

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)



Audit Number: AO-000633

SITE DETAILS

Site: **BAT Mexico - Tepic**

Address: Predio Los Sauces S/N Col. Los Sauces, C.P. Nayarit, 63197, Tepic, MEXICO

Contact Person: Rosa Renteria

AWS Reference Number: AWS-000507

Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Core

Date of certification decision: 2023-Nov-22

Validity of certificate: 2026-Nov-22

AUDIT DETAILS

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

Audit Type(s): Initial Audit

Audit Start Date: 2023-Jul-25

Lead Auditor: Ricardo Salas Colunga

Audit team participants:

Ricardo Salas Colunga, Lead Auditor

Site Participants:

Marío Delfino Salazar, Sustainability coordinator

Xintly Cabrera, Q.A Water Analyst

Juan Carlos Prado, CILT Processing

Flavio Chuava, Head of Leaf

María Fernanda Hernández, Business and Development Manager

Blanca Rubí Vega, IWS coordinator

Rosa Guadalupe Rentería, coordinator EHS

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ADDITIONAL INFO

Summary of Audit Findings: A total of 20 findings were raised during the certification audit, 2 major non-conformities, 14 minor non-conformities, 4 observations. The major non-conformities were of sufficient concern to warrant the categorisation of the non-conformity as major and related to Water balance and IWRA.

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 28/10/2023.

The major non-conformities must be sufficiently addressed and evidence submitted to WSAS within 90 days of receipt of the report by 28 November 2023.

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

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

CLOSURE OF FINDINGS AND CORRECTIVE ACTION PLAN:

The Client has successfully resolved the major non-conformity and submitted the corrective action plan addressing all findings.

Proof of implementation has been requested for the Minors and this will be evaluated during the Surveillance Audit. The client is requested to upload evidence of implementation prior to the Surveillance Audit.

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

Procesadora de Tabacos de México, S.A. de C.V. (BAT TEPIC), is located at Predio Los Sauces S/N Col. Los Sauces, Tepic, Nayarit, C.P. 63197. The company began operations in September 2000 as a tobacco development company and is located on a property of approximately 18.823 hectares, with a constructed area of approximately 9.20 hectares. The Plant operates on a harvest regime, which extends from 6 to 7 months per year in 3 shifts, from Monday to Saturday. During the off-season, maintenance activities are carried out during normal hours, Monday through Friday. During the harvest season, the teams are staffed with up to 450 people, and in the off-season with approximately 80 people.

The audit was conducted onsite on 25/07/2023-27/07/2023.

The onsite site visit included the assessment of Offices, receiving areas, warehouses, production lines, boilers, chemical stores, hazardous waste, WWTP water treatment plant, green areas, storm drainage area, wells, drainage line. as part of the audit.

FINDINGS

NUMBER OF FINDINGS PER LEVEL

Observation	4
Minor	14
Major	2

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FINDING DETAILS

Finding No:	TNR-005192
Checklist Item No:	1.1.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Jul-16
Checklist item:	<p>The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including:</p> <ul style="list-style-type: none">- Site boundaries;- Water-related infrastructure, including piping network, owned or managed by the site or its parent organization;- Any water sources providing water to the site that are owned or managed by the site or its parent organization;- Water service provider (if applicable) and its ultimate water source;- Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies;- Catchment(s) that the site affect(s) and is reliant upon for water.
Findings:	<p>The site plans do not show that there are two lots separated by a railway track.</p> <p>Some plans do not have coordinates and/or scale.</p> <p>The legend on the site plans of the water mains do not have a proper legend and do not facilitate interpretation.</p>
Corrective action:	<p>Site boundary plans will be included, representing the two lots that make up the site and the railroad that separates them. The plans will include the geographical location, scale and legends. An appropriate legend will be included on the water pipe location plans to facilitate interpretation.</p>

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Finding No:	TNR-005374
Checklist Item No:	1.2.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Jul-16
Checklist item:	<p>Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall:</p> <ul style="list-style-type: none">- Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people;- Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies;- Provide evidence of stakeholder consultation on water-related interests and challenges;- Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups;- Identify the degree of stakeholder engagement based on their level of interest and influence.
Findings:	<p>The site does not include in the evidence presented the shared challenges related to water from the stakeholder consultation.</p> <p>The site presents the shared challenges document in 1.6.1 however it is not possible to identify with which stakeholders it shares these challenges.</p>
Corrective action:	<p>Shared water-related challenges will be presented based on stakeholder consultation and the challenges will be linked to point 1.6.1.</p>

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Audit Number: AO-000633

Finding No:	TNR-005215
Checklist Item No:	1.3.2
Status:	Closed
Finding level:	Major
Due date:	2023-Nov-28
Checklist item:	Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped
Findings:	<p>The site does not present a reliable water balance and includes information on water abstraction from wells and water consumption that is not consistent.</p> <p>The site does not indicate to which year the information presented refers.</p> <p>The site does not include in its water balance that it purchases for human consumption.</p> <p>The site does not present an equation of its water balance.</p>
Corrective action:	<p>In 2023, the installation of water meters will be ensured and from 2024, more precise measurement of the water used in all processes will begin. The site will provide a water balance equation and will review the data included in the water balance for consistency and indicate the start and end dates of the information it submits as evidence. Water for human consumption will be reported as indirect use in point 1.4.1.</p>
Finding No:	TNR-005376
Checklist Item No:	1.3.3
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Jul-16
Checklist item:	Site water balance, inflows, losses, storage, and outflows, including indication of annual variance in water usage rates, shall be quantified. Where there is a water-related challenge that would be a threat to good water balance for people or environment, an indication of annual high and low variances shall be quantified.
Findings:	<p>The site does not include the date of the information submitted as evidence.</p> <p>The incoming/extracted water and outgoing effluent should be metered.</p>
Corrective action:	<p>In 2023, the installation of water meters will be ensured and from 2024, more precise measurement of the water used in all processes will begin. The water balance will clearly indicate the date of the data submitted.</p>

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Audit Number: AO-000633

Finding No:	TNR-005193
Checklist Item No:	1.3.4
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Jul-16
Checklist item:	Water quality of the site's water source(s), provided waters, effluent and receiving water bodies shall be quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be quantified.
Findings:	The site does not present seasonal variation of water quality analyses of its source water, performs annual analyses and does not have data on maximum and minimum variation.
Corrective action:	Water analyzes will be performed on a quarterly basis to obtain seasonal water data, maximum and minimum values will be included.
Finding No:	TNR-005379
Checklist Item No:	1.3.6
Status:	In Progress - CA plan approved
Finding level:	Observation
Checklist item:	On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.
Findings:	The site does not present evidence of the condition of the site's IWRA's, site staff indicated that they have initiated contacts to conduct an environmental assessment of their IWRA's.
Corrective action:	Evidence of IWRA status will be provided.
Finding No:	TNR-005380
Checklist Item No:	1.3.7
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Jul-16
Checklist item:	Annual water-related costs, revenues, and a description or quantification of the social, cultural, environmental, or economic water-related value generated by the site shall be identified and used to inform the evaluation of the plan in 4.1.2.
Findings:	The site does not include all costs identified during the audit. Cost of bottled water for human consumption, cost of electrical energy used for the extraction of water from its wells.
Corrective action:	All water-related costs will be identified and presented.

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Audit Number: AO-000633

Finding No:

TNR-005383

Checklist Item No:

1.4.2

Status:

In Progress - CA plan approved

Finding level:

Minor

Due date:

2024-Jan-16

Checklist item:

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

Findings:

The site has partial information from its service providers and an inadequate approach to calculating the site's indirect water use.

Corrective action:

As much information as possible on water use by service providers will be collected and an approach will be adapted to calculate their indirect water use.

Finding No:

TNR-005392

Checklist Item No:

1.5.4

Status:

In Progress - CA plan approved

Finding level:

Observation

Checklist item:

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

Findings:

The site presents the available information which does not include data on the maximum and minimum variations of the water quality of the Mololoa River.

The site is in its initial audit and it is normal that it does not have all its initiatives of its sustainable water management plan in place so this finding is identified as an observation.

Corrective action:

Information will be presented on the water quality of discharges from the site and the Mololoa River. Maximum and minimum data will be presented, as well as seasonal variability.

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Finding No:	TNR-005393
Checklist Item No:	1.5.5
Status:	Closed
Finding level:	Major
Due date:	2023-Nov-28
Checklist item:	Important Water-Related Areas shall be identified, and where appropriate, mapped, and their status assessed including any threats to people or the natural environment, using scientific information and through stakeholder engagement.
Findings:	<p>The site does not identify important water-related areas in the catchment.</p> <p>The site is in the process of establishing a monitoring programme on the Mololoa river in whose catchment they are located.</p> <p>It seems contradictory that they are collaborating to monitor a river and do not identify it as an IWRA in the catchment.</p> <p>This indicates that the site has not understood the concept of IWRA in the watershed and its importance for the sustainability of the site's productive activity.</p>
Corrective action:	IWRA in the catchment, its characteristics and value will be identified, mapped and its status, including threats to people or the environment, assessed. In addition, the bibliographic reference will be indicated.
Finding No:	TNR-005394
Checklist Item No:	1.6.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Jul-16
Checklist item:	Shared water challenges shall be identified and prioritized from the information gathered.
Findings:	<p>The site did not include the shared challenge identified by several stakeholders "poor surface water quality".</p> <p>The site was not consistent with the evidence in 1.2.1 and therefore failed to include at least one of the challenges shared by stakeholders.</p>
Corrective action:	A review of the evidence will be done in 1.2.1 so that the challenges shared in this indicator are included in the list of challenges shared in 1.6.1.

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Finding No:	TNR-005395
Checklist Item No:	1.6.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Jul-16
Checklist item:	Initiatives to address shared water challenges shall be identified.
Findings:	<p>The site did not include site initiatives related to surface water quality.</p> <p>The site is inconsistent in omitting an initiative it shares with UAN if it is not included in its plan it cannot be implemented without allocating financial resources.</p>
Corrective action:	All initiatives to address the identified common challenges will be included in the sustainable water plan. In addition, initiatives will be clearly linked to the shared water challenges identified. The site will be consistent with initiatives to address shared challenges.
Finding No:	TNR-005416
Checklist Item No:	1.8.1
Status:	In Progress - CA plan approved
Finding level:	Observation
Checklist item:	Relevant catchment best practice for water governance shall be identified.
Findings:	<p>The site identifies 14 good practices of good water governance, not all good practices listed correspond to good water governance.</p> <p>The site does not include good practices identified during the audit.</p>
Corrective action:	<p>The list of good practices will be reviewed to verify that they correspond to the main outcomes defined in the AWS standard.</p> <p>The list of best practices will be updated and those identified during the audit will be included.</p>
Finding No:	TNR-005397
Checklist Item No:	1.8.3
Status:	In Progress - CA plan approved
Finding level:	Observation
Checklist item:	Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.
Findings:	<p>The site did not include all good practices related to water quality identified during the audit.</p> <p>The site did not present a list of all the good practices identified, the evidence is scattered in several files.</p>
Corrective action:	All good practices related to water quality in the catchment will be listed in a clear and easy to interpret way.

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Finding No:

Checklist Item No:

Status:

Finding level:

Due date:

Checklist item:

Findings:

Corrective action:

TNR-005403

1.8.5

In Progress - CA plan approved

Minor

2024-Jul-16

Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.

The site does not include all good WASH practices identified during the audit e.g. the commissioning of its WWTP.

The site does not include good practices related to WASH in the catchment.

The site will submit a complete list of good practices identified in the evidence provided.

