

Alliance for Water Stewardship (AWS)

Audit Number: AO-001575

SITE DETAILS

Site: Philip Morris Tutun Mamulleri Sanayi ve Ticaret Anonim Sirketi Address: 7 Eylül Mahallesi, Philsa Caddesi No: 32, 35860, Torbali, TURKEY

Contact Person: Hulya Seven

AWS Reference Number: AWS-000153

Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Core

Date of certification decision: 2025-Jun-20

Validity of certificate: 2028-Jun-19

AUDIT DETAILS

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

Audit Type(s): Re-Certification Audit Audit Start Date: 2025-May-26 Audit End Date: 2025-May-28 Lead Auditor: Ozge Gokmen

Audit team participants:

Ozge Gokmen, Lead Auditor

Site Participants:

Sedef Mayda, Manager Leaf Sustainability

Erkin Korkmaz, IFMS Engineer

Huseyin Emir, Eurest Environmental Engineer

Gulriz Ozaltay, Senior Sustainability Engineer

Mehmet Rahmi Savas, EHS Development Manager

MUSTAFA ACIR, Manager Engineering

Ezgi Kesimli, Regional Communication Lead

Ezgi Terim, Program Manager

Senem GUMUS, IFMS Manager

Suleyman Hancerli, External Affairs Manager

ISAAC DIAZ, Director Manufacturing

HULYA SEVEN, EHS Manager

Mert Tunalı, Supervisor Process Support

DUYGU KARAN, Sustainability Engineer

IPEK GURBUZ, Senior Sustainability Engineer

Stefeno Cristaldi, Head of Production



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ADDITIONAL INFO

Summary of Audit Findings: During the re-certification audit, one observation was raised.

The audit team recommends re-certification of Philip Morris Tutun Mamulleri Sanayi ve Ticaret Anonim Sirketi at Core level.

Scope of Assessment: The scope of services covers the recertification audit for assessing conformity of Philip Morris Tutun Mamulleri San. ve Tic. A..S. against the AWS International Water Stewardship Standard Version 2.

PMTM is located in the Küçük Menderes Basin. When evaluated in terms of surface water, the site is located in the Fetrek sub-basin; in terms of groundwater, it is situated in the Torbalı - Bayındır Aquifer. The basin has a series of lower basins and these are the following:

 Küçük Menderes
 3.490,95 km2 50,1 %

 Tahtalı-Seferihisar
 1.248,92 km2 17,9 %

 İzmir-Körfez
 816,68 km2 11,7 %

 Çeşme-Karaburun
 1.114,27 km2 16,0 %

 Kuşadası
 292,43 km2 4,2 %

Philip Morris International is a company that manufactures tobacco-related products, with more than 80,000 employees. It has operations worldwide, and they established Philip Morris Tutun Mamulleri Sanayi ve Ticaret Anonim Sirketi located in the 7 Eylul Mahallesi, Philsa Caddesi No: 32, at Torbali in Izmir, Turkey.

The audit was conducted on-site on May 26-27-28, 2025.

The onsite site visit included the assessment of the factory water-related facilities and also a catchment tour to visit the discharge points.

FINDINGS

Observation 1

FINDING DETAILS

Finding No: TNR-018258

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: In the document shared via e-mail with all stakeholders, although the

challenges are identified, the site's efforts to address these challenges

are not clearly linked to them.



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Report Details	
Report	Value
Report prepared by	Ozge Gokmen
Report approved by	Carla Schmidt Oberdiek
Report approved on (Date)	17 June 2025
Surveillance	

Proposed date for next audit

2026-May-26

Stakeholder Announcements

Date of publication	Location
07/03/2025	https://watersas.org/wp-content/uploa ds/2025/02/AWS-000153_Philip-Morri s-Tutun-Mamulleri-Sanayi-ve-Ticaret- Anonim-Sirketi_SA_May25_V3.0.pdf
07/03/2025	https://www.linkedin.com/posts/duygu -k-bb83a8152_payda%C5%9F-duyur usu-activity-7303797200466116611-q Uwc? utm_source=social_share_send&utm _medium=member_desktop_web&rc m=ACoAAApIApkBs8xDRPM0X-4BLu luN0HTB8nPcSU
07/03/2025	One Turkey - All global operation and Vivaengage-internal communication portal (All TR operations)
Comment	



