

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)



Audit Number: AO-000672

### SITE DETAILS

Site: **BAT Croatia (TDR d.o.o.) - Kanfanar**

Address: Burići 9b, 52952, Kanfanar, CROATIA (local name: Hrvatska)

Contact Person: Factory Sustainability Manager

AWS Reference Number: AWS-000479

Site Structure: Single Site

### CERTIFICATION DETAILS

Certification status: Certified Core

Date of certification decision: 2023-Dec-05

Validity of certificate: 2026-Dec-05

### AUDIT DETAILS

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

Audit Type(s): Initial Audit

Audit Start Date: 2023-Oct-10

Lead Auditor: Carlo Enrico Freschi

Audit team participants:

Ana Kojakovic

Carlo freschi, Lead Auditor

Site Participants:

- , Director
- , Production manager
- , Engineering Manager
- , Utilities Manager
- , WWT Manager
- , Environmental Manager and NCI Coordinator
- , Sr. EHS Specialist
- , Area Sustainability Manager

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### ADDITIONAL INFO

**Summary of Audit Findings:** A total of seven findings were raised during the certification audit, one major non-conformity, four minor non-conformities, and two observations. The major non-conformity was of sufficient concern to warrant the categorization of the non-conformity as major and related to GOOD WATER GOVERNANCE

The Client is requested to perform a root cause analysis and define corrective actions for each of the non-conformities and to submit these to WSAS within 60 days of receipt of the audit report by 24/01/2024.

The major non-conformity must be sufficiently addressed, and evidence submitted to WSAS within 90 days of receipt of the report by 24/02/2024.

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

The audit team recommends certification of TDR d.o.o. (BAT Croatia) - Kanfanar at Core level pending approval of the corrective actions plan and closure of the major non-conformity.

#### CLOSURE OF FINDINGS AND CORRECTIVE ACTION PLAN:

The Client has successfully 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 TDR d.o.o.- Kanfanar (BAT Croatia) - Burići 9b, 52952, Kanfanar, CROATIA against the AWS International Water Stewardship Standard Version 2.

BAT acquired the cigarette factory on the Istria peninsula in 2015 when it took over Tvornica Duhana Rovinj. Kanfanar Tobacco factory produces cigarettes for local and export markets. Factory owns a roughly 120,000 m2 plot, roughly 44,000 m2 of that is a green field including roughly 5,000 m2 large lake.

The Kanfanar plant was renovated in 2022 when the main investment included the establishment of a processing line for a new line of tobacco products. The plant consumes 100% renewable electricity. Since 2019 natural gas has also been used as an energy source. Water utilized in the processing includes recycled water, rainwater, and potable water supplied by the regional water supply company Istarski Vodovod.

The audit was conducted onsite on September 10, 11, 12, 2023  
The onsite visit included the assessment of the production sites that were visited as part of the audit.

The following external stakeholders were interviewed during the audit: Istarski vodovod d.o.o. za proizvodnju i distribuciju vode, Buzet (Istrian Watersupply Ltd); NGO UZOR – Udruga za održivi razvoj Hrvatske (Association for sustainable development of Croatia); Limska draga d.o.o. Company owned by the Municipality Kanfanar, responsible for waste and wastewater management.

### FINDINGS

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NUMBER OF FINDINGS PER LEVEL	
Observation	2
Minor	4
Major	1

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### FINDING DETAILS

Finding No:	TNR-007174
Checklist Item No:	0.1.1.1
Status:	Closed
Finding level:	Major
Due date:	2024-Feb-24
Checklist item:	The site(s) occupy one catchment OR an exception has been granted.
Findings:	The site should take into consideration for the catchment definition other relevant areas such as the Municipality of Kanfanar sharing the wastewater treatment for its domestic sewerage system and the nearby areas where the IWRA's are located.
Corrective action:	<ol style="list-style-type: none"><li>1. From official sources receive the area where households from which wastewater is received on wastewater treatment plant and which are connected to the sewage system - DONE (30.11.2023.)</li><li>2. Contact the authorised company in order to agree the extension of the catchment as per report in order to include the Municipality of Kanfanar from which the wastewater is received to the waste water purification plant and the nearby areas where the IWRA's are located - due date 05.12.2023.</li><li>3. Upload the corrected documentation with explanation of changes made - due date 05.12.2023.</li></ol>
Evidence of implementation:	Updated documentation consists from:  <ol style="list-style-type: none"><li>1. Document - 1.1.1 TDR-AWS-Catchment 041223<ul style="list-style-type: none"><li>- Updated/extended description of the catchment in paragraph Factory Catchment on page 6.</li><li>- Designs (1. 2. 3 and 5) modified in order to show extended catchment as per report (including the Municipality of Kanfanar from which the wastewater is received to the waste water purification plant and the nearby areas where the IWRA's are located)</li></ul></li><li>2. Document - 1.1.1 TDR-AWS-Catchment document additional explanation<ul style="list-style-type: none"><li>- Updated file contains comments/explanation for each design in the PDF document (1.1.1 TDR-AWS-Catchment 041223)</li></ul></li></ol>



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## Alliance for Water Stewardship (AWS)

Audit Number: AO-000672

Finding No:

TNR-006947

Checklist Item No:

1.3.3

Status:

Closed

Finding level:

Observation

Due date:

2024-Nov-24

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 water glide-path balance should be related to the production and thus became an index rather than a total volume figure.

Corrective action:

1. Collect the data from production related to produced volumes

2. For each area calculate the intensity and record it in the water balance document

3. Inform the engineering department in this process in order to follow it

Finding No:

TNR-007177

Checklist Item No:

1.3.5

Status:

In Progress - CA plan approved

Finding level:

Minor

Due date:

2024-Nov-24

Checklist item:

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

Findings:

although the chemical handling is correctly performed to avoid any possible spillage and drain water pollution, in one case in the production department a dangerous product (probably used for glue removal) was found during the site survey stored without a protective basin and very near to a sewer collection grid with a potential threat pollution in case of uncontrolled spillage

Corrective action:

1. revise the hazardous material handling procedure and positions

2. revise if there are enough quantity of protective basin at the area where hazardous substances handling is being performed

3. Increase / refresh awareness to employees - at the locations where hazardous substances handling is performed to publish materials of safe handling (One point lesson)

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Audit Number: AO-000672

Finding No:	TNR-007178
Checklist Item No:	1.5.7
Status:	Closed
Finding level:	Observation
Due date:	2024-Nov-24
Checklist item:	The adequacy of available WASH services within the catchment shall be identified.
Findings:	The extension of the sewer net to all houses in Kanfanar could be considered as a WASH challenge to share with the stakeholder Municipality.
Corrective action:	Include into the water action plan the investigation of the possibility of including as a shared water challenge the extension of the sewer net to all houses in Kanfanar Municipality and the factory contribution possibility- DONE
Evidence of implementation:	in attached file 2.3.1_2.3.2 AWS_Action Plan Water_KF 20231023 in line number 24 it is included the Action: In cooperation with Kanfanar Municipality, explore / investigate if this is a WASH challenge that could be shared and a possibility of factory contribution
Finding No:	TNR-007175
Checklist Item No:	3.2.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Nov-24
Checklist item:	A process to verify full legal and regulatory compliance shall be implemented.
Findings:	The process to verify full legal and regulatory compliance doesn't cover the AWS system in terms of requirements and auditor qualification.
Corrective action:	During the next auditing process announced from the auditing company (eg WSAS), TDR representative will check with WSAS the capability of the auditors that will perform the auditing process.

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Audit Number: AO-000672

Finding No: TNR-007172  
Checklist Item No: 5.3.1  
Status: In Progress - CA plan approved  
Finding level: Minor  
Due date: 2024-Nov-24  
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 not yet defined a way of disclosing in an appropriate format and at a reasonable level of detail regarding the results and performance against targets obtained by the AWS system.  
Corrective action:  

1. Prepare the disclosing text template with the content
2. Contact the Legal and CORA department and present them the disclosing text template and agree on the context
3. From Legal and CORA department receive explanation what, how and where can the material be disclosed
4. Disclose the results and performance against targets obtained by the AWS system in an affordable way
5. Benchmarking with other end markets

Finding No: TNR-007707  
Checklist Item No: 5.4.1  
Status: In Progress - CA plan approved  
Finding level: Minor  
Due date: 2024-Nov-24  
Checklist item: The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.  
Findings: The site has not yet defined its water-related challenges (consistent with 1.6.1) and described the actions and efforts they have implemented.  
Corrective action:  

1. Challenges are included in the Water action plan - DONE (uploaded file 2.3.1\_2.3.2 AWS\_Action Plan Water\_KF 20231023 water-related challenges and actions included in line number 23)
2. define meetings with relevant stake holders to search for opportunities of supporting in mitigate the challenges
3. if any actions resulted from the meetings, develop an action plan
4. update the water action plan accordingly

Evidence of implementation: In uploaded file 2.3.1\_2.3.2 AWS\_Action Plan Water\_KF 20231023 water-related challenges and actions included in line number 23

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### Report Details

Report	Value
Report prepared by	Carlo Enrico Freschi
Report approved by	Juan Carlos Ceron
Report approved on (Date)	24-11-2023

### Surveillance

**Proposed date for next audit**  
2024-Oct-07

Comment      The audit of 2024 will be a surveillance audit.

