

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)



Audit Number: AO-001292

### SITE DETAILS

Site: **BAT Turkey - Samsun**

Address: Operations İstiklal Mah. İskele Cad. No: 19 BAT Sigara Fabrikası Ondokuz Mayıs, 55420, Samsun, TURKEY

Contact Person: Gurur Asi

AWS Reference Number: AWS-000407

Site Structure: Single Site

### CERTIFICATION DETAILS

Certification status: Certified Core

Date of certification decision: 2025-Jan-27

Validity of certificate: 2028-Jan-26

### AUDIT DETAILS

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

Audit Type(s): Re-Certification Audit

Audit Start Date: 2024-Nov-19

Lead Auditor: Ozge Gokmen

Audit team participants:

Ozge Gokmen, Lead Auditor

Site Participants:

Gurur Asi, Area Sustainability Manager

Deniz YILMAZ, ESG Coordinator

Eray Devecioglu, ISS Utilities Manager

Yavuz Yıldız, ISS Technical Manager

Senem YURTSEVER, Quality Operator

Omer Topcu, Environmental Representative

Nurcan ÇOBANOĞLU, Visual & Training Coordinator

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### ADDITIONAL INFO

Summary of Audit Findings: A total of 26 findings were raised during the certification audit, 17 minor non-conformities, 9 observations.

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 07 February 2025.

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

The audit team recommends re-certification of BAT Turkey - Samsun at Core level pending approval of the corrective actions plan.

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

The Client has successfully submitted the corrective action plan addressing all findings. Proof of implementation has been requested for the Minors and this will be evaluated during the Surveillance Audit. The client is requested to upload evidence of implementation prior to the Surveillance Audit.

Scope of Assessment: The scope of services covers the re-certification audit for assessing conformity of BAT Turkey - Samsun against the AWS International Water Stewardship Standard Version 2 at core level.

BAT Turkey – Samsun is located in the Lower Kızılırmak Sub-Basin. The site receives water mainly from the Dam on the Kızılırmak River which is ventilated, filtrated, chlorinated and supplied by SASKİ (Samsun Su ve Kanalizasyon İdaresi Genel Müdürlüğü). Until April 2024, the facility drew water from 4 wells in addition to the municipal water supplied by SASKİ. After April 2024, the use of wells was completely discontinued, and all water consumption has been sourced exclusively from SASKİ.

The audit was conducted onsite on 19/11/2024 to 21/11/2024.

The onsite site visit included the assessment of the following:

- Borehole
- Water Treatment Plant
- Wastewater Treatment Plant
- BAT Factory
- Water Reuse System
- Firefighting System

### FINDINGS

#### NUMBER OF FINDINGS PER LEVEL

Observation	9
Minor	17

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### FINDING DETAILS

Finding No:	TNR-014992
Checklist Item No:	1.2.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Nov-19
Checklist item:	<p>Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall:</p> <ul style="list-style-type: none"><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:	<p>The stakeholder list is too general and does not allow for the individual evaluation of each stakeholder's specific interests and impacts related to water.</p> <p>Also; The stakeholder identification process used to define them has not been identified. Additionally, the site has not provided evidence of consulting stakeholders on their water-related interests and challenges, apart from the meeting facilitated by the university.</p>
Corrective action:	<p>"*Stakeholder evaluation criteria will be established and included WSAS documentation by November 2025</p> <p>*Water-related interest and challenges will be consulted to the stakeholders via survey and a meeting which will be held by November 2025"</p>
Finding No:	TNR-014994
Checklist Item No:	1.3.4
Status:	Open
Finding level:	Observation
Checklist item:	<p>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.</p>
Findings:	<p>It is recommended that the facility monitor not only the legal limits but also the overall variance to achieve the best possible water quality.</p>
Corrective action:	<p>It will be monitored and quantified, trend analysis will be done</p>

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Finding No:	TNR-014996
Checklist Item No:	1.3.7
Status:	Open
Finding level:	Observation
Checklist item:	Annual water-related costs, revenues, and a description or quantification of the social, cultural, environmental, or economic water-related value generated by the site shall be identified and used to inform the evaluation of the plan in 4.1.2.
Findings:	Actions related to water within the facility and basin, such as IWRA cleaning, can be reviewed and the list expanded accordingly.
Corrective action:	The list will be revisited and expanded with the relevant costs
Finding No:	TNR-014997
Checklist Item No:	1.3.8
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Nov-19
Checklist item:	Levels of access and adequacy of WASH at the site shall be identified.
Findings:	However, a comprehensive inventory of all WASH facilities has not been provided by the facility, nor has a comparison of these facilities' adequacy against national and/or other independent standards or guidelines been conducted.
Corrective action:	"*All WASH facilities will be identified and listed by November 2025 *National Standards will be checked and site WASH facilities will be evaluated accordingly"
Finding No:	TNR-014999
Checklist Item No:	1.5.3
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Nov-19
Checklist item:	The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.
Findings:	The site has not established an annual catchment water balance and does not monitor variances.
Corrective action:	*Annual Catchment water balance will be developed seasonal base