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Catchment Information



1.1.1_-_d2._PMTM_Google_Earth_Screenshot_-_Surface_catchment_area_(Küçük_Menderes) (1).jpg



 $1.1.1_-_d3._PMTM_Google_Earth_Screenshot_-_Groundwater_catchment_area_(Torbali_Bayindir_aquifer).jpg$

Catchment Information



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PMTM is located in the Küçük Menderes Basin, near the location where the Küçük Menderes River flows into the sea, there are the Gebekirse and Çatal lakes with a surface area of approximately 75 ha with element swamp covering an area of approximately 1.500 hectares. The Lake Gebekirse is included in the Ramsar Convention as being part of the Küçük Menderes Delta in 2006 at the Zeytinköy Mevkii. It is located in 839 ha area. With regards to the groundwater mass, PMTM is located in Torbali Bayındır area (601.07 km2)

Catchment Name

The facility is situated within the Küçük Menderes River Basin, a significant hydrological region in western Turkey.

Water Supply & Discharge Catchment

In terms of surface water, the site is located in the Fetrek sub-basin. Regarding groundwater, it falls within the Torbali - Bayındır Aquifer. The facility does not connect to a municipal sewer system; instead, all wastewater is treated on-site at the facility's wastewater treatment plant before being discharged into the Fetrek Creek.

Groundwater Aquifers

The facility relies on groundwater extracted from the alluvial aquifers of the Küçük Menderes Basin. These aquifers are characterized by unconsolidated sediments with high permeability, making them significant sources for agricultural and industrial water use. However, over-extraction has led to a notable decline in groundwater levels over the past three decades, primarily due to intensive agricultural irrigation, livestock farming, and industrial activities.

openaccess.iyte.edu.tr

Catchment Water Service Providers

The facility operates independently of municipal water service providers, utilizing its own groundwater extraction systems and on-site wastewater treatment facilities. There is no reliance on external water treatment or wastewater treatment plants.

Catchment Features

The Küçük Menderes Basin is characterized by several critical features:

Water Scarcity: The region has experienced significant groundwater depletion due to over-extraction for agricultural and industrial purposes. openaccess.iyte.edu.tr

Flood Prone Areas: Certain areas within the basin are susceptible to flooding, particularly during periods of heavy rainfall.

Environmentally Protected Areas: The basin includes habitats for endemic fish species, such as Barbus pergamonensis and Oxynoemacheilus germencicus, which are threatened by habitat degradation and invasive species.

Climate: The basin experiences a Mediterranean climate, characterized by hot, dry summers and mild, wet winters, contributing to seasonal variability in water availability.

Dominant Water Uses: The region is predominantly agricultural, with extensive irrigation practices. Industrial activities also contribute to water demand, further stressing the water resources.

These features underscore the importance of sustainable water management practices within the basin to ensure the long-term availability of water resources for all users.



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Client Description and Site Details



site map.png



1.1.1_-_a2._PMTM_Google_Earth_Screenshot_-_Site_boundaries (1).jpg

Client/Site Background

Philip Morris International is a company that manufactures tobacco-related products, with more than 80,000 employees. It has operations worldwide, Philip Morris Tütün Mamulleri Sanayi ve Ticaret A.Ş. (PMTM) started its operations towards the end of 1992. The company is responsible for the national distribution and sales of Philip Morris cigarette brands.

The water used for both industrial and domestic purposes in PMTM is supplied from four wells. The water consumption from these four wells is measured using meters and recorded regularly. For wastewater, domestic and industrial wastewater are collected together and conveyed to the wastewater treatment plant via pumping stations, where they are treated in compliance with environmental regulations and discharged under the Environmental Permit.

Wastewater from the water treatment facility may be discharged directly into the receiving environment without prior treatment, as long as it complies with the discharge parameters set for the receiving environment. Wastewaters from the water treatment section are discharged directly into the Fetrek Creek without treatment (Discharge Point-1); other waters are treated and discharged into the Fetrek Creek from the designated discharge point 2 after treatment. Additionally, treated wastewater stored in the pond can be reused for irrigation purposes as needed. Rainwater collected within the PMTM boundaries is routed separately and discharged directly to the stream (Fetrek) without any treatment.

