

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)



Audit Number: AO-000768

### SITE DETAILS

Site: **BAT – Fiedler & Lundgren AB**

Address: Fiedler & Lundgren AB, Stenåldersgatan 23, 21376, Malmö, SWEDEN

Contact Person: Jeanette Nilsson

AWS Reference Number: AWS-000487

Site Structure: Single Site

### CERTIFICATION DETAILS

Certification status: Certified Core

Date of certification decision: 2023-Dec-19

Validity of certificate: 2026-Dec-19

### AUDIT DETAILS

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

Audit Type(s): Initial Audit

Audit Start Date: 2023-Sep-25

Lead Auditor: Wicki Nielsen

Audit team participants:

Tanya Christensen

Site Participants:

Plant Manager,

Sustainability Executive,

Sustainability Coordinator,

Production Manager,

Engineering Manager,

Facility Manager,

Operations Finance Manager,

Safety Representative,

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ADDITIONAL INFO

Summary of Audit Findings: A total of 34 findings were raised during the certification audit, 2 major non-conformities, 11 minor non-conformities, 21 observations. The major non-conformities were of sufficient concern to warrant the categorisation of the non-conformity as major and related to identification of the catchments and shared water challenges.

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 30 days of receipt of the audit report by 29 December 2023.

The major non-conformities must be sufficiently addressed and evidence submitted to WSAS within 90 days of receipt of the report by 29 February 2024.

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

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

Scope of Assessment: The scope of services covers the Initial certification audit for assessing conformity of BAT Sweden - Fiedler & Lundgren AB against the AWS International Water Stewardship Standard Version 2.

BAT Sweden - Fiedler & Lundgren AB is a company that is part of British American Tobacco plc., located in Malmö, Sweden. The company manufactures snus, which is a chewing tobacco product. All is manufactured and packed on site.

The factory is located in the South West part of Sweden and receives water from the surface water body Vombsjoen Lake.

The audit was conducted onsite from the 25th until the 27th of September 2023.

The onsite site visit included the assessment of intake points, storage tanks, waste water treatment plant, areas with main water use within production facilities and discharge location as part of the audit.

The following external stakeholders were interviewed during the audit:

- One anonymous
- CarlF
- Phoenix Sweden

FINDINGS

NUMBER OF FINDINGS PER LEVEL

Observation	21
Minor	13

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### FINDING DETAILS

Finding No:	TNR-007071
Checklist Item No:	1.1.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Sep-25
Checklist item:	The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including: <ul style="list-style-type: none"><li>- Site boundaries;</li><li>- Water-related infrastructure, including piping network, owned or managed by the site or its parent organization;</li><li>- Any water sources providing water to the site that are owned or managed by the site or its parent organization;</li><li>- Water service provider (if applicable) and its ultimate water source;</li><li>- Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies;</li><li>- Catchment(s) that the site affect(s) and is reliant upon for water.</li></ul>
Findings:	Catchment(s) that the site affects (via wastewater) and is reliant upon for water (via water supply) have not been identified, and maps have not been provided that would indicate the extent of the catchment(s) and locations of the ultimate water sources, the site, the receiving water bodies, and water treatment and wastewater treatment plant locations within those catchment(s).
Corrective action:	Adjust the catchment map to include catchment where the site is located.
Evidence of implementation:	The catchment map is updated to better illustrate the extent of our catchments as well as the catchment where the factory is located. Clarified in page 3-5.

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## Alliance for Water Stewardship (AWS)

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Finding No:	TNR-007285
Checklist Item No:	1.1.1
Status:	Open
Finding level:	Observation
Checklist item:	The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including: <ul style="list-style-type: none"><li>- Site boundaries;</li><li>- Water-related infrastructure, including piping network, owned or managed by the site or its parent organization;</li><li>- Any water sources providing water to the site that are owned or managed by the site or its parent organization;</li><li>- Water service provider (if applicable) and its ultimate water source;</li><li>- Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies;</li><li>- Catchment(s) that the site affect(s) and is reliant upon for water.</li></ul>
Findings:	Currently, there is only a hard copy map showing the on-site infrastructure. The company is aware of this needing to be rectified however, are waiting until the new building is up and running in 2024 to include all areas in the development of the map, at the same time. The company should generate the digital map as soon as possible in order to be able to clearly identify water related infrastructure on the site.
Finding No:	TNR-006949
Checklist Item No:	1.2.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Sep-25
Checklist item:	Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall: <ul style="list-style-type: none"><li>- Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people;</li><li>- Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies;</li><li>- Provide evidence of stakeholder consultation on water-related interests and challenges;</li><li>- Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups;</li><li>- Identify the degree of stakeholder engagement based on their level of interest and influence.</li></ul>
Findings:	As there is no catchment map yet, it is not clear to which extent the stakeholders are representative of the catchment, primary water sources, and ultimate receiving water bodies.
Corrective action:	Link Stakeholder list (1.2 Stakeholders for Fiedler & Lundgren, Malmo with catchment map (1.1.1 Catchment map rev. 1) The communication log can be found under EHS Internal

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## Alliance for Water Stewardship (AWS)

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Finding No: TNR-006950  
Checklist Item No: 1.2.2  
Status: Open  
Finding level: Observation  
Checklist item: Current and potential degree of influence between site and stakeholder shall be identified, within the catchment and considering the site's ultimate water source and ultimate receiving water body for wastewater.  
Findings: Documentation about any meetings or communications with stakeholders should be kept, as well as a record of dates and means. This should include details of level of interest and influence.

Finding No: TNR-006951  
Checklist Item No: 1.3.3  
Status: Open  
Finding level: Observation  
Checklist item: Site water balance, inflows, losses, storage, and outflows, including indication of annual variance in water usage rates, shall be quantified. Where there is a water-related challenge that would be a threat to good water balance for people or environment, an indication of annual high and low variances shall be quantified.  
Findings: The should revise the methodology for quantifying the site water balance once the meters are functioning.

Finding No: TNR-007807  
Checklist Item No: 1.4.1  
Status: In Progress - CA plan approved  
Finding level: Minor  
Due date: 2024-Sep-25  
Checklist item: The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be identified.  
Findings: The company has generated a document that lists identified suppliers of primary inputs within their proposed catchment area, bearing in mind this is still to be mapped. However, the document does not include details of quantity, quality and level of water risk (if any).  
Corrective action: Update 1.4.1 Summary of components with over 5% of weight or cost, with details such as: details of quantity, quality and level of water risk within the site's catchment.

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## Alliance for Water Stewardship (AWS)

Audit Number: AO-000768

Finding No:	TNR-006952
Checklist Item No:	1.4.2
Status:	Open
Finding level:	Observation
Checklist item:	The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.
Findings:	Continue communications with outsourcers on data gathering to improve water stewardship within catchment, especially once a map clearly defining catchment area is developed.
Finding No:	TNR-006954
Checklist Item No:	1.5.1
Status:	Open
Finding level:	Observation
Checklist item:	Water governance initiatives shall be identified, including catchment plan(s), water-related public policies, major publicly-led initiatives under way, and relevant goals to help inform site of possible opportunities for water stewardship collective action.
Findings:	The company should develop a record that details all initiatives and associated documentation and/or communication, within the catchment area, once clearly mapped and defined.
Finding No:	TNR-007858
Checklist Item No:	1.5.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Sep-25
Checklist item:	Water governance initiatives shall be identified, including catchment plan(s), water-related public policies, major publicly-led initiatives under way, and relevant goals to help inform site of possible opportunities for water stewardship collective action.
Findings:	The site has not identified the relevant river basin management plan developed under the Water Framework Directive.
Corrective action:	Identify and understand all river basin management plans that are relevant to the site. Include in the site's documentation about catchments and review actions related to these.

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## Alliance for Water Stewardship (AWS)

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Finding No:	TNR-006956
Checklist Item No:	1.5.3
Status:	Open
Finding level:	Observation
Checklist item:	The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.
Findings:	As no map of the catchment(s) boundaries has been provided as of yet, it is not clear how the area for which catchment balance is calculated, aligns with the relevant catchment boundaries. There are also further questions about the revised balance that would need to be discussed at an on-site audit.
Finding No:	TNR-007050
Checklist Item No:	1.5.4
Status:	Open
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:	It is not sufficiently clear what conclusions does the site draw from the data collected on catchment water quality.
Finding No:	TNR-007104
Checklist Item No:	1.5.5
Status:	Open
Finding level:	Observation
Checklist item:	Important Water-Related Areas shall be identified, and where appropriate, mapped, and their status assessed including any threats to people or the natural environment, using scientific information and through stakeholder engagement.
Findings:	The company should re-assess the IWRA's once a map clearly defining the boundaries of the catchment has been developed.

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Finding No: TNR-007161  
Checklist Item No: 1.6.1  
Status: In Progress - CA plan approved  
Finding level: Minor  
Due date: 2024-Sep-25  
Checklist item: Shared water challenges shall be identified and prioritized from the information gathered.  
Findings: The shared current and future water challenges have not been appropriately identified by linking the water challenges identified by stakeholders with the site's water challenges and other information gathered in step 1. Instead, the company has provided a record of water challenges identified by one of its stakeholders, and there is some relevant information in the site's Risk and Opportunities document. There is also no prioritisation of shared water challenges.  
Corrective action: Continue identification of shared water challenges with stakeholders to create a comprehensive list of shared water challenges including prioritization.  
Evidence of implementation: We have included a new column "Shared risk with stakeholders" to our Risk and opportunities document and reviewed risks accordingly. We have added a risk that was identified by two stakeholders and assessed this (raising sea water levels).