Finding No:

Checklist Item No:

Status:

Finding level:

Due date:

Checklist item:

Findings:

Corrective action:

TNR-005423

2.3.2

In Progress - CA plan approved

Minor

2024-Jul-16

A water stewardship plan shall be identified, including for each target:

- How it will be measured and monitored

- Actions to achieve and maintain (or exceed) it

- Planned timeframes to achieve it

- Financial budgets allocated for actions

- Positions of persons responsible for actions and achieving targets

- Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.

The site omits to include BP22, related to surface water quality in the catchment where the site is located, in its objectives.

The site includes objectives that should be carried out every 2 or 3 years, this frequency prevents the progress of the objectives from being reviewed on an annual basis.

The description of the monitoring of the objectives in some cases does not allow for monitoring of the progress of the objective.

Some targets are not clearly written.

A review and analysis of the established objectives will be carried out, the necessary adjustments will be made so that they are clear, the monitoring of each one is better described and that these objectives are allowed to be measured annually. In addition to that, objective related to surface water quality in the catchment where the site is located will be included.

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Audit Number: AO-000633

Finding No:	TNR-005425
Checklist Item No:	2.4.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Jul-16
Checklist item:	A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.
Findings:	<p>The site does not present a plan for adaptation to the identified water risks, although it presents the identified risks and the actions to address them, the evidence presented presents some inconsistencies that do not give a true picture of the site's water risks. As it does not match the context observed during the audit.</p> <p>The site does not describe the methodology for assessing the degree of the risks and the degree assigned to several of them does not seem consistent.</p>
Corrective action:	A mitigation plan for water risks associated with climate change projections will be developed. This plan will be defined considering the risks identified in 1.7.1. The wording of the identified risks will be improved.
Finding No:	TNR-005435
Checklist Item No:	3.4.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Jul-16
Checklist item:	Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.
Findings:	The site does not present sufficient evidence of progress on water quality related objectives, most of them are identified as being 100% advanced.
Corrective action:	The plan will be divided by each of the actions to make it clearer and the evidence of each action will be presented with data to demonstrate current performance against the target.

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Audit Number: AO-000633

Finding No:

TNR-005438

Checklist Item No:

3.5.1

Status:

In Progress - CA plan approved

Finding level:

Minor

Due date:

2024-Jul-16

Checklist item:

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

Findings:

The site does not present most of the practices to maintain or improve the IWRAs in an inconsistent manner.

Corrective action:

The progress identified is not in line with what is described in the sustainable water management plan and with the evidence of the IWRAs.

A clear identification of IWRAs will be made both at the site and in the watershed and progress in implementing practices to maintain and/or improve IWRAs will be identified. The site will consistently write objectives related to the IWRA.

Finding No:

TNR-005479

Checklist Item No:

5.5.1

Status:

In Progress - CA plan approved

Finding level:

Minor

Due date:

2024-Jul-16

Checklist item:

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

Findings:

The site did not present evidence of SIAPA's disclosure of the charge for the excess contaminant load to the drainage system.

Corrective action:

A payment is being made for excess wastewater discharge parameters; this does not correspond to an infraction that requires payment of a fine. If there is any violation, it will be reported to the corresponding authorities.

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Report Details

Report	Value
Report prepared by	Ricardo Salas Colunga
Report approved by	Lurdes Guerra
Report approved on (Date)	28 August 2023

Surveillance

Proposed date for next audit
2024-Jul-16

Stakeholder Announcements

Date of publication	Location
19/06/2023	https://www.batmexico.com.mx/group/sites/bat_9yaad9.nsf/vwPagesWebLive/DOAFHM5K?opendocument
05/06/2023	WSAS & AWS Website
Comment	The site is a tobacco producer and is prohibited from open promotional activities, its disclosure is done directly or in closed forums.

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Catchment Information

Catchment Information

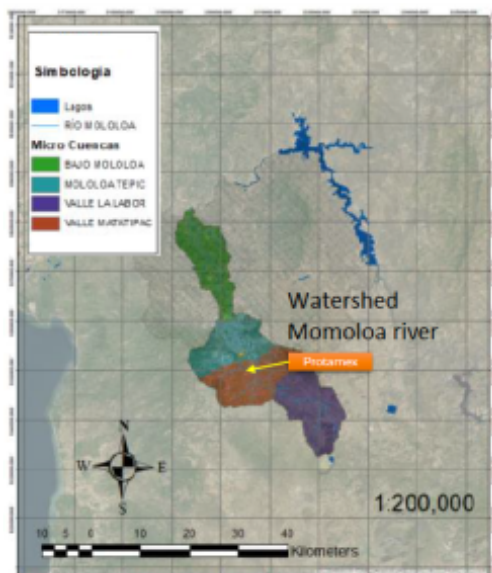
The Mololoa River rises in the Acuña spring, in San Leonel, at an altitude of approximately 1182 m and flows into the Santiago River at an altitude of 43 m. It has an approximate length of 70 km. The Mololoa basin is located between the geographical coordinates 21° 16' 30" and 21° 44' 30" N, and 104° 39' 30" and 105° 00' 30" W. According to Avalos et al. (2015) it has a surface area of 56 937 ha. It is considered an exoreic basin, bounded by the San Juan, Tepetitlic, Sangangüey and Las Navajas volcanoes. The average annual temperature of the basin ranges between 21-22 °C in the Matatipac valley and 24-26 °C towards the mouth, while the average annual precipitation is between 1000-1200 mm, although in some areas it follows up to 1500 mm (Vivanco et al., 2010). The study area mainly contains Tertiary igneous rocks (extrusive and intrusive), followed in order of importance by alluvial, palustrine and littoral deposits of Quaternary age.

The site is supplied by groundwater and therefore includes a map of the Matatipac Valley aquifer and a brief description of its characteristics:

The Matatipac Valley aquifer functions as a free type system and is constituted in heterogeneous granular materials, with granulometry of boleos, gravels and sands of variable composition, as well as silts and clays, alternating at depth with pyroclastics and basaltic spills.

It is naturally recharged by underground flow, by infiltration of surface water flowing through the Mololoa River and by direct infiltration of rainfall, with a radial flow direction towards the center of the valley, and later adopting a southeast-northwest direction. It is discharged by underground flow, by pumped extraction and through springs that are incorporated into the river's base flow.

The most favorable zone for groundwater extraction is located outside the urban area, to the east of Pantanal and in the center of the valley, an area with the greatest thicknesses of saturated fill materials. Agricultural developments in this area have been slowed down by the reserve declaration. Between the localities of La Cantera and San Cayetano, the aquifer is less productive due to the presence of fine sandy-clayey materials.

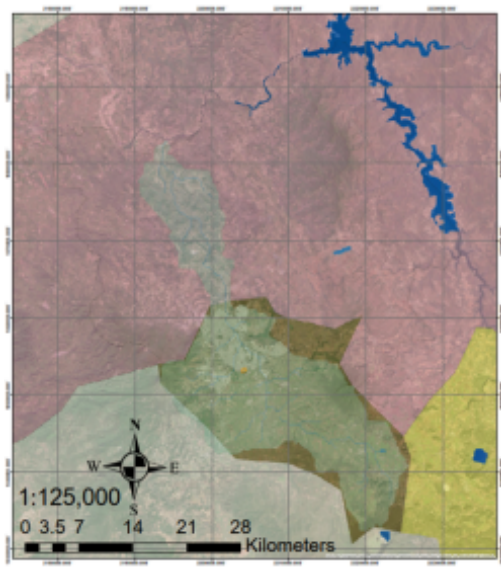


Plano de la cuenca del Río Mololoa.png

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Cuenca_y_Valle_Matatipac.png

CERTIFICATION REPORT

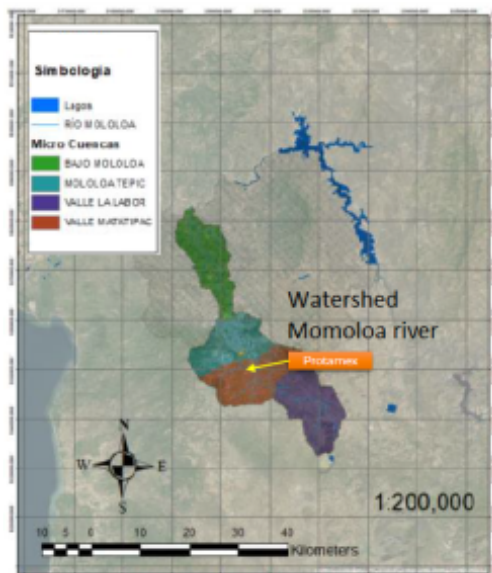
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Client Description and Site Details



BATTEpic_Mapa del sitio.png



Plano de la cuenca del Río Mololoa.png

Client/Site Background

WSAS

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

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Procesadora de Tabacos de México, S.A. de C.V., located at Predio Los Sauces S/N Col. Los Sauces, Tepic, Nayarit, C.P. 63197. The company started operations in September 2000 as a company dedicated to the development of tobacco and is located on a property of about 18.823 hectares, and a built-up area of about 9.20 hectares. The Plant operates on a harvesting regime, which extends from 6 to 7 months a year in 3 shifts, from Monday to Saturday. Out of season, maintenance activities are carried out during normal hours from Monday to Friday. In the harvest period, the teams number up to 450 people and in the off-season, approximately 80 people. Protamex processes tobacco leaf and stem for the production of cigarettes, in 2021, production reached a grand total of 19,182,000 kg.

The production process

1. RECEIPT Tobacco is supplied by producers located in the state of Nayarit, it is transported by trucks in 50 kg tobacco packets, which are called bales. These are called bales; they are received by teams of unloaders, classifiers and buyers. Subsequently, they are stored in warehouses numbers 1, 2, 3, 4, 5, shed 1 and shed 2, which are called "Bodegas de Tabaco Verde" (Green Tobacco Warehouses). The tobacco received is avoided according to the production programmes.

2.PROCESS According to the production programme, the pallets with tobacco are transported from "Bodegas de Tabaco Verde" to the feeding area, requiring the use of forklifts. 2.1 Feeding The personnel of this department has the purpose of depositing the bales of tobacco on the conveyor belts respecting the tobacco blend established in the Production Programme. 2.2 Sorting The main purpose of the staff in this department is to ensure the output quality of our finished product by removing from the production line all non-standard tobacco and all foreign material (thread, grass, cardboard, paper, labels, labels, mouth covers, ferrous materials, plastic materials, etc.). 2.3 Pre-conditioning and Conditioning It is carried out inside the cylinders by applying steam, hot air and steam. The initial objective is to hydrate the tobacco leaves that are fed, so that they can be handled during selection and thus reduce the degradation of the tobacco. Subsequently, they are conditioned at approximately 55°C and 21% humidity before the mechanical deveining process, thus reducing degradation and increasing the yield per kilogram of product. The final temperature and humidity of the products will determine the quality.