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Audit Number: AO-001292

Finding No:	TNR-015000
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:	Considering the requirements of the criterion, the analyses should be reviewed, their frequency determined, and variance monitoring implemented to assess the basin's water quality comprehensively.
Corrective action:	The analyses will be reviewed, their frequency determined, and variance monitoring implemented to assess the basin's water quality comprehensively.
Finding No:	TNR-014998
Checklist Item No:	1.5.5
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Nov-19
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:	However, the site has not assessed the condition of IWRA (Important Water-Related Areas). Additionally, the facility does not have any engagement with stakeholders regarding IWRA.
Corrective action:	"*The condition of IWRA's will be evaluated and included to WSP *The IWRA's conditions evaluation will be shared and discussed with Stakeholders "
Finding No:	TNR-014968
Checklist Item No:	1.5.7
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Nov-19
Checklist item:	The adequacy of available WASH services within the catchment shall be identified.
Findings:	The site has not identified the adequacy of available WASH services within the catchment.
Corrective action:	*WASH availability and services will be identified in the catchment

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## Alliance for Water Stewardship (AWS)

Audit Number: AO-001292

Finding No:	TNR-015008
Checklist Item No:	1.6.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Nov-19
Checklist item:	Shared water challenges shall be identified and prioritized from the information gathered.
Findings:	The shared water challenges have been identified based on general documents collected by the site regarding the catchment and do not involve stakeholder engagement.
Corrective action:	*Stakeholder engagement will be provided to define water challenged in the catchment. A Survey will be prepared and distributed to the Stakeholders
Finding No:	TNR-015027
Checklist Item No:	1.8.1
Status:	Open
Finding level:	Observation
Checklist item:	Relevant catchment best practice for water governance shall be identified.
Findings:	It is recommended to express best practices and their contributions in a list format. The facility is carrying out numerous activities that could be considered best practices in various areas. The absence of such a list could lead to these practices being overlooked.
Corrective action:	The list will be created regarding best practices
Finding No:	TNR-015028
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:	Indicating which specific best practices are included in each listed application/project will facilitate the tracking of standard requirements.
Corrective action:	Proper monitoring system and document will be developed and embedded to the system

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Finding No: TNR-015029  
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: Indicating which specific best practices are included in each listed application/project will facilitate the tracking of standard requirements.  
Corrective action: The monitoring list will be developed and included to the AWS documentation

Finding No: TNR-015031  
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 site added new IWRAs to its list. The status of these IWRAs should be analyzed, and best practices for their maintenance should be identified.  
Corrective action: New IWRAs will be added to the list and the status of these IWRAs will be analysed, and best practices for their maintenance will be identified

Finding No: TNR-015032  
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: It would be beneficial to analyze WASH adequacies and define best practices accordingly.  
Corrective action: WASH adequacies will be analysed and best practices will be defined accordingly.

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Finding No:	TNR-015023
Checklist Item No:	2.3.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Nov-19
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:	it is important to note that the WSP document is very recent, and some of the targets defined within it are quite general. Current targets set are not SMART goals (Specific, Measurable, Achievable, Relevant and Time-bound). Furthermore, there is no clear connection between actions and best practices within the WSP.
Corrective action:	<p>"*WSP document will be revisited and revised with SMART objectives</p> <p>*The connection between best practices and action will be provided"</p>
Finding No:	TNR-015022
Checklist Item No:	2.4.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Nov-19
Checklist item:	A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.
Findings:	The site has identified potential opportunities for collaboration with institutions; however, these efforts need to be integrated into the risk analysis process. A comprehensive plan should be developed to address or mitigate identified risks. This plan must be created in close cooperation with public sector entities and infrastructure organizations to ensure effective implementation.
Corrective action:	<p>"*Potential opportunities will be included to the risk assessment process</p> <p>*Risk Assessment plan will be revisited and risks will be addressed to mitigate the risks</p> <p>*Risk Assessment and opportunities will be developed with public sector entities and infrastructure organizations "</p>



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## Alliance for Water Stewardship (AWS)

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Finding No:	TNR-015020
Checklist Item No:	3.5.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Nov-19
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:	Additional IWRA's were identified; however, no specific targets have been set for the newly defined IWRA's.
Corrective action:	*Specific targets will be set for newly identified IWRA's
Finding No:	TNR-015021
Checklist Item No:	3.6.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Nov-19
Checklist item:	Evidence of the site's provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers onsite shall be identified and where applicable, quantified.
Findings:	However, a comprehensive inventory of all WASH facilities has not been provided by the facility, nor has a comparison of these facilities' adequacy against national and/or other independent standards or guidelines been conducted.
Corrective action:	"*WASH facilities inventory will be developed *WASH facilities will be evaluated against national legislation which is existed "
Finding No:	TNR-015026
Checklist Item No:	3.9.4
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Nov-19
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 target that the site has identified on WSP, is a requirement of the standard and cannot be considered a best practice. The site should analyze the status of IWRA in greater detail, in collaboration with stakeholders, and then define specific targets related to this issue. These targets shall be measurable and aligned with best practices for IWRA protection.
Corrective action:	*The status of IWRA will be revisited and re-identified with the collaboration of stakeholder with the SMART targets

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Audit Number: AO-001292

Finding No:	TNR-015016
Checklist Item No:	4.1.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Nov-19
Checklist item:	Value creation resulting from the water stewardship plan shall be evaluated.
Findings:	The site has not identified any value resulting from the WSP.
Corrective action:	*The WSP's outcome and value will be clarified and documented in AWS documentation
Finding No:	TNR-015017
Checklist Item No:	4.1.3
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Nov-19
Checklist item:	The shared value benefits in the catchment shall be identified and where applicable, quantified.
Findings:	The site has not identified any shared value benefits resulting from the WSP.
Corrective action:	*The shared value benefits will be established with stakeholders participation
Finding No:	TNR-015019
Checklist Item No:	4.3.1
Status:	Open
Finding level:	Observation
Checklist item:	Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.
Findings:	These events were primarily aimed at providing information, with limited focus on obtaining feedback.
Corrective action:	*The feedback regarding consultation of AWS Water Stewardship activities of the site will be obtained from stakeholders during information sharing sessions which is planned for 2025 Stakeholder Engagement Plan