Finding No: TNR-007163  
Checklist Item No: 1.6.2  
Status: In Progress - CA plan approved  
Finding level: Minor  
Due date: 2024-Sep-25  
Checklist item: Initiatives to address shared water challenges shall be identified.  
Findings: As the shared water challenges have not been identified, initiatives to address shared water challenges have also not been appropriately identified - what is identified, is more possible mitigation activities to address the site's risks.  
Corrective action: Connected to the document that will be created in 1.6.1, also initiatives to address shared water challenges shall be identified and added to this document.

Finding No: TNR-007192  
Checklist Item No: 1.8.1  
Status: Open  
Finding level: Observation  
Checklist item: Relevant catchment best practice for water governance shall be identified.  
Findings: The company should provide supporting evidence for all points identified and listed in '1.8 Best practices submitted'.

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Finding No: TNR-007193  
Checklist Item No: 1.8.2  
Status: Open  
Finding level: Observation  
Checklist item: Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.  
Findings: The company should provide supporting evidence for all points identified and listed in '1.8 Best practices submitted'.

Finding No: TNR-007194  
Checklist Item No: 1.8.3  
Status: Open  
Finding level: Observation  
Checklist item: Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.  
Findings: The company should provide supporting evidence for all points identified and listed in '1.8 Best practices submitted'.

Finding No: TNR-007195  
Checklist Item No: 1.8.4  
Status: Open  
Finding level: Observation  
Checklist item: Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.  
Findings: The company should provide supporting evidence for all points identified and listed in '1.8 Best practices submitted'.

Finding No: TNR-007196  
Checklist Item No: 1.8.5  
Status: Open  
Finding level: Observation  
Checklist item: Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.  
Findings: The company should provide supporting evidence for all points identified and listed in '1.8 Best practices submitted'.

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Finding No:	TNR-007865
Checklist Item No:	2.3.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Sep-25
Checklist item:	A water stewardship plan shall be identified, including for each target: <ul style="list-style-type: none"><li>- How it will be measured and monitored</li><li>- Actions to achieve and maintain (or exceed) it</li><li>- Planned timeframes to achieve it</li><li>- Financial budgets allocated for actions</li><li>- Positions of persons responsible for actions and achieving targets</li><li>- Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.</li></ul>
Findings:	<p>In the water stewardship plan:</p> <ul style="list-style-type: none"><li>- Whilst for the 1st and 4th target it is clear what outcome the site wants to achieve and by when, other targets lack this clarity.</li><li>- There are no targets on maintaining or enhancing IWRA's. It was confirmed in 1.3.6 that there are no IWRA's on the site land however, eight IWRA's were identified within the source and discharge areas of the proposed catchment area (bearing in mind the finding raised in 1.1.1 on the missing catchment map). There are actions on the plan that refer to the outcome related to IWRA's however, all these actions relate to the site and not the catchment.</li><li>- Also there is a lack of linking between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.</li></ul>
Corrective action:	<p>Review the WSP to:</p> <ul style="list-style-type: none"><li>Correct inconsistencies.</li><li>Include goals that can be followed up.</li><li>Link between each target and the achievement of best practice.</li></ul>
Finding No:	TNR-007200
Checklist Item No:	3.1.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Sep-25
Checklist item:	Evidence that the site has supported good catchment governance shall be identified.
Findings:	There is a lack of record of engagement and support for good catchment governance.
Corrective action:	The communication log has been included in EHS Internal to ensure current evidence. As a corrective action, an internal procedure will be created in the AWS routine to ensure that future communications are recorded.

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## Alliance for Water Stewardship (AWS)

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Finding No: TNR-007287  
Checklist Item No: 3.5.1  
Status: In Progress - CA plan approved  
Finding level: Minor  
Due date: 2024-Sep-25  
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: Actions in the plan that are noted as contributing to IWRAs, are related to the site's wastewater and water use reduction and it is not clear how they maintain or enhance the IWRAs. There are no other practices set in the water stewardship plan on IWRAs.  
Corrective action: Review WSP with IWRA's catchment.

Finding No: TNR-007289  
Checklist Item No: 3.7.1  
Status: Open  
Finding level: Observation  
Checklist item: Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.  
Findings: The company should investigate potential opportunities for targets related to indirect water use.

Finding No: TNR-007290  
Checklist Item No: 3.7.2  
Status: In Progress - CA plan approved  
Finding level: Minor  
Due date: 2024-Sep-25  
Checklist item: Evidence of engagement with suppliers and service providers, as well as, when applicable, actions they have taken in the catchment as a result of the site's engagement related to indirect water use, shall be identified.  
Findings: The company has listed the service providers they have discussed indirect water use with and the comments resulting from these engagements. However, the evidence of engagement was not provided.  
Corrective action: The internal procedure to ensure the recording of contacts and engagement with suppliers of primary inputs in the catchment will be included in the AWS routine.

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## Alliance for Water Stewardship (AWS)

Audit Number: AO-000768

Finding No:	TNR-007867
Checklist Item No:	3.9.1
Status:	Open
Finding level:	Observation
Checklist item:	Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.
Findings:	The company shall consider ways of keeping a record of all identified best practices related to water governance, with associated actions taken to implement these, with a link to relevant targets and actions in the Water Stewardship Plan.
Finding No:	TNR-007868
Checklist Item No:	3.9.2
Status:	Open
Finding level:	Observation
Checklist item:	Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.
Findings:	The company shall consider ways of keeping a record of all identified best practices related to water balance, with associated actions taken to implement these, with a link to relevant targets and actions in the Water Stewardship Plan.
Finding No:	TNR-007869
Checklist Item No:	3.9.3
Status:	Open
Finding level:	Observation
Checklist item:	Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.
Findings:	The company shall consider ways of keeping a record of all identified best practices related to water quality, with associated actions taken to implement these, with a link to relevant targets and actions in the Water Stewardship Plan.
Finding No:	TNR-007870
Checklist Item No:	3.9.4
Status:	Open
Finding level:	Observation
Checklist item:	Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.
Findings:	The company shall consider ways of keeping a record of all identified best practices related to Important Water Related Areas, with associated actions taken to implement these, with a link to relevant targets and actions in the Water Stewardship Plan.

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## Alliance for Water Stewardship (AWS)

Audit Number: AO-000768

Finding No:	TNR-007871
Checklist Item No:	3.9.5
Status:	Open
Finding level:	Observation
Checklist item:	Actions towards achieving best practice related to targets in terms of WASH shall be implemented.
Findings:	The company shall consider ways of keeping a record of all identified best practices related to WASH, with associated actions taken to implement these, with a link to relevant targets and actions in the Water Stewardship Plan.
Finding No:	TNR-007316
Checklist Item No:	4.1.1
Status:	Open
Finding level:	Observation
Checklist item:	Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.
Findings:	The company should develop and implement a methodology for comparison of current performance against the targets set in the WSP, using the measurements stipulated for these, making sure this includes the contribution of each target to the AWS outcomes.
Finding No:	TNR-007352
Checklist Item No:	4.3.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Sep-25
Checklist item:	Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.
Findings:	Aside from the legally required communication with the environment agency Miljöförvaltningen, the contact with the NGO described in 1.2, who did not want to engage with the company (which there is no record of), and the verbal communications held with neighbours and suppliers, there are no records to identify consultation efforts with stakeholders on the site's water stewardship performance.
Corrective action:	The internal procedure to ensure the register of consultation efforts, means of communication and any feedback from stakeholders in the catchment will be included in the AWS routine.

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## Alliance for Water Stewardship (AWS)

Audit Number: AO-000768

Finding No:	TNR-007354
Checklist Item No:	5.1.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Sep-25
Checklist item:	The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.
Findings:	The company has not disclosed the site's water-related internal governance.
Corrective action:	Consolidation of evidence, showing images and access links that demonstrate the site's internal water-related governance, including the positions of those responsible for compliance with water-related laws and regulations, as required by AWS Standard Guidance.
Finding No:	TNR-007355
Checklist Item No:	5.2.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Sep-25
Checklist item:	The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.
Findings:	The company has not communicated the water stewardship plan to all relevant stakeholders.
Corrective action:	Need to communicated the WSP to stakeholders, and provided evidence of doing this.
Finding No:	TNR-007859
Checklist Item No:	5.4.1
Status:	Open
Finding level:	Observation
Checklist item:	The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.
Findings:	The disclosure of shared challenges will need to be revised once the shared challenge identification is addressed.