Summary of Shared Water Challenges




Summary of Shared Water Challenges

Poor surface water quality
Water scarcity
Overexploited aquifer
Poor groundwater quality
Water conflicts

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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>
	<div>  </div> <p>Yes</p> <p>Comment The site is located in the Mololoa river basin: This river originates in the Acuña spring, in San Leonel, at an altitude of approximately 1182 m and flows into the Santiago river at an altitude of 43 m. It is approximately 70 km long. It has an approximate length of 70 km. The Mololoa basin is located between the geographical coordinates 21° 16' 30" and 21° 44' 30' 30" N, and 104° 39' 30" and 105° 00' 30" W. It has a surface area of 56 937 ha. It is considered an exoreic basin, delimited by the San Juan, Tepetitlic, Sangangüey and Las Navajas volcanoes. The average annual temperature of the basin ranges from 21 to 22 °C in the Matatipac valley and from 24 to 26 °C towards the mouth, while the average annual precipitation is between 1000-1200 mm, although in some areas it follows up to 1500 mm. The study area mainly contains Tertiary igneous rocks (extrusive and intrusive), followed in order of importance by alluvial, marsh and littoral deposits of Quaternary age.</p>
0.1.1.2	<i>The scope of the proposed certification shall be under the control of a single management system.</i>
	<div>  </div> <p>Yes</p> <p>Comment Procesadora de Tabacos de México, S.A. de C.V., located at Predio Los Sauces S/N Col. Los Sauces, Tepic, Nayarit, C.P. 63197. The company started operations in September 2000 as a company dedicated to the development of tobacco and is located on a property of about 18.823 hectares, and a built-up area of about 9.20 hectares. The Plant operates on a harvesting regime, which extends from 6 to 7 months a year in 3 shifts, from Monday to Saturday. Out of season, maintenance activities are carried out during normal hours from Monday to Friday. In the harvest period, the teams number up to 450 people and in the off-season, approximately 80 people. Protamex processes tobacco leaf and stalk for the manufacture of cigarettes, in 2021, production reached a grand total of 19,182,000 kg.</p>
0.1.1.3	<i>The scope of the proposed certification shall be homogeneous with respect to primary production system, water management, product or service range, and the main market structures.</i>
	<div>  </div> <p>Yes</p>

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Comment The Production Process

1. RECEIPT

Tobacco is supplied by producers located in the state of Nayarit, and is transported by trucks in 50 kg tobacco packets. These are called bales; they are received by teams of unloaders, classifiers and buyers. Subsequently, they are stored in warehouses numbers 1, 2, 3, 4, 5, shed 1 and shed 2, which are called "Bodegas de Tabaco Verde" (Green Tobacco Warehouses). The tobacco received is avoided according to the production programmes. 2. PROCESSING

According to the production programme, the pallets with tobacco are transported from "Bodegas de Tabaco Verde" to the feeding area, requiring the use of forklifts.

2.1 Feeding The purpose of the personnel of this department is to place the tobacco bales on the conveyor belts, respecting the tobacco blend established in the Production Programme. Making sure to remove the threads holding the bales and all foreign matter that is not tobacco. 2.2 Sorting

The staff of this department has the fundamental purpose of ensuring the output quality of our finished product by removing from the production line all non-standard tobacco and foreign material (twine, grass, cardboard, paper, labels, labels, mouthpieces, ferrous materials, plastic materials, etc.).

2.3 Pre-conditioning and Conditioning This is carried out inside the cylinders by applying steam, hot air and steam. The initial objective is to hydrate the tobacco leaves that are fed, so that they can be handled during selection and thus reduce the degradation of the tobacco, subsequently it is conditioned at approximately 55°C and 21% humidity before the mechanical deveining process is carried out, thus reducing degradation and increasing the yield per kilogram of product. The final temperature and humidity of the products will determine the quality.

2.4.- Stripping Stripping is the mechanical process of separating the tobacco into two products, the first is called "Leaf" and the other "Vein", it is carried out through two types of machinery "Threshers" and "Separators".

2.4.1- Threshing machines: The whole tobacco leaf is mechanically passed through equipment called Threshing machines, by means of an extrusion process, the leaf is separated from the vein.

2.4.2.- Separators: The leaf free from the vein is separated by this equipment through controlled air currents. As the sheet is lighter, it is lifted by the air and deposited (through air locks) on a conveyor belt which takes it to the next process. The remaining leaf on the conveyor belt (called the flag) continues on its way to the next threshing stage, completing a total of 6 stages (threshing-separation).

2.5. - Packing The products obtained from the stripped tobacco are: Leaf, vein and scrap. These are packed in cardboard boxes by means of different machinery.

2.5.1. - The leaf presses are equipped with three fillers which pour the tobacco in its natural density into the box, when the weight of the tobacco is specified by the client, the tobacco is pressed so that the box complies with the subsequent operations such as: strapping, labelling, registration, turning, stacking and storage in a temporary warehouse until it is transported to the finished product warehouses.

2.5.2.- Vein packaging The process is similar to that of sheeting, the difference being that here there are only two fillers.

2.5.3.- Foil packaging The process is similar to that of foil packaging, the difference being that here there are only two fillings.

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2.6 Finished Product Warehouse and Shipments The last part of the process is when the boxes are transported from the Packaging department to the finished product warehouses. The transfer is done by means of a trailer that is loaded by a forklift. The stowage in the finished product warehouses is six boxes high per row, 8 rows of these form what is called a cocoon, these boxes will be in an ageing process for a period of time until the cigarette factory schedules their departure from the warehouse. Once the requisition is made, they will be loaded and transported to the warehouse.

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1	STEP 1: GATHER AND UNDERSTAND	
1.1	<i>Gather information to define the site’s physical scope for water stewardship purposes, including: its operational boundaries; the water sources from which the site draws; the locations to which the site returns its discharges; and the catchment(s) that the site affect(s) and upon which it is reliant.</i>	
1.1.1	<i>The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including:</i> <ul style="list-style-type: none">- Site boundaries;- Water-related infrastructure, including piping network, owned or managed by the site or its parent organization;- Any water sources providing water to the site that are owned or managed by the site or its parent organization;- Water service provider (if applicable) and its ultimate water source;- Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies;- Catchment(s) that the site affect(s) and is reliant upon for water.	<div> in progress</div>

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Comment -Site boundaries: The site presents several plans with different characteristics, plan within the document "Paso 1-1" on page 5 presents an adequate plan with the site boundaries, the site plans do not show that they are two lots divided by a railway line.

- Water related infrastructure: The site has several plans with the piping networks, belonging to the site document "Paso 1-1" pages 6-9, 12 in the plans the drinking water lines, toilet and work area discharges, drainage networks are shown, however the legends of the plans do not clearly describe the content of the plans, making it difficult to interpret them.

- Any water source supplying the site, owned or managed by the site. The drinking water system map identifying the wells operated by the site and their water treatment plants is presented "Paso 1-1" page 7.

- Water service provider the site extracts water for its operations through two wells managed by the site and registered with the competent authority and its final water source, "Paso 1-1" pages 7-8, 10, 15, The water is delivered to the drainage network operated by SIAPA where it is treated in its WWTP and then discharged into the Mololoa River.

- Discharge points and wastewater service provider, The site presents plans of its discharge point and receiving water body, the treated water is delivered to the drainage network operated by SIAPA where it is treated at its WWTP and then discharged into the Mololoa River "Paso 1-1" pages 7-8, 10, 15.

- The watershed that affects the site and on which it relies for water The site presents the watershed plans of the Mololoa river basin that affects the treated water discharges and the area of the Matatipic aquifer from which the water used by the site is extracted "Paso 1-1" page 14.

The site plans do not show that there are two lots separated by a railway track.

Some plans do not have coordinates and/or scale.

Evidence:

Paso 1-1

1_Mapa_Limites_del_sitio

2_Limites_del_sitio_cuencas

3_Infraestructura_de_agua

4_Lay_out_Sistema_de_agua_potable

5_Lay_out_sistema_de_agua_residual

6_Lay_out_proveedor_de_servicio_de_agua

10_Fuentes_de_agua_de_pozo

11_Lay_out_Punto_de_vertido

Finding No: TNR-005192

1.2

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


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Alliance for Water Stewardship (AWS)

Audit Number: AO-000633

1.2.1

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

 in progress

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

Comment

The site identifies stakeholders (1_stakeholders), including various types of stakeholders such as local, state and federal governments, educational institutions, private companies, civil society organisations. The site describes possible common interests but does not clearly identify shared water-related challenges.

The site describes the process used for stakeholder identification:

Include all relevant stakeholder groups according to the activities of the companies - Include all relevant stakeholder groups, including the national institute of indigenous peoples of Nayarit. The site visited a colonia composed of indigenous people located in the city of Tepic, including a brief description of its characteristics and condition "step 1-1" p20-22.

- The site identifies the physical scope of the stakeholders. Including stakeholders, representatives of the final water source for the site and the final receiving water body or bodies;

- The site provides evidence of stakeholder consultation on water-related interests and challenges "Step 1-1" p23-27.

- The site takes into account that the ability and/or willingness of stakeholders to participate may vary between relevant stakeholder groups, the particular status of each is described in its "1_stakeholders" listing.

- Identify the degree of engagement of stakeholders according to their level of interest and influence, the particular status of each is described in its "1_stakeholders" listing.

The site does not include in the evidence presented the shared challenges related to water from the stakeholder consultation.

The site presents the shared challenges document in 1.6.1 however it is not possible to identify with which stakeholders it shares these challenges.

Evidence:

Paso 1-1

1_Stakeholders

2_MAPA_DE_STAKEHOLDERS_TEPIC

2.0_Tepic_cuencas

3_mapa-nayarit-Indígenas

3.0_Tepic_General

4_Tepic_COLONIA_ZITACUA

AGROTEMAC

Consulta_buenas_prácticas_INPI-PROTAMEX




Consulta_Instituto_Nacional_de_Pueblos_Indígenas

Finding No: TNR-005374

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Alliance for Water Stewardship (AWS)

Audit Number: AO-000633

1.2.2	<i>Current and potential degree of influence between site and stakeholder shall be identified, within the catchment and considering the site's ultimate water source and ultimate receiving water body for wastewater.</i>	 Yes
Comment	<p>The site identifies the current degree of influence with stakeholders "1_Stakeholders".</p> <p>In the description of some of the identified key stakeholders it mentions the degree of potential influence as the "Comisión estatal de agua potable y alcantarillado" or Grupo empresarial Álica S.A de C.V. Both with influence in the basin of the Mololoa River where the site is located.</p> <p>Evidence: 1_Stakeholders Paso 1-1 p28 Glado_de_influencia_Stakeholders</p>	
1.3	<i>Gather water-related data for the site, including: water balance; water quality, Important Water-Related Areas, water governance, WASH; water-related costs, revenues, and shared value creation.</i>	
1.3.1	<i>Existing water-related incident response plans shall be identified.</i>	 Yes
Comment	<p>The site presents its current water-related incident response plans: Related to its WWTP, Natural Disaster Plan (Hurricanes, Earthquakes, Volcanic Eruption and Droughts), Chemical Spill Prevention and Response, Emergency Plan (GLT Tepic), Water Resources Contamination, Storm Drain Contamination due to Chemical Spill, Groundwater.</p> <p>Evidence: Atención_a_emergencias_en_PTAR BCP_Plan_de_Desastres_naturales Plan_de_Emergencias_(GLT_Tepic) P-EH-15_Prevencción_y_atención_a_derrames_químicos Procedimiento_Atención_a_emergencias_en_PTAR</p>	
1.3.2	<i>Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped</i>	 No

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Comment The site identifies its water balance, flows and losses, during the audit the site staff indicated that they are installing meters for their water discharges, the volume of discharge included is an estimate so the site's water balance may have significant errors.

The site presents a map of its facilities with areas that it identifies as water related.

Water consumption during the site's production processes is listed including consumption, during the audit it was noted that the data is not clearly presented as one of the volumes is identified as being stored in sisternas and should not be considered within the consumption.

The recycling of water indicated in the balance sheet of 1,248 m3 cannot be considered as water extracted from the well.

If these two volumes are not considered within the total volume consumed the precession of the balance would be 100%.

The data presented does not clearly include the date to which it refers, it is estimated that the consumption data is annual but it does not indicate the year, its start and end date.