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Finding No: TNR-015018  
Checklist Item No: 4.4.1  
Status: In Progress - CA plan approved  
Finding level: Minor  
Due date: 2025-Nov-19  
Checklist item: The site's water stewardship plan shall be modified and adapted to incorporate any relevant information and lessons learned from the evaluations in this step and these changes shall be identified.  
Findings: The WSP document does not include records or information summarizing previous plans and the details of the changes made.  
Corrective action: \*The WSP will be revisited and revision number, ex records and status of the recent activities will be documented

Finding No: TNR-015014  
Checklist Item No: 5.2.1  
Status: In Progress - CA plan approved  
Finding level: Minor  
Due date: 2025-Nov-19  
Checklist item: The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.  
Findings: Water Stewardship Plan (WSP) and how its goals and actions contribute to the outcomes of the AWS Standard have not been directly communicated to stakeholders by the site. Some of the efforts and targets mentioned in the WSP are included in the facility's ESG report. However, this selective disclosure does not constitute a systematic approach to sharing the WSP with the relevant stakeholders.  
Corrective action: \*The WSP disclosure will be provided and the plan, outcomes, status, best practices will be shared with stakeholders

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## Alliance for Water Stewardship (AWS)

Audit Number: AO-001292

Finding No:	TNR-015013
Checklist Item No:	5.3.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Nov-19
Checklist item:	A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.
Findings:	During the Water Panel organized in collaboration with the municipality, the site shared information about its AWS journey, including its 35% water reduction target. However, the goals outlined in the Water Stewardship Plan (WSP) and their progress are not shared on an annual basis. Additionally, it should be noted that the WSP document has been recently prepared.
Corrective action:	*The WSP disclosure will be provided and the plan, outcomes, status, best practices and ESH agenda targets will be shared with stakeholders annually
Finding No:	TNR-015012
Checklist Item No:	5.4.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Nov-19
Checklist item:	The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.
Findings:	The site has not systematically communicated its water challenges, actions taken, and planned initiatives in a structured manner, such as presenting these as "BAT's identified water challenges, completed actions, and planned activities."
Corrective action:	*Water Challenges and taken actions along with planned initiatives will be communicated with Stakeholders annually

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### Report Details

Report	Value
Report prepared by	Ozge Gokmen
Report approved by	Lorenzo Brioschi
Report approved on (Date)	07 January 2025

### Surveillance

Proposed date for next audit	2025-Nov-18
Comment	It's a re-certification audit.

### Stakeholder Announcements

Date of publication	Location
03/09/2024	Linkedin
03/09/2024	Yammer_Global Sosyal Medya / social media platform only for BAT employees <a href="https://a4ws.org/wp-content/uploads/2024/09/AWS-000407_BAT-Turkey-Samsun_StakeholderAnnouncement_V3.0-002.pdf">https://a4ws.org/wp-content/uploads/2024/09/AWS-000407_BAT-Turkey-Samsun_StakeholderAnnouncement_V3.0-002.pdf</a>
Comment	The link for publication of the Stakeholder Announcement at AWS website is: <a href="https://a4ws.org/wp-content/uploads/2024/09/AWS-000407_BAT-Turkey-Samsun_StakeholderAnnouncement_V3.0-002.pdf">https://a4ws.org/wp-content/uploads/2024/09/AWS-000407_BAT-Turkey-Samsun_StakeholderAnnouncement_V3.0-002.pdf</a>

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### Catchment Information

#### Catchment Information

The Kızılırmak Delta is located approximately 1 km from the factory site. Kızılırmak Delta has an area of 56,000 hectares, of which 12,000 hectares is in wetland regime. Having different habitats such as sea, river, lake, reeds, marsh, meadow, pasture, forest, dune and agricultural areas, the delta has a uniquely important biological diversity. On the eastern side, the open water area and marshy land is about 10,000 ha. On the western side, the lakes and the marsh-reed land around them are approximately 1,400 ha. The fact that it is one of the wetlands on the Black Sea coast that has partially preserved its natural character increases the importance of the delta even more. The natural habitats in the delta are the eastern wetlands where Liman, Balık, Uzun, Cernek, Gıcı and Tatlı lakes are located, and the western wetlands where Karaboğaz and Mülk Lake are located. Natural Protected Area and Wildlife Development Area are protected by protection status. Horhor Stream passes 1 km north of the factory site and Engiz Stream passes 840 m south.



Kizilirmak Basini.png

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### Client Description and Site Details

#### Client/Site Background

The Samsun factory, ranked 4th among BAT's 45 factories globally and 2nd in the Europe and North Africa (ENA) region, is located in the 19 Mayıs district of Samsun. The facility spans a total area of 520 decares and has a closed area of 136,000 square meters. The company manufactures cigarettes. All is manufactured and packed on site. Until April 2024, water for the facility was supplied from 4 wells and the SASKİ municipal network. Starting in April 2024, with SASKİ beginning to source water from the 19 Mayıs Dam, all water used at the facility is now supplied exclusively from the SASKİ network. The on-site water treatment plant at the facility is not operational, and all wastewater generated is sent to SASKİ's treatment plant.