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### Report Details

Report	Value
Report prepared by	Wicki Nielsen
Report approved by	Neringa Pumputyte
Report approved on (Date)	28 November 2023

### Surveillance

Proposed date for next audit  
2024-Sep-25

### Stakeholder Announcements

Date of publication	Location
01/07/2023	<a href="https://www.batsweden.se/">https://www.batsweden.se/</a>
24/07/2023	WSAS & AWS: <a href="https://watersas.org/wp-content/uploads/2023/07/20230718-EN-StakeAnn-AWS-00487-BAT-Fiedler-Lundgren-Sweden.pdf">https://watersas.org/wp-content/uploads/2023/07/20230718-EN-StakeAnn-AWS-00487-BAT-Fiedler-Lundgren-Sweden.pdf</a>
Comment	The company uploaded an announcement onto their website in July 2023 - <a href="https://www.batsweden.se/">https://www.batsweden.se/</a> The announcement explained the company was applying for, and being audited for compliance with AWS certification from the 25th until the 27th of September, and that stakeholders were welcome to submit comments related to their activities.
Comment	Three stakeholders were interviewed, one of them requested to be anonymous.

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### Catchment Information

#### Catchment Information

The company has yet to generate a map that outlines the identified catchment area.

The company has developed a document that includes details of the areas considered by the company to be core catchment areas:

1. Fiedler& Lundgren, Fosie industrial area Malmö
2. Sjölundaverket (discharge water treatment plant) and Lommabukten (the bay where the water is discharged)
3. Vombsjön (lake)and Vombverket (intake water treatment plant)

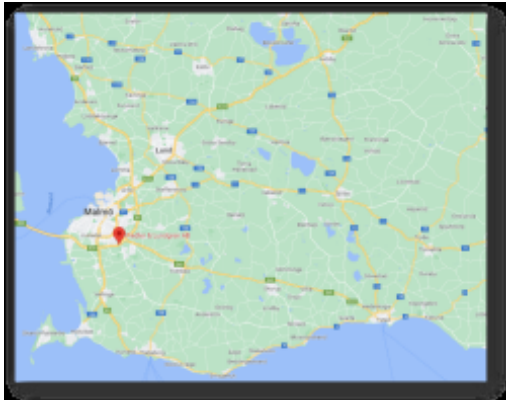
The document includes maps showing the location of these three areas.

According to information provided by BAT Sweden:

Vombsjön is a lake in the Kävlingeån catchment area. The lake has an average depth of 6.6 m and a maximum depth of 16 m. The lake's surface is 11.82 km<sup>2</sup> and it is located about 20 m above sea level. The theoretical turnover time for the lake's water has been calculated to be 0.7-0.8 years. Most of the catchment area consists of agricultural land.

Sjölundaverket receives wastewater from various catchment areas. In the downstream part of the drainage areas is a pumping station that pumps the wastewater further to a pressure sewer system leading to Lommabukten, where the water is discharged. Lommabukten is a bay in Öresund, which is a straight that is one of four waterways that connect the Baltic Sea to the Atlantic Ocean.

During the initial audit, a map had not been generated that showed the catchment area. For now, a map taken from the Catchment map shows the company location within Sweden.



BAT Sweden location Google map.png

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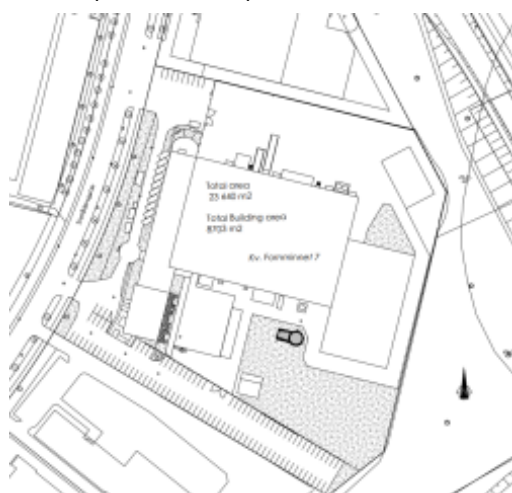
Audit Number: AO-000768

### Client Description and Site Details

#### Client/Site Background

BAT Sweden - Fiedler & Lundgren AB is part of BAT Group (British American Tobacco). BAT Group employs over 53,000 people and operates in over 180 countries, with factories in 43. Fiedler & Lundgren manufactures nicotine pouches, which is a nicotine-containing, tobacco-free oral product. Fiedler & Lundgren also manufactures snus, which is an oral tobacco product. All are manufactured and packed on site. The Fiedler & Lundgren site is located in the Fosieby industrial area of Malmö, Sweden. The property has a total area size of 23.640 m<sup>2</sup>, and out of this, the buildings composing the office and production buildings amount to 8703 m<sup>2</sup>.

Two maps have been provided that show the site boundaries with scale and direction.



Site 2.png

### Summary of Shared Water Challenges

#### Summary of Shared Water Challenges

Two shared water challenges have been identified by one stakeholder:

- Shortage / restrictions of water
- Rising sea water

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0.1 General Requirements for Single Sites, Multi-Sites and Groups	
0.1.1	<i>Eligibility Criteria</i>
0.1.1.1	<i>The site(s) occupy one catchment OR an exception has been granted.</i>
Comment	The single site will identify one single catchment area.
0.1.1.2	<i>The scope of the proposed certification shall be under the control of a single management system.</i>
Comment	Single management system.
0.1.1.3	<i>The scope of the proposed certification shall be homogeneous with respect to primary production system, water management, product or service range, and the main market structures.</i>
Comment	The site has a homogenous production system.

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### 1 STEP 1: GATHER AND UNDERSTAND

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

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

- Site boundaries;
- Water-related infrastructure, including piping network, owned or managed by the site or its parent organization;
- Any water sources providing water to the site that are owned or managed by the site or its parent organization;
- Water service provider (if applicable) and its ultimate water source;
- Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies;
- Catchment(s) that the site affect(s) and is reliant upon for water.

 No

**Comment** The company have provided the following documentation to address each aspect of this requirement:

Site boundaries: '1.1.1 Site boundaries' shows the boundaries around the factory, showing as building 7 on the graphic, and contains data for total area size (23.640 m2) and the building area size (8703 m2).

Water-related infrastructure, including piping network, owned or managed by the site or its parent organization: '1.1.1 Site water flow' shows the main infrastructure in place however, only the main inflow, on-site and outflow points. A more comprehensive map of infrastructure exists in paper form - see the AWS assessor photo 'Hard copy map of water related infrastructure'.

No water sources are owned or managed by the company.

Water service provider and its ultimate water source: '1.1.1 VA Syd water supplier\_invoice' confirms the water service provider VA Sud.

The map '1.1.1\_Bolmen\_och\_Vomb\_Karta' shows the water sources in the Malmö area however, it is not clear from this which areas or water bodies the company receives their water from.

Discharge points and waste water service provider, and ultimate receiving water body or bodies: Sjölanda is the name of the wastewater treatment plant (WWTP) - the water ends up in LommaBugten, a bay of the straight Öresund. The WWTP is managed by the water service provider VA Sud.

See '1.1.1\_Sjölanda\_reningverk\_future\_plans' for the location of the WWTP (red star in figure 8 of the document) and the red dots on figure 9 are discharge points. '1.1.1\_Sjölanda\_treatment\_process\_Eng' details the treatment process used.

Catchment(s) that the site affects and is reliant upon for water: At the on-site audit, there was in-depth information and resources provided about the available surface water sources and the discharge location relevant to the company. However, a map with boundaries of their identified catchment(s) had not been provided. The company wanted to provide this prior to the AWS report completion (within the 10 day allowed period) and a document summarising the main components and providing a map of the catchment area. The document provided was '1.1.1 Catchment map', which does contain the summarised pertinent details, including water source, treatment centre, factory location and discharge area. However, there is still no map of the identified catchment(s) and their boundaries.

**Finding No: TNR-007285**

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-000768

**Finding No: TNR-007071**

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

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

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

 in progress

**Comment** Considering this is the initial assessment, the company has done sufficient work in this area until now. All required stakeholder groups have been considered. However, as there is still no catchment map, the exact area and organisations/individuals./companies within this still needs to be defined.

They started looking on a national level, moved to regional and local, with Miljöverket (The Environment Agency) the main focus to start with.

They included suppliers using a lot of water for processes (cleaners, uniforms, waste contractor).

Then they identified neighbours.

Contacted one NGO however, they don't work with private companies, no further relevant NGO's identified to date but will look on national level going forward.

The document '1.2\_Stakeholders\_for\_Fiedler\_&\_Lundgren,\_Malmö\_2021\_(version\_2)' includes data about influence/power of stakeholder, interest of stakeholder, influence/power of stakeholder on site, level of influence of site on stakeholder - based on AWS guidance matrix. Also means and date of communication.

Notification on website of AWS audit - <https://www.batsweden.se/>.

No public stakeholder meetings yet, only individual contact either over phone or via email.

**Finding No: TNR-006949**

**Finding No: TNR-007805**

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

 Obs.

**Comment** The document '1.2\_Stakeholders\_for\_Fiedler\_&\_Lundgren,\_Malmö\_2021\_(version\_2)' includes data about influence/power of stakeholder, interest of stakeholder, influence/power of stakeholder on site, level of influence of site on stakeholder - based on AWS guidance matrix. Also means and date of communication.