The site does not include data on drinking water purchased for human consumption, this information should be considered in the site's water balance.

The site does not present a mathematical equation of the water balance.

Evidence:

Paso 1-1 p 35-37

Balance hídrico del sitio

Consumo del agua del pozo

Finding No: TNR-005215

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

 in progress

Comment The site quantifies its water balance and identifies its inflow, storage losses and outflow.

The site presents the annual variation of water use rates.

The information presented on the catchment does not identify that there is a water-related challenge that poses a threat to the water balance for people or the environment.

The site provides annual maximum and minimum variations in its water consumption.

The site does not present information on the year the information presented refers to.

The incoming/extracted water and outgoing effluent should be metered.

Evidence:

Paso 1-1 p 35-37

Balance hídrico del sitio

Consumo del agua del pozo

Consumo agua ciel

Finding No: TNR-005376

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

 in progress

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000633

Comment The site presents water quality analyses of its source water for legionella sp. processes carried out from 2020 to 2023.

It presents data from the analyses carried out on its water sources in October 2022.

It includes accreditation's of the laboratories performing the analyses but few results of the analyses.

The site presents the analyses performed by your drinking water supplier.

The site submits water quality analyses.

The site does not present seasonal variation of water quality analyses of its source water, performs annual analyses and does not have data on maximum and minimum variation.

Evidence: Step 1-1 p 38-41 102781 PROCESADORA DE TABACOS DE MEXICO Legionella and cadmium results 2020 Legionella results 2022 Legionella results 2022 Legionella results 2021 Declaration 4 quarter 2022 SIAPA Declaration 3 quarter 2022 SIAPA Declaration 2 quarter 2022 SIAPA Declaration 1 quarter 2022 SIAPA ema_water_2022_(1) Ema_waste_2022_(1) 1.5.2_Water_analysis pdf 1.5.2_Water_analysis excel

Finding No: TNR-005193

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



Yes

Comment The site identifies 5 possible sources of contamination:

Fuel oil storage pit, risk of fuel oil spillage,

Hydraulic oil storage area, risk of hydraulic oil spillage, risk of hydraulic oil spillage.

Chemical storage, risk of shampoo and degreaser spillage, Chemical storage, risk of shampoo and degreaser spillage

Chemical storage, risk of spillage of oils, degreasers, paints, etc.

Diesel tank, fire fighting system, diesel spill.

The site analyses the risk level for each hazard and determines that 4 of them have a low level and one of them has a medium level. During the audit each of the identified risk areas were visited and it was identified that each site is protected, materials are segregated and appropriate safety measures are in place.

Evidence:

Paso 1-1 p44-50

photographs taken during the tour of the site

1.3.5_Fuentes_potenciales_de_contaminación

1.3.5_Potential_sources_of_pollution

Análisis_de_riesgos_de_posible_derrame_sustancias_quimicas

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



Obs.

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Audit Number: AO-000633

Comment The site identifies three areas that it considers to be important water-related areas on the site.

The site is in the process of assessing its areas in order to correctly characterise each of them.

1) Rain catchment lagoon; this is the lowest part of the site and may contain ecological features that are in the process of being evaluated and according to site staff, landscape specialists will be contracted to convert this area into a recreational area for employees while maintaining its ecological values.

2) The green areas according to site staff have cultural and recreational values for all staff and their families.

3) Buffer zone is a property that the site bought to avoid any conflict with its neighbours in residential areas, this area is planted with eucalyptus trees which are intended to provide wood to their producers, the site is evaluating the type of forestry or recreational management that can be given to this area.

The site does not present an evaluation of the conditions of the IWRA of the site, nevertheless it is in contact with specialists to plan its use and to know its environmental condition.


Evidence:

Paso 1-1 p51-52

Photographs

4._Tepic_AREAS_NATURALES_internas_sitio

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

 in progress

Comment The site presents evidence of water-related costs:

Cost of concession for water abstraction

Cost of water discharge permits

Cost of maintenance of its WWTP

investment made for the installation of water treatment plants.

The site presents an authorised quotation for the purchase of metering equipment.

The site submits information that the water it recycles is equivalent to the daily consumption of 87 people for one year and the savings made.

The site purchases bottled water for human consumption. Information on this cost is not included in the identified costs.

The cost of electricity for water extraction is not included in the costs.

Evidence:

Paso 1-1 p 54-55

Datos relacionados con el agua

Distribución_de_presupuesto_MEDIDORES

TCO_Medidores_Master

Finding No: TNR-005380

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

 Yes

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Comment The site presents evidence of compliance with this indicator of providing adequate access to drinking water and sanitary facilities for the use of its workers. During the tour of the site's facilities it was identified that drinking fountains and sanitary facilities are distributed throughout the site.

The site presents a table with all the WASH facilities in the different areas of the site including the personnel present during the tobacco harvest and when not in harvest. According to the data provided by the site complies with the nom-001-STPS which refers to the availability of WASH facilities in a company.

Evidence:
Paso 1-1 p56-58
Fotografias
1.3.8_WASH_facilities
Distribución_dispensadores_y_sanitarios PDF
Distribución_dispensadores_y_sanitariosPPTX

1.4 *Gather data on the site's indirect water use, including: its primary inputs; the water use embedded in the production of those primary inputs the status of the waters at the origin of the inputs (where they can be identified); and water used in out-sourced water-related services.*

1.4.1 *The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be identified.*



Yes

Comment The site presents evidence showing the annual water consumption of its main suppliers and the amount of raw material delivered to the site, thus estimating the indirect water use of the site, its main supplier is BAT LEAF and Tabacos del pacifico Norte with more than 20 and 10 million cubic metres because they are agricultural products that are out of the physical reach identified by the site.

In the interview with the producers, they indicated that the site is promoting and supporting them to reduce their water consumption by using drip irrigation, which reduces consumption by 67% according to the producer. Both the site and the farmers are located within the Santiago river basin but in different sub-basins.

The physical scope of the site does not include the watershed where the farmers are located, however their water consumption is high and the fact that the site helps to reduce their consumption has an impact on indirect water use even beyond the physical scope of the site. That in terms of the volume of water consumed by the producers is very significant (millions of cubic metres more than all the water used by all their other suppliers combined).

The site includes evidence of consultation with their suppliers of inputs and services.

Evidence:
Paso 1-1 p 59-60
Uso_Indirecto_del_Agua
Uso_indirecto_del_Agua_de_proveedores_y_contratistas-_PROTAMEX

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




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Comment	<p>The site presents evidence showing the monthly water consumption of some service providers.</p> <p>The site includes a column indicating the amount of raw material delivered to the site, this does not apply as they provide a non-raw material service.</p> <p>Due to the wrong approach they cannot calculate indirect water use even if they know the water use of their service providers.</p> <p>In the information presented they include evidence of consultation with their service providers and in their indirect use table it is noted that many of them have not yet provided information.</p> <p>The site has made efforts to collect information for the calculation of indirect water use, however it does not present data on the volumes of indirect water use due to the wrong approach used for its calculation.</p> <p>The site has partial information from its service providers and an inadequate approach to calculating the site's indirect water use.</p> <p>Evidence: Paso 1-2 p1 Uso_Indirecto_del_Agua Uso_indirecto_del_Agua_de_proveedores_y_contratistas- _PROTAMEX</p>	
		Finding No: TNR-005383
1.5	<i>Gather water-related data for the catchment, including water governance, water balance, water quality, Important Water-Related Areas, infrastructure, and WASH</i>	
1.5.1	<i>Water governance initiatives shall be identified, including catchment plan(s), water-related public policies, major publicly-led initiatives under way, and relevant goals to help inform site of possible opportunities for water stewardship collective action.</i>	 Yes
Comment	<p>The site presents as evidence the municipal development plan that includes actions to improve access to WASH in the municipality where the site is located.</p> <p>The site presents the cover page and a brief summary of the regional water programme prepared by conagua where it identifies the main challenges of the Mololoa River basin The site identifies "Master plan for the integrated hydrological and sanitation management in the Mololoa River basin.</p> <p>The site identifies "studies and project for the construction of the sanitation system in the state of Nayarit".</p> <p>The site identifies "studies and project for the construction of the sanitation system of the state of Nayarit. Studies for the improvement of the drinking water system through sectorisation in the city of Tepic.</p> <p>The site presents the communication with the Autonomous University of Nayarit to establish a collaboration agreement for the analysis of the water quality of the Mololoa river before and after the sanitary discharges of the municipality to evaluate the environmental impact of such discharges.</p> <p>Evidence: Paso 1-2, p 2, 3, 23, 37 Captura_de_pantalla_propuesta_UAN 1.5.1_PMDTepic2017-2021</p>	


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1.5.2	<i>Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.</i>	 Yes
Comment	<p>The site presents as evidence of compliance with this indicator its procedure for following up on notifications from the "Legismex" service or the EH&S legal department. It includes a list of the most recent updates provided by this service.</p> <p>The site identifies that Mexican law protects customary rights, it does not identify that customary rights exist in the urban area of Tepic.</p> <p>The site identifies that there is an indigenous settlement in Tepic that receives WASH services from the metropolitan provider SIAPA.</p> <p>The site presents evidence of its water access concessions, proof of payment for rights and services.</p> <p>Evidence: Paso 1-2 p 5-9 12_ley_ingresos_2023_tepic Derechos_consuetudinarios Declaración_4_trimestre_2022_SIAPA FW_Actualización_de_LEGISMEX_del_01_al_19_de_mayo_de_2023 Reporte CONAGUA 1 Reporte CONAGUA 2 Titulo_de_concesion_08NAY100103_oct_2014 Titulo_Concesión_NAY100027 Seguimiento_de_la_Lesgilación</p>	
1.5.3	<i>The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.</i>	 Yes
Comment	<p>The site uses for its water supply wells located within the "Valle Matatipac" aquifer, from which it presents its official water balance, which is positive, i.e. more water is recharged than extracted. The aquifer balance according to CONAGUA is:</p> <p>Recharge 123.9 hm3/year; Extraction 80.25 hm3/year; Availability 16.65 hm3/year.</p> <p>The site includes data from the Mololoa river basin, which the municipal system discharges treated water from Tepic. This information highlights that about 70% of the water evaporates and drains 89.5 million cubic metres representing 14.4% of the precipitated volume, 94.1 million of the rainwater infiltrates.</p> <p>The site does not identify any water scarcity for the aquifer or the basin.</p> <p>Evidence: Paso 1-2 p 9-14 Balance hídrico de la cuenca Cuenca_y_Valle_Matatipac Cuencas_hidrograficas Datos_relacionado_con_el_agua_de_la_cuenca Mapa_estrés_hídrico Mapa_Variabilidad_estacional</p>	
1.5.4	<i>Water quality, including physical, chemical, and biological status, of the catchment shall be identified, and where possible, quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be identified.</i>	 Obs.

