data for stormwater could be strengthened by reflect not only the lack of violations, but actual water quality results against the limits set per parameter in the permit requirements.</p> <p style="text-align: right;">Finding No: TNR-002310</p>	
3.4.2	<i>Where water quality is a shared water challenge, continual improvement to achieve best practice for the site's effluent shall be identified and where applicable, quantified.</i>	 closed

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Comment	<p>Evidence: AWS - Disclosure.ppt 3.4 Water Quality Targets (1).doc</p> <p>Assessment: Water quality was identified as a shared water challenge. The AWS - Disclosure.ppt presentation indicates identified (and some quantified) actions including: - Aggressive target established for all Reynolds American Facilities to be Alliance for Water Stewardship (AWS) Certified by 2025 - Aggressive target established to Decrease Water Usage by 35% by 2025 - Aggressive target established to Increase the Amount of Water Recycled by 30% by 2025 - Ensure the Farmers Used Abide by Good Agricultural Practices (GAP) - Regulatory Compliance Remains a Top Priority - Promote Good Stewardship by Actively Participating in Clean Up Efforts in Local Communities</p> <p>However, the WSP only reflects legal compliance as the target set, which in the site's context does not constitute best practice.</p> <p>The site has recently had challenges maintaining TSS & BOD levels below legal limits. Finding No: TNR-002287</p>
3.5	<i>Implement plan to maintain or improve the site's and/or catchment's Important Water-Related Areas.</i>
3.5.1	<i>Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.</i>
Comment	<p>Evidence: 3.5 IWRA Targets (1).doc</p> <p>Assessment: There are no IWRAs at the Whitaker Park site.</p>
3.6	<i>Implement plan to provide access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers at all premises under the site's control.</i>
3.6.1	<i>Evidence of the site's provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers onsite shall be identified and where applicable, quantified.</i>



Yes



Obs.

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Audit Number: AO-000455

Comment Evidence:
 3.6 WASH Targets.docx
 2021 Water Quality Report.pdf
 1.3.8 Narrative updated.docx

Assessment:
 The site's drinking water is provided by the City of Winston-Salem and is approved for drinking. Sanitary facilities are prescribed in local building code and OSHA requirements and the site has specified the required number based on occupancy, gender, and accessibility needs. Each year a water report is generated by the City that outlines the current condition of the drinking water provided.

All RJRT facilities as per OSHA and standard building codes have the required amount of water access points (sinks; toilets; drinking water). Water coolers are provided throughout the facilities as well to ensure there is no lack of water available to personnel.

The site's staff complement is currently 72 males and 8 females. A total of 8 toilets, 5 urinals and 2 showers are in place for men; and 8 toilets and 1 shower for women. Eye wash stations, 11 water stations (Bubble Coolers), 8 coffee areas with water source directly plumbed, 25 basins (sinks), 2 ice machines, 4 women's menstrual product stations have been provided. However, a few of these facilities are very old and could benefit from upgrading.

3.6.2 *Evidence that the site is not impinging on the human right to safe water and sanitation of communities through their operations, and that traditional access rights for indigenous and local communities are being respected, and that remedial actions are in place where this is not the case, and that these are effective.* in progress 


Comment Evidence:
 3.6 WASH Targets.docx
 2021 Water Quality Report.pdf
 2021 01 WP TSS BOD.pdf to 2022 Q3 WP Signed DMR (1).pdf

Assessment:
 The site has advised that it does not take actions that have a negative impact to the community water supplies. The water quality results reflect only minor periodic exceedances for (process) effluent that have not impinged on the human right to safe water and sanitation of communities, and that effective remedial actions are in place and have been implemented where this has not been the case.

However, the site has not provided any evidence that traditional access rights for local communities are being respected.

Finding No: TNR-002586

3.7 *Implement plan to maintain or improve indirect water use within the catchment:*

3.7.1 *Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.* in progress 

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Audit Number: AO-000455

Comment Evidence:
 3.7 Indirect Water Use.doc
 2022 GAPC Certification Compliance Guide_V10 FINAL.pdf
 3.7 Leaf-ESG-Report.pdf

Assessment:
 Reynolds Good Agricultural Practices (GAP) Program ensures that all tobacco suppliers are compliant with best practices. If non-compliance is present, the program works with the supplier to improve practices to ensure compliance. Reynolds Procurement is working with each supplier encouraging them to improve their practices. Reynolds is supplied by tobacco inside and outside of the site's catchment; the GAP program works with all tobacco suppliers. Reynolds Procurement team works primarily with suppliers outside of the site's watershed.