BAT\_physical\_scope.png

### Summary of Shared Water Challenges

#### Summary of Shared Water Challenges

- 1- Water pollution on the catchment (An increase in salinity levels in the Kızılırmak watershed due to seawater intrusion).
- 2- Coastal Erosion
- 3- Climate Change
- 4- Biodiversity
- 5- Conservation of water resource
- 6- protection of IWRA (Bird Paradise).

#### 0.1 General Requirements for Single Sites, Multi-Sites and Groups

##### 0.1.1 Eligibility Criteria

**0.1.1.1** The site(s) occupy one catchment OR an exception has been granted.



Yes

Comment The site occupies a single catchment.

**0.1.1.2** The scope of the proposed certification shall be under the control of a single management system.



Yes

Comment The scope of certification is under the control of a single management system.

**0.1.1.3** 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.



Yes

Comment The site has a homogenous primary 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.



**Comment** The site has defined its physical scope and mapped it.

BAT Turkey - Samsun boundaries delimitate the entire area over which the site has control and include the built area as well as the green lands associated with the facility. The site boundary map is attached.

BAT Turkey – Samsun catchment area has been identified, in more detail, as an area covering part of the territory of the Lower Kizilirmak Sub-basin. The catchment area also identifies the territory on which the site is reliant for water and that could be influenced either directly or indirectly by the site's activity.

Evidence:

1.1\_Ek-1\_BAT\_Su\_Altıyapı\_Planı\_2023.pdf: Water-related infrastructure, including piping network, owned or managed by the site or its parent organization has defined.

BAT\_Konum.jpg: Site boundaries have been defined.

1.1\_Ek-2\_BAT\_Siteye\_Su\_Sağlayan\_Su\_Kaynağı.jpg: Water sources providing water to the site

**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.





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Comment	<p>The site has identified and listed the stakeholders. However, this listing is too general and does not allow for the individual evaluation of each stakeholder's specific interests and impacts related to water. Additionally; the stakeholder identification process used to define them has not been identified.</p> <p>A meeting titled "Kızılırmak Basin Water Issues Stakeholder Meeting" was organized in response to a call from the local university. During the meeting, water-related issues within the basin were discussed. BAT participated as an attendee.</p> <p>Moreover, BAT has not conducted a direct study aimed at analyzing its stakeholders concerning water issues and has not provided evidence of consulting stakeholders on their water-related interests and challenges, apart from the meeting facilitated by the university.</p> <p><b>Finding No: TNR-014992</b></p>	
1.2.2	<p><i>Current and potential degree of influence between site and stakeholder shall be identified, within the catchment and considering the site's ultimate water source and ultimate receiving water body for wastewater.</i></p>	 Yes
Comment	<p>The site has identified the degree of influence between the site and stakeholders by using "stakeholder influence and engagement matrix."</p>	
1.3	<p><i>Gather water-related data for the site, including: water balance; water quality, Important Water-Related Areas, water governance, WASH; water-related costs, revenues, and shared value creation.</i></p>	
1.3.1	<p><i>Existing water-related incident response plans shall be identified.</i></p>	 Yes
Comment	<p>The PL-SUS-03_Emergency Plan document addresses chemical spills, meteorological emergencies, and flood/water inundation scenarios. It provides detailed procedures on how to respond to each incident. Additionally, the post-incident response section is detailed through the following documents: 1.3.1_P-O-EHS-070_Spill Prevention, Control, and Cleanup Procedure, 1.3.1_T-O-EHS-041_Spill Response Instruction, and FR-SUS-117_Emergency Drill Report for Chemical Spills.</p>	
1.3.2	<p><i>Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped</i></p>	 Yes
Comment	<p>The site water balance is detailed both schematically and in an Excel file. The water balance comprehensively addresses inflows, losses, storage, and outflows.</p>	
1.3.3	<p><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></p>	 Yes
Comment	<p>The site continuously monitors its consumption on a daily basis through the ENEERCON system. Daily targets are defined, and the monitoring process involves a continuous comparison of the targets with the actual situation. This assessment is sent daily to the relevant departments, reporting the target versus actual performance. If the targets are not met, an evaluation is conducted and shared. All data is entered into CR360 (CREDIT system). Additionally, on a global scale, the target and actual performance are tracked monthly. For this, all data is entered into the CREDIT system (CR360) on a monthly basis, and variance is monitored.</p>	
1.3.4	<p><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></p>	 Obs.

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Comment	The quality of water sources, consumed water, and treated water is analyzed every three months and monitored through the FR-SUS-91 Water Quality Monitoring Form. This form is used to track issues where limit values are exceeded. During the audit, an example was reviewed where the chloroform value in the drinking water analysis exceeded the limit. The actions taken by the facility to address this issue were analyzed in detail. It was observed that the facility systematically took the necessary steps until the levels were brought below the limit.	
1.3.5	<i>Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.</i>	Yes
Comment	In the 1.3.5_BAT_Soil and Water Pollution Sources_December 2023_2024 document, all potential sources have been identified and mapped.	
1.3.6	<i>On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.</i>	Yes
Comment	No on-site IWRA as confirmed by the site visit.	
1.3.7	<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>	Obs.
Comment	Water-related costs are defined as CAPEX in the 1.3.7_Annex 5_Water Management Costs_2021_2022_2023_2024 and 1.8 & 2.3.2 & 2.4.2 & 4.1_FR_SUS_06_12_Water Management Action Plan_November 2023 (3).xls documents.	
1.3.8	<i>Levels of access and adequacy of WASH at the site shall be identified.</i>	in progress
Comment	The site has shared cleaning control schedules related to WASH. However, a comprehensive inventory of all WASH facilities has not been provided by the facility, nor has a comparison of these facilities' adequacy against national and/or other independent standards or guidelines been conducted.	
<b>Finding No: TNR-014997</b>		
1.4	<i>Gather data on the site's indirect water use, including: its primary inputs; the water use embedded in the production of those primary inputs the status of the waters at the origin of the inputs (where they can be identified); and water used in out-sourced water-related services.</i>	
1.4.1	<i>The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be identified.</i>	Yes
Comment	The site does not have any primary inputs with embedded water use.	
1.4.2	<i>The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.</i>	Yes
Comment	The site does not have any embedded water use from outsourced services. Although not directly related to the site, awareness training on water usage has been provided by the facility to local car wash and carpet cleaning businesses in the region.	
1.5	<i>Gather water-related data for the catchment, including water governance, water balance, water quality, Important Water-Related Areas, infrastructure, and WASH</i>	
1.5.1	<i>Water governance initiatives shall be identified, including catchment plan(s), water-related public policies, major publicly-led initiatives under way, and relevant goals to help inform site of possible opportunities for water stewardship collective action.</i>	Yes