Audit Number: AO-000633

Comment	<p>The site identifies that the water quality in the Mololoa river basin is impacted by a high load of organic matter and faecal coliforms. In the summary of the regional water programme 2021-2024 of CONAGUA, it is described that part of the water pollution of the Mololoa river is due to the low efficiency with which the installed WWTPs work, and the contamination of water supply sources in the city of Tepic is identified.</p> <p>The site indicated during the audit that they had not had access to seasonal or annual data on water quality in the basin.</p> <p>In the city of Tepic, untreated wastewater discharges into the Mololoa River represent a constant risk to the health of the inhabitants living along the river (H. XLI Ayuntamiento de Tepic, 2017), given the poor water quality of the Mololoa River the site together with the UAN are about to initiate the study of municipal discharges from the treatment plant.</p> <p>The site presents the results of a research article published in 2022 which indicates that the most polluted points of the Mololoa River were the discharges from the slaughterhouse in Tepic, Nayarit, where they determined average BOD5 concentrations of 288 mg/L respectively, which identifies a high organic load that does not comply with the Maximum Allowable Limits of Mexican regulations. The highest concentration of nitrogen and phosphorus was found in these discharges, which leads to eutrophication problems. The same article points out the high deficit of wastewater treatment and its lack of efficiency (Espinoza-Rodriguez M. 2022).</p> <p>The site currently contributes to this environmental impact which will be significantly reduced when its WWTP becomes operational (it is currently in the process of stabilising the microbiological process of its WWTP).</p> <p>The site will be able to present seasonal data and maximum and minimum variations in the next audit, when water quality analyses of the Mololoa River will be carried out in its monitoring agreement with the Autonomous University of Nayarit. The monitoring points established are before and after the discharge of the SIAPA WWTP.</p> <p>Evidence: Paso 1-2 p23-24 1.5.1_PMDTepic2017-2021 2.PHR_2021-2024_RHA_VIII_LSP (Programa hídrico regional 2021-2024) Impacto ecológico por descargas de aguas residuales hacia el río Mololoa (Nayarit, México) en 12.5 km</p>	
1.5.5	<p><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></p>	<div> No</div>

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Audit Number: AO-000633

Comment The site does not present a list of IWRAs within its physical Scope.

During the audit it was indicated to the site that they had already identified the IWRAs for the site in the watershed, as they were in the process of establishing an agreement with UAN for the monitoring of the Mololoa River. That they could include others but the most important for the site is where they can collaborate on sustainable water management.

The evidence uploaded to the Intact platform does not correspond with the information identified during the audit, as the evidence indicates that there are no natural protected areas in the Mololoa River basin (step 1-2 p15).

They include natural protected areas outside the physical scope of the site, however they do not describe their condition and characteristics (image "Important_water_related_areas_(watershed)").

In the presentation "1.3.6_Important_Water_Related_Areas" they include the main natural protected areas of the state of Nayarit in this document if they describe their main characteristics.

From the information uploaded to the platform it can be considered that the site did not fully understand what an IWRA is in the watershed. In the evidence they use the term "areas of natural interest and watersheds" which is not used in the AWS standard.

Evidence:

Paso 1-2 p15

Areas_importantes_relacionadas_con_el_agua_(cuenca)

1.3.6_Important_Water_Related_Area

Finding No: TNR-005393

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



Yes

Comment The site identifies that the only water infrastructure it uses is the WASH services operator's (SIAPA's) water network and wastewater treatment plant (WWTP).

The site presents information on the existing infrastructure, as well as the projects to be implemented, and identifies the risks to which it is exposed.

The site identifies that the risk of flooding in the Mololoa River basin is considered HIGH. This risk is related to the channelling of the river into the urban area and the loss of flood plains. More than five flood events have occurred annually on the banks of the Mololoa River (Paso 1-2 p.17). It is not identified whether these floods are likely to affect water infrastructure.

The site identifies several municipal projects underway: the modernisation of drinking water pipelines in different areas of Tepic, there is a project to improve SIAPA's WWTPs, management and conservation of forest areas (Paso 1-2 p26-31).

The site identifies that the risk of water stress is low, the risk from untreated water is low to medium, the risk from seasonal variability is medium to high.

Evidence:

Paso 1-2 p 26-31

Tepic_ESTRES_HIDRICIO

Tepic_RIESGO_AGUAS_SIN_TRATAR

Tepic_VARIABILIDAD_ESTACIONAL

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



Yes

Audit Number: AO-000633

Comment The site presents as evidence the municipal development plan of Tepic which indicates that the water and sewage coverage is 97%, currently a large part of the drinking water network is in the process of replacement.

The evidence identifies that there are five wastewater treatment plants, which are not always in operation and when they do work, they do so well below optimal levels, which together with clandestine discharges, open dumps and direct discharges into canals, contaminates the Mololoa River and represents a risk factor for public health and a challenge for the operating agency and the municipal government.

Evidence:
1.5.1_PMDTepic2017-2021, p12
Paso 1-2 p 26-31
Servicios_WASH

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

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

 in progress

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000633

Comment The site identifies 4 shared challenges:

Water scarcity

Overexploitation of the Matatipac aquifer

Poor water quality

Water conflicts

During the audit it was indicated to the site that these challenges were not linked to the information obtained in 1.2.1 "Stakeholders and their water-related challenges will be identified".

It was also pointed out that water scarcity was associated more with lack of infrastructure and lack of efficiency of the water service provider than with low water availability.

It was questioned that the overexploitation of the aquifer was identified as a shared challenge when official data indicate an availability of 16 hm³/year of the aquifer. The sources of information were reviewed and it was found that the availability of the aquifer had been significantly reduced in recent years and the availability according to the basin council of the Santiago river, which includes the Matatipac aquifer, is only 5 hm³/year, which under a precautionary principle is acceptable to consider that the aquifer is close to overexploitation.

Poor groundwater quality the site identifies risks of contamination of the aquifer due to poor well use and wastewater discharges, it does not identify if there is evidence of anthropogenic contamination.

Conflicts over water, the site indicates that this is a future risk.

During the preparation of the report, unsuccessful attempts were made to access the links included in the shared challenges document, some of them could be accessed by other routes, but most of them were unreachable.

The site does not include a challenge highlighted by several stakeholders and found in the documents presented as evidence "the poor quality of surface water, which according to the Tepic master development plan "is a risk factor for public health and a challenge for the operating agency and the municipal government" p12.

The site is already working on this challenge by promoting water quality monitoring of the Mololoa river. During the audit the site was instructed to adapt its shared challenges according to 1.2.1.

Evidence:

<https://www.cocurs.mx/?articulo=179>

1.5.1_PMDTepic2017-2021

Desafios_compartidos pdf

Desafios_compartidos excel

Finding No: TNR-005394

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



in progress

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000633

Comment The site identifies the following initiatives to address shared water challenges:

- Master plan for integrated hydrological and sanitation management in the Mololoa river basin.
- Studies and projects for the construction of the sanitation system in the state of Nayarit.
- Studies and projects for the construction of the sanitation system of the state of Nayarit, Studies for the improvement of the drinking water system through sectorisation in the city of Tepic.

Municipal government programmes: Drinking water programme, sanitary sewerage programme, storm sewerage programme, wastewater treatment plant programme, environmental programme.

The site identifies that its sustainable management plan has actions that address shared challenges. None of the site's initiatives relate to the agreement to work with UAN in monitoring the water quality of the Mololoa River, the agreement between UAN and the site was one of the themes of the interviews conducted and the importance of the shared challenge of the water quality of the Mololoa River was verified.

Evidence:
Paso 1-2p 35, 37, 38.
Desafios_compartidos pdf
Desafios_compartidos excel
Captura_de_pantalla_propuesta_UAN

Finding No: TNR-005395

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

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


Yes

Comment The site identifies 11 risks in total, some physical, some reputational and some regulatory, some of the risks are both physical and reputational or regulatory.

The site identifies 9 physical risks that involve operational failures and put the business, equipment and infrastructure costs at risk.

The site identifies 3 reputational risks in case of receiving fines for non-payment or other types of infringements.

The site identifies 2 regulatory risks due to non-compliant water abstraction violations.

Risk RSG 03 is not a risk, it is a situation that is occurring at the moment and the site is working on putting all relevant meters in place.

The risk RSG09 risk does not seem real given that the Mexican norms do not fine you for poor aquifer water quality, perhaps it is poorly worded and refers to using poor quality water for production processes or human consumption or other issue.




The site evaluates the degree of risk as: low, medium, high.

Evidence
Riesgos del agua.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000633

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	<p>The site identifies 11 opportunities for improvement 4 of them refer to improving the management of the Mololoa River among them the joint work of UAN and the site.</p> <p>Other objectives refer to the improvement of urban water infrastructure, with different objectives, improving water quality, improving water supply in the city and avoiding flooding.</p> <p>The first opportunity refers to the integral improvement of the Mololoa River. According to the text of the site, the river presents economic, social and environmental problems, so it is not clear why the water quality of the Mololoa River was not included in the shared challenges.</p> <p>The second opportunity refers specifically to the water quality of the river and wastewater treatment.</p> <p>The seventh opportunity refers to the agreement between UAN and the site.</p> <p>Evidence: Oportunidades</p>	
1.8	<i>Understand best practice towards achieving AWS outcomes: Determining sectoral best practices having a local/catchment, regional, or national relevance.</i>	
1.8.1	<i>Relevant catchment best practice for water governance shall be identified.</i>	 Obs.
Comment	<p>The site identifies 14 good practices related to good governance practices among them:</p> <ul style="list-style-type: none"> - BP01 leak detection programme - BP02 Rainwater harvesting - BP07 Recycling of treated wastewater among stakeholders - BP10 Installation of water meters <p>During the audit the site staff presented evidence of having participated in the state water forum 2023, where they presented their implementation of the AWS standard, and were told that it could be considered a good practice, however it is not included in the list of good practices.</p> <p>Evidence: Paso 1-2 p38 WSP Programa_Foro_Estatal_del_Agua_2023 Participación_en_Foro_del_Agua Información_Foro_Estatal_del_Agua_2023_Ing._Rosa_Rentería Photographs</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

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000633

Comment The site presents its list of good practices for sustainable water balance, the site and identifies 7 good practices with this main outcome:
 -BP01 Leak detection programme
 -BP02 Use of rainwater on crops
 -BP03 Use of pressure washers -
 BP07 Recycling of treated wastewater between stakeholders
 -BP08 Wastewater Recycling Treatment Plant (GLT & Warehouses).

In the document "Step 1-2" p39 identifies a list of 12 best practice actions to reduce water consumption on site that improve the sustainable water balance in the catchment by reducing water abstraction.

These 12 best practices do not match perfectly with the best practices in its WSP.

Evidence:
 Paso 1-2 p 39-55
 WSP

1.8.3 *Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.*


Obs.

Comment The site identifies 4 good practices related to water quality in its WSP:
 -BP08 Wastewater Recycling Treatment Plant (GLT & Cellars)
 -BP13 Install a drinking water treatment plant to treat well water
 -BP22 Collaboration between stakeholders to monitor surface water quality (Mololoa River)
 -BP23 Reforestation of San Juan Hill

During the audit the activity of cleaning the banks of the Mololoa River promoted by SIAPA was identified as a good practice related to governance and water quality in the watershed, however the site did not include this good practice in the evidence.

The site identifies some good practices related to water quality but they are not all those described during the audit, for example the change of drinking water networks being carried out by the municipality or the rehabilitation of SIAPA's WWTP.

Evidence:

Paso 1-2 p56-57
 Mejores_prácticas-_Calidad_el_agua
 WSP

1.8.4 *Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.*


Yes

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000633

Comment The site identifies 6 good practices related to IWRAs:


- BP 14 Water Care Bulletins
- BP15 Protection and maintenance of internal green area (rainwater reservoir).
- BP20 Monitoring of an important water-related area in the Lerma Santiago watershed.
- BP21 Visit basic sanitation infrastructure in the municipality, municipal WWTP and WTPW
- BP22 Collaboration between stakeholders to monitor surface water quality (Rio Mololoa)
- BP23 Reforestation Cerro San Juan
- BP24 Baking and beautification days in Tepic Metropolitan Park

It is not clear how BP14 Water Care Bulletins are good practice in relation to IWRAs.