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




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

 Yes

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)





Audit Number: AO-000768

Comment	<p>According to the company's insurer's risk assessment document '1.3.1 Willis insurance survey_2022_perils', the site is in a low flood risk area.</p> <p>Based on this assessment, and a risk assessment document by the regional authority (1.3.1_Malmöområdet_Riskhanteringsplan), there is no incident plan related to external flooding risks.</p> <p>There is however an internal incident response document called '1.3.1_C.4.5.4_Rutin_för_hantering_av_nikotinspill_på_lageravdelningen', that Includes instruction for moving spillage using granules GYLLI, Spill kit content list., Instructions for smaller spills, and how to act in case of exposure to nicotine (first aid).</p>	
<b>1.3.2</b>	<i>Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped</i>	 Yes
Comment	<p>The document 'F&amp;L water balance overview 2022 FY' is a good and clear graphic mapping movements of water on site - figures used are taken from the document '1.3.2 2022 Water balance FL_updated'.</p>	
<b>1.3.3</b>	<i>Site water balance, inflows, losses, storage, and outflows, including indication of annual variance in water usage rates, shall be quantified. Where there is a water-related challenge that would be a threat to good water balance for people or environment, an indication of annual high and low variances shall be quantified.</i>	 Obs.
Comment	<p>The document '1.3.3 2022 Water balance FL incl variances_updated' contains quantified data on inflows, storage, outflows and overall site water balance, including annual variances. No water related challenges.</p> <p>MO stands for modern oral (nicotine-containing, tobacco-free oral product). TO stands for traditional oral (tobacco containing oral product).</p> <p>Meters have been installed around the site however, not currently functioning fully. The facilities manager was working with the supplier of the meters to address this. Meters were seen during the site visit. Due to the lack of meters at time of audit:</p> <p>Inflow data is taken from provider bills. Factory volume is volume of products (millions of pouches), water use is based on estimation of water used for each product. Drink and canteen water are estimated and water out is based on estimated usage.</p>	
<b>1.3.4</b>	<i>Water quality of the site's water source(s), provided waters, effluent and receiving water bodies shall be quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be quantified.</i>	 Yes

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## Alliance for Water Stewardship (AWS)

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Comment	<p>Currently no water related challenges that would be a threat to good water quality status have been identified by the site.</p> <p>INFLOWS Document '2022_1 drinking water quality malmo', report from supplier VA Sud</p> <p>OUTFLOWS FROM SITE Summary of inhouse control 2022 in the document '1.3.4_Rapportering_av egenkontrollprogram_2022_reported_to_Miljöverket'.</p> <p>OUTFLOWS FROM WWTP AT RECEIVING WATER BODY The document '1.5.6_Miljörapport_2022_Sjölunda_ARV_ver_1' is an in-depth analysis report on outflow quality from supplier that includes data on: BOD7 - organic pollutants (7 is over 7 days) COD - oxidisable matter P-tot - phosphats N-tot - nitrates</p> <p>Installation of the company's own WWTP was a response to pH and other levels being above national allowed levels. WWTP was live and functioning from October 2022.</p> <p>The quality of the ultimate receiving water body is identified as part of the catchment water quality indicator.</p>	
1.3.5	<p><i>Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.</i></p>	 Yes
Comment	<p>The document '1.3.5_Potential_sources_of pollution' identifies potential sources of pollution on the site, including incidents over the past 3 years and how they were managed. It is a good, clear and considered document that has narrative, maps and photos of all relevant areas.</p> <p>The document '1.3.5 List of chemicals at F&amp;L_2022_reported to Miljöverket' is the list of chemicals kept on-site that is submitted annually to the environment agency.</p> <p>'1.3.5 Brandritning BFV 230920' shows locations of chemicals kept inside factory (for fire planning purposes in the case of this document).</p> <p>'1.3.5 ÖVERSIKT BFV 230920' shows chemicals kept outside the factory itself.</p>	
1.3.6	<p><i>On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.</i></p>	 Yes
Comment	<p>There are no on-site Important Water-Related Areas.</p> <p>The images '1.3.6_Naturvardsverket_registret_karta_F&amp;L_område' and '1.3.6_SGU_Kartvisare_Brunnar_F&amp;L_område' confirm this.</p>	
1.3.7	<p><i>Annual water-related costs, revenues, and a description or quantification of the social, cultural, environmental, or economic water-related value generated by the site shall be identified and used to inform the evaluation of the plan in 4.1.2.</i></p>	 Yes
Comment	<p>The document '1.3.7_Water_related_cost_2022_LE_2023' list all (currently perceived) water-related costs, associated with water stewardship activities. There are no revenues from water related activities.</p>	
1.3.8	<p><i>Levels of access and adequacy of WASH at the site shall be identified.</i></p>	 Yes
Comment	<p>The document '1.3.8_Arbeitsplatsens-utformning-afs2020-1' outlines legal guidelines for provisions.</p> <p>'1.3.8_Documentation_of_WASH_facilities_on_site' details all facilities on site. On site facilities were also sampled and seen during audit and all were clean and appeared suitable for use by the number of employees.</p>	

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-000768

**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.*



in progress

**Comment** The company had made a good start on identifying embedded water use within the catchment with the document '1.4.1\_Indirect\_water\_use' prior to the site audit. However, this was a broad document that went beyond the catchment and had not clearly identified primary suppliers within the catchment that account for over 5% of the total weight or cost of the final product. Following the on site audit, another document was provided that further narrowed down the applicable suppliers and listed the ones that fulfil the 5% criteria within the catchment. Updated document '1.4.1 Summary of components with over 5% of weight or cost'. The applicable suppliers have been highlighted yellow rows in column K of the document however, the document did not include details of quantity, quality and level of water risk within the site's catchment.

**Finding No: TNR-007807**

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



Obs.

**Comment** The document '1.4.2 Indirect water use of outsourced services\_updated' shows the Indirect water use of main outsourced services.

**1.5** *Gather water-related data for the catchment, including water governance, water balance, water quality, Important Water-Related Areas, infrastructure, and WASH*

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



in progress

**Comment** Seven documents were identified and explained:  
1.5.1\_Förvaltningsplan\_för\_vatten\_2022-2027\_Södra\_Östersjöns\_vattendistrikt and  
1.5.1\_Förvaltningsplan\_för\_vatten\_2022-2027\_Västerhavets\_vattendistrikt - Sweden is divided into 5 water districts, each of them looked after by a water authority. The area chosen by BAT Sweden falls within two of these water districts, Södra Östersjön and Västerhavet. The provided documents are the 2022-2027 management programs for the two applicable districts. Section 3.1.2 of the documents include details of surface water ecology and management of this.

Two documents from Malmö city about Malmö's Water, plans and activities as well as actions working towards Malmö's future, as a coastal city.

1.5.1\_Handlingsplan\_Malmö\_framtidens\_kuststad\_rev2021\_210506-tillgänglig - Action plan for Malmö

1.5.1\_Malmö's\_vatten\_31\_maj2018 - Pages 36 and 44 relate to water , page 58 shows roles and responsibilities

1.5.1\_Projektbeskrivning\_-Fokus-Vombsjön\_180911 - the project Foksu Vombsjön was initiated in 2018 with different stakeholders and is still ongoing.

1.5.1\_SDG6\_SE\_Clean\_water\_and\_sanitation - Swedish government info document on SDG 6, water management and WASH

However, the site has not identified the relevant river basin management plan developed under the Water Framework Directive.




**Finding No: TNR-007858**

**Finding No: TNR-006954**

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-000768

<b>1.5.2</b>	<i>Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.</i>	 Yes
Comment	<p>The company provided several documents prior to the on-site audit. At the audit, five of these were identified as being the most pertinent in relation to their legal and regulatory requirements:</p> <p>1.5.2_Riksdagen_SFS_2006_412_Lag_om_allmänna_vattentjänster - Document outlining legal responsibilities in relation to their activities, including on reporting.</p> <p>1.5.2_ABVA_-_Allmänna_bestämmelser_för_brukande_av_den_allmänna_vatten-_och_avloppsanläggningen - directives for water users and who discharges water</p> <p>1.5.2_ABVA_-_Tilläggsbestämmelser - includes details of legal parameters allowed for discharge</p> <p>1.5.2_Miljöförvaltningen_Beslut_klassning_miljöfarlig_verksamhet_F&amp;L_20111107 - Legal guidelines on what activities can be done at primary source</p> <p>1.5.2_Miljöfarlig_verksamhet_-_F&amp;L_Årsrapport_2022 - Annual report required in the document about regulation on water provision and maintenance, incl government, municipality, property owners.</p> <p>Post on-site audit, a record was developed and provided that lists all relevant legal and regulatory documents/decrees: '1.5.2 Record of applicable legislation'.</p> <p>No stakeholder verified customary water rights.</p>	
<b>1.5.3</b>	<i>The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.</i>	 Obs.
Comment	<p>Prior to the on-site audit, the company had provided the document '1.5.3_Catchment_water_balance' which included catchment water balance information (vattenbalans) for the two source districts and the Malmo area itself, some very good resource data. However, the water balance for the chosen catchment area had not been quantified. Post audit the document '1.5.3 Catchment water balance (cal)' was provided, which shows inflows and outflows along with storage capacity for three areas identified to constitute the catchment: Fosie (industrial area factory sits in), Vombsjön (the lake the water comes from), and Lommabukten (the discharge water body - bay). It shows two periods - last 6 months and last 24 months. As stated prior, no map of the catchment(s) boundaries has been provided as of yet and it is not clear how the area for which catchment balance is calculated, aligns with the relevant catchment boundaries. There are also further questions about the revised balance that would need to be discussed at an on-site audit.</p>	
<b>1.5.4</b>	<i>Water quality, including physical, chemical, and biological status, of the catchment shall be identified, and where possible, quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be identified.</i>	 Obs.