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Comment	The water management action plan document prepared by the facility is structured into two sections. The second section, titled "External Target Plan," specifies the relevant public institutions corresponding to each action. Relevant public research on the basin is compiled, and discussions are held regarding the shared water challenges.	
1.5.2	<i>Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.</i>	 Yes
Comment	<p>The site holds a subscription to the Lebib Yalkin Legal Legislation Monitoring Platform, which is one of the methods used in the country for tracking regulations. Through this subscription, daily emails are sent to relevant personnel regarding updates to regulations published by Lebib Yalkin.</p> <p>If a legislative change pertains to the Sustainability Team, the Sustainability Manager reviews the update, and the team analyzes the regulation to determine its requirements. This process is then recorded in the 1.5.2_1.8_FR-SUS-96_Environmental Legislation and Other Requirements Compliance Obligations Tracking Table_2023_2024, where responsibilities are assigned, and the information is published.</p>	
1.5.3	<i>The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.</i>	 in progress
Comment	<p>General information about the catchment's condition is available. A water balance assessment has been conducted in the overall projection, and the catchment's status has been analyzed comprehensively. The impact of BAT has also been evaluated. However, the site has not established an annual catchment water balance and does not monitor variances.</p> <p><b>Finding No: TNR-014999</b></p>	
1.5.4	<i>Water quality, including physical, chemical, and biological status, of the catchment shall be identified, and where possible, quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be identified.</i>	 Obs.
Comment	<p>The facility conducts analyses in the following areas:</p> <p>Discharge point of the treatment plant – monthly (conducted by both the facility and SASKİ) at the SASKİ discharge point.</p> <p>19 Mayıs Dam, the water source – analyses are conducted at the dam's source, middle point, and the confluence point with the sea.</p> <p>Upon reviewing the evaluation of the analysis results, it has been observed that the analyses are only assessed for compliance with the limit values. Considering the requirements of the criterion, the analyses should be reviewed, their frequency determined, and variance monitoring implemented to assess the basin's water quality comprehensively.</p>	
1.5.5	<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>	 in progress
Comment	<p>The site has identified IWRA as a list. However, the site has not assessed the condition of IWRA (Important Water-Related Areas). Additionally, the facility does not have any engagement with stakeholders regarding IWRA.</p> <p><b>Finding No: TNR-014998</b></p>	
1.5.6	<i>Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.</i>	 Yes

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Comment	<p>BAT Turkey – Samsun has identified the water-related infrastructure in the catchment area based on the following documents:</p> <ul style="list-style-type: none"> <li>- 1.1_Ek-1_BAT_Su_Altiyapı_Planı_2023.pdf</li> <li>- 1.5.1_SASKI_Alt_Yapı_ve_Ulaştırma_Planı.pdf</li> <li>- PL-SUS-03_Acil_Durum_Planı.docx</li> </ul> <p>Among the shared documents are SASKI's infrastructure plan and its 2018-2023 strategic plan, which reflect the existing water-related infrastructure. A request was made to SASKI for the strategic plan covering 2024 and beyond, but SASKI did not respond positively to the request.</p> <p>The facility has provided maintenance forms for its internal infrastructures (e.g., sewer systems, lift stations, wells), demonstrating that regular maintenance is carried out. For extreme situations, flood events are addressed in the emergency response plan.</p>	
1.5.7	<i>The adequacy of available WASH services within the catchment shall be identified.</i>	 in progress
Comment	<p>The facility has obtained the drinking water supply plan for the 19 Mayıs Dam, which serves as its water source. However, the plan has not been reviewed considering the requirements of the indicator.</p>	<b>Finding No: TNR-014968</b>
1.6	<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>	
1.6.1	<i>Shared water challenges shall be identified and prioritized from the information gathered.</i>	 in progress
Comment	<p>In the Stakeholder_Matrix_Challenges_2024.xls document, water challenges are identified as follows:</p> <p>Catchment Water Pollution Increased Salinity in the Kızılırmak Basin due to seawater intrusion Coastal Erosion Climate Change Ramsar Site Conservation of Bird Paradise – Biodiversity</p> <p>The shared water challenges have been identified based on general documents collected by the site regarding the catchment and do not involve stakeholder engagement.</p>	<b>Finding No: TNR-015008</b>
1.6.2	<i>Initiatives to address shared water challenges shall be identified.</i>	 Yes
Comment	Initiatives corresponding to the water challenges shared by the site have been identified.	
1.7	<i>Understand the site's water risks and opportunities: Assess and prioritize the water risks and opportunities affecting the site based upon the status of the site, existing risk management plans and/or the issues and future risk trends identified in 1.6.</i>	
1.7.1	<i>Water risks faced by the site shall be identified, and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.</i>	 Yes
Comment	<p>The site has identified risks and their potential consequences in the AWS Water Management Risk Assessment document. Risks have been prioritized as "low risk," "medium risk," and "high risk" based on their likelihood and severity. Actions to address these risks have been defined in the Water Management Action Plan document, with responsible persons, deadlines, and potential costs specified.</p>	