BP21 Visit basic sanitation infrastructure in the municipality, municipal WWTP and WTPW, it is not clear how it is a good practice related to IWRA.

Evidence:
WSP

1.8.5 *Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.*

 in progress

Comment The site identifies 4 WASH good practices:

- BP16 Inclusion of Policlínico, medical and dental care for collaborators.
- BP17 Inclusion of health insurance and payment of medicines for employees
- BP18 Training on the good use of water, value of water, strategic water management and its implementation in PROTAMEX facilities.
- BP19 Provision of quality hydration (drinking water from a certified source) for employees.

During the audit it was indicated that the installation and operation of their WWTP could be identified as a good practice for WASH.

At the catchment level the main challenge shared in WASH relates to insufficient wastewater treatment and there are many opportunities for improvement.

The site only identifies good practices within the site, however it does not include all the good practices identified during the audit.



Evidence:
WSP

Finding No: TNR-005403

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)


Audit Number: AO-000633

2	STEP 2: COMMIT & PLAN - Commit to be a responsible water steward and develop a Water Stewardship Plan	
2.1	<i>Commit to water stewardship by having the senior-most manager in charge of water at the site, or if necessary, a suitable individual within the organization head office, sign and publicly disclose a commitment to water stewardship, the implementation of the AWS Standard and achieving its five outcomes, and the allocation of required resources.</i>	
2.1.1	<i>A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:</i> <ul style="list-style-type: none"> - That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes - That the site implementation will be aligned to and in support of existing catchment sustainability plans - That the site's stakeholders will be engaged in an open and transparent way - That the site will allocate resources to implement the Standard. 	 Yes
Comment	<p>The site submits as evidence its strategic plan which includes a letter signed by the site's general manager committing to all points of indicator 2.2.1, the letter is dated 16 August 2022.</p> <p>The document was published on the site's website and is currently not available on the website.</p> <p>Evidence: Plan_estratégico_AWS</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"> - Identification of responsible persons/positions within facility organizational structure - Process for submissions to regulatory agencies. 	 Yes

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)



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Comment	<p>The site presents its system for maintaining compliance with water and wastewater management obligations:</p> <p>The site's strategic plan identifies the positions and responsibilities for maintaining compliance with water management obligations p5.</p> <p>The system identifies all legal provisions applicable to the site.</p> <p>The system includes a schedule of measurements and monitoring to be carried out during the year.</p> <p>The system is supported by the legismex service that sends periodical information to the site that keeps it updated on new legal provisions.</p> <p>The site does not include in the description of its system the process of submission to the regulatory authorities, however it presents as evidence the data of its concession titles for water use and wastewater discharges, as well as the payments made.</p> <p>Evidence: Paso_2 p 5-9 Plan estratégico p 6-7, 9-10 Monitoring Plan FW_Actualización_de_LEGISMEX_del_01_al_19_de_mayo_de_2023 Procedimiento_Seguimiento_de_la_Lesgilación</p>	
2.3	<i>Create a water stewardship strategy and plan including addressing risks (to and from the site), shared catchment water challenges, and opportunities.</i>	
2.3.1	<i>A water stewardship strategy shall be identified that defines the overarching mission, vision, and goals of the organization towards good water stewardship in line with this AWS Standard.</i>	 Yes
Comment	<p>The site presents its strategic plan for sustainable water management.</p> <p>The strategy to meet the site's objectives and targets is based on:</p> <ul style="list-style-type: none"> -Identification of water consumption -Involvement of key stakeholders -Monitoring of legislation -Communication of results. <p>The plan defines the mission and vision of the p5 site, which are aligned with the objectives of the AWS standard.</p> <p>It includes a signed commitment to meet the requirements of the standard.</p> <p>Evidence: Plan estrategico Paso 2 p 10-11</p>	

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Alliance for Water Stewardship (AWS)

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2.3.2	<p><i>A water stewardship plan shall be identified, including for each target:</i></p> <ul style="list-style-type: none">- <i>How it will be measured and monitored</i>- <i>Actions to achieve and maintain (or exceed) it</i>- <i>Planned timeframes to achieve it</i>- <i>Financial budgets allocated for actions</i>- <i>Positions of persons responsible for actions and achieving targets</i>- <i>Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.</i>	 in progress
Comment	<p>The site presents its sustainable management plan (WSP) which includes for each objective:</p> <ul style="list-style-type: none">- how it will be measured and monitored- The measures to achieve and maintain (or exceed) it- The expected timelines for achieving it- The financial budgets allocated to the actions- The positions of those responsible for the actions and for the achievement of the objectives.- Where possible, consider the relationship between each target and the achievement of best practice to help address shared water challenges and AWS outcomes. <p>The site additionally associates each objective with specific indicators, risks, opportunities, shared challenges and best practices identified in step 1.</p> <p>The plan includes all the requirements for each objective in the plan, however there are areas for improvement:</p> <p>The plan indicates that objectives 7.3 will be developed every two years and that objective 8.1 indicates that it will be carried out every 3 years, which is inconsistent with the annual review of progress towards the objectives of the sustainable water management plan, the minimum frequency should be annual.</p> <p>The plan omits BP22 "Stakeholder collaboration to monitor surface water quality (Mololoa River)", which relates to surface water quality in the basin, which stems from not identifying surface water quality as a shared challenge.</p> <p>Not all objectives are worded correctly e.g. "Make a visit every 2 years in an important water related area within the Lerma Santiago Basin" is an activity not an objective.</p> <p>The measurement and monitoring methods should better describe how the progress of the objectives will be monitored, e.g. for objective 7.3 the methods are: email sent, photographic record. The photographic record provides inputs for monitoring, but the monitoring would be to identify changes and improvements based on the progress of the objective.</p> <p>Evidence: WSP</p>	Finding No: TNR-005423
2.4	<p><i>Demonstrate the site's responsiveness and resilience to respond to water risks</i></p>	
2.4.1	<p><i>A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.</i></p>	 in progress

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000633

Comment The site does not present an integrated plan, the site identifies a series of actions to be taken to mitigate or eliminate the identified water risks.

The site identifies 11 water risks:

RSG01 Risk of soil and groundwater contamination from Fuel oil spillage, Hydraulic oil spillage and Spillage of oils, degreasers, paints. For this risk, the site assessed its level of frequency and impact, which allowed it to identify the risk levels for the different compounds stored in its facilities, and also took measures to reduce the risk of soil and groundwater contamination.

RSG02 and RSG03 are associated with the risk of high water consumption costs due to monthly variability in consumption and lack of water flow meters. Proposed actions to be taken Identify strategic points for the installation of new meters, Request budget, approve purchase, Installation of meters.

RSG04 Compromised production due to failure of well water extraction infrastructure. Mitigation actions Include the company in the stakeholder engagement plan, implement preventive and corrective maintenance plan for infrastructure related to groundwater extraction. The site has a maintenance plan for its wells.

RGS05 Reduction of concessioned volumes. Proposed mitigation actions Optimise use of industrial water, explore for other water sources.

RSG06 Infringement for wastewater discharge with parameters above standards due to control of wastewater treatment process, or groundwater contamination. Proposed action to reduce risk. Proceed with internal treatment of effluent from the site, monitoring the operation of the wastewater treatment plant to ensure compliance with relevant legislation.

RSG07 Most of the plant's water demand is supplied by a Groundwater, systems that also supplies the population and industry in the target area. proposed preventive actions Create a stakeholder engagement plan.

RSG08 Possible reduction in the amount of water made available to the plant due to the scarcity scenario in the target area. Proposed actions pr maintain actions to reduce water consumption on site, optimise floor cleaning processes.

RSG09 Infringement for groundwater abstraction with parameters over standards for human use. Proceed with the internal treatment of effluents, monitoring of the operation of the WATER PURIFICATION PLANT in compliance with the corresponding legislation.

RSG10 Risk of flooding in areas adjacent to rainwater canals. Proposed Actions Maintain maintenance actions and carry out clean-up days (removal of solids) prior to the rainy season.

RSG11 Risk of diseases associated with the quality of water for human use. Maintain actions for the proper use of sanitary facilities, Maintain actions for the proper use of sanitary facilities.

The assessment of the degree of risk appears inconsistent. The site does not describe the procedure used for risk assessment.

The Infringement for groundwater abstraction with parameters on standards for human use is not consistent with the applicable legislation as there is no legal regulation that fines for the abstraction of poor quality water, perhaps the risk is poorly worded.

Similarly, the high degree of risk 06 does not seem appropriate, as the WWTP is currently in the process of stabilisation and has already reduced the pollutant discharge, and the site was not fined when discharging its effluent without treatment.

The site does not include a risk related to the operation of its WWTP, however it has a procedure for dealing with emergencies at the WWTP.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)



Audit Number: AO-000633

Evidence:

paso 2 p 13-24

Riesgos_del_Agua

Planta de tratamiento de aguas residuales

Plantas_purificadoras_de_agua

PO_Wastewater_Treatment_Plant- GLT_Tepic_(english)

Procedimiento_Atención_a_emergencias_en_PTAR

Plan_mantenimiento_pozos

Mantenimiento_a_pozos

Análisis_de_riesgos_de_posible_derrame_sustancias_quimicas

1.3.5_Fuentes_potenciales_de_contaminación




182-A_PROCESADORA_DE_TABACOS_POZO_GLT_PROYECTO_INSTALACIÓN

Finding No: TNR-005425

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000633

3 STEP 3: IMPLEMENT - Implement the site's stewardship plan and improve impacts
<p>3.1 <i>Implement plan to participate positively in catchment governance.</i></p>
<p>3.1.1 <i>Evidence that the site has supported good catchment governance shall be identified.</i></p> <p style="text-align: right;">  Yes </p>
<p>Comment The site identifies its participation in the state water forum 2023 as part of its actions to support good governance in the Watershed.</p> <p>The site is in the process of establishing an agreement with the Autonomous University of Nayarit to monitor discharges from the water operator's WWTP in the Mololoa River.</p> <p>Collaboration with another company to use its treated water for irrigation of green areas is another action by the site to support good water governance.</p> <p>The site is developing actions to engage with various stakeholders to participate in a more involved way to support good governance of the basin.</p> <p>Evidence: photographs Información_Foro_Estatal_del_Agua_2023_Ing._Rosa_Rentería Participación_en_Foro_del_Agua Programa_Foro_Estatal_del_Agua_2023 Paso_3 p 2-9, 31-32</p>
<p>3.1.2 <i>Measures identified to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be implemented.</i></p> <p style="text-align: right;">  Yes </p>
<p>Comment Outside the watershed, the site has taken action to improve the living conditions of day labourers involved in tobacco harvesting, and the site highlights this action as it benefits vulnerable groups including indigenous peoples.</p> <p>Evidence: Informe_de_visita_a_campo pdf Informe_de_visita_a_campo doc</p>
<p>3.2 <i>Implement system to comply with water-related legal and regulatory requirements and respect water rights.</i></p>
<p>3.2.1 <i>A process to verify full legal and regulatory compliance shall be implemented.</i></p> <p style="text-align: right;">  Yes </p>

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000633

Comment The site presents its procedure for monitoring legislation, which serves as a guide for identifying and assessing regulatory changes applicable to the site.

It describes the internal procedures to be followed.

It identifies who is responsible for each area of the site.

The site includes as evidence the flow chart of the legislative tracking process and information on the tracking process with information from legismex from 2022, as well as the most recent release from May 2023.