### Stakeholder Announcements

Date of publication	Location
14/07/2023	AWS website
01/10/2023	TDR website
14/07/2023	WSAS Website

Comment      A 2023 Stakeholder AWS announcement was prepared for the certification audit. The announcement was published on the AWS website and the company website, The publication has been verified during the audit. The Lead Auditor did not receive any request for information or complaint before the audit.

Comment

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### Catchment Information

#### Catchment Information

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## Alliance for Water Stewardship (AWS)



WATER  
STEWARDSHIP  
ASSURANCE  
SERVICES

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The Catchment consists of:

1. dislocated area (approx 25 km straight line distance from factory) Butoniga Lake watershed (surrounding Butoniga Lake is defined as an area that contributes to the water source),
2. a pipeline that brings water from Butoniga Lake to the location of the factory (Burići 9b, Kanfanar),
3. site location (including the surface area from which rainwater is harvested), the pipeline that discharges water into the site accumulation lake, and the area around the site accumulation lake that potentially could be affected by water discharged from the lake or eventual overflow

### 1: Butoniga Lake Area:

Water supply for the wider Istria region is achieved from the water supply system "Butoniga" operated by Istarski vodovod d.o.o. Buzet.

The water supply system "Butoniga" is based on the surface water reservoir (accumulation lake) of the same name – Butoniga (max and min capacity 1.000 l/s), from which the water (after conditioning) is pumped by high-pressure pumps to the Ladavci distribution reservoir located above the lake.

The Kanfanar industrial zone, where the factory is located, takes water from Butoniga Lake which is located in the northern part of the Istrian region (approx 25 km straight line distance from the factory).

The site is reliant on this area for its water supply.

### 2: Water pipeline:

From this reservoir, water is transported by gravity in several directions:

- (a) branch for Pazin, from the direction of Beram to the east to the water reservoir Pazinka to be used in the wider area of Žminj;
- (b) from the direction of Beram towards the south in the direction of extending the Butoniga pipeline towards the Kanfanar reservoir, where the main pipeline forks in two directions: the branch for Rovinj and in the direction of Pula.

### 3: Site location:

The factory uses water for sanitary, industrial, and fire-fighting purposes. The Factory has a closed internal sewage system. Sanitary and industrial wastewater are collected and discharged into the biological Wastewater Treatment Plant. Stormwaters from manipulative surfaces and internal transportation routes are collected via a separate sewage system and discharged into the four oil separators. Treated sanitary and industrial wastewater, together with treated stormwater and clean run-off water from building roofs are discharged into the artificial lake.

The water from the lake is further used for fire-fighting systems and in industrial steam production processes.

To define the catchment around the factory it is necessary to take into account the topography of the land, geological layers, and conditions of:

- the physical zone around the site that provides water supply (upstream),
- the zone around the factory where wastewater goes (downstream),
- the zone around the site's accumulation lake.

Furthermore, factory downstream impact (eg. volume of water required and possible impact on further consumers, possible effect on nature and impact of wastewater to the surrounding area, etc.), and upstream impact (eg. activities that might impact water supply, water usage volume, water availability, possible extraordinary events, etc.) were taken into consideration as well.

The wider area of the subject property is made of limestone, to a lesser extent dolomite, followed by thin-bedded platy limestone with thin layers of dolomitic limestone breccia. On the surface of the terrain, different morphological forms are developed, e.g. smaller or larger sinkholes in various stages of development and caves of different depths and shapes. The surface of the terrain is mostly covered with reddish clay (terra rossa), which sometimes has a greater thickness and covers the karstification of the carbonate beds. Rocks that form the wider area of the subject property location have different hydrogeological properties.

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Concerning the water permeability characteristics, they can be divided into permeable and poorly permeable carbonate rocks and clastic formations of variable permeability. Their hydrogeological characteristics have a significant influence on the spatial layout of aquifers and the variety of groundwater flow conditions.

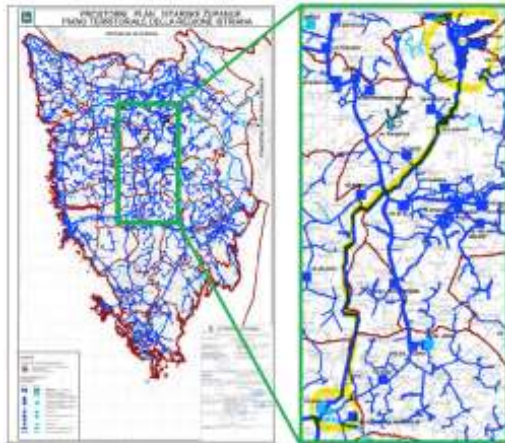


Figure 2 (left & 2 right): infrastructure water supply system of istria region (from official spatial plan of the istria  
5 detailmap of the accumulation area, pipeline and water reservoir (printed yellow))

catchment 1.jpg

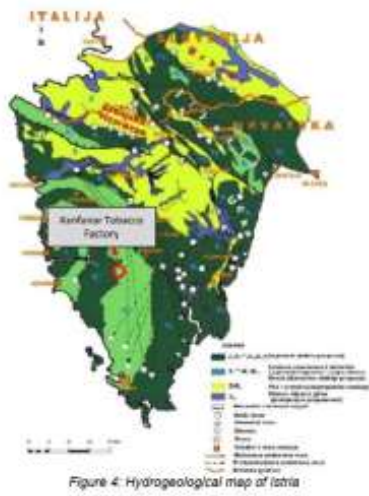


Figure 4: Hydrogeological map of Istria

catchment 2.jpg



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### Client Description and Site Details

#### Client/Site Background

Kanfanar Tobacco factory produces cigarettes for local and export markets. The maximum capacity for the site is 30 billion cigarette equivalents in PMD and 25 billion cigarette equivalents in SMD. The working scheme is 3 shifts 24 hours /5 days a week with temporary adjustment to 24 hours /7 days. BAT employs 506 people at this factory. Additionally, approximately 50 people are present from 3rd parties and provide auxiliary services like cleaning, kitchen, security, etc. Factory owns a roughly 120,000 m2 plot, roughly 44,000 m2 of which is a green field including a roughly 5,000 m2 water reservoir (in the form of an artificial lake). There is a 3-story Office block and a production/storage building, which is of three sections. Hall #3 has a small lower floor for technical premises. Hall #2 is 2- story, while Hall #1 is a single story.

The factory headquarters is registered at Obala Vladimira Nazora 1 in the Town of Rovinj. The factory is located in Kanfanar, Burići 9b, in an industrial zone, approximately 1 km away from Kanfanar city center and 18 km from the Town of Rovinj. The closest inhabited object is approximately 60 m distant from the subject property. The subject property is situated in the east-west direction and enclosed by Istarski Epsilon highway in the north, undeveloped land, and Divača – Pula railway from the east, and local road from the south and south-west.. It is located at an altitude of 240 meters above sea level.



0 Screenshot 2023-10-25 alle 18.06.53.png

### Summary of Shared Water Challenges

#### Summary of Shared Water Challenges

Based on stakeholder interviews (mainly with water supplier "Istarski vodovod d.o.o. Buzet" the site identified the following risks:

1. Increased scarcity of sanitary and drinking water in times of drought and tourist season
2. Deterioration of water quality due to drought
3. Increased damage to water supply due to obsolete infrastructure

From the listed risks the following shared water challenges were identified:




- Securing local water supplies in the long term
- Avoid the emergence of conflicts of interest in water use, both economic and social
- Limit potential economic losses due to water scarcity (business interruption)
- Limiting the impact of drought on local production capacity
- Preserve the availability of pasture and watering places, limit the impact of drought, and identify contingency plans if necessary
- Implementation of water-saving initiatives
- Ensuring the natural conservation of groundwater
- Stop/Decrease drinking water treatment and preserve pure water
- Limiting the impact of industrial solutions on water, soil/air to develop a plan for continued development of biodiversity
- Search opportunities to support the municipal water supplier



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0.1 General Requirements for Single Sites, Multi-Sites and Groups	
0.1.1	<i>Eligibility Criteria</i>
0.1.1.1	<i>The site(s) occupy one catchment OR an exception has been granted.</i> 
Comment	Yes The TDR d.o.o. (BAT Croatia) site occupies one area within the Kanfanar municipality. The catchment covers separated areas interconnected by the water pipeline used by the factory as the inlet source.
0.1.1.2	<i>The scope of the proposed certification shall be under the control of a single management system.</i> 
Comment	Yes The site is managed under a single-based management system by TDR d.o.o. (BAT Croatia). The site is part of an international group and the same policies are centrally defined.
0.1.1.3	<i>The scope of the proposed certification shall be homogeneous with respect to primary production system, water management, product or service range, and the main market structures.</i> 
Comment	Yes The site's primary production process is the manufacturing of cigarettes. mainly from tobacco sleeves.