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<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	Water-related opportunities have been identified by the facility through a SWOT analysis. The goals associated with these opportunities, along with their evaluation and prioritization, are outlined in the Water Management Action Plan.	
<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.
Comment	The site has not defined best practices and the associated topics. However, the site is implementing many best practices. For example, on June 25, 2024, the Kızılırmak Basin Water Issues Stakeholder Meeting was organized, where the status and issues of the Kızılırmak basin were discussed with all stakeholders. Additionally, the site has met with rice producers, who play a significant role in water consumption in the region, to raise awareness about water use. A pilot project has been implemented to promote the use of drip irrigation for rice production.	
<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>	 Obs.
Comment	The site has prepared a water-saving project plan for the years 2020-2027. The projects outlined in this plan include best practices related to water balance. Indicating which specific best practices are included in each listed application/project will facilitate the tracking of standard requirements.	
<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>	 Obs.
Comment	The site has prepared a water-saving project plan for the years 2020-2027. The projects outlined in this plan include best practices related to water balance. Indicating which specific best practices are included in each listed application/project will facilitate the tracking of standard requirements.	
<b>1.8.4</b>	<i>Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.</i>	 Obs.
Comment	The site organized a Horhor Stream cleanup activity and invited all stakeholders to participate. As the site gained a better understanding of the IWRA definition, it added new IWRAs to its list. The status of these IWRAs should be analyzed, and best practices for their maintenance should be identified.	
<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>	 Obs.
Comment	Although the site has only recently grasped the requirements of the standard regarding WASH and has not yet compared its WASH adequacy against a specific standard, it conducts periodic hygiene inspections and provides regular hygiene training to its employees.	

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2	<b>STEP 2: COMMIT &amp; PLAN - Commit to be a responsible water steward and develop a Water Stewardship Plan</b>	
2.1	<i>Commit to water stewardship by having the senior-most manager in charge of water at the site, or if necessary, a suitable individual within the organization head office, sign and publicly disclose a commitment to water stewardship, the implementation of the AWS Standard and achieving its five outcomes, and the allocation of required resources.</i>	
2.1.1	<i>A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:</i> <ul style="list-style-type: none"> <li>- 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>	 <b>Yes</b>
Comment	BAT-Samsun has a signed and publicly disclosed site statement, which has been signed by the Turkey Factory Manager and displayed on notice boards accessible to everyone on-site.	
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>	 <b>Yes</b>
Comment	See below 1.5.2. The site's organizational chart has been shared. The roles and responsibilities of individuals within the organizational structure are outlined in the role descriptions. An internal audit is conducted at least once a year by the Environmental Officer to evaluate compliance with regulatory requirements, permitting processes, and related matters. Additionally, the Environmental Officer prepares monthly regulatory compliance tracking reports.	
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>	 <b>Yes</b>
Comment	The site has defined a water stewardship strategy, which includes its mission and vision.	
2.3.2	<i>A water stewardship plan shall be identified, including for each target:</i> <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>	 <b>in progress</b>




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Comment      The site has defined relevant targets, and assigned responsibilities, and specified the start and end dates for each goal in the WSP. Additionally, progress on each target is tracked, and every goal is linked to AWS outcomes. However, it is important to note that the WSP document is very recent, and some of the targets defined within it are quite general. All targets should be SMART goals. Furthermore, there is no clear connection between actions and best practices within the WSP, which needs to be addressed.

**Finding No: TNR-015023**

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.*

in progress 

Comment      The site has identified potential collaborations with institutions, but these should be linked to risk analysis. The site should develop a plan to address or mitigate risks. It is important to note that this plan should be created with the active participation of public sector and infrastructure organizations.

**Finding No: TNR-015022**

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<b>3</b>	<b>STEP 3: IMPLEMENT - Implement the site's stewardship plan and improve impacts</b>	
<b>3.1</b>	<i>Implement plan to participate positively in catchment governance.</i>	
<b>3.1.1</b>	<i>Evidence that the site has supported good catchment governance shall be identified.</i>	✓ Yes
Comment	The facility organized the "Kızılırmak Basin Water Issues Stakeholder Meeting" on June 25, 2024. During this meeting, all relevant parties, including public institutions, discussed water issues in the basin, raised awareness, and evaluated potential actions. Additionally, a Water Panel was organized in collaboration with the 19 Mayıs Municipality, with all stakeholders invited to the panel. BAT also organized a clean-up event for the HORHOR stream, calling on all stakeholders to participate. Furthermore, the facility conducted analyses at the dam to assess the water quality of the dam.	
<b>3.1.2</b>	<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	The site provided WASH training to farmers. Additionally, awareness-raising training sessions on indirect water usage were organized for carpet cleaning businesses and car wash services in the area. Furthermore, WASH training was also delivered to the maintenance and cafeteria staff of the facility	
<b>3.2</b>	<i>Implement system to comply with water-related legal and regulatory requirements and respect water rights.</i>	
<b>3.2.1</b>	<i>A process to verify full legal and regulatory compliance shall be implemented.</i>	✓ Yes
Comment	Please see 1.5.2.	
<b>3.2.2</b>	<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	Although the facility has not defined requirements related to the water rights of others, it analyzes legal requirements thoroughly and ensures that these requirements are met to the highest standard.	
<b>3.3</b>	<i>Implement plan to achieve site water balance targets.</i>	
<b>3.3.1</b>	<i>Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.</i>	✓ Yes
Comment	In the site's WSP plan, two water balance targets have been defined: (1) monitoring total water consumption on a monthly basis and ensuring a 35% reduction target by 2025, and (2) monitoring reclaimed water on a monthly basis and achieving a 30% target by 2025. The progress of these targets is monitored periodically.	
<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 identified as a shared water challenge. On the other hand; there are targets in place for managing and improving water efficiency, such as the goal of achieving 30% water recycling.	