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)






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Comment	<p>The company generated the presentation '1.5.4 Catchment water quality ex VISS_updated' with information and data on water quality in their identified catchment area. From the source Vombsjön and the discharge water body (a bay on the coast of Malmö) called Lommabukten. Official data from government commissioned reports were used to generate this presentation, which includes details about physical, chemical and biological attributes and their status.</p> <p>Chemical and ecological status information was gathered from the following annual government reports: '1.5.4_VISS_Vatten_Vombsjön_SE617666-135851' '1.5.4_VISS_Vatten_Lomabukten_SE554040-125750'</p> <p>Considerations on seasonal variance has not been included, and it is not sufficiently clear what conclusions does the site draw from the data collected.</p>	
<b>1.5.5</b>	<i>Important Water-Related Areas shall be identified, and where appropriate, mapped, and their status assessed including any threats to people or the natural environment, using scientific information and through stakeholder engagement.</i>	Q Obs.
Comment	<p>The company has developed both a record and a presentation showing the details of the identified and mapped IWRA's in the three areas identified as constituting their catchment area. However, as stated previously, there is no map yet defining the exact total area of the catchment.</p> <p>The record shows the area within the catchment the IWRA relates to, a map of the location, description, protection background and references for sources of information. The 'protection background', includes details of status and potential threats to flora or fauna. The presentation includes the same information, just with bigger maps. '1.5.5 Catchment IWRA's Naturvardsverket_updated' and '1.5.5 Catchment IWRA's'</p>	
<b>1.5.6</b>	<i>Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.</i>	✓ Yes
Comment	<p>Water related infrastructure in Malmö, and the whole region of Skåne, is managed by two municipality owned and managed companies, Sydsvatten and VA Syd. Sydsvatten manages Bohlmen lake and the Bohlmen tunnel that facilitates the water supply, as well as the water treatment plant. Whereas VA Syd are responsible for the provision of the water to the inhabitants and businesses of Skåne.</p> <p>The document '1.5.6_Water-related_infrastructure_Summary' shows, in order of slides, the provision of water with current and future infrastructure improvements. Including a plan to build a drainage tunnel under Malmö to help manage high rainwater volumes in the future (Program Maxima / Avloppsstunnel).</p> <p>The document '1.5.6_Sydsvatten_strategiskplan_2018_2022' (new version not published yet due to Covid related delays) details the overall strategy of Sydsvatten, in terms of infrastructure and management. Whereas the document '1.5.6_Skyfallsplan_Malmo stad_samarbete_med_VA_Syd' contains details and plans for development and implementation of better infrastructure to manage higher rainfall volumes (skyfall). The plan has been drawn up as a joint collaborative project between the street office (GK), the city planning office (SBK), the environmental administration (MF), the property office (FK), the city office safety and security unit (ETOS), the service administration (SEF) and VA SYD.</p>	
<b>1.5.7</b>	<i>The adequacy of available WASH services within the catchment shall be identified.</i>	✓ Yes
Comment	<p>The document '1.5.7_SDG6_SE_Clean_water_and_sanitation' has been published by the Swedish government and is a statement on meeting SDG 6, which includes access to WASH (all of Sweden, including catchment).</p> <p>The document states that "Access to clean water and sanitation for all inhabitants in Sweden is considered to be met. Regarding the global indicators, the preliminary assessment is that Sweden fulfils the targets. Legislation and directives adequately cover the majority of the targets that relate to this SDG, including several of Sweden's environmental objectives."</p>	

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-000768

<b>1.6</b>	<i>Understand current and future shared water challenges in the catchment, by linking the water challenges identified by stakeholders with the site's water challenges.</i>	
<b>1.6.1</b>	<i>Shared water challenges shall be identified and prioritized from the information gathered.</i>	 in progress
Comment	<p>The company has provided the document '1.6.2 Shared water challenges' that details two water challenges identified by their waste contractor, who has also been identified as a stakeholder. The water challenges identified by the contractor are:</p> <ul style="list-style-type: none"> <li>- Shortage / restrictions of water</li> <li>- Rising sea water (as they are located in the harbor).</li> </ul> <p>Aside from this document identifying the waste contractor's water challenges, there is no other documentation related to shared water challenges.</p> <p>In the company's Water Stewardship Plan, there is a column called "Challenge" however, this does not appear to relate to shared water challenges, more on what the challenge related to a specific action is.</p> <p>In the document '1.7_2.4.1 Risks and opportunities_updated', there is an overall risk area titled 'Municipal water supply' with two risks identified: "restrictions to water supply", and "disruptions/loss of supply due to sudden infrastructure failure.</p> <p>However, in neither "1.7_2.4.1 Risks and opportunities_updated" or the Water Stewardship plan, is there any link or reference to the water challenges identified by the waste contractor.</p> <p><b>Finding No: TNR-007161</b></p>	
<b>1.6.2</b>	<i>Initiatives to address shared water challenges shall be identified.</i>	 in progress
Comment	<p>There are mentioned of some solutions to potential challenges (risks) in the document '1.7_2.4.1 Risks and opportunities_updated. For example, a contingency plan in case of contamination of the water and contributing to a functioning stormwater drainage, in accordance with the Skyfall plan. However, there is no clear identification of initiatives related to shared water challenges.</p> <p><b>Finding No: TNR-007163</b></p>	
<b>1.7</b>	<i>Understand the site's water risks and opportunities: Assess and prioritize the water risks and opportunities affecting the site based upon the status of the site, existing risk management plans and/or the issues and future risk trends identified in 1.6.</i>	
<b>1.7.1</b>	<i>Water risks faced by the site shall be identified, and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.</i>	 Yes
Comment	<p>The document '1.7_2.4.1 Risks and opportunities_updated' lists identified risks and opportunities. This includes priority, likelihood, impact level, cost considerations within a given timeframe as well as business impact (risk).</p>	
<b>1.7.2</b>	<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 document '1.7_2.4.1 Risks and opportunities_updated' lists identified risks and opportunities. This includes opportunity, priority, benefits and cost considerations.</p>	
<b>1.8</b>	<i>Understand best practice towards achieving AWS outcomes: Determining sectoral best practices having a local/catchment, regional, or national relevance.</i>	
<b>1.8.1</b>	<i>Relevant catchment best practice for water governance shall be identified.</i>	 Obs.

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-000768

Comment	The company has identified and listed good practices for water governance in the document '1.8 Best practices submitted'. It includes details about regulations, transparency and planning. It also mentions that water is classified as food in Sweden, which ensures "strictest level of requirements and controls on all levels".	
<b>1.8.2</b>	<i>Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.</i>	Q Obs.
Comment	<p>The company has identified and listed good practices for water balance in the document '1.8 Best practices submitted'. It includes details about municipal supply, stormwater management and reduction of withdrawal needs. The document '1.8_Livsmedelsforetagens-hallbarhetsmanifest-utvardering-anslutnaforetag-2021' shows details of a survey that's part of a manifest by food suppliers about how to improve sustainability of water use.</p> <p>Furthermore, the Swedish Meteorological and Hydrological Institute (SMHI) - "a government authority under the Ministry of Climate and Business with the mission of being an expert body in meteorology, hydrology, oceanography and climatology" monitor water balances within the region. They are the source of the information provided in '1.5.3_Catchment_water_balance'.</p>	
<b>1.8.3</b>	<i>Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.</i>	Q Obs.
Comment	<p>The company has identified and listed good practices for water quality in the document '1.8 Best practices submitted'. It includes details about regulations, transparency and reporting. It also mentions that water is classified as food in Sweden, which ensures "strictest level of requirements and controls on all levels".</p> <p>The document also mentions the use of UV filters on site to ensure water quality.</p> <p>Outside the identified core catchment areas, but still of importance to water provision in South Malmö, where BAT Sweden is located, are two reports including research and management practises related to the bigger lake supplying North Malmö with water. The reason for these documents being included is explained in the document '1.1.1 Catchment map': "In the future (current plan by 2031), Sydsvatten plans to build a connection to deliver water from Bolmen also to Vombverket, in lights of expected population growth in Malmö"</p> <p>- '1.8_Bolmen_vattenskyddsomrade_Utformning_foreskrifter_bilaga_F1_190909', includes details about quality of the water in/from Bolmen lake. The document also mentions good research and development practises around quality, as also shown in the evidence provided for 1.5.4, including the document '1.5.4_Bolmen-Report_2020' is a comprehensive report on the Bolmen lake, developed in collaboration between Lund University, Sudvatten (the water authority) and Sweden Water Research.</p>	
<b>1.8.4</b>	<i>Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.</i>	Q Obs.
Comment	The company has identified and listed good practices for site maintenance of Important Water-Related Areas in the document '1.8 Best practices submitted'. It includes details about regulations, research and management.	
<b>1.8.5</b>	<i>Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.</i>	Q Obs.
Comment	<p>The company has identified and listed good practices for WASH in the catchment in the document '1.8 Best practices submitted'. It includes details about regulations, as well as motion raised by the Swedish government to investigate provision of free menstrual products for everyone (following in the footsteps of Scotland). See the document '1.8_Kostnadsfria_mensskydd_i_Sverige' for a copy of the proposed motion.</p> <p>The company already provides female hygiene products for free on site, and have implemented automatic flushing of showers to prevent legionella.</p>	