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### 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.



Yes

**Comment** Factory TDR d.o.o. is in the central part of Istria, in Kanfanar municipality. The business complex is bordered by the main road (Istarski Y) on the north side and green areas on the south and west sides.

The inlet water-related infrastructure is connected to the main inlet water pipes providing water supply from Lake Butoniga, (The water supplier is Istarski vodovod d.o.o. Buzet), and they serve an industrial and potable water network. After using two sewage networks collect the site's industrial and domestic discharges, other network is for rainwater collection, and for firefighting feeding the hydrants.

The WWTP (owned by the municipality and jointly operated with TDR) is located outside the site limit but is connected to the site. It is designed to treat the municipality's domestic water discharges and all the site's waste industrial and domestic waters.

The water-related infrastructure also includes a lake that is used for storage of the treated water before recycling.

The use of water from an artificial lake for irrigation purposes (not in use anymore) and the technological needs of the factory are foreseen by the construction of a pumping station. The pumping station facility is located on the eastern edge of the lake. In a concrete manhole located below the water level, there are submerged pumps that independently work for a particular need.

Recycled water is consumed in technology, in the boiler room, as sanitary and cooling water. In the tobacco production process, technological wastewater is formed, which enters the factory sewage network and then into the city's sewers connected to the WWTP. Wastewater is treated on a WWTP using activated sludge technology with the tertiary stage and the treated wastewater is poured into the lake.

Rainfall water from roofs and asphalted surfaces is collected through a separate drainage system and discharged into the lake via a oil removal section.

The lake is irregular (triangular) in shape, located on the western edge of the area of the existing depression. The northern and western boundaries of the lake are determined by the road. The eastern border is defined by a cross-sectional line and is an irregularly shaped, indented coastline, partially cut into the terrain.

The size of the lake is: lake area 5.000 – 7.000 m2 depth 3-5 m

All the water from the lake is used for recycling inside the plant and there is no outlet from the lake to the catchment (a bottom line with a valve always closed in place for emergency or major lake maintenance).

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

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### 1.2.1

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

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



Yes

#### Comment

Stakeholders are identified and listed in the AWS - Stakeholders Map KF  
The stakeholders are:

- Ministarstvo zaštite okoliša i energetike, Uprava vodnoga gospodarstva
- Municipality of Kanfanar
- Istarski vodovod d.o.o., Buzet
- Hrvatske vode
- Communal society Limska draga d.o.o.
- AMBRA water solutions d.o.o.
- Authorized waste management company METIS
- BAT Global
- BAT Europe
- TDR Kanfanar - Factory Manager
- TDR Kanfanar - Site Service Manager
- Public Firefighting Department Rovinj
- Employees and long-term contractors on site
- Association for Sustainable Development of Croatia

They are listed in a Stakeholders Map.

For each SH the table summarizes:

Stakeholder Name, address, Contact person, Category, Stakeholders, influence/power on site, Site influence on stakeholders, Interest, Engagement Strategy, Site actions.

The identified SH can be classified in the following categories:

LOCAL REPRESENTATIVE ORGANIZATIONS

INTERNAL (local and group representatives),

ASSOCIATION / ONLUS

A questionnaire was provided to the Stakeholders to collect information about the following topics :

- if TDR operation is impacting their water requirements and their operations due to its usage of water from the public water supplier network,
- if TDR purified wastewater discharged to its lake has an impact on them,
- if there is the interest of sharing a deeper knowledge of AWS and the possibility of implementing in their business,
- if they have suggestions in better water usage reducing water pollution
- any other activity related to water management where TDR could closely cooperate.

### 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.*



Yes

#### Comment

Stakeholders are related to the site's catchment and the site has identified the stakeholders' ability to influence or be influenced. The stakeholders are characterized according to their level of Influence/Interest (3 levels from low to high).

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**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.*



Yes

**Comment** The water-related incident response plans have been identified and listed in separate documents :

1. The document " Operational plan of measures in case of emergency and sudden water pollution" defines and lists the measures that need to be taken in the event of extraordinary and sudden water and environmental pollution for the company TDR d.o.o. The Croatian government published a document covering this emergency.
2. Another document "Denial of site Kanfanar" contains action that must be taken in case of water scarcity.
3. The document " "KOO 084-117 DESCRIPTION OF REMEDIATION IN THE SPILLAGE OF CHEMICALS AND HAZARDOUS LIQUID WASTE" contains equipment that can be used in case of chemical spills and hazardous liquid waste - oil, gasoline, chemicals, acids, and alkalis.
4. The document "KOR 059-117 METHOD OF REMEDIATION IN THE SPILLAGE OF CHEMICALS AND HAZARDOUS LIQUID WASTE" is a document that explains the method of remediation when spilling all chemicals (oil, gasoline, acid) and hazardous liquid waste. The above emergency incidents will not affect the external water balance, quantity or quality and will not be a threat to good water access for people or environment . The site has no water outlet, and all drain are connected to the WWTP discharging only to the internal lake used for recycling.

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



Yes

**Comment** The site identified water inflows, outflows and storage components on the site which can be seen on the attached layouts with a special focus on water recycle .

**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.*



Obs.

**Comment** Data showing detailed water inflows, outflows, and losses are available. Annual variances are not relevant. The data analysis (excel) contains detailed data on mass balance. The site utilizes a Water Glide-path mass evaluation of the efficiency of its recycling system. The chart is considering a site general efficiency index, but there is no evidence that it would be a threat to good water balance for catchment people or the environment. The evolution of this mass performance is checked periodically, and they can compare these data between years. The plant's total water consumption from the inlet supply main pipe is irrelevant compared to the total water area availability. So, total consumption is not a relevant water-related challenge but is more connected to the plant running costs. In 2023 continuing with the installation project of additional water meters in different areas will help a better understanding of the main water consumers on site and identify potential initiatives to reduce water consumption as well as potential underground water losses. This will bring another great benefit towards achieving targets of water consumption reduction.

**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.*







Yes

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Comment	<p>According to the Law, water supply in the Republic of Croatia is a public service. The municipality of Kanfanar (where the site is located) is not in a drought-prone area.</p> <p>The service provider in the area Istarski vodovod d.o.o. Buzet is obliged to monitor the quality of water at the pumping point and the quality of water in the water supply system. TDR d.o.o. additionally conducts tests of water at the site inlet point which are done by authorized companies.</p> <ul style="list-style-type: none"> <li>- "IVB - Plan uzorkovanja" is a sampling plan from the water provider.</li> <li>- "IVB - Rezultati analiza vode za ljudsku potrošnju na izlazima iz postrojenja-interna kontrola 2021" contains results of an analysis of water for human consumption which is done by a local water service provider.</li> <li>- "IVB - Godišnje izvješće 2021 and 2022" contains a report on the water service provider's business operations for 2021/2022 with information about water quality, distribution, water losses, water production etc.</li> </ul> <p>The stormwater is generally considered of good quality as it comes from roofs and paved external areas. This water is not metered nor analyzed.</p> <p>The plant wastewater discharged to the WWTP is also periodically monitored. The site provided a recapitulation of the results of the analysis of treated water produced by the WWTP and discharged to the internal recycling lake. (očevidnik-otpadne vode pogon Kf + UPOV),</p> <ul style="list-style-type: none"> <li>- "KVALITETA VODE ZA GODIŠNJE IZVJEŠĆE ZA 2021 GOD od 16.2.2022." is the water quality annual report for the year 2021.</li> <li>- "Vodopravna dozvola UPOV (WWTP)" &amp; "Vodopravna dozvola pogon Kanfanar" defines parameters for water quality on the site and WWTP.</li> </ul> <p>The site water management is not a threat to the catchment water quality.</p>	
<b>1.3.5</b>	<i>Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.</i>	 Obs.
Comment	<p>The site has identified and mapped all chemical products. The document "KoI 303-0816-List of hazardous substances on site contains information on where chemicals are located and information about chemicals (CAS number, flashpoint, etc.). The locations where the risk of pollution is present, are mapped in the documents "NACRTI". The documents "Operativni plan pravne osobe koja djelatnost obavlja korištenjem opasnih tvari" and "Procjena rizika pravne osobe koja obavlja djelatnost korištenjem opasnih tvari" are created based on laws and regulations.</p>	
<b>1.3.6</b>	<i>On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.</i>	 Yes
Comment	<p>The site has identified that there is no on-site IWRA. The final lake where all recycling water is temporarily stored doesn't have an ecological value or use.</p>	
<b>1.3.7</b>	<i>Annual water-related costs, revenues, and a description or quantification of the social, cultural, environmental, or economic water-related value generated by the site shall be identified and used to inform the evaluation of the plan in 4.1.2.</i>	 Yes
Comment	<p>The site evaluated the costs related to water supply and the cost for the operation of the WWTP.</p> <p>The only revenue is related to the selling of steam (evaporated water) to the nearby printing factory.</p> <p>The site won't affect any social, cultural, environmental, or economic water-related value.</p>	
<b>1.3.8</b>	<i>Levels of access and adequacy of WASH at the site shall be identified.</i>	 Yes