Evidence:
Procedimiento_Seguimiento_de_la_Lesgilación
FW_Actualización_de_LEGISMEX_del_01_al_19_de_mayo_de_2023
LEGISMEX_2022
Paso 3 p 11-13

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



Yes

Comment The right to access to water and sanitation are integrated into Mexican law and all government agencies are obliged to comply with them, therefore by complying with the legislation applicable to the site it is identified that the water rights of others, including indigenous groups, are being respected.

The site has water extraction concessions, wastewater discharge permits and proof of payment for water services.

Evidence:
Procedimiento_Seguimiento_de_la_Lesgilación
FW_Actualización_de_LEGISMEX_del_01_al_19_de_mayo_de_2023
LEGISMEX_2022
Paso 3 p 11-14, 55
8_Titulo_Concesión_NAY100027
9_Titulo_de_concesion_08NAY100103_oct_2014
Oficio_SEDERMA-PTAR
Pago_SIAPA_primer_trimestre
Pago_SIAPA_segundo_trimestre

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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Alliance for Water Stewardship (AWS)

Audit Number: AO-000633

Comment The site identifies several projects on which it has made progress as it has been preparing for AWS certification since 2022.


The site identifies progress on the following objectives included in its sustainable water management plan:

- Leak detection programme
- Rainwater for irrigation
- Pressure washers
- Installation of timers on taps
- Condensate recovery
- Automatic irrigation system for football pitch
- Use of treated water donated by the company
- Use of treated water donated by another company
- Drinking water treatment plants
- Drinking water purification plants
- Waste water treatment plant
- Installation of water meters

As the site is in its initial audit, it is not necessary to identify progress on all objectives of the sustainable water management plan.

Evidence:

WSP
proyecto de gestión del agua

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

Comment The site presents 4 objectives to improve the water efficiency of the site, whilst there is no shared challenge related to water scarcity, the objectives are:

2.1 Achieve 20% water recycling.


2.2 Reduction of water abstraction by 10%.

3.2 To ensure 100% compliance with the supply limit defined in the groundwater concession.

14.1 2% reduction in indirect water use.

Evidence:

WSP

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

Comment The site indicates that it consulted with its legal advisors who indicated that no legally binding documents were identified for reallocation of water for social, cultural or environmental needs.

In addition, they indicated that the reallocation of water concessions is the exclusive responsibility of the federal government authorities.

Evidence:


Indicador_3.3.3_Documentos_vinculantes

3.4 *Implement plan to achieve site water quality targets*

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000633

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

Comment The site presents 4 water quality related objectives for the site and the catchment:

1.1 Ensure that potential leakage of polluting materials does not reach the soil and groundwater, by solving 100% of identified leakage problems, the site identifies progress from 85% to 100%. The site does not provide any evidence to verify progress, during the audit the prevention of leaks and spills was verified, however evidence of the initial condition prior to the development of the objective is lacking.

1.2 Well water analysis results 100% within the limits set by legislation, the site identifies 100% progress. The site does not provide evidence for this objective in indicator 3.4.1, the analyses presented in 1.3.4 correspond to 2022.

1.3 Ensure that stormwater drainage is occurring correctly, resolving 100% of identified drainage problems, the site identifies 100% progress, the site does not include any evidence, however what was observed during the walkthrough matches the progress described.


3.3 Ensure 100% compliance with the effluent discharge limit into the municipal sewerage network, the site identifies 100% progress, the payment slips presented as evidence for 3.4.2 identify that an additional charge is made for the pollutant load but not for any additional volume to that authorised, these slips are only partial evidence of progress, the site should have evidence for the whole of 2022.

While the site identifies major progress on the water quality objectives for the site and catchment, it presents short evidence,

As this is an initial audit, identifying short or no progress on the objectives is to be expected, but by identifying major progress for the objectives and most of them at 100%, it is not possible to validate the site's claims without evidence of progress.

Evidence:
WSP
Paso 3 p42
Objetivos_de_calidad_del_agua

Finding No: TNR-005435

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

Comment Surface water quality is a shared challenge identified by stakeholders.

The site recently installed its wastewater treatment plant, which is currently in the process of stabilisation, however it has already had a positive impact on reducing the pollutant load of the site's effluent, evidence shows the suspended solids, grease and oils content has been significantly reduced. BP08 "Wastewater Recycling Treatment Plant (GLT & Warehouse)".

The site presents progress on BP13 "Install a drinking water treatment plant to treat well water".


Evidence
WSP
Paso 3 p 56-57

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

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

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

Comment The site identifies 8 objectives related to IWRAs, of which 2 have no progress, the rest of the objectives are well advanced according to the site's sustainable water management plan.

-6.1 Maintain the fenced area (refers to the green areas of the site considered according to the wording of the objective as IWRA), if in the tour of the facilities it was corroborated that they are not open to the public and some of them are fenced, it indicates that the fencing will be reviewed every 2 months if the audit was conducted in July the progress would be 50% and that the reviews of August, October and December would be missing, however the site indicates a progress of 100%.

-6.2 Carry out regular pruning and watering of the area the plan indicates a bimonthly frequency as with the previous objective progress would be 50% in July, however the site indicates 100% progress.

6.3 Carry out biannual inspections, making photographic records. the plan presents an inconsistency by indicating a bimonthly frequency instead of biannual. however the site indicates a progress of 150%.

-7.1 Monitor the status of the IWRAs, updating them annually, in its plan the site indicates that an IWRA file will be generated on an annual basis and indicates that it is completed. the evidence presented "site IWRA maintenance" is only one page where it reports the cutting of the grass of its soccer field and includes the date on which the mowing was done. does not include any other IWRAs the evidence presented does not meet the objective as it does not describe the status of the IWRAs.

-7.2 Communicate with related stakeholders. the site does not include or indicate evidence to determine 150% progress?

7.3 Make a visit every 2 years to an important water-related area within the Lerma Santiago Basin the objective is poorly stated as no objective can be made every 2 years.

-7.4 and 7.5 Schedule one visit per year to the municipal water treatment plant (drinking water treatment plants) and municipal WWTP, what is the purpose of these visits? environmental, training and only asks for a photographic record as evidence, in no indicator in the guide or the standard indicates that this type of infrastructure is an IWRA.

The progress recorded in the plan is inconsistent and in most cases no evidence is presented to support the claims of the site.

Evidence
WSP
Paso 3
Mantenimiento IWRA.

Finding No: TNR-005438

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

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

 Yes

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Comment The site identifies and quantifies evidence that the site has adequate access to safe drinking water, effective sanitation and protective hygiene (WASH) for all on-site workers.

The site presents evidence that the site's drinking water comes from a reliable source that periodically tests its products for water quality.

The site presents a plan with the layout of the drinking water dispensers and toilets.

The site submits the sanitary facilities review logs, includes photographic evidence to show the good condition of its facilities, the site indicates that in case of finding a WASH related finding sw lw is followed up.

The site in 1.3.8 WASH Facilities evaluates the access to sanitary services considering the variations in the personnel working in the site during the tobacco harvest and out of season of the harvest, with the objective to comply with nom-001-STPS.

Evidence:

1.3.8_WASH_facilities
0623-ciel 20 Lts.
0523-ciel 20 Lts.
0423-ciel 20 Lts.
0323-ciel 20 Lts.
0223-ciel 20 Lts.
Paso 3 p 53-45

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


Yes

Comment The site indicates that it does not affect the human right to drinking water and sanitation of communities through its operations.

The site identifies that it complies with all applicable legal requirements, has its water concessions, discharge permit and has made the relevant payments, and that it uses its own infrastructure to supply water to the site and effluents are discharged in compliance with applicable standards.

Evidence:

indicador criterio 3.6.2
Paso 3 p 42, 55-56, 62
8_Titulo_Concesión_NAY100027
9_Titulo_de_concesión_08NAY100103_oct_2014

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

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


Yes

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Comment The site identifies that in its sustainable water management plan it has an objective related to indirect water use:

-14.1 2% reduction in indirect water use , the actions it identifies are.

Supplier training on AWS

Awareness raising through newsletters on water care.

Influence 3 input suppliers to establish water reduction actions in their activities.

Site includes images with their input suppliers and service providers during training.

The site includes as evidence the water management course, which includes the 5 steps of the AWS standard.

As indirect evidence of water savings during the interview the tobacco farmer indicated that the use of drip irrigation reduces water use by 67%.

Evidence
WSP
Curso_Manejo_de_Agua
photographs
Paso 3 p 58-59

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


Yes

Comment The site presents evidence of a training workshop for its input suppliers and service providers, including photographic evidence of the people trained.

Additionally, it presents a screenshot of a virtual meeting with some of its suppliers and service providers.

The document "Indirect water use" includes the responses to the survey of these stakeholders, whose theme is Water care.

The site does not include the content of the workshop, the surveys were conducted via email, the site shares the link to the survey but does not share evidence of the emails with the survey responses.

The site identifies that it has developed several actions that demonstrate the site's commitment to indirect water use.

The evidence presented in relation to all activities undertaken is limited.

Evidence.
Captura_pantalla-_Stakeholders_materias_primas_(1)
Photographs
Uso_Indirecto_del_Agua
Uso_indirecto_del_Agua_de_proveedores_y_contratistas-PROTAMEX
3.7.2_Compromiso_con_proveedores_y_prestadores_serv

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



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


Yes

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Comment	<p>The site identifies that the only shared water infrastructure is the drainage network and provides evidence of a request for a review of the drainage pipework for the installation of its WWTP.</p> <p>The site includes the permit issued to the site for the installation of its WWTP and its diversion management procedure.</p> <p>Evidence:</p> <p>Paso 3 p 60-62</p>	
3.9	<i>Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.</i>	
3.9.1	<i>Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.</i>	 Yes
Comment	<p>The site identifies several actions it has implemented to achieve best practices related to water governance.</p> <p>BP01 Leak detection programme the site presents its well maintenance plan including photographs of actions taken.</p> <p>BP07 Recycling of treated wastewater among stakeholders the site presents evidence of the donation of treated water by another company for the irrigation of its football pitch.</p> <p>BP14 Water care newsletters, the site presents 3 newsletters containing simple messages on various water-related topics.</p> <p>Evidence:</p> <p>WSP</p> <p>Paso 3 Resumen de buenas prácticas p 40-58</p> <p>photographs</p>	
3.9.2	<i>Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.</i>	 Yes
Comment	<p>The site identifies several good practice actions related to sustainable water balance.</p> <p>BP03 Use of pressure washer in washing areas, site submits photographic evidence.</p> <p>BP04 Installation of timers on sinks the site presents photographic evidence.</p> <p>BP07 Recycling of treated wastewater among stakeholders the site presents evidence of the donation of treated water by another company for the irrigation of its football pitch.</p> <p>BP08 Wastewater treatment the site presents photographic evidence, the plant was visited during the tour of the site facilities during the audit.</p> <p>Evidence:</p> <p>Paso 3 resumen de buenas prácticas</p> <p>photographs</p> <p>WSP</p>	

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3.9.3	<i>Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.</i>	 Yes
Comment	<p>The site identifies several good practice actions related to water quality.</p> <p>BP08 Wastewater treatment the site presents photographic evidence, the plant was visited during the tour of the site facilities during the audit.</p> <p>BP13 Install a drinking water treatment plant to treat well water, the plant was visited during the audit tour.</p> <p>Evidence: Paso 3 resumen de buenas prácticas photographs WSP</p>	
3.9.4	<i>Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.</i>	 Yes
Comment	<p>The site identifies several good practice actions related to IWRA.</p> <p>BP15 Protection and maintenance of the internal green area (rainwater reservoir), the site has requested a budget for this good practice and requested the development of a project to condition the rainwater reservoir to create a wildlife viewing area.</p> <p>BP22 Collaboration between stakeholders to monitor surface water quality (Mololoa River), the site presents a screenshot of the communication it maintains with the Autonomous University of Nayarit for the implementation of this good practice. During the stakeholder interview, the progress of the collaboration between the site and the UAN was questioned, confirming that there is interest in establishing a collaboration agreement.</p> <p>Evidence: Paso 3 resumen de buenas prácticas p 66-67 photographs WSP Captura_de_pantalla_propuesta_UAN</p>	
3.9.5	<i>Actions towards achieving best practice related to targets in terms of WASH shall be implemented.</i>	 Yes
Comment	<p>The site identifies several good practice actions related to WASH.</p> <p>BP04 Installation of timers on sinks the site presents photographic evidence.</p> <p>BP08 Wastewater treatment the site presents photographic evidence, the plant was visited during the tour of the site facilities during the audit.</p> <p>BP19 Provision of quality hydration (drinking water from a certified source) for workers). the site includes water quality test results from your supplier.</p> <p>Evidence: Paso 3 resumen de buenas prácticas WSP 0123-Ciel_20_Lts 0223-Ciel_20_Lts 0323-Ciel_20_Lts 0423-Ciel_20_Lts 0523-Ciel_20_Lts 0623-Ciel_20_Lts</p>	

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

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

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



Yes

Comment This is the initial audit of the site and consequently the progress is a result of the preparation work for AWS certification.