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-000768

2	<b>STEP 2: COMMIT &amp; PLAN - Commit to be a responsible water steward and develop a Water Stewardship Plan</b>	
2.1	<i>Commit to water stewardship by having the senior-most manager in charge of water at the site, or if necessary, a suitable individual within the organization head office, sign and publicly disclose a commitment to water stewardship, the implementation of the AWS Standard and achieving its five outcomes, and the allocation of required resources.</i>	
2.1.1	<i>A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:</i> <ul style="list-style-type: none"> <li>- That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes</li> <li>- That the site implementation will be aligned to and in support of existing catchment sustainability plans</li> <li>- That the site's stakeholders will be engaged in an open and transparent way</li> <li>- That the site will allocate resources to implement the Standard.</li> </ul>	
Comment	The document 'F&L_AWS_Commitment_statement_2023' includes all requirements for this indicator, was signed by the Factory Manager, and is displayed in the company reception.	
2.2	<i>Develop and document a process to achieve and maintain legal and regulatory compliance.</i>	
2.2.1	<i>The system to maintain compliance obligations for water and wastewater management shall be identified, including:</i> <ul style="list-style-type: none"> <li>- Identification of responsible persons/positions within facility organizational structure</li> <li>- Process for submissions to regulatory agencies.</li> </ul>	
Comment	<p>Identification of responsible persons/positions within facility organizational structure: The company provided two organisational structures at the on-site audit: one valid from July 2023 ('2.2.1_Org_structure_Water,_wastewater_01072023') and one from October following the start of the new Engineering &amp; Sustainability Manager ('2.2.1_Org_structure_Water,_wastewater_01102023'). The charts include responsibility areas related to compliance obligations for water and wastewater.</p> <p>Process for submissions to regulatory agencies: The Sustainability Executive is overall responsible, the Sustainability Coordinator will do in their absence. They will gather the relevant information / data, also from external providers if necessary. Online reporting system for submitting environmental report, to be submitted by the 31st of March for the previous year. The document '2.2.1_Routine_for_annual_reporting_to_Miljöverket' shows the procedure for preparing and submitting annual reports.</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>	
Comment	The document '2.3.2_F&L_Water_Stewardship_strategy' defines the company's overall mission, vision and goals in regards to AWS water stewardship.	

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- 2.3.2** *A water stewardship plan shall be identified, including for each target:*
- *How it will be measured and monitored*
  - *Actions to achieve and maintain (or exceed) it*
  - *Planned timeframes to achieve it*
  - *Financial budgets allocated for actions*
  - *Positions of persons responsible for actions and achieving targets*
  - *Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.*

  
No

Comment The document '2.3.2\_Water\_Stewardship\_Plan' is a well laid out plan for the initial certification, however, it is missing some components in its current state:

- There are no targets on maintaining or enhancing IWRAs. It was confirmed in 1.3.6 that there are no IWRA's on the site land however, eight IWRAs were identified within the source and discharge areas of the proposed catchment area (bearing in mind the finding raised in 1.1.1 on the missing catchment map). There are actions on the plan that refer to the outcome related to IWRA's however, all these actions relate to the site and not the catchment.
- Whilst for the 1st and 4th target it is clear what outcome the site wants to achieve and by when, other targets lack this clarity
- Also there is no linking between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.

**Finding No: TNR-007865**

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

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

  
Yes






Comment The document '1.7\_2.4.1 Risks and opportunities\_updated' lists identified risks, the column titled Mitigation/Opportunity includes plans for mitigation/adaptation with details of who to collaborate with.

In addition, the document '2.4.1\_Case\_for\_UV\_filter\_incoming\_water\_to\_be\_implemented\_in\_building\_extension' includes further details about a plan to install a UV filter on incoming water in case of future contamination of water (to ensure continued production).

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3	STEP 3: IMPLEMENT - Implement the site's stewardship plan and improve impacts	
3.1	<i>Implement plan to participate positively in catchment governance.</i>	
3.1.1	<i>Evidence that the site has supported good catchment governance shall be identified.</i>	 in progress
Comment	<p>According to discussions at the on-site visit, there is sharing of water actions with BAT International group.</p> <p>The company also stated that there is active communicating with the environment agency (Miljöverket) but no documentation about this.</p> <p style="text-align: right;"><b>Finding No: TNR-007200</b></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>	 Yes
Comment	<p>The company has confirmed that they respect water rights of others with the document '3.1.2_3.2.2 Respecting water rights of others' and that there are no indigenous peoples in the area.</p> <p>The company has also referred to the document from the Swedish government about compliance with SDG6 (3.1.2_3.2.2 SDG6_SE Clean water and sanitation)</p>	
3.2	<i>Implement system to comply with water-related legal and regulatory requirements and respect water rights.</i>	
3.2.1	<i>A process to verify full legal and regulatory compliance shall be implemented.</i>	 Yes
Comment	<p>The company utilises Ecotech (www.ecoweb.se), which is database with legislation and changes alerts. You can sign up to key-words and then you get regular updates on areas you have shown interest in. See '3.2.1 EcoTech Website' for a snapshot of the company's dashboard on the Ecotech website.</p> <p>This website is used to monitor any changes in applicable laws, legislations, policies etc. related to the company's environmental practises.</p> <p>Quarterly safety meetings include work environment (including unions), environmental indicators, labour law. The Sustainability Executive chairs this meeting, together with the Factory Manager.</p> <p>See '3.2.1 Safety Committee meeting SCM 2 2023' for an example of an agenda from a safety committee meeting and '3.2.1 SCM protocol with actions March 2023' and '3.2.1 SCM protocol with actions May 2023' for examples of minutes and actions.</p>	
3.2.2	<i>Where water rights are part of legal and regulatory requirements, measures identified to respect the water rights of others including Indigenous peoples, shall be implemented.</i>	 Yes
Comment	<p>The company has legal and regulatory compliance in place, as shown in 3.2.1. Sweden has ratified SDG6, and the company has used this as evidence.</p> <p>There are no additional things the site can do as water rights provisions are already in place.</p>	
3.3	<i>Implement plan to achieve site water balance targets.</i>	
3.3.1	<i>Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.</i>	 Yes

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Comment	<p>Column G of the Water Stewardship Plan includes status for the targets. There is a target related to water balance: 'Improve water balance of the site by utilising submeters in production and considering changes to site'</p> <p>Four actions had been set to achieve this target:</p> <ol style="list-style-type: none"> <li>1 Update water balance with sprinkler tank post installation - open</li> <li>2 Submeter installations water (PMD, SMD lines) - closed</li> <li>3 Finalise System integration (Schneider) water meters to receive correct volume information - ongoing</li> <li>4 Review need for additional submeters to improve site water balance - open</li> </ol> <p>Action 1 is low priority and has not been started. Action 2 was completed in May 23, see '3.3.1_Submeter_installations_onsite_Status_May_2023' for initial readings. Action 3 was in process at the audit. The additional submeters had been installed (examples seen during site visit) but were unfortunately not working properly. The Facilities Manager was working with the suppliers of the meters to fix the calibration so the meters could be put into use. Action 4 is open, the site plans to action this after the additional meters come into use.</p>	
<b>3.3.2</b>	<i>Where water scarcity is a shared water challenge, annual targets to improve the site's water use efficiency, or if practical and applicable, reduce volumetric total use shall be implemented.</i>	 Yes
Comment	Water scarcity has not been identified as a shared water challenge. The site still provided information on its water use trends and water recycling rates. The total water withdrawn has decreased from 2020 baseline, and the recycling rate has increased.	
<b>3.3.3</b>	<i>Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.</i>	 Yes
Comment	Not applicable as no re-allocation of water from site. The water goes back into the municipal sewers post use.	
<b>3.4</b>	<i>Implement plan to achieve site water quality targets</i>	
<b>3.4.1</b>	<i>Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.</i>	 Yes
Comment	<p>Column G of the WSP includes status on water quality (incl WASH).</p> <p>There is a target related to water quality: 'Achieve access to continued safe drinking water by YE 2024 through Implementation of UV filter for all incoming water'</p> <p>Two actions had been set before the audit to achieve this target:</p> <ol style="list-style-type: none"> <li>1 Review &amp; procure incoming water UV filter - closed</li> <li>2 UV filter - Installation in new room when building extension completed - open</li> </ol> <p>Action 1 has been closed - saw UV filter on site, as well as location in new building where this will be installed during the 2024 factory shutdown. Action 2 is open, as stated above, will be installed during factory shutdown in summer 2024.</p> <p>Another two actions had been set that relate to WASH however, there was no overarching Target set for this (see finding 2.3.2):</p> <ol style="list-style-type: none"> <li>1 Install Libresse boxes (4 toilets) - closed</li> <li>2 Hygiene information/ repeat campaign (integrating WASH elements) - open</li> </ol> <p>Action 1 has been closed - free librette dispensers seen in two sampled toilets during site visit. Action 2 open - deadline of 2023.</p>	