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Comment	<p>TDR d.o.o. provides for employees and other persons on site safe and healthy drinking water in sufficient quantities and drainage of wastewater. Water is also used for the preparation and distribution of hot meals in the restaurant.</p> <p>A sufficient number of taps and toilets are also provided for all employees and others present at the site and a sufficient number of showers for workers for whom this is necessary. The legal document "Pravilnik o zaštiti na radu za mjesta rada Ordinance on occupational safety for places of work " defined the exact number of showers and toilets (depending on the number of people on site)</p> <p>The quality of the potable water is shown in the analysis which are partially provided directly by TDR while the official ones are provided by the water provider.</p> <p>"Aquaviva" and "Ziva voda" are analytical reports on water quality .</p> <p>According to the Law "Zakon o vodnim uslugama" water supply in RH is a public service. The documents "Vodopravna dozvola UPOV (WWTP)" &amp; "Vodopravna dozvola pogon Kanfanar" define parameters for water quality on the site and WWTP. In att there is a recapitulation of the results of the analysis, "IVB - Godišnje izvješće 2021 and 2022" contains a report on water service provider's business operations for 2022 containing information about water quality, distribution, water losses, water production, etc.</p>	
1.4	<i>Gather data on the site's indirect water use, including: its primary inputs; the water use embedded in the production of those primary inputs the status of the waters at the origin of the inputs (where they can be identified); and water used in out-sourced water-related services.</i>	
1.4.1	<i>The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be identified.</i>	 Yes
Comment	<p>The site have a list to identify all major suppliers.</p> <p>They all have their own production area outside the catchment, so they do not have a direct influence on the catchment water balance.</p>	
1.4.2	<i>The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.</i>	 Yes
Comment	<p>The embedded water use of the outsourced identified services has a limited impact on the use of water. On-site, outsourced services are provided by "Klanjac", "Retia Volante" and "Securitas". Water usage for car wash services is attached.</p>	
1.5	<i>Gather water-related data for the catchment, including water governance, water balance, water quality, Important Water-Related Areas, infrastructure, and WASH</i>	
1.5.1	<i>Water governance initiatives shall be identified, including catchment plan(s), water-related public policies, major publicly-led initiatives under way, and relevant goals to help inform site of possible opportunities for water stewardship collective action.</i>	 Yes
Comment	<p>Istarski is the public authority for water distribution.</p> <p>The most important water-related initiatives in the area are described in the following documents:</p> <p>"IVB - Plan poslovanja 2022 and 2023" and "IVB-Rebalans plana 2023" contains water service provider's business plan.</p> <p>"IVB - Godišnje izvješće 2021 and 2022" contains a report on the water service provider's business operations for 2021/2022 with information about water quality, distribution, water losses, water production</p> <p>"IVB - Odluka o razvoju vodoopskrbe" is a decision on water supply development.</p> <p>"IVB - Politika kvalitete i održivog poslovanja 2019" is Quality and sustainable business policy.</p> <p>In this link (<a href="https://www.ivb.hr/o-vodovodu/zakonska-regulativa/">https://www.ivb.hr/o-vodovodu/zakonska-regulativa/</a>) water water-related legal requirements.</p>	

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<b>1.5.2</b>	<i>Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.</i>	 Yes
Comment	<p>The Site has developed a comprehensive legal register and perform an assessment of its compliance with legal and regulatory requirements yearly according to the requirement of its internal management ISO 14001 system.</p> <p>All the legal requirements are checked every year.</p> <p>Document 'KOL 012-117 Lista zakonskih i dr. Zahtjeva' contains water-related legal and regulatory requirements which we track/implement.</p> <p>In this link (<a href="https://www.ivb.hr/o-vodovodu/zakonska-regulativa/">https://www.ivb.hr/o-vodovodu/zakonska-regulativa/</a>) we can see legal requirements for water. "Provjera zakonske regulative" identifies the law/regulation that applies or does not apply in TDR d.o.o., with the NN number in which the regulation was issued. Also attached are the job descriptions for EHS coordinator, EHS specialist, and EHS manager.</p> <p>In the last 12 months, the following changes in water relatives regulations were published : Regulation on helpful areas and Regulation on special conditions for performance activities water service 70/23</p> <ul style="list-style-type: none"> <li>- Law on changes and additions of the Law on waters NN 47/23</li> <li>- Law on leads for human consumption NN 30/23</li> </ul> <p>Decision on fees for development merchant societies Istarian water system doo Buzet NN 83/22</p> <p>The key change that will affect the water management process is that the WWTP, as it is processing public wastewater, is a public infrastructure and must be operated by the public water supplier. By this requirement, our Factory will remain without direct operation over the existing WWTP.</p>	
<b>1.5.3</b>	<i>The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.</i>	 Yes
Comment	<p>The document "NOVELACIJA VODOOPSKRIBNOG PLANA ISTARSKE ŽUPANIJE" provides an analysis of the current state of water supply and, based on the processing of all elements, provides correct solutions for the water supply system.</p> <p>IVB - Godišnje izvješće 2021 and 2022" contains a report on the water service provider's business operations for 2021/2022 where information about water quality, distribution, water losses, and water production are available.</p> <p>The total quantity of water flowing through the catchment is almost constant and there are no remarkable seasonal fluctuations. No scarcity in the area is identified.</p>	
<b>1.5.4</b>	<i>Water quality, including physical, chemical, and biological status, of the catchment shall be identified, and where possible, quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be identified.</i>	 Yes
Comment	<p>The document "IVB - Godišnje izvješće 2021 and 2022" contains a report on the water service provider's business operations for 2021/2022 and information about water quality, distribution, water losses, water production, etc. Document "Tabela 1." contains results of the analysis of water for human consumption which is performed by the service provider.</p> <p>IVB - Plan uzorkovanja" is a sampling plan from the water provider.</p> <p>The document "KVALITETA VODE ZA GODIŠNJE IZVJEŠĆE ZA 2021 GOD od 16.2.2022." is the water quality annual report for the year 2021.</p> <p>In case of a threat to good water quality immediate action on sanitation must be performed according to "Water network sanitation plan" and "Sanitation plan for water supply facilities".</p> <p>There is no threat to good water quality status for people or environment.</p>	
<b>1.5.5</b>	<i>Important Water-Related Areas shall be identified, and where appropriate, mapped, and their status assessed including any threats to people or the natural environment, using scientific information and through stakeholder engagement.</i>	 Yes

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**Comment** The Site has identified and mapped the following IWRA and the status of different protection areas around the basins into the catchment:  
The nearest to the site are:

- Jama kod Burići: Karst pit. Limestones and dolomites (lower cretaceous - K1); fossilized and typical deep terra rossa. Burići is near the town Kanfanar in an industrial zone. Local legends are developed about this cave. Due to the historical importance of the local community and the fact that the site represents an important habitat for aquatic and terrestrial underground TDR detected it as IWRA where they can contribute.
- Limska draga: Dry karst valley, undulating shape. The flooded end of the Lim Bay continues on the sea and thus represents its land continuation. The morphologically incised valley initially has a widened bottom with a shallow Quaternary alluvium. It is a continuation of the once permanent bed of the Pazinčica river, which before the uplift of the limestone Istrian plate and the creation of the Pazin sinkhole flowed east of the present-day town of Pazin. The width of the Limska draga from the beginning to the vicinity of Kanfanar is about 900 m, with a narrowing at the foot of Dvigrad and above Kanfanar to about 600 m. The height of the slopes is about 150-165 m. Due to the importance of the preservation of existing surroundings TDR detected it as IWRA where they can contribute.
- Kašteljir: The first mention of Kanfanar is related to this spring (Castellerium de fontana). The springs were crucial for the foundation of the settlement because the population was supplied with water from them for centuries. Due to historical importance of the local community TDR detected it as IWRA where they can contribute.

Taking into consideration a larger area of influence in the catchment, other IWRA of interest can be detected from the IWRA\_Istra, Nacionalna ekološka mreža, Zaštićena područja prirode - on this maps of Istria.

The documents "Prijedlog izmjena i dopuna prostornog plana IŽ (article 135.-145.)" and "Sažetak za javnost\_Prijedlog izmjena i dopuna prostornog plana IŽ (pages 30-34)" contain information about protection measures of natural values and special features.