However, no indirect water use targets were set in the WSP and no evidence was provided of indirect water use performance.

Also, the GAP program activities are not incorporated into the WSP.

Finding No: TNR-002305

3.7.2 *Evidence of engagement with suppliers and service providers, as well as, when applicable, actions they have taken in the catchment as a result of the site's engagement related to indirect water use, shall be identified.* 🚩 in progress

Comment Evidence:
 3.7 Indirect Water Use.doc
 2022 GAPC Certification Compliance Guide_V10 FINAL.pdf
 Aug 17 Ops Pit Stop Q3 2022.pdf (shown on screen)
 Leaf-ESG-Report.pdf

Assessment:
 Reynolds Good Agricultural Practices (GAP) Program ensures that all tobacco suppliers are compliant with best practices. If non-compliance is present, the program works with the supplier to improve practices to ensure compliance. Reynolds Procurement is working with each supplier encouraging them to improve their practices. There are documents attached providing evidence of this. Reynolds is supplied by tobacco inside and outside of the site's catchment; the GAP program works with all tobacco suppliers. Reynolds Procurement team works primarily with suppliers outside of the site's watershed.

However, no evidence was provided of the site engaging with suppliers and service providers, and if/when applicable actions they have taken in the catchment as a result of the site's engagement related to indirect water use.

Finding No: TNR-002306

3.8 *Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have.*

3.8.1 *Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.* 🚩 in progress

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000455

Comment Evidence:
3.8 Infrastructure.docx
Joel Freeman May 11 Conversation.pdf

Assessment:
The site advised that there are no current concerns that need to be addressed and that during periodic routine City inspections (wastewater and stormwater) the site uses that opportunity to engage regarding any issues or concerns, which was confirmed by the City of Winston-Salem during the stakeholder interviews. The site is proud of having and supporting a good relationship with the City of Winston-Salem Utilities (both water supply and WWTP).

However, the site shares a stormwater outlet, which discharges into the Muddy Creek, with their immediate neighbour to the north-west of the site. Consequently the potential exists for pollution from either site via stormwater into the Muddy Creek, which requires co-ordination to avoid and/or minimize potential impacts. The site has not implemented plan to engage with and notify this neighbour on this matter.

Finding No: TNR-002587

3.9 *Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.*

3.9.1 *Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.*



in progress

Comment Evidence:
AWS - Disclosure.ppt
3.9 AWS Best Practices.doc
3.9.11 and 3.9.12 List of Efforts & Collective Efforts.xls

Assessment:
The site identified the following actions:
- Became a Member of the Yadkin-Pee Dee Water Management Group Advisory Board representing the industrial sector
- Began actively reaching out to local stakeholders to promote collaboration with the goal of communication with all stakeholders at least annually
- Report to internal stakeholders on progress toward key metrics on a monthly basis.

To date, action 1 has been completed, action 2 has commenced, and action 3 has not taken place yet. This could be strengthened by describing how each of these actions will contribute towards better water governance.

Finding No: TNR-002290

3.9.2 *Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.*





in progress

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Alliance for Water Stewardship (AWS)

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Comment	<p>Evidence: 3.9 AWS Best Practices.doc 3.9.11 and 3.9.12 List of Efforts & Collective Efforts.xls</p> <p>Assessment: The site is currently working on a sitewide project to implement water metering in each area of the facility to provide a more detailed understanding of water use throughout the facility. However, clear demonstration of the installation of water metering across the facility was not provided. The metering goals have not been made SMART, to inform whether they can be determined as best practices or not.</p> <p>The Utilities Department also follows strict protocol regarding blowdowns and cycle calculations to ensure priority of high efficiency and water reduction.</p> <p>The site, through its IWS continual improvement program, is training workers on how to improve efficiency in the work they do. The site also undertakes a leak detection program, followed up by actions to reduce leaks. However, a large number of leaks were detected during the on-site audit. Finding No: TNR-002307</p>	
3.9.3	<p><i>Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.</i></p>	 closed
Comment	<p>Evidence: 2021_Water_Quality_Report.pdf 3.9 AWS Best Practices.doc</p> <p>Assessment: The site identified legal compliance as the proposed action, but legal compliance within the context of the site does not constitute best practice. Also, the site has had exceedances above legal limits for effluent.</p> <p>RJRT stated they voluntarily test their effluent monthly, which is more frequent than the quarterly compliance requirements. However, this has not been reflected in the WSP. Finding No: TNR-002291</p>	
3.9.4	<p><i>Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.</i></p>	 in progress