Two separate discharge points have been designated for wastewater.

Comment



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Summary of Shared Water Challenges

Summary of Shared Water Challenges

- 1. Water scarcity. Very high
- 2. Infrastructure vulnerability Very high
- 3. IWRA deterioration Very high
- 4. Water governance limitations Low
- 5. Water quality degradation Low
- 6. Reputational damage low
- 7. Regulatory challenges low
- 8. Flooding very low
- 9. WASH inadequacy very low



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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 boundaries have been mapped. The sections within the factory boundaries are also shown on this GIS map ((1.1.1_-a5_PMTM_site_boundaries). On the second map (1.1.1__c1_PMTM_Google_Earth_map_-_Withdrawal-discharge_points.kmz), 4 wells and 2 discharge points are determined.

Catchment area (Both Küçük menders and sub-basin Fetrek) has been mapped. Also; the groundwater layer/basin has been indicated (1.1.1-PMTM_groundwater_mapping.kmz) Map of oil separator, and piping network both wastewater, raw water and rainwater are determined.

(1.1.1 b3. PMTM Oil separator location and piping network (waste, raw & rain water)

- 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

The site has developed a comprehensive stakeholder identification and engagement process that aligns with the requirements of indicators 1.2.1 and 1.2.2. This process is documented and supported by four main sheets: List, Memorandum, Summary, and Map.

1. Stakeholder Identification (Sheet 1 - "List")

The "List" sheet provides a structured and detailed overview of all relevant stakeholders. A total of 61 stakeholders have been identified based on both primary (e.g., survey-based) and secondary data sources. These stakeholders include representatives from all relevant groups, including vulnerable, minority, Indigenous peoples, and women.

Key features of the stakeholder mapping include:

General Information: Sector, category, sub-category, and location (inside/outside catchment);

Identification Rationale and Shared Water-Related Challenges;

Bi-directional Interest and Influence Levels, using a 4x4 matrix (Very High, High, Moderate, Low);

Stakeholder Typology and proposed Engagement Type (e.g., Partner, Consult, Inform);

Annual Engagement Trends, tracked over time to monitor changes;

Barriers to Engagement, where applicable;

Annual Updates and Future Engagement Opportunities.

As part of the prioritization, a trend analysis was used to determine stakeholder dynamics over time. Based on this analysis, 10 stakeholders have been identified as key stakeholders, due to their high or evolving levels of influence and interest.

The process takes into account stakeholders connected to the site's ultimate water source and ultimate receiving water body, ensuring full consideration of the physical scope.

2. Stakeholder Communication Record (Sheet 2 - "Memorandum")

This sheet documents all engagement actions with stakeholders during the certification year, including:

Name, contact date, certification year;

Medium of engagement (e.g., meeting, email), and whether the communication was one- or two-way;

Topics discussed, expected outcomes, and contact references.

A scoring methodology based on engagement medium and content is used to calculate the relationship level with each stakeholder (as detailed in Tables 2–4).

3. Stakeholder Prioritization (Sheet 3 - "Summary")

This sheet provides a graphical summary of the top 10 key stakeholders, based on their average relationship level with the site over time. These are the stakeholders considered most critical for ongoing engagement and influence.

4. Geographic Context (Sheet 4 - "Map")

The "Map" sheet visually represents the location of all identified stakeholders in relation to the catchment, supporting the spatial understanding of stakeholder relevance and proximity to the water source and discharge points.

Conclusion

The site's stakeholder engagement process is inclusive, data-driven, and clearly structured. It

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identifies and prioritizes shared water challenges, establishes meaningful engagement strategies, and is responsive to changes over time. The identification of 10 key stakeholders out of 61, based on trend analysis, demonstrates a dynamic and forward-looking approach to water stewardship and stakeholder collaboration.

1.2.2 Current and potential degree of influence between site and stakeholder shall be identified, within the catchment and considering the site's

Yes

ultimate water source and ultimate receiving water body for wastewater.