Six Area Natura 2000 site are located in the nearby area and information on their values are also available and taken into consideration.

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



Yes

**Comment** The site has submitted maps with the existing infrastructure including the inlet water pipelines for the whole area.  
"IVB - Godišnje izvješće 2021 and 2022" contains a report on the water service provider's business operations for 2021/2022 containing information about water quality, distribution, water losses, water production, etc.  
"IVB - Plan poslovanja 2022 and 2023" contains the water service provider's business plan.  
"IVB - Odluka o razvoju vodoopskrbe" contains decisions on water supply development.  
"Sažetak za javnost\_Prijedlog izmjena i dopuna prostornog plana IŽ - pages 30-34" contain information about protection measures of natural values and special features.  
"NOVELACIJA VODOOPSKRBNOG PLANA ISTARSKE ŽUPANIJE" analyzes the current state of water supply and based on the processing of all elements, correct solutions for the water supply system.

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



Obs.

**Comment** The adequacy of available WASH services within the catchment has been evaluated as satisfactory. The population of Kanafar has access to sanitation, drinking water, and hygiene (including schools).  
As some houses in Kanfanar Municipality are not directly connected to the sewer system and the municipality provides truck Imhoff tanks emptying services with final discharge to the WWTP).




**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.*



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<b>1.6.1</b>	<i>Shared water challenges shall be identified and prioritized from the information gathered.</i>	 Yes
Comment	<p>The site provided a list of their shared water challenges, that it has identified in consultation with their stakeholders. The challenges are also prioritized according to the application of defined criteria.</p> <p>For each topic, the following points are developed:</p> <p>Risk Stakeholder with whom the challenge is shared Time horizon : Likelihood : Magnitude of impact : Result: Challenge Opportunities.</p> <p>The main water challenges are: Securing local water supplies in the long term. Avoid the emergence of conflicts of interest in water use, both economic and social Limit potential economic losses due to water scarcity (business interruption) Limit the impact of drought on local production capacity. Preserve the availability of pasture and watering places, limit the impact of drought, and identify contingency plans if necessary Implementation of water saving initiatives" Ensuring natural conservation of groundwater. Stop/Decrease drinking water treatment and preserve pure water Limiting the impact of industrial solutions on water, soil/air to develop a plan of continued development of biodiversity " Search opportunities to support the municipal water supplier Noncompliance with legal regulation. Loss of reporting recycling rate"</p>	
<b>1.6.2</b>	<i>Initiatives to address shared water challenges shall be identified.</i>	 Yes
Comment	<p>The identified initiatives related to each water challenge are listed in the table Water Stewardship Plan.</p> <p>The initiatives cover the expectations of the site and some of them are also clearly marked as shared with the stakeholders,</p> <p>For each target, a detailed set of management information is given proving the different phases of identification, planning, acting, monitoring, and evaluating.</p>	
<b>1.7</b>	<i>Understand the site's water risks and opportunities: Assess and prioritize the water risks and opportunities affecting the site based upon the status of the site, existing risk management plans and/or the issues and future risk trends identified in 1.6.</i>	
<b>1.7.1</b>	<i>Water risks faced by the site shall be identified, and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.</i>	 Yes

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Comment	<p>The site has identified a list of water risks related to shared water challenges and other risks not related to shared water challenges; For each risk, the following points are defined: Dangers; internal/external; description; consequences; severity likelihood; economic impact; risks; existing measures; opportunities for improvement.</p> <p>For two risks (monitoring of operation and maintenance of oil/grease separators kitchen and stormwater from the manipulative surface; internal instruction for carrying out control of the safety of wastewater drainage facilities ) an internal procedure to face the risk has been produced and attached.</p> <p>A short-term (1 to 3 years frame) opportunity shared with Istarski Vodovod Buzet d.o.o. is about the Increased scarcity of sanitary and drinking water in times of drought and tourist season. The site is taking into consideration actions on Raising stakeholder awareness of the importance of water resources, participating in actions proposed by Kanfanar Municipality, monitoring consumption and investigating to find and finance industrial solutions that use less water.</p>	
1.7.2	<i>Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.</i>	 Yes
Comment	Water-related opportunities for improvement. are identified in the document "AWS - Water challenges and opportunities KF" (see indicator 1.6.1.).	
1.8	<i>Understand best practice towards achieving AWS outcomes: Determining sectoral best practices having a local/catchment, regional, or national relevance.</i>	
1.8.1	<i>Relevant catchment best practice for water governance shall be identified.</i>	 Yes
Comment	<p>The site has identified several actions to define and implement applicable best practices relevant to the AWS system exchanging info with the water public authority and other r interested parties including the Group experience shearing of experience. Documents providing the efforts from the main SH to apply the TDR techniques are contained in: "IVB - Godišnje izvješće 2021 and 2022" contains a report on water service provider's business operations for 2021/2022 where information about water quality, distribution, water losses, water production, etc. are described. "IVB - Plan poslovanja 2022 and 2023" contains the water service provider's business plan. Hrvatske vode which is a legal person for water management has a proper water strategy. "IVB - Rezultati analiza vode za ljudsku potrošnju na izlazima iz postrojenja-interna kontrola 2021" contains results of an analysis of water for human consumption which is done by the local water service provider. The site is also sharing data with other BAT factories, so this is also best practice and evidence for that is attached. GRI 303 WATER AND EFFLUENTS is also taken into consideration to evaluate the results versus the best possible applicable techniques.</p>	
1.8.2	<i>Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.</i>	 Yes

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Comment	<p>In "WATER - REPORTING SYSTEM" presentation it is shown how water circulates through the site system.</p> <p>"KANFANAR MJESEČNI LETAK LIPANJ 2022" (monthly newsletter) has a part where EHS is raising workers' awareness of how to reduce water consumption:</p> <p>Examples of water management improvement points are:</p> <ul style="list-style-type: none"> <li>-If anybody notice that the water is "dripping" or "leaking" or any other malfunction that may cause excessive consumption of water (e.g. breakdown water tank) report the event to the general maintenance department to remove failure and eliminate possible losses</li> <li>-Everybody must use water rationally while performing personal hygiene</li> </ul> <p>Department Site Services has checklists in which there is a trace on how they are performing checks of water-related infrastructure.</p> <p>Attached is an example. Picture 1 and 2 - awareness about saving water in the factory</p>	
<b>1.8.3</b>	<i>Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.</i>	 Yes
Comment	<p>In att document "NOVELACIJA" Istarski there are information about best practices for water quality (page: 170-182/395, 223-233/395)</p> <p>Water analyses performed for the site by authorized companies are available.</p> <p>"IVB - Politika kvalitete i održivog poslovanja 2019" is Quality and sustainable business policy.</p>	
<b>1.8.4</b>	<i>Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.</i>	 Yes
Comment	<p>The site organized different forms of Communication with the interested parties: material distributed on Family Day for the inclusion of all employees in water-related initiatives, increasing public awareness related to AWS (IWRA, catchment), and participation in external activities on World Water Day.</p>	
<b>1.8.5</b>	<i>Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.</i>	 Yes
Comment	<p>"Aquaviva" and "Ziva voda" are analytical reports on water quality in gallons.</p> <p>In the "Troškovi za vodu u galonima" the costs for water in gallons are shown.</p> <p>The site also provides an analysis of the potable water "očividnik-otpadne vode".</p> <p>A sufficient number of taps and toilets are also provided for all employees and others present at the site and a sufficient number of showers for workers for whom this is necessary in accordance with document "Elaborat zaštite na radu, mapa XIII."</p> <p>The legal document "Pravilnik o zaštiti na radu za mjesta rada" defines the exact number of showers and toilets (depending of the number of people on site).</p>	