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000455


Comment Evidence:
3.9 AWS Best Practices.doc
Reynolds Adopt A Stream contract.pdf
Adopt a Stream Aug 2021- Stream Cleanup Info.pdf

Assessment:
The site does not have an IWRA on site.

The site identified the following actions for implementation in support of IWRA's in the catchment:
- Achieve AWS Certification and Develop system for Shorefair based on existing system at TVL and work performed by SCS for Clarksville location. However, this erroneously refers to a different site and does not constitute best practice).
- Engage, consult, and participate with local stakeholders and Attend Yadkin - Pee Dee Water Management group meetings and represent Industry on the Stakeholder Advisory Board.
- Comply with all permit requirements and Act upon any issues discovered during quarterly inspections. However, this does not constitute best practice.

To date the site has implemented the following actions, which need to be integrated into the WSP:
- Reynolds is 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].
- Reynolds is also committed to its stakeholders and routinely participates in stakeholder engagement, but this does not constitute best practice.

Finding No: TNR-002383

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

Comment Evidence:
3.9 AWS Best Practices.doc

Assessment:
The site has advised that Reynolds is committed to supplying safe drinking water for all employees. Reynolds is supplied water from the city of Winston-Salem, which routinely provides safe drinking water in compliance with regulatory standards. Reynolds provides high standards for toilets and washrooms for all employees. Reynolds also provides showers in the workout facility for all employees. However, this does not constitute best practice.

The site provided free access to menstrual products in the women's bathrooms, which is considered a best practice for WASH. This should be integrated into the WSP and reflected as best practice.

The site should consider how it can support WASH efforts in the catchment beyond the site's boundaries (e.g., for homeless individuals in the city). Again, this would need to be reflected in the WSP.

Finding No: TNR-002309

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000455

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

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

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

Comment Evidence:
 AWS - Disclosure.ppt
 Water Stewardship Tabular Plan.xls
 4.1.1 Tabular Plan.xls
 4.1 Site Performance.doc

Assessment:
 The evaluation was undertaken in the WSP Tabular Plan in Q4 2021, but not for all actions identified in the WSP.

Action 1 was implemented and assessed. Action 2 was not implemented and was evaluated as N/A.

Action 3 and 4 were implemented and evaluated, including tracking of violations as the action was to "Maintain compliance through quarterly and semi-annual sample testing".

Action 5 the site did not implement any actions, but did evaluate its current performance.

Action 6 was not implemented and consequently wasn't evaluated.

Action 7, 8 and 9 were implemented, but not documented in terms of actions undertaken and not evaluated.

Finding No: TNR-002314

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

Comment Evidence:
 Section 4.1.2.xlsx (Financial Cost-Benefit for AWS Implementation)
 4.1 Site Performance.doc

Assessment:
 The site has quantified their water-related costs linked to water infrastructure improvement projects but has not quantified the benefits although these have been described. The new version of "Section 4.1.2.xls" ((Financial Cost-Benefit for AWS Implementation) quantifies costs but not benefits.

Finding No: TNR-002315

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

Comment Evidence:
 4.1.3.xlsx
 4.1 Site Performance.doc

Assessment:
 Shared-Value Benefits have been identified at a high level, but not quantified. Water quality and water balance have been considered, but WASH was not reflected beyond high-level legal compliance.

Finding No: TNR-002316

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000455

4.2 Evaluate the impacts of water-related emergency incidents (including extreme events), if any occurred, and determine the effectiveness of corrective and preventative measures.

4.2.1 A written annual review and (where appropriate) root-cause analysis of the year's emergency incident(s) shall be prepared and the site's response to the incident(s) shall be evaluated and proposed preventative and corrective actions and mitigations against future incidents shall be identified.