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<b>3.4.2</b>	<i>Where water quality is a shared water challenge, continual improvement to achieve best practice for the site's effluent shall be identified and where applicable, quantified.</i>	 Yes
Comment	<p>Water quality has not been identified as a shared water challenge. However, there is continuous monitoring of on site effluent. This is a legal requirement anyway and the annual reports submitted to the Environment Agency (Miljöverket) show that since the WWTP was put into action in September 2022, an issue with too high fluctuations in the pH levels has been resolved.</p> <p>Graphs in the documents '5_ex_1.3.4_Rapportering_av_egenkontrollprogram_2021_reported_to_Miljöverket' and '5_ex_1.3.4_Rapportering_av_egenkontrollprogram_2022_reported_to_Miljöverket' show the quality of the effluent has been within parameters following install of WWTP.</p>	
<b>3.5</b>	<i>Implement plan to maintain or improve the site's and/or catchment's Important Water-Related Areas.</i>	
<b>3.5.1</b>	<i>Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.</i>	 in progress
Comment	<p>There are no IWRA's within the company site however, eight have been identified in the water source and discharge areas of the proposed catchment (bearing in mind, map not provided of area and findings raised in 1.1.1).</p> <p>Due to the catchment IWRA's not being included in the Stewardship Plan, there are currently no practices listed.</p> <p style="text-align: right;"><b>Finding No: TNR-007287</b></p>	
<b>3.6</b>	<i>Implement plan to provide access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers at all premises under the site's control.</i>	
<b>3.6.1</b>	<i>Evidence of the site's provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers onsite shall be identified and where applicable, quantified.</i>	 Yes
Comment	<p>The document '1.3.8_Documentation_of_WASH_facilities_on_site' provides details of the locations and numbers of all WASH facilities on site.</p> <p>Not all were seen during site visit but a representative sample were seen from around the site. All looked clean and sufficient. It is also worth mentioning the recent addition of the free female sanitary products, in four toilets around the site, two of which were seen during site visit.</p>	
<b>3.6.2</b>	<i>Evidence that the site is not impinging on the human right to safe water and sanitation of communities through their operations, and that traditional access rights for indigenous and local communities are being respected, and that remedial actions are in place where this is not the case, and that these are effective.</i>	 Yes
Comment	<p>See the document '3.1.2_3.2.2 Respecting water rights of others' and that there are no indigenous peoples in the area.</p> <p>The company has also referred to the document from the Swedish government about compliance with SDG6 (3.1.2_3.2.2 SDG6_SE Clean water and sanitation).</p> <p>The tap water in Sweden is safe to drink and with the taps seen in sampled toilets as well as the canteen area were fully functioning, it is clear that the company is not impinging on peoples right to water.</p>	
<b>3.7</b>	<i>Implement plan to maintain or improve indirect water use within the catchment:</i>	
<b>3.7.1</b>	<i>Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.</i>	 Obs.

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Comment	The company has started the process of mapping indirect water use by suppliers (see '1.4.1 Summary of components with over 5% of weight or cost') however, no targets have been set in this area yet.	
3.7.2	<i>Evidence of engagement with suppliers and service providers, as well as, when applicable, actions they have taken in the catchment as a result of the site's engagement related to indirect water use, shall be identified.</i>	 in progress
Comment	The company has made a record of the service providers they have discussed indirect water use with (see '1.4.2 Indirect water use of outsourced services_updated'), and the comments resulting from these engagements. However, there are no records of the conversations themselves, or records of engagement with suppliers of the primary inputs in the catchment. <b>Finding No: TNR-007290</b>	
3.8	<i>Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have.</i>	
3.8.1	<i>Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.</i>	 Yes
Comment	There are no concerns about shared water-related infrastructure however, the company has obtained and studied the OECD document '3.8_Sweden_Financing-water-supply-sanitation-and-flood-protection_country-fact-sheet' about resources required to maintain Swedish water related infrastructure.	
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>	 Obs.
Comment	The company has developed a good presentation document ('3.9.1 - 3.9.5 Actions towards achieving best practice_evidence') that details actions carried out in relation to water governance. The document includes supporting evidence references for best practises, as well as some slides with pictorial evidence of the actions. However, the practises on this document do not correlate with the best practises listed on the document '1.8 Best practices submitted', or link clearly with the targets and actions in the Water Stewardship Plan.	
3.9.2	<i>Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.</i>	 Obs.
Comment	The company has developed a good presentation document ('3.9.1 - 3.9.5 Actions towards achieving best practice_evidence') that details actions carried out in relation to water balance. The document includes supporting evidence references for best practises, as well as some slides with pictorial evidence of the actions. However, the practises on this document do not correlate with the best practises listed on the document '1.8 Best practices submitted', or link clearly with the targets and actions in the Water Stewardship Plan.	
3.9.3	<i>Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.</i>	 Obs.
Comment	The company has developed a good presentation document ('3.9.1 - 3.9.5 Actions towards achieving best practice_evidence') that details actions carried out in relation to water quality. The document includes supporting evidence references for best practises, as well as some slides with pictorial evidence of the actions. However, the practises on this document do not correlate with the best practises listed on the document '1.8 Best practices submitted', or link clearly with the targets and actions in the Water Stewardship Plan.	

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3.9.4	Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.	Q Obs.
Comment	The company has developed a good presentation document ('3.9.1 - 3.9.5 Actions towards achieving best practice_evidence') that details actions carried out in relation to Important Water Related Areas. The document includes supporting evidence references for best practises, as well as some slides with pictorial evidence of the actions. However, the practises on this document do not correlate with the best practises listed on the document '1.8 Best practices submitted', or link clearly with the targets and actions in the Water Stewardship Plan.	
3.9.5	Actions towards achieving best practice related to targets in terms of WASH shall be implemented.	Q Obs.
Comment	The company has developed a good presentation document ('3.9.1 - 3.9.5 Actions towards achieving best practice_evidence') that details actions carried out in relation to WASH. The document includes supporting evidence references for best practises, as well as some slides with pictorial evidence of the actions. However, the practises on this document do not correlate with the best practises listed on the document '1.8 Best practices submitted', or link clearly with the targets and actions in the Water Stewardship Plan.	

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4 STEP 4: EVALUATE - Evaluate the site's performance.	
4.1	<i>Evaluate the site's performance in light of its actions and targets from its water stewardship plan and demonstrate its contribution to achieving water stewardship outcomes.</i>
4.1.1	<i>Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.</i> <span style="float: right;">Q Obs.</span>
Comment	<p>As this is the Initial Audit, the company has not evaluated performance against all the actions, as several have not been started yet. Instead, an Interim Evaluation report ('4 Evaluation of the site's performance against stewardship plan_updated') has been developed, with a status description of the targets set.</p> <p>Key points to notice is that:</p> <ul style="list-style-type: none"> <li>- The installation of the new on-site WWTP has led to all parameters within discharge water now being within set limits. As already stated, there had previously been issues with the pH being too high. Particles and Cadmium had also reduced.</li> <li>- The company is on target to reach their goal of a 30% reduction in water use by 2025. At the evaluation date of the 4th of September, 2023, the site had reduced use by 26% (2022 FY vs 2020 baseline).</li> <li>- A UV filter had been purchased to further ensure a high quality of incoming water. This will be installed during the factory shutdown in summer 2024.</li> <li>- Free female hygiene products dispensing machines have been installed in four toilets on the site.</li> </ul>
4.1.2	<i>Value creation resulting from the water stewardship plan shall be evaluated.</i> <span style="float: right;">✔ Yes</span>
Comment	<p>As explained in 4.1.1, as this is the Initial Audit, an in-depth analysis of value creation of all actions in the Water Stewardship Plan has not been carried out. Instead, the company has included a description in '4 Evaluation of the site's performance against stewardship plan_updated' of the summarised performances in this.</p> <p>Key points to note:</p> <ul style="list-style-type: none"> <li>- Through increased water efficiency and water recycling (CIP TO mixers), F&amp;L has thus far managed to reduce the absolute amount of water withdrawn by 3396 kbm (2022FY vs 2020FY baseline), resulting in 43.4k SEK saving in water supply (calculated at VA Syd 2022 price of 12.79 SEK / kbm).</li> <li>- From the installed WWTP, and improved discharge water quality, there is a reduced risk for loss of reputation or potential penalties, if failing to reach limit values consistently.</li> <li>- The provision of menstrual hygiene products (LE 11k SEK p.a.) is a personal and monetary benefit for employees &amp; visitors onsite.</li> <li>- The benefit and value created from the install of the new UV filter shall be evaluated upon completed implementation.</li> </ul>
4.1.3	<i>The shared value benefits in the catchment shall be identified and where applicable, quantified.</i> <span style="float: right;">✔ Yes</span>

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**Comment** It was acknowledged at the audit that approaching this indicator could be difficult in the case of BAT Sweden, due to being in the context of solid Swedish legislation and treatment of incoming and outgoing water. Due to this, it had not been easy to identify shared value benefits in the wider catchment area.