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2	<b>STEP 2: COMMIT &amp; PLAN - Commit to be a responsible water steward and develop a Water Stewardship Plan</b>	
2.1	<i>Commit to water stewardship by having the senior-most manager in charge of water at the site, or if necessary, a suitable individual within the organization head office, sign and publicly disclose a commitment to water stewardship, the implementation of the AWS Standard and achieving its five outcomes, and the allocation of required resources.</i>	
2.1.1	<i>A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:</i> <ul style="list-style-type: none"> <li><i>- That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes</i></li> <li><i>- That the site implementation will be aligned to and in support of existing catchment sustainability plans</i></li> <li><i>- That the site's stakeholders will be engaged in an open and transparent way</i></li> <li><i>- That the site will allocate resources to implement the Standard.</i></li> </ul>	
Comment	<p>On the 15th of April, the new AWS Policy (Water Management policy) was signed by the Operations Director (Member of the Management board) and Engineering and Sites Services Manager (Proxy) stating the commitment to implement and maintain the AWS standard and providing enough resources. The commitment was published internally via employee dashboards and on the Intranet.. Furthermore, the commitment was posted on BAT's social network (Yammer) and public newspapers and to the main identified stakeholders. The Kanfanar site policy has been prepared taking into consideration the general group policy defined in document C11 where the group policy are defined.</p> <p>In this document, TDR recognizes that water is a critical natural resource of strategic importance to the business and the communities in which it operates. It acknowledges the importance of having guiding principles in terms of responsible use and preservation of this vital resource, to remain aligned and demonstrate its share of contribution towards UN's Sustainable Development Goal 6: Ensure availability and sustainable management of water and sanitation for all.</p>	
2.2	<i>Develop and document a process to achieve and maintain legal and regulatory compliance.</i>	
2.2.1	<i>The system to maintain compliance obligations for water and wastewater management shall be identified, including:</i> <ul style="list-style-type: none"> <li><i>- Identification of responsible persons/positions within facility organizational structure</i></li> <li><i>- Process for submissions to regulatory agencies.</i></li> </ul>	
Comment	<p>The site has been identified in a Document KOL 012-117 Lista zakonskih i dr. Zahtjeva the water-related legal and regulatory requirements correctly applied.</p> <p>In the job description, there are the EMS duties and responsibilities mainly for: facility coordinator, EHS coordinator, EHS specialist, EHS manager, and utility and facility manager.</p> <p>The water discharge permits are issued by Croatian Water (Hrvatske Vode) in the name of the company TDR d.o.o. (BAT).</p> <p>The company nominated (Internal decisions signed by the Member of the board and the proxy) the responsible people for:</p> <ul style="list-style-type: none"> <li>• operation and maintenance of the internal water discharge system</li> <li>• management, operation, and maintenance of the wastewater treatment plant and for auditing and implementation of applicable legal requirements related to water protection</li> </ul>	
2.3	<i>Create a water stewardship strategy and plan including addressing risks (to and from the site), shared catchment water challenges, and opportunities.</i>	

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2.3.1	<p><i>A water stewardship strategy shall be identified that defines the overarching mission, vision, and goals of the organization towards good water stewardship in line with this AWS Standard.</i></p>	 Yes
Comment	<p>The TDR top management has defined a water stewardship strategy statement taking the Group policies as a starting framework. . The document is structured as a mainframe containing three different parts strictly linked covering Mission, Vision, and Targets There is coherence between the Targets and Actions described in the WSP and the overarching mission.</p>	
2.3.2	<p><i>A water stewardship plan shall be identified, including for each target:</i></p> <ul style="list-style-type: none"> <li><i>- How it will be measured and monitored</i></li> <li><i>- Actions to achieve and maintain (or exceed) it</i></li> <li><i>- Planned timeframes to achieve it</i></li> <li><i>- Financial budgets allocated for actions</i></li> <li><i>- Positions of persons responsible for actions and achieving targets</i></li> <li><i>- Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.</i></li> </ul>	 Yes
Comment	<p>A detailed water stewardship plan was created as part of the AWS process. The plan details for each action/target on a line completed by all the necessary details to cover the PLAN/DO/CHECK / ACT cycle: Outcomes name; Action/Target; Actions to achieve and maintain it; Target deadline / frequency; Risk; Opportunity; Value creation (include numerical and financial benefit); Best practice; Description Best Practice; Owner/Position; Budget; Measure of achievement; Shared water challenge addressed by the action; Action related to IWRA; Engaged stakeholder; Reference to detailed project management to reach the expected results; "Water reduction year [m3]; Water recycling year [m3]; Net savings [EUR]; Evaluation (numerical results, e.g. %); Status; a final section is dedicated to the continuous monitoring with periodical evaluation and updates with kpi, ongoing and final evaluation by the AWS team.</p> <p>The Water Action Plan for 2023 as well as Risks and Opportunities were updated and discussed on 20.10.2023. in the Leadership monthly meeting as well. and updated. The action plan is extended with measures of value, financial benefit, shared water challenge addressed by the action, engaged stakeholders, references to detailed project management to reach the expected results, and corrected evaluation to reflect numerical. resolutions, existing actions status are updated, and new actions are added. All actions listed were discussed including the site's performance against the targets set in the water stewardship plan, value creation from each action implemented, and shared value benefits. Details are listed in the Water Stewardship Plan.</p> <p>Here below examples of an action defined to achieve each of the five main outcomes: Good Water Governance: Assure continuous running of WWTP; Improving monitoring of water consumption. Sustainable Water Balance: Balancing the hot water system; Dichlorination system. Good Water Quality Status: Assure good quality of purified water used for technological processes; maintain the oil separators in proper condition Important Water-Related Areas: explore the contribution possibility for Jama kod Burići ; explore the contribution possibility for Limska Draga. Safe Water, Sanitation, And Hygiene For All (Wash): Explore contribution possibility for shared water challenges: - to reduce the possible scarcity of sanitary and drinking water in times of drought and tourist season; - to reduce possible deterioration of water quality due to possible drought; - to reduce damage to water supply due to obsolete infrastructure "</p>	

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**2.4** *Demonstrate the site's responsiveness and resilience to respond to water risks*

**2.4.1** *A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.*



Yes

**Comment** Water risks identified for each water challenges are shared with the stakeholders. .

The document "Operativni plan mjera u slučaju izvanrednog i iznenadnog onečišćenja voda" defines and lists the measures that need to be taken in the event of extraordinary and sudden water and environmental pollution for the company TDR d.o.o. at the location - Pogon Kanfanar - Burići 9b. As part of the operational plan, there is a "scheme". Croatian government published the document "Državni plan mjera za slučaj izvanrednih i iznenadnih onečišćenja voda". Another document "Denial of site Kanfanar" contains action that must be taken in case of scarcity.



The municipality of Kanfanar doesn't have any plan related to water risks as they stated that no risk related to water is detected. MoM attached.



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3	STEP 3: IMPLEMENT - Implement the site's stewardship plan and improve impacts	
3.1	Implement plan to participate positively in catchment governance.	
3.1.1	Evidence that the site has supported good catchment governance shall be identified.	 Yes
Comment	<p>The Site provided documentation of its efforts to support good catchment governance through participation with the local governing agencies, sharing information with agencies, and continuing to expand education on AWS and outcomes toward good water governance.</p> <p>The group water policy document defines parameters for water quality on the site and for WWTP.</p> <p>The site is sharing data with other BAT factories so this is also best practice and evidence for that is attached and already described in indicator 1.8.1.</p> <p>The document 'IVB - Godišnje izvješće 2021 and 2022' contains a report on the water service provider's business operations for 2021/2022 where we can see information about water quality, distribution, water losses, water production, etc.</p> <p>The Department of Site Services has checklists in which we can see that they are performing checks of water-related infrastructure. Attached is an example.</p> <p>"IVB - Rezultati analiza vode za ljudsku potrošnju na izlazima iz postrojenja-interna kontrola 2021" contains results of an analysis of water for human consumption which is done by a local water service provider.</p> <p>The document "Dokaz o održavanju WWTP" is a monthly maintenance report of the WWTP which is performed by contractor(also stakeholder) AMBRA.</p> <p>A meeting is periodically run with a focus on the communication with the Stakeholders for all these actions and recorded.</p> <p>In "ZAHVALA -zabilješke sastanka 30.08." is evidence that we have been on meeting with our stakeholder Istarski vodovod d.o.o. Buzet (our water provider).</p> <p>A meeting was performed with the Municipality of Kanfanar regarding this indicator, MoM is attached.</p>	
3.1.2	Measures identified to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be implemented.	 Yes

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**Comment** "Zakon o vodama" stipulates that water management consists of all tasks, measures, and actions undertaken by the Republic of Croatia, Hrvatske vode, and units of local and regional self-government based on this law and the law governing the financing of water management. The principle is that water is not a commercial product like some other products, but it is a heritage that should be preserved, protected, and used wisely and rationally, and that water should be managed according to the principles of the unity of the water system and sustainable development, which meet the needs of the present generation and do not jeopardize the right and possibility of future generations to achieve this for itself. That law also stipulates that waters are a common good and have the special protection of the Republic of Croatia and that waters in bodies of surface and underground water cannot be the object of property rights and other real rights. The above-mentioned law adequately ensured the water wealth of the Republic of Croatia as Water issues are directly regulated by two other laws: "Zakon o financiranju vodnoga gospodarstva" and "Zakon o vodi za ljudsku potrošnju". The first law determines the sources and use of funds for the financing of water management, and the latter regulates the healthiness of water for human consumption and implementing rules that ensure, among other things, the verification of deviations from the parameters for checking the conformity of water for human consumption, monitoring and other official controls of healthiness water for human consumption and their financing, all to protect human health from the adverse effects of any pollution of water for human consumption and ensure the healthiness of water for human consumption in the territory of Croatia. Document "Elaborat zaštite na radu, mapa XIII." - defining adequate number of toilets and taps related to occupancy.