Q
Obs.

Comment Evidence:
AWS - Disclosure.ppt
RAI_IBC_BC_Evidence_Exercise_Recon_2022.docx
4.2 Emergency Incidents.doc

Assessment:
The site had to evacuate on Monday January 31, 2022 until Friday February 4, 2022 due to a fire at a nearby fertilizer plant. The fire posed potential air quality, explosion, and downstream water quality impacts and risks. The company's regional group safety staff deal with such emergency incidents. The BCP response to the fertilizer plant fire was documented, reviewed, and Opportunities for Improvement identified. However, the rating of the site's emergency response was not explained and no description of effectiveness was provided in the review.

RJRT Whitaker Park has noted that it had two (2) NOV's issued for Wastewater Permit exceedances related to BOD & TSS. The first is from July sampling results and the second from August sampling results. However, these exceedances above permit conditions should not be deemed as emergency incidents.

4.3 Evaluate stakeholders' consultation feedback regarding the site's water stewardship performance, including the effectiveness of the site's engagement process.

4.3.1 Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.

➔
in progress

Comment Evidence:
4.3 Stakeholder Consultation.doc
5.2 Stewardship Plan Stakeholder Disclosure.docx
RJRT_Alliance_for_Water_Stewardship_Annual_Disclosure.pdf
Feedback_from_YRK_RE_RJRT_Alliance_for_Water_Stewardship_Annual_Disclosure.pdf
AWS_-_Disclosure.pptx
Joel_Freeman_May_11_Conversation.pdf

Assessment:
The site disclosed its AWS commitment at a high-level including WSP actions at a summary level and some assessment of performance regarding compliance objectives and actions implemented. Feedback was received from Yadkin Riverkeeper.

The email thread shows RJRT receiving feedback about ways to improve water stewardship in the catchment and their openness to discuss opportunities with stakeholders.

However, the disclosure information needs to be more comprehensive across the spectrum of WSP actions and associated performance.

This indicator would be strengthened via the demonstration of greater ongoing conversations and with a broader suite of relevant stakeholders.

Finding No: TNR-002293

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000455

- 4.4** *Evaluate and update the site’s water stewardship plan, incorporating the information obtained from the evaluation process in the context of continual improvement.*
- 4.4.1** *The site’s water stewardship plan shall be modified and adapted to incorporate any relevant information and lessons learned from the evaluations in this step and these changes shall be identified.* 🚩 in progress

Comment

Evidence:
Water Stewardship Tabular Plan.xls
Section_4.4_Annual_Evaluation_of_Water_Stewardship_Plan.xlsx (see 2021 Evaluation and 2022 Evaluation).

Assessment:
The initial WSP was created in 2020. A gap assessment was undertaken in early 2021, but the WSP has not been modified or adapted yet (i.e., no changes made yet). The site has undertaken a high-level review of the effectiveness of the plan and where improvements or updates may be needed, but this hasn't led to modifications or revisions to the WSP yet.

No lessons learned have been documented from the evaluations undertaken for Step 4.

The site should specify the lifespan of the current plan and the frequency for revisions.

Finding No: TNR-002385

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.* 🚩
in progress

Comment Evidence:
5.2 Stewardship Plan Stakeholder Disclosure.docx
AWS - Disclosure.pptx
Feedback from YRK- RE_ RJRT Alliance for Water Stewardship Annual Disclosure.pdf
RJRT Alliance for Water Stewardship Annual Disclosure.pdf

Assessment:
Slide 8 of AWS - Disclosure.pptx provides an organogram of the responsibilities, but only specifies positions not roles and responsibilities for compliance issues. The roles and responsibilities of the EHS team are described in Slide 7, but it is not clearly explained how this relates to the organogram in Slide 8.

The presentation was emailed to City of Winston-Salem, Yadkin Riverkeeper, NC DEQ, Piedmont Environmental Alliance (PEANC), WatershedNow, Gateway Nature Preserve, NC Sierra Club Foothills Group, Piedmont Land Conservancy, and Forsyth Audubon. However, this was only sent to the site's key stakeholders for whom they currently have email addresses and not all the site's stakeholders. This information was also not made available to the public in general, so other stakeholders or interested or concerned parties would not have access to this information to understand these roles and responsibilities.