The stakeholder document includes a section that outlines each stakeholder's level of engagement, as well as their degree of influence and interest in PMTM. Additionally, PMTM

has created a physical map of its stakeholders.

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.



Comment

Comment

The site has identified and implemented comprehensive water-related incident response plans.

According to the documentation and evidence provided, the site conducts regular drills and scenario-based exercises. As of 2024, drills were organized monthly or biweekly based on team roles, totaling 14 distinct exercises in 2024 across 14 different teams and scenarios. In 2025, the frequency increased to weekly drills, with 16 conducted to date. Drill activities have also become more frequent across shifts. These exercises are coordinated with the external service provider Euroserve.

At the WWTP, chemical-related emergencies are particularly well managed. All chemicals are stored in a designated chemical room with bunded areas, sump pits, and capacity control measures in place. Spill response drills are regularly conducted. The site also provided detailed descriptions of how these drills are implemented, including a risk analysis to identify which personnel are most likely to encounter spills. Based on this analysis, relevant staff—including two cleaning personnel per drill—are included in the exercises. Drills are now organized across all relevant operational areas and involve all employees.

Additionally, the Engineering Business Continuity Plan (ENG.01.E.003) outlines a specific emergency scenario in which groundwater extraction is either not possible or not advisable. Three key scenarios have been identified:

- -The first scenario in the BCP is, in critical situations if the factory can not be fed from the wells.
- -The second scenario is groundwayer levels drop below 100 meters.
- -Groundwater quality deteriorates and no longer meets legal requirements.

In such cases, the site is prepared to switch to municipal supply (IZSU), though this is limited to 18 m³/h. While this volume would be sufficient to maintain production during winter, it may be necessary to temporarily suspend certain services (e.g., showers, toilets, green area irrigation) during the summer period since the demand is higher during this season. Long-term strategies related to this scenario are covered under criteria 2.4.1.

These practices demonstrate a proactive and structured approach to water-related emergency preparedness and response.

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



Comment

The site's water balance was presented in detail by the PMTM. All inflows, storage, losses and outflows were identified and mapped. The use of water, firewater tanks, and leaf field irrigation was taken into consideration.

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



Comment

The site has addressed the requirements of this criterion through a comprehensive presentation titled "PMTM Site Water Balance & Annual Water Seasonality Trend 2019–2024."

The presentation includes a detailed annual comparison of water consumption using 2019 as the baseline year. It also illustrates the monthly increase in water use in correlation with production, showing seasonal peaks in July and August, primarily due to increased cooling needs, which is an expected outcome.

Monthly and annual comparisons are presented in table and graph formats, allowing clear visibility into annual and seasonal water usage variances. In addition to overall consumption, the site monitors water use per unit of cooling energy as a defined KPI, and tracks this data on a daily basis for operational control.

Furthermore, a four-year rainfall trend has been analyzed to assess its impact on groundwater levels. Static and dynamic well levels are monitored and analyzed monthly to evaluate aquifer response to climatic and operational variations.

These efforts collectively demonstrate that the site has quantified inflows, outflows, storage, and losses, and has accounted for annual variances. The analysis of well levels in relation to precipitation trends also supports the identification of potential water-related challenges.

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.



Comment

1.3.4

The site has developed a comprehensive "Water Quality Monitoring" presentation that outlines its systematic approach to monitoring potable water, drinking water, wastewater, and the receiving body, Fetrek Creek. Both internal and external analyses are conducted as part of this monitoring effort.

For wastewater treatment plant (WWTP) discharge, internal analyses are conducted using test kits. Results are recorded in the "Analysis Tracking Form," actions to be taken in case of deviations from the defined operational parameters for the sub-units of the wastewater treatment system have been established. Corrective actions are taken and documented on the same form. Additionally, external analyses are carried out monthly by a ministry-authorized laboratory through MELBES, with results logged in the "Wastewater Control and Monitoring Form." Fetrek Creek, the receiving body, analyses carried voluntarily for PMTM and samples taken and analyzed 3 times in a year by an accredited laboratory.