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

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

 in progress

**Comment** The site has developed a comprehensive legal register. Document KOL 012-117 Lista zakonskih i dr. Zahtjeva contains water-related legal and regulatory requirements. Every year an internal audit on legal compliance is performed as a requirement for the 14001 certifications followed by the third part EMS audit; the Third part certification audit, although cannot be considered a legal compliance audit, gives an evaluation of the internal management of the compliance level.

An internal audit is also performed with the issue of an internal checklist on Environmental requirements. Provjera zakonske regulative identifies the law/regulation that applies or does not apply in TDR d.o.o.,

The checklist used for the internal audits doesn't cover the AWS requirements. The internal auditor (external consultant) is qualified for ISO 14001 but should have a reasonable knowledge of AWS standards.

Job description for EHS specialist, coordinator, and manager in att.

**Finding No: TNR-007175**

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

 Yes

**Comment** Water Rights for indigenous people are guaranteed by Law. At the moment there is no threat on water rights and availability.

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

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





 Yes



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Comment	<p>The Site has submitted its WSP with 25 projects, some dating before the AWS implementation, and others coming from the Water challenges identification with relevant Risk / Opportunity analysis. For each single project, there is a detailed planning and several controls.</p> <p>These documents are discussed and evaluated with the site's top management during a periodic progress AWS meeting.</p> <p>The owner illustrates the progress of the activities, highlighting positive points achieved or problems and delays to share any step with the management and with the rest of the team.</p> <p>The main topics are reported on the "Vodopravna dozvola pogon KF" and "Vodopravna dozvola UPOV", water glide path, water road map, legionella preventive measures, očevidnik odpadnih voda, regional sustainability meeting etc.</p> <p>The target of water is to reduce the use of raw water from public distribution to 30% from 2017 by 2030. This point is related to Water action plan 1, 2, 3, 5, 6, 8, 11, 12, 13, 14.</p>	
<b>3.3.2</b>	<i>Where water scarcity is a shared water challenge, annual targets to improve the site's water use efficiency, or if practical and applicable, reduce volumetric total use shall be implemented.</i>	 Yes
Comment	<p>The TDR site is located in an area without water scarcity. However, the site has set targets to reduce water consumption annually, the water reuse plant, and improve the ratio of bottled water/catchment water.</p> <p>The water consumption for the process is under control with a Kpi.</p> <p>The total site water consumption split for the different sources and uses is also monitored.</p> <p>In the attached official table, the Risk level in the area is defined where it is officially stated that water stress is Low (&lt; 10%).</p>	
<b>3.3.3</b>	<i>Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.</i>	 Yes
Comment	There is no legally enforced reallocation of water to social, cultural, or environmental needs in the region.	
<b>3.4</b>	<i>Implement plan to achieve site water quality targets</i>	
<b>3.4.1</b>	<i>Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.</i>	 Yes
Comment	<p>The progress towards meeting water quality targets set in the Water Stewardship Plan is kept under control in the management review periodically scheduled.</p> <p>The attached documents "Vodopravna dozvola UPOV (WWTP)" &amp; "Vodopravna dozvola pogon Kanfanar" define parameters for water quality on the site and WWTP.</p> <p>Quality control of pipelines performed by the authorized company, report in att.</p> <p>See "AWS_Action Plan Water_KF" (indicator 2.3.2.)</p> <p>A relevant project on water quality is related to the control of legionella: the project consists of Installing an automatic flow vs temperature balancing system to have: Optimal heating of water in boilers; Efficient distribution to water pipeline brancher; Automatic weekly legionella preventive action, optimizing heat to flow distribution; Minimal heat loss; ZERO water loss</p>	
<b>3.4.2</b>	<i>Where water quality is a shared water challenge, continual improvement to achieve best practice for the site's effluent shall be identified and where applicable, quantified.</i>	 Yes

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Comment	<p>Waste Water Quality is one of the shared water challenges and has been identified as a top priority.</p> <p>Two main streams are kept under control.</p> <p>1: The wastewater exiting from the site after collecting civil and industrial (from the very limited process) waste and is drained to the external WWTP.</p> <p>2: The WWTP-treated water enters the lake from where it is reused as industrial water for the site. There is no external discharge from the WWTP to the downstream catchment. The Water quality exiting from the WWTP is measured in quantity and tested periodically (for the main parameters with kit) by the external service company that is running the plant and periodically by the official Environmental Agency.</p> <p>Water analyses are performed by authorized companies. The documents "Vodopravna dozvola UPOV (WWTP)" &amp; "Vodopravna dozvola pogon Kanfanar" define parameters for water quality from the site and the WWTP: both are always respected.</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>	 Yes
Comment	The site has identified the main IWRA and defined a communication plan for Information/awareness shared with the public (e.g. Family Day, newspapers..) with meetings with stakeholders.	
3.6	<i>Implement plan to provide access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers at all premises under the site's control.</i>	
3.6.1	<i>Evidence of the site's provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers onsite shall be identified and where applicable, quantified.</i>	 Yes
Comment	The provision for WASH access to all workers inside the site is granted by law and it is not a potential problem in the Site location. "Aquaviva" and "Ziva voda" are analytical reports on water quality.	
3.6.2	<i>Evidence that the site is not impinging on the human right to safe water and sanitation of communities through their operations, and that traditional access rights for indigenous and local communities are being respected, and that remedial actions are in place where this is not the case, and that these are effective.</i>	 Yes
Comment	The respect of human rights related to the access to WASH for local communities within the catchment granted by law and it is not a potential problem in the Site location.	
3.7	<i>Implement plan to maintain or improve indirect water use within the catchment:</i>	
3.7.1	<i>Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.</i>	 Yes
Comment	The indirect use of water is not relevant to the site. There is no relevant supplier company located in the catchment.	
3.7.2	<i>Evidence of engagement with suppliers and service providers, as well as, when applicable, actions they have taken in the catchment as a result of the site's engagement related to indirect water use, shall be identified.</i>	 Yes

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Comment	The embedded water use of outsourced services is identified. On-site outsourced services provided by "Klanjac", "Retia Volante" and "Securitas" are using water on-site. Another water use is the car wash services: consumption is evaluated.	
<b>3.8</b>	<i>Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have.</i>	
<b>3.8.1</b>	<i>Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.</i>	 Yes
Comment	The site provided pieces of evidence of engagement (questionnaire, presentation, meeting, and attendance report..) with stakeholders.	
<b>3.9</b>	<i>Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.</i>	
<b>3.9.1</b>	<i>Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.</i>	 Yes
Comment	The site water department in cooperation with the Group technical department is always working to implement the best practice. As an example of good water management towards a best practice (n. 18 in the action plan): The target is Water withdrawal reductions per BAT targets. The action is Increasing the usage of recycled water and decreasing the usage of municipality water, implementing of EnerCon tool (measuring the consumption n more detailed levels, detecting potential losses) The value creation is that Every 1% water recycled increases results in a 743 m3 increase of recycled water and reduces the water withdrawn for the same amount. .	
<b>3.9.2</b>	<i>Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.</i>	 Yes
Comment	The main project put in place towards achieving best practice towards an efficient water balance are related to the decrease of the use of water from the public supply. An example is (n.6 on the action plan): The target is to use waste water from cooling towers to produce steam; the action is the Installation of an additional collective tank, pumps, pipeline which will direct water from cooling towers directly to the boilerhouse for steam production the value creation is Reducing water withdrawn	
<b>3.9.3</b>	<i>Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.</i>	 Yes
Comment	Several projects are put in place towards achieving best practices in terms of water quality. An example is (n.6 on the action plan): The target is to Use waste water from cooling towers to produce steam; the action is the Installation of additional collective tanks, pumps, and pipelines which will direct water from cooling towers directly to the boilerhouse for steam production the value creation is Reducing water withdrawn	
<b>3.9.4</b>	<i>Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.</i>	 Yes

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Comment Several projects are put in place towards achieving best practices in terms of IWRA  
An example is (n.21 on the action plan):  
The target is to Explore contribution possibilities for Limska Draga;  
the action is to Contact the Local Municipality to develop an action plan (eg. cleaning of walkways (preventive fire protection and maintenance of the natural balance of the habitat), in the event of a fire, vegetation is destroyed, without vegetation, soil erosion occurs due to rain, soil erosion destroys the upper fertile soil, the biodiversity of the ecosystem is damaged)  
the value creation is to improve the environmentally 'preserved area.