Finding No: TNR-002392

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.* 🚩
in progress

Comment Evidence:
5.2 Stewardship Plan Stakeholder Disclosure.docx
AWS - Disclosure.pptx
Feedback from YRK- RE_ RJRT Alliance for Water Stewardship Annual Disclosure.pdf
RJRT Alliance for Water Stewardship Annual Disclosure.pdf

Assessment:
The site has shared a high-level overview of its AWS targets and proposed actions for RJRT sites across the USA. However, detail was not provided on actions identified in terms of the site's Water Stewardship Plan and how these relate to AWS outcomes.

Finding No: TNR-002393

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.* 🚩
in progress

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Alliance for Water Stewardship (AWS)


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Comment Evidence:
 5.2 Stewardship Plan Stakeholder Disclosure.docx
 AWS - Disclosure.pptx
 Feedback from YRK- RE_ RJRT Alliance for Water Stewardship Annual Disclosure.pdf
 RJRT Alliance for Water Stewardship Annual Disclosure.pdf

Assessment:
 The site has shared a high-level overview of its AWS targets and proposed actions for RJRT sites across the USA. However, detail was not provided on actions identified in terms of the site's Water Stewardship Plan, how these relate to AWS outcomes, and has not shared any quantified performance information yet.

This was only rated as a Minor in light of the recent AWS policy decision for non-conformities for Steps 4 and 5 to be assessed as Minors at most during a site's first year of implementation of their WSP.
Finding No: TNR-002394


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.*  in progress

Comment Evidence:
 5.2 Stewardship Plan Stakeholder Disclosure.docx
 AWS - Disclosure.pptx
 Feedback from YRK- RE_ RJRT Alliance for Water Stewardship Annual Disclosure.pdf
 RJRT Alliance for Water Stewardship Annual Disclosure.pdf

Assessment:
 The site has disclosed shared water challenges relevant to RJRT's sites across the USA, but not specific to Winston-Salem and the actions the site has undertaken or planned to implement to address these challenges.

This was only rated as a Minor in light of the recent AWS policy decision for non-conformities for Steps 4 and 5 to be assessed as Minors at most during a site's first year of implementation of their WSP.
Finding No: TNR-002395

5.4.2 *Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.*  Yes

Comment Evidence:
 5.2 Stewardship Plan Stakeholder Disclosure.docx
 AWS - Disclosure.pptx
 Feedback from YRK- RE_ RJRT Alliance for Water Stewardship Annual Disclosure.pdf
 RJRT Alliance for Water Stewardship Annual Disclosure.pdf
 JANAE TO PROVIDE CONTRACT AND CORRESPONDENCE FOR ADOPT-A-STREAM VOLUNTARY SUPPORT



Assessment:
 The site has coordinated with Adopt-a-Stream on voluntary activities to support catchment management.

The site has engaged with the City of Winston-Salem on its AWS journey. In the past it has engaged with the City on its water-related infrastructure needs and provided assistance with water-related infrastructure.

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5.5	<i>Communicate transparency in water-related compliance: make any site water-related compliance violations available upon request as well as any corrective actions the site has taken to prevent future occurrences.</i>	
5.5.1	<i>Any site water-related compliance violations and associated corrections shall be disclosed.</i>	 Yes
Comment	<p>Evidence: 5.2 Stewardship Plan Stakeholder Disclosure.docx AWS - Disclosure.pptx Feedback from YRK- RE_ RJRT Alliance for Water Stewardship Annual Disclosure.pdf RJRT Alliance for Water Stewardship Annual Disclosure.pdf 2021 01 WP TSS BOD.pdf to 2022 Q3 WP Signed DMR (1).pdf 9-28-2021 Signed Response Letter to Joel Freeman July 2021 NOV.pdf RJR Tobacco WP inspection 2021.pdf SWAP Report for WINSTON-SALEM, CITY OF.pdf City of Winston-Salem-Quality of Water Provided 2019 - Copy.pdf 2020 Water Quality Report .pdf 2021 Water Quality Report.pdf</p> <p>Assessment: The site has not had an significant non-compliance events for stormwater or effluent discharge as per their permit conditions or the AWS Guidance Note definition for "significant" events. Significant non-compliance in effluent permit conditions are specified in criteria 1 to 8 (2022 Whitaker Park IUP Permit(3014) -Effective July 1 2022 - June 30 2027.pdf) and none of the site's effluent exceedances constitute "significant" events.</p> <p>The site has experienced 4 instances of exceedances for effluent discharge due to operational challenges, but these were all corrected promptly and additional controls or operational performance improvements were instituted. In these cases, the site advised the City of Winston-Salem orally and in writing of the actions they undertook and proposed to rectify the exceedances, as well as the assessment the site undertook to improve future practices and ensure compliance.</p> <p>The City of Winston-Salem undertakes quarterly sampling at the site and during this site visit a meeting is held with the site. This includes a report by the City of Winston-Salem of the meeting that reflects an annual compliance summary for the site, and any agreed and/or identified corrective actions by the site.</p>	
5.5.2	<i>Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.</i>	 Yes