However, the company has made a good start, including details of this in the F&L Cost - benefit analysis in '4 Evaluation of the site's performance against stewardship plan\_updated'. The description related to this area so far includes:

- From a catchment perspective, the increased water efficiency and water recycling on-site means that the respective amount of water would instead have been available to others through VA Syd or not required to be produced by Sydvatten.
- From a catchment perspective, achieving the limit values for F&L's discharged wastewater reduces risk of corrosion (pH) and clogging (particles) to VA Syd's pipe network.

OBS: The company should keep looking at potential value benefits in the catchment from the activities on site, and the targets set in the Water Stewardship Plan.

**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.*



**Comment** A summary of water related incidents is included in the interim review document '4 Evaluation of the site's performance against stewardship plan\_updated', and was also in 1.3.5 on potential sources of pollution. No need to report either of these to the authorities as no negative consequences. These types of incidents are also reviewed at annual meeting with the environment agency.

As initial audit, this review is considered sufficient considering no serious incidents that required reporting to the relevant authorities.

**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.*



**Comment** Consultation efforts is mainly with the environment agency Miljöförvaltningen. Aside from conversations with suppliers, no other identified stakeholders have been contacted yet (aside from the contact with the NGO described in 1.2, who did not want to engage with the company however there is no record of that).

See '1.2\_Stakeholders\_for\_Fiedler\_&\_Lundgren,\_Malmö\_2021\_(version\_2)' for overall record, with column for recording of consultation efforts.

The company keeps a record of all correspondence or meetings with the environment agency, see '4.3.1\_3.3.1\_5.4.2 Kommunikation, Miljöförvaltningen Malmö Stad'.

**Finding No: TNR-007352**

**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.*



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**Comment**      Based on the interim evaluation against the water stewardship plan ('4 Evaluation of the site's performance against stewardship plan\_updated'\_), the water stewardship plan and the contents of this along with the explanation from the audit attendees and sustainability representatives, that AWS targets will be reviewed as part of the Safety Committee Meetings, it can be confirmed that the company has evaluation mechanisms in place and that the learnings from this year's audit and evaluation will be incorporated into next year.

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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.	in progress 
Comment	<p>The company had not disclosed details of the water-related internal governance prior to the on-site audit and during the audit it was discussed that this needed to be approved by the External Affairs team, due to the company not normally publishing staff details online. However, names do not need to be disclosed - it is sufficient to disclose positions. No evidence showing this had been addressed post audit, and nothing has been added to the website.</p> <p><b>Finding No: TNR-007354</b></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.	in progress 
Comment	<p>The company had not communicated the WSP to stakeholders prior to the audit, and provided no evidence of doing this post audit.</p> <p><b>Finding No: TNR-007355</b></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>As this was the initial audit, and there has yet to be carried out quantified evaluation of all actions related to targets, and due to not having received the AWS certification yet, the company had not disclosed a summary of performance in any way. This was resolved post audit where a summary document detailing the progress of BAT Sweden towards AWS certification ('5 Extracts of F&amp;L annual reports 2021, 2022_progress update published 2023') was published on the company website under the Sustainability header - <a href="https://www.batsweden.se/">https://www.batsweden.se/</a>. In addition, the company has to generate annual performance reports and submit them on the website <a href="http://www.hitta.se">www.hitta.se</a>. This is part of a legal requirement on public disclosure and also includes information about water aspects. For example, 2021 intention to build WWTP and in 2022, confirmation of build. See '5 Extracts of F&amp;L annual reports 2021, 2022_progress update published 2023'.</p>	
5.4	Disclose efforts to collectively address shared water challenges, including: associated efforts to address the challenges; engagement with stakeholders; and co-ordination with public-sector agencies.	
5.4.1	The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.	Obs. 

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Comment	As stated in 1.6.1, two water challenges were addressed by the company's waste contractor, and stakeholder: - Shortage / restrictions of water - Rising sea water (as they are located in the harbor). The challenge related to shortage/restrictions of water, has been considered in the company's Water Stewardship Plan and an action and progress related to this has been included in '5 BAT Fiedler & Lundgren - Progress Towards Good Water Stewardship - published' in point 2: "Contribute to long-term sustainable drinking water supply by continued optimization of our water consumption and/or reduced water intensity", including with details of the 30% reduction target and where the company is now in respect to this (26% reduction).	
<b>5.4.2</b>	<i>Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.</i>	 Yes
Comment	During the audit, it was explained that the company had contacted their water supplier VA Syd about the AWS certification but had received no reply. The company is listed as a stakeholder but there are no details on '1.2_Stakeholders_for_Fiedler_&_Lundgren,_Malmö_2021_(version_2)' about the company contact. As already raised in 4.3.1, the company has the record mentioned above however, have only recorded contact with two stakeholders. As also stated in 4.3.1, the company is keeping a detailed record of communications with Miljöförvaltningen as shown in '4.3.1_3.3.1_5.4.2 Kommunikation, Miljöförvaltningen Malmö Stad'. The company could look to engage more stakeholders, including the public sector agencies they are not working with already, and keep records of any efforts carried out in regards to this.	
<b>5.5</b>	<i>Communicate transparency in water-related compliance: make any site water-related compliance violations available upon request as well as any corrective actions the site has taken to prevent future occurrences.</i>	
<b>5.5.1</b>	<i>Any site water-related compliance violations and associated corrections shall be disclosed.</i>	 Yes
Comment	No violations have occurred. The company has to submit an annual report to the environment agency on monitoring and measuring parameters of all environmental activities and aspects, including for water. See '5_Extracts_of_F&L_annual_reports_2021,_2022' for the sections of the 2021 and 2022 reports where its stipulated the company must submit an annual report, and '5_ex_1.3.4_Rapportering_av_egenkontrollprogram_2021_reported_to_Miljöverket' and '5_ex_1.3.4_Rapportering_av_egenkontrollprogram_2022_reported_to_Miljöverket' for copies of the reports from the last two years.	
<b>5.5.2</b>	<i>Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.</i>	 Yes
Comment	No violations have occurred. The company has to submit an annual report to the environment agency on monitoring and measuring parameters of all environmental activities and aspects, including for water. See '5_Extracts_of_F&L_annual_reports_2021,_2022' for the sections of the 2021 and 2022 reports where its stipulated the company must submit an annual report, and '5_ex_1.3.4_Rapportering_av_egenkontrollprogram_2021_reported_to_Miljöverket' and '5_ex_1.3.4_Rapportering_av_egenkontrollprogram_2022_reported_to_Miljöverket' for copies of the reports from the last two years.	
<b>5.5.3</b>	<i>Any site water-related violation that may pose significant risk and threat to human or ecosystem health shall be immediately communicated to relevant public agencies and disclosed.</i>	 Yes

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)



Audit Number: AO-000768

**Comment** No violations have occurred. The company has to submit an annual report to the environment agency on monitoring and measuring parameters of all environmental activities and aspects, including for water.  
See '5\_Extracts\_of\_F&L\_annual\_reports\_2021,\_2022' for the sections of the 2021 and 2022 reports where its stipulated the company must submit an annual report, and '5\_ex\_1.3.4\_Rapportering\_av\_egenkontrollprogram\_2021\_reported\_to\_Miljöverket' and '5\_ex\_1.3.4\_Rapportering\_av\_egenkontrollprogram\_2022\_reported\_to\_Miljöverket' for copies of the reports from the last two years.

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-000768

### Photographic Evidence from Audit

✓  
Yes

Comment Twenty two images attached.



External sewer drains.JPEG



Water with nicotine post production - stored and collected by waste contractor.JPEG

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-000768



Outflow pipe.JPEG



Secure handling container for nicotine process.JPEG



Ice box spill tray.JPEG

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-000768



Water flow meters.JPG



Flavour mixing dispenser.JPG

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-000768



Flavour storage cupboards.JPG



Spill tray in nicotine storage room - not connected to water infrastructure.JPG

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-000768



Ice box inflow.JPG



Hard copy map of water related infrastructure.JPG

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

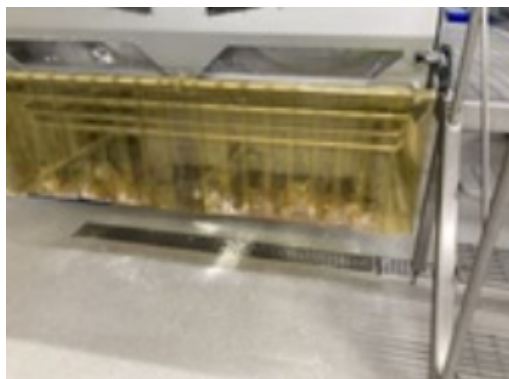
Audit Number: AO-000768



Ice box instructions.JPEG



Hazard kits to wear when working with pure nicotine.JPEG



Spill trays in primary production - not connected to water infrastructure pipes.JPEG

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-000768



Wash and disinfection room for production tools.JPEG



Ice box temperature.JPEG

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-000768



Hallway piping.JPG



Spill kit in primary production.JPG



Hazardous waste storage containers.JPG

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-000768



Hand wash and sanitation.JPEG



Flavour mixing container.JPEG

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-000768



Spill kit component in nicotine storage room.JPEG