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3.3.3	<i>Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.</i>	 N/A
3.4	<i>Implement plan to achieve site water quality targets</i>	
3.4.1	<i>Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.</i>	 Yes
Comment	In the WSP, watershed-related targets concerning water quality have been defined: (1) periodic sampling from the 19 Mayis Dam based on seasonal and rice cultivation periods, and (2) seasonal sampling and analysis from the Horhor Stream. The progress of these targets is monitored periodically.	
3.4.2	<i>Where water quality is a shared water challenge, continual improvement to achieve best practice for the site's effluent shall be identified and where applicable, quantified.</i>	 Yes
Comment	<p>Although not located within the site's boundaries, a treatment plant inherited from the TEKEL privatization in the area belonging to the site has been maintained by the facility and transferred to SASKI for its use. This initiative aims to prevent SASKI from discharging untreated water during periods of high population density due to insufficient treatment plant capacity (part of the AWS project).</p> <p>The facility also maintains its biological treatment plant, equipped with MBR (membrane bioreactor) technology, located on its premises. As there is a globally defined target for water recycling, the facility aims to achieve 100% water recovery through its treatment plant. This aligns with its objective to completely eliminate its impact on the watershed in terms of water quality</p>	
3.5	<i>Implement plan to maintain or improve the site's and/or catchment's Important Water-Related Areas.</i>	
3.5.1	<i>Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.</i>	 in progress
Comment	<p>The site has defined a very general target in the WSP, which is "to create an emergency procedure for the protection of the watershed and IWRA, ensure spill control, and take corrective and preventive actions." More measurable targets should be defined. Additionally, the site initially identified only the HORHOR stream as an IWRA. As the concept of IWRA has started to be better understood, additional IWRA's were identified; however, no specific targets have been set for the newly defined IWRA's.</p> <p style="text-align: right;"><b>Finding No: TNR-015020</b></p>	
3.6	<i>Implement plan to provide access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers at all premises under the site's control.</i>	
3.6.1	<i>Evidence of the site's provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers onsite shall be identified and where applicable, quantified.</i>	 in progress
Comment	<p>The site has shared cleaning control schedules related to WASH. However, a comprehensive inventory of all WASH facilities has not been provided by the facility, nor has a comparison of these facilities' adequacy against national and/or other independent standards or guidelines been conducted.</p> <p style="text-align: right;"><b>Finding No: TNR-015021</b></p>	

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<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	As there is a globally defined target for water recycling, the facility aims to achieve 100% water recovery through its own treatment plant. This aligns with its goal to eliminate its impact on the watershed in terms of water quality.	
<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>	 Yes
Comment	The site has not defined any targets for indirect water use in the WSP. The site has stated that there are no services or materials purchased within the same watershed that would cause indirect water use, and that all purchases are made outside the watershed.	
<b>3.7.2</b>	<i>Evidence of engagement with suppliers and service providers, as well as, when applicable, actions they have taken in the catchment as a result of the site's engagement related to indirect water use, shall be identified.</i>	 Yes
Comment	The site has stated that there are no services or materials purchased within the same watershed that would cause indirect water use, and that all purchases are made outside the watershed.	
<b>3.8</b>	<i>Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have.</i>	
<b>3.8.1</b>	<i>Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.</i>	 Yes
<b>3.9</b>	<i>Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.</i>	
<b>3.9.1</b>	<i>Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.</i>	 Yes
Comment	The site has defined targets in the WSP related to good water governance. One of the targets identified as an example of good water management is: "Engaging with the State Hydraulic Works (DSİ), municipalities, Provincial Directorate of Environment, and universities to collect and understand data on the water status of the Kızılırmak Basin, as well as analyzing the alignment of external targets with the Water Stewardship Plan	
<b>3.9.2</b>	<i>Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.</i>	 Yes
Comment	The site has prepared a water-saving project plan for the years 2020-2027. The projects outlined in this plan include best practices related to water balance. Indicating which specific best practices are included in each listed application/project will facilitate the tracking of standard requirement.	
<b>3.9.3</b>	<i>Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.</i>	 Yes

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**Comment** The site has prepared a water-saving project plan for the years 2020-2027. The projects outlined in this plan include best practices related to water quality. Indicating which specific best practices are included in each listed application/project will facilitate the tracking of standard requirements.

**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.*  in progress

**Comment** The site has defined a very general target in the WSP related to "the creation of an emergency procedure for the protection of the basin and IWRA, ensuring leakage and spill control, and implementing corrective and preventive actions." This target is a requirement of the standard and cannot be considered a best practice. The site should analyze the status of IWRA in greater detail, in collaboration with stakeholders, and then define specific targets related to this issue. These targets should be measurable and aligned with best practices for IWRA protection.