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Alliance for Water Stewardship (AWS)

Audit Number: AO-000455

Comment Evidence:
 5.2 Stewardship Plan Stakeholder Disclosure.docx
 AWS - Disclosure.pptx
 Feedback from YRK- RE_ RJRT Alliance for Water Stewardship Annual Disclosure.pdf
 RJRT Alliance for Water Stewardship Annual Disclosure.pdf
 2021 01 WP TSS BOD.pdf to 2022 Q3 WP Signed DMR (1).pdf
 RJR Tobacco WP inspection 2021.pdf

Assessment:
 The site has not had an significant non-compliance events for stormwater or effluent discharge as per their permit conditions or the AWS Guidance Note definition for "significant" events. Significant non-compliance in effluent permit conditions are specified in criteria 1 to 8 (2022 Whitaker Park IUP Permit(3014) -Effective July 1 2022 - June 30 2027.pdf) and none of the site's effluent exceedances constitute "significant" events.

The site has experienced 4 instances of exceedances for effluent discharge due to operational challenges, but these were all corrected promptly and additional controls or operational performance improvements were instituted. In these cases, the site advised the City of Winston-Salem orally and in writing of the actions they undertook and proposed to rectify the exceedances, as well as the assessment the site undertook to improve future practices and ensure compliance.

The City of Winston-Salem undertakes quarterly sampling at the site and during this site visit a meeting is held with the site. This includes a report by the City of Winston-Salem of the meeting that reflects an annual compliance summary for the site, and any agreed and/or identified corrective actions by the site.

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:
 5.2 Stewardship Plan Stakeholder Disclosure.docx
 AWS - Disclosure.pptx
 Feedback from YRK- RE_ RJRT Alliance for Water Stewardship Annual Disclosure.pdf
 RJRT Alliance for Water Stewardship Annual Disclosure.pdf
 2022 Whitaker Park IUP Permit(3014) -Effective July 1 2022 - June 30 2027.pdf
 9-28-2021 Signed Response Letter to Joel Freeman July 2021 NOV.pdf
 2021 01 WP TSS BOD.pdf to 2022 Q3 WP Signed DMR (1).pdf
 RJR Tobacco WP inspection 2021.pdf

Assessment:
 The site has not had an significant non-compliance events for stormwater or effluent discharge as per their permit conditions or the AWS Guidance Note definition for "significant" events. Significant non-compliance in effluent permit conditions are specified in criteria 1 to 8 (2022 Whitaker Park IUP Permit(3014) -Effective July 1 2022 - June 30 2027.pdf) and none of the site's effluent exceedances constitute "significant" events.

The site has experienced 4 instances of exceedances for effluent discharge due to operational challenges, but these were all corrected promptly and additional controls or operational performance improvements were instituted. In these cases, the site advised the City of Winston-Salem orally and in writing of the actions they undertook and proposed to rectify the exceedances, as well as the assessment the site undertook to improve future practices and ensure compliance.

The City of Winston-Salem undertakes quarterly sampling at the site and during this site visit a meeting is held with the site. This includes a report by the City of Winston-Salem of the meeting that reflects an annual compliance summary for the site, and any agreed and/or identified corrective actions by the site.

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Photographic Evidence from Audit



Yes

Comment Site photographs were provided by the site at the auditors' request during the on-site audit, as various site infrastructure is deemed to be of a proprietary and confidential nature.