- The site from 2017 to 2022 has managed to steadily reduce the volume of water used in its processes from 33,736 m3/year in 2017 to 14,277 m3/year.
- Leak detection programme the site presents its well maintenance plan including photographs of actions taken.
- Installation of timers on sinks the site presents photographic evidence.
- Recycling of treated wastewater among stakeholders the site presents evidence of the donation of treated water by another company for the irrigation of its football pitch.
- Wastewater treatment the site presents photographic evidence, the plant was visited during the tour of the site facilities during the audit.
- Install a drinking water treatment plant to treat well water, the plant was visited during the audit tour.
- Protection and maintenance of the internal green area (rainwater reservoir), the site has requested a budget for this good practice and requested the development of a project to condition the rainwater reservoir to create a wildlife viewing area.
- Provision of quality hydration (drinking water from a certified source) for workers). the site includes water quality test results from your supplier.

The site identifies that it has made progress on all the main outcomes of the standard.

Evidence:
Paso 3 resumen de buenas prácticas 40-58
Paso4
Indicadores_de_agua_en_sitio
WSP
photographs
0123-Ciel_20_Lts
0223-Ciel_20_Lts
0323-Ciel_20_Lts
0423-Ciel_20_Lts
0523-Ciel_20_Lts
0623-Ciel_20_Lts

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



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Comment The site identifies that it has contributed to value creation from the implemented actions of its sustainable management plan.

-Economic The site identifies that it has achieved water cost savings of \$39,640, it does not indicate whether this is from water recycling, the installation of its WWTP or the implementation of its leak detection programme.

Social The site identifies an increase in the company's reputation for its commitment to sustainable water management, this was indicated in all interviews conducted. Site staff were also invited to participate in the State Water Forum 2023 where they developed a presentation related to the AWS standard.

Environmental The site identifies that the treatment and reuse of effluents generates environmental values related not only to the volume of water no longer being extracted from nature, but also to the negative impact on surface water bodies due to the treatment and reduction of effluent disposal.

Evidence:
4.1.2_Creación_de_valor
Photographs

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



Comment The site identifies a number of shared benefits from actions taken to advance sustainable water management in the basin. The site includes benefits that will be created as it moves forward with the actions in its plan, only those benefits that are already being shared are included.

-Contribution to the maintenance and enhancement of the balance of local hydraulic dynamics
- Contribution to the maintenance and enhancement of cultural values associated with water.

The site presents some data on the quantification of shared values:

According to the UN, for each citizen to meet their basic needs in a dignified manner, 3.3 m³ of water per month is required, which adds up to 39.6 m³/year. Taking into account projections for 2024, the annual reduction achieved by Protamex is equivalent to 4,006 people in the basin having water to meet their basic needs.

Evidence:
4.1.2_Creación_de_valor
4.1.3_Beneficios_del_valor_compartidos_en_la_cuenca

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

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



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Comment The site identifies incidents related to the pollutant load of its discharges. To understand the nature and severity of the incidents, aspects of the requirements are highlighted:

In the first requirement the excess pollutant load refers to pH does not indicate the values determined and only assigns an additional payment.

The second requirement the excess pollutant load refers to the chemical oxygen demand (COD) does not indicate the determined values and only assigns an additional payment.

It is inferred that the amounts assigned are in relation to the excess of the parameters pH and COD, that in the analyses carried out by SIAPA there is only one parameter in excess is striking, in the same way that with the WWTP still operating there are still excesses in the pollutant load, it can be associated to the fact that it is in a process of stabilisation in its operation.

The volumes used in the second half of the year are 4 times higher than in the first quarter, however the payment for the excess pollutant load was 14 times lower, the site identifies that this is due to the start-up of its WWTP.

The site's action plan is to have its WWTP operational at 100% to avoid discharging excess pollutants.

The site's discharges are monitored on a quarterly basis by the water utility operator, so it can be identified whether the corrective action was sufficient.

Evidence:

paso 4 p18-19

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 developed communication and consultation with various stakeholders, but consultation efforts on the site's sustainable water management performance will not be identified. This is logical given that the initial audit was conducted.

Evidence:

Solicitud_colaboración_AGROTEMAC
Solicitud_colaboración_COESPRISNAY
Solicitud_colaboración_UAN
Re_Colaboración_PROTAMEX-CENITT
RE_Invitación_AWS_Kick_Off
Evidencia_envío_de_Plan_Sostenible_del_Agua
Consulta_buenas_prácticas_INPI-PROTAMEX_

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 initial audit was carried out so this is their first sustainable water management plan and there is no previous plan to compare with to identify modifications and changes.

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5	STEP 5: COMMUNICATE & DISCLOSE - Communicate about water stewardship and disclose the site's stewardship efforts	
5.1	Disclose water-related internal governance of the site's management, including the positions of those accountable for legal compliance with water-related local laws and regulations.	
5.1.1	The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.	Yes
Comment	<p>The site presents its communication manual which aims to set out the water management communication process, including the requirements set out.</p> <p>It describes the internal governance related to water, including a letter of commitment to partners, civil society, government agencies and the general public.</p> <p>Describes its "SYSTEMATICS AND MANAGEMENT OF ENGAGEMENT WITH STAKEHOLDERS", the way in which results will be disseminated, its system for communicating identified deviations.</p> <p>Evidence: Manual de comunicación. Paso 5 p 5</p>	
5.2	Communicate the water stewardship plan with relevant stakeholders.	
5.2.1	The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.	Yes
Comment	<p>The site presents evidence of communication with relevant stakeholders on its sustainable water management plan.</p> <p>The presentation made by the site at the state water forum 2023 focused on the benefits of implementing the AWS standard.</p> <p>Evidence: Paso 5 p 6-9 Información_Foro_Estatal_del_Agua_2023_Ing._Rosa_Rentería Photographs</p>	
5.3	Disclose annual site water stewardship summary, including: the relevant information about the site's annual water stewardship performance and results against the site's targets.	
5.3.1	A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.	Yes
Comment	<p>The initial audit of the site was carried out and therefore the site does not yet have a summary of the results of the sustainable water management of the site.</p> <p>The site does not yet have quantified results in relation to the objectives.</p>	
5.4	Disclose efforts to collectively address shared water challenges, including: associated efforts to address the challenges; engagement with stakeholders; and co-ordination with public-sector agencies.	

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5.4.1	<i>The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.</i>	 Yes
Comment	<p>The site identifies that it disclosed the site's shared water challenges and efforts to address these challenges in its presentation at the state water forum entitled "Water management, a concern of environmentally responsible businesses".</p> <p>The topics discussed were:</p> <ul style="list-style-type: none"> -AWS Certification -Shared Challenges -Good practices <p>Evidence: Paso 5 información foro estatal del agua 2023 Photographs</p>	
5.4.2	<i>Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.</i>	 Yes
Comment	<p>The site held a meeting entitled "AWS Kick Off" where it invited various stakeholders to get involved in sustainable water management (the site was instructed to overuse the AWS logo.).</p> <p>The site intends to collaborate with and support public sector bodies, NGOs, companies and universities.</p> <p>Evidence: Invitación_AWS_Kick_Off_ Paso 5 p 10-16 RE__Invitación_AWS_Kick_Off_ Solicitud_colaboración_AGROTEMAC Solicitud_colaboración_COESPRISNAY Solicitud_colaboración_UAN Invitación_evento_de_resultados Comunicación_Certificación_AWS_GLT_Tepic</p>	
5.5	<i>Communicate transparency in water-related compliance: make any site water-related compliance violations available upon request as well as any corrective actions the site has taken to prevent future occurrences.</i>	
5.5.1	<i>Any site water-related compliance violations and associated corrections shall be disclosed.</i>	 in progress
Comment	<p>The site has received additional charges for discharging excess pollutant load to the sewage system, the site did not present evidence of any communication regarding this noncompliance.</p> <p>Additionally, the site must supply a schematic, chart or description of the site's water-related governance where it is clearly indicated which position is accountable for compliance with water related laws and regulations. The document needs to be publicly available.</p> <p>Evidence: paso 4 p 19</p>	
		Finding No: TNR-005479
5.5.2	<i>Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.</i>	 Yes

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Comment The site identifies the construction of its WWTP as the primary measure to avoid future charges for excess pollutant discharges.

The site presents a flowchart of its defect management procedure.

Evidence:
Paso 5 p17-18

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



Yes

Comment The site identifies that the excess pollutant load of its effluent reaches the municipality's WWTP where the wastewater is treated, and therefore does not represent a significant risk or threat to human or ecosystem health.

The site provides evidence of communication with local authorities.

Evidence:
paso 5 p19-20

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Photographic Evidence from Audit



Yes

Comment The photographs show various aspects of the site facilities, storage areas, production lines, green areas, toilets, drinking water dispensers, WWTP, chemical and high risk waste storage areas.



tobacco storage area.jpg



Firefighting equipment.jpg



Pozo de agua 2.jpg

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tobacco storage area 3.jpg



production line 2.jpg



Buffer_zone.jpeg



chemical warehouse.jpg

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Reservoir_of_pluvial_water.jpeg



Hazardous waste storage.jpg



Tobacco 2 collection area.jpg



iguana near the WWTP.jpg

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Tobacco sorting line.jpg



Water well.jpg



chemical materials area.jpg



Hazardous waste.jpg

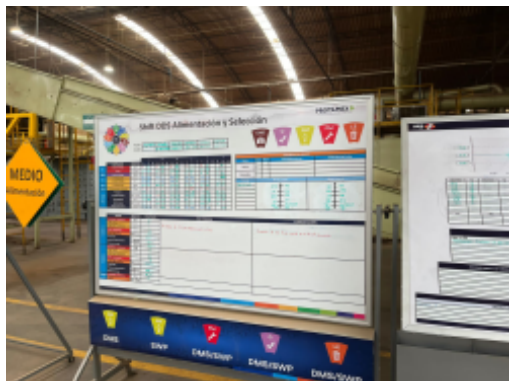
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Wastewater treatment plant.jpg



Operations control panel.jpg



Fire water pipelines.jpg



WSAS

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

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Green_area_2.png



packed tobacco area.jpg



Fire water pipelines 2.jpg



Operation control panel.jpg

WSAS

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

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Sanitary production areas.jpg



football_field.jpg



Green_area_1.jpg