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



Yes

Comment Several projects are put in place towards achieving best practices in terms of WASH.  
An example is (n. 24 the action plan):  
The target is to Balancing the hot water system  
the action is to Installing balancing valves to enable a constant flow of water in all parts of the pipeline to prevent legionella  
the value creation of the procedure/action is to prevent legionella is to heat the water system at 70°C once per month and to drain water on taps till the hot water appears. Reducing the consumption of municipality water for 500-1000 m3 which brings 2000 EUR savings/per year

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4 STEP 4: EVALUATE - Evaluate the site's performance.	
4.1	<i>Evaluate the site's performance in light of its actions and targets from its water stewardship plan and demonstrate its contribution to achieving water stewardship outcomes.</i>
4.1.1	<i>Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.</i>
Comment	<p>For all the projects detailed in the AWS Plan, the site keeps control of its progress and performance against each quantified target with meetings planned twice a year. The process owner presents the progress of the project to the management. Some projects have a duration of more than one year: in this case, intermediate steps are defined to monitor the progressive management of the projects.</p> <p>Several initiatives have been implemented on the site that reduce the site water withdrawal and increase the water recycling rate. The targets for 2022 have been met and 2023 Glidepath shows that water targets are on track.</p> <p>The recycling rate has increased due to the implementation of initiatives: improved easy aeration, installation of the ultrasonic device that suppresses the growth of algae, and improved maintenance plan of ultrafiltration and reverse osmosis system. In 2023 vs. 2022, the expected recycling rate is increased by approximately 18%. increasing the recycling rate, reducing the consumption of water from public suppliers reducing the impact on the public water supply network.</p>
4.1.2	<i>Value creation resulting from the water stewardship plan shall be evaluated.</i>
Comment	<p>In the AWS plan, the cost or the value creation for each objective is defined and approved by the top management as a budget before starting operations on it.</p> <p>The target (i.e.: water consumption reduction,) is indicated.</p>
4.1.3	<i>The shared value benefits in the catchment shall be identified and where applicable, quantified.</i>
Comment	<p>Some projects contained in the AWS plan, will bring a benefit to the community. An example is (n.22 on the action plan):</p> <p>The target is to Explore contribution possibilities for Kašteljir;</p> <p>the action is to Contact Local Municipality to develop an action plan (eg. Support in purchasing waste bins so that waste does not enter the environment, environmental cleaning action)</p> <p>the value creation is to improve the Environmental/cultural benefit</p>
4.2	<i>Evaluate the impacts of water-related emergency incidents (including extreme events), if any occurred, and determine the effectiveness of corrective and preventative measures.</i>
4.2.1	<i>A written annual review and (where appropriate) root-cause analysis of the year's emergency incident(s) shall be prepared and the site's response to the incident(s) shall be evaluated and proposed preventative and corrective actions and mitigations against future incidents shall be identified.</i>

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**Comment** The site Manager declared that in recent years no emergency events have been recorded. Following the internal system procedures (for emergency management, NC, CA, and PA procedure; business continuity plan), the episode would be recorded, and the root causes evaluated. Where applicable, a subsequent corrective action is put in place which will help prevent future occurrences.  
Should an emergency present, it would be analyzed in the Management Review.

The internal organization shared with the 14001 EMS system is based on a document and relevant records :  
"EXERCISE PLAN FOR EMERGENCY SITUATIONS", "NOTIFICATION SCHEME IN CASE OF EMERGENCY EVENT" , "LIST OF PARTICIPANTS IN THE IMPLEMENTATION OF INTERVENTION MEASURES" and evacuation leaders training.  
"Operativni plan mjera u slučaju izvanrednog i iznenadnog onečišćenja voda", "Shema za UPOV i Pogon KF"

In the upcoming revision of the BCP And scenario in which WWTP stops functioning will be included, covering the contingency actions where in the mentioned occurrence, wastewater from the factory will be collected with tank trucks and transported it Rovinj WWTP.

**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.*



Yes

**Comment** The Site has engaged in active communication with the identified stakeholders to be repeated once a year to communicate and review its water stewardship performance. This consultation is finalized to confirm shared water challenges and Important Water-Related Areas in the catchment. The form of the consultation is appropriate for the local context and the stakeholders engaged.  
The site performed meetings on April 10 and September 15 with the stakeholders followed by the distribution of a questionnaire.

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

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



Yes

**Comment** The WSP is kept updated at every management meeting. The previous revisions of the files are available as records.  
Any change in a project is managed, discussed, evaluated, and agreed



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5	<b>STEP 5: COMMUNICATE &amp; DISCLOSE - Communicate about water stewardship and disclose the site's stewardship efforts</b>	
5.1	<i>Disclose water-related internal governance of the site's management, including the positions of those accountable for legal compliance with water-related local laws and regulations.</i>	
5.1.1	<i>The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.</i>	
Comment	<p>The Site has an organization chart with the people named in a hierarchy. Relating to the governance of water issues and AWS responsibility they are classified as part of the Sustainability department.</p> <p>The Factory Sustainability Manager is in charge of the Implementation of AWS standards, monitoring of key performance indicators (KPIs), reporting</p> <p>The Sustainability Coordinator is in charge of the Environmental Management System, Coordinator, monitoring and analysis of KPIs results, reporting results, monitoring of legislation, and communication with the public sector.</p> <p>The Sustainability Specialist is in charge of the Implementation of AWS standard, education, assistance, and reporting of results.</p> <p>All duties are carefully described in a specific job description</p> <p>The company also nominated (Internal decisions signed by the Member of the board and the proxy) the responsible people for:</p> <ul style="list-style-type: none"> <li>• operation and maintenance of the internal water discharge system (Utilities &amp; Facilities Manager)</li> <li>• management, operation and maintenance of the waste water treatment plant (Facility Coordinator) and for auditing and implementation of applicable legal requirements related to water protection (Sustainability Coordinator)</li> </ul> <p>For the implementation purpose of the AWS standard a new full-time resource was created - ESG Specialist. The main tasks of this role was given collection for sites and catchment, creation of necessary documents, internal &amp; external stakeholders engagement and research.</p>	
✓	Yes	
5.2	<i>Communicate the water stewardship plan with relevant stakeholders.</i>	
5.2.1	<i>The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.</i>	
Comment	<p>The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, is communicated to relevant stakeholders.</p> <p>During the interviews with stakeholders, it was confirmed that the site keeps an active communication related to the implementation of the AWS outcomes.</p> <p>The AWS project was communicated at the meeting with the stakeholders and via e-mail.</p> <p>The site also informed the stakeholders in a newspaper article.</p> <p>Other initiatives were implemented, eg AWS awareness during the "Family Day" event where employees with their family members were present (approx 700 participants), in monthly letter (shared with factory employees) and good practices for water consumption reduction were published, employees' information about the importance of water and KPI's via rollups and dashboards.</p>	
✓	Yes	
5.3	<i>Disclose annual site water stewardship summary, including: the relevant information about the site's annual water stewardship performance and results against the site's targets.</i>	

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<b>5.3.1</b>	<i>A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.</i>	 Obs.
Comment	<p>The site will produce a summary of their annual WSP performance in an abstract of the WSP. This will include quantified performance against targets.</p> <p>General information on the AWS system is given in the internal communication periodical news, and in a general presentation used for clients and guests.</p>	
<b>5.4</b>	<i>Disclose efforts to collectively address shared water challenges, including: associated efforts to address the challenges; engagement with stakeholders; and co-ordination with public-sector agencies.</i>	
<b>5.4.1</b>	<i>The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.</i>	 Obs.
Comment	<p>At the beginning of the AWS project, the site shared water-related challenges, and efforts made to address these challenges were explained during the first meetings with the stakeholders.</p> <p>Starting from next year the site will share the progress achieved on water challenges, including associated efforts to address the challenges, and its engagement with local authorities, public-sector agencies, other local companies, organizations, and community groups in the area.</p>	
<b>5.4.2</b>	<i>Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.</i>	 Yes
Comment	<p>The site provided evidence of its relationship with the local water authorities for the improvement of the design and installation of the wastewater treatment plan.</p>	
<b>5.5</b>	<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>	
<b>5.5.1</b>	<i>Any site water-related compliance violations and associated corrections shall be disclosed.</i>	 Yes
Comment	<p>There is no disclosure as there were no compliance violations.</p> <p>The documents "Operativni plan mjera u slučaju izvanrednog i iznenadnog onečišćenja voda", "Shema za UPOV i Pogon KF" are available and in those documents, there is a procedure of communication flow in case of water-related violations/incidents.</p> <p>ISO 14001 audit report and state inspection reports have no comment on water-related compliance violations. Report (PIV) from the Register of Environmental Pollution received after reporting data of water withdrawn and water discharged to the lake with the conclusion that water parameters are in required or prescribed limits.</p>	
<b>5.5.2</b>	<i>Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.</i>	 Yes
Comment	<p>There is no disclosure as there were no compliance violations.</p>	
<b>5.5.3</b>	<i>Any site water-related violation that may pose significant risk and threat to human or ecosystem health shall be immediately communicated to relevant public agencies and disclosed.</i>	 Yes
Comment	<p>There is no disclosure as there were no compliance violations.</p>	



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### Photographic Evidence from Audit



Yes