**Finding No: TNR-015026**

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

**Comment** The site has defined a target in the WSP related to "the analysis of WASH adequacy / WC, showers, etc. per employee." This target is a standard requirement and cannot be considered a best practice. However, it is appropriate that the facility has set this target, as it has only recently recognized this requirement. Additionally, the site provides training to its employees on WASH and conducts regular hygiene checks in WASH areas, which demonstrates its commitment to meeting these standards.

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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;">✔ Yes</span>
Comment	The site reviews its global water balance targets annually within the "Steering Community." As part of KPI management, it has been observed that monthly target tracking is conducted through the SCORE CARD system. Additionally, daily targets and actual performance are monitored via the ENERCON monitoring system, enabling daily evaluations and follow-ups with appropriate actions.
4.1.2	<i>Value creation resulting from the water stewardship plan shall be evaluated.</i> <span style="float: right;">➡ in progress</span>
Comment	The site has not identified any value resulting from the WSP. The WSP document has been recently prepared. <b>Finding No: TNR-015016</b>
4.1.3	<i>The shared value benefits in the catchment shall be identified and where applicable, quantified.</i> <span style="float: right;">➡ in progress</span>
Comment	The site has not identified any value resulting from the WSP. The WSP document has been recently prepared. <b>Finding No: TNR-015017</b>
4.2	<i>Evaluate the impacts of water-related emergency incidents (including extreme events), if any occurred, and determine the effectiveness of corrective and preventative measures.</i>
4.2.1	<i>A written annual review and (where appropriate) root-cause analysis of the year's emergency incident(s) shall be prepared and the site's response to the incident(s) shall be evaluated and proposed preventative and corrective actions and mitigations against future incidents shall be identified.</i> <span style="float: right;">✔ Yes</span>
Comment	There have been no water-related emergency incidents over the past year.
4.3	<i>Evaluate stakeholders' consultation feedback regarding the site's water stewardship performance, including the effectiveness of the site's engagement process.</i>
4.3.1	<i>Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.</i> <span style="float: right;">🔍 Obs.</span>
Comment	It has been observed that the site organized a "Water Management Panel" in collaboration with the municipality, where awareness-raising presentations were delivered. Additionally, the site gave a presentation during the Climate Change and Water Management Seminar held with the university under the SCORE - Smart Control of the Climate Resilience in European Coastal Cities project. The site also organized the Kızılırmak Basin Water Issues Stakeholder Meeting, where various presentations were made, and water issues in the basin were discussed. However, it has been noted that these events were primarily aimed at providing information, with limited focus on obtaining feedback.
4.4	<i>Evaluate and update the site's water stewardship plan, incorporating the information obtained from the evaluation process in the context of continual improvement.</i>

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4.4.1	<i>The site's water stewardship plan shall be modified and adapted to incorporate any relevant information and lessons learned from the evaluations in this step and these changes shall be identified.</i>	 in progress
Comment	The site's WSP document has been recently prepared. The publication date of the WSP document is noted as 06.09.2024, and the revision date as 20.11.2024. It has been observed that the WSP document does not include records or information summarizing previous plans and the details of the changes made.	
	<b>Finding No: TNR-015018</b>	

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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.	<div><div><div></div></div></div> Yes
Comment	Please see 1.5.2 and 2.2.1.	
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.	<div><div><div></div></div></div> in progress
Comment	It has been observed that the Water Stewardship Plan (WSP) and how its goals and actions contribute to the outcomes of the AWS Standard have not been directly communicated to stakeholders by the site. The WSP document has been recently prepared. Some of the efforts and targets mentioned in the WSP are also included in the facility's ESG report. However, it should be noted that this does not constitute a systematic approach to directly sharing the WSP.	
Finding No: TNR-015014		
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.	<div><div><div></div></div></div> in progress
Comment	During the Water Panel organized in collaboration with the municipality, the site shared information about its AWS journey, including its 35% water reduction target. However, the goals outlined in the Water Stewardship Plan (WSP) and their progress are not shared on an annual basis. Additionally, it should be noted that the WSP document has been recently prepared.	
Finding No: TNR-015013		
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.	<div><div><div></div></div></div> in progress
Comment	The site has a Communication Matrix that outlines how and with whom both internal and external communications are conducted. This matrix specifies when and how the AWS Policy will be shared. However, it was observed that the site has not systematically communicated its water challenges, actions taken, and planned initiatives in a structured manner, such as presenting these as "BAT's identified water challenges, completed actions, and planned activities."	
Finding No: TNR-015012		
5.4.2	Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.	<div><div><div></div></div></div> Yes


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Comment	The site collaborated with the municipality to organize a Water Panel. Additionally, in partnership with the university, a Climate Change and Water Management Seminar was held as part of the SCORE - Smart Control of the Climate Resilience in European Coastal Cities project. BAT delivered a presentation during this seminar.	
<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	The site has not had any water-related compliance violations in the past year.	
<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	Please see 5.5.1	
<b>5.5.3</b>	<i>Any site water-related violation that may pose significant risk and threat to human or ecosystem health shall be immediately communicated to relevant public agencies and disclosed.</i>	 Yes
Comment	Please see 5.5.1	

### Photographic Evidence from Audit

		 Yes
Comment	The photographic evidence is uploaded.	

### Upgrade or Downgrade of Certification

#### Justification for Upgrade or Downgrade

#### Summary of Evidence which led to change

### Previous Findings

*All non-conformities raised in the previous audit have been satisfactorily closed.*

  
N/A