At the water treatment plant (WTP), total coliform analysis is conducted weekly using test kits, and results are filed under the "Water Analysis Results" folder. External analyses are carried out quarterly, with findings stored in the folder.

For drinking water, external analyses are also conducted quarterly, and results are maintained in the "Water Analysis" folder.

All deviations identified through these various water quality analyses are illustrated in a graph, and the corresponding corrective measures taken have been clearly detailed following thorough evaluations.

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



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Comment

The site has identified and mapped potential sources of pollution, in alignment with the indicator's requirements. Chemical substances used or stored on-site are monitored through a digital tool called "Chemwatch," which enables real-time tracking of the type and quantity of chemicals present at the facility. This system supports effective risk management and emergency preparedness. Additionally, the site has a permitted hazardous waste temporary storage area, the initial permit was granted on 31.07.2007, and its current validity was confirmed through a permit renewal on 31.10.2024.. These actions demonstrate the site's compliance with legal requirements and its proactive approach to managing pollution risks.

1.3.6

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



Comment

The site has identified and mapped the IWRAs. The document called "1.3.6-1.5.5_PMTM_IWRAs_Assessment_&_Location.25.03.23.xlsm" outlines the type, classification, and value of each identified IWRA (Important Water-Related Area), as well as the relationship with the site. The status of each IWRA has been described. For each area, a risk assessment has been conducted under the following categories: habitat loss, invasive species, pollution, over-extraction of water, drought occurrence, flood occurrence, and erosion.

All this information has been analyzed and determined based on scientific research and stakeholder engagement outcomes. The methodology used for the assessment is also described within the same document.

Only "On-site green areas and irrigational pond" is defined as on-site IWRA.

1.3.7

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



Comment

The site has identified and documented its annual water-related costs under this indicator. However, revenue from water use could not be quantified, as the site primarily uses groundwater extracted from on-site wells, for which no direct payment is made. Therefore, the water-related revenue is not applicable in this context. This approach is consistent with the site's operational reality and is considered acceptable.

1.3.8

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



Comment

The site has demonstrated compliance with this indicator through the use of a detailed and structured self-assessment tool designed to evaluate WASH (Water, Sanitation, and Hygiene) access and adequacy at the site. The tool addresses not only Indicator 1.3.8 but also integrates requirements from related indicators 3.1.2 and 3.2.2 concerning the respect for water rights and the Human Rights to Water and Sanitation (HRWS).

The WASH component of the tool is organized into six thematic categories, including both on-site and external (supply chain and community) aspects, while the HRWS component covers five categories aligned with international standards. Each section is scored based on implementation levels (0 to 2), with a summary of results indicating the maturity level of WASH and HRWS implementation.

The scoring methodology, alignment with WHO and UNICEF frameworks, and inclusion of specific legal and regulatory references in the comments section provide a robust and transparent approach. Based on the documented evidence and structured evaluation, the site is considered to meet the intent and requirements of this criterion.

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.

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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.



Comment

The site has taken comprehensive steps to address the requirements of this indicator. Through a structured stakeholder survey, the site collects detailed information from all relevant actors regarding the embedded water use of primary inputs. This includes data on water quantity (source, use, intensity, annual consumption per organization and per facility), water quality (regulatory compliance, monitoring frequency, relevant parameters, corrective and/or preventive actions), water conservation measures (type and description), CDP reporting practices, and identified water-related concerns. The systematic approach to gathering and evaluating this information demonstrates that the site meets the intent of this criterion.

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



Comment

The site has taken comprehensive steps to address the requirements of this indicator. Through a structured stakeholder survey, the site collects detailed information from all relevant actors regarding the embedded water use of primary inputs. This includes data on water quantity (source, use, intensity, annual consumption per organization and per facility), water quality (regulatory compliance, monitoring frequency, relevant parameters, corrective and/or preventive actions), water conservation measures (type and description), CDP reporting practices, and identified water-related concerns. The systematic approach to gathering and evaluating this information demonstrates that the site meets the intent of this criterion.

- 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.



Comment

The site has prepared a presentation to demonstrate its conformance with the requirements of this indicator. The presentation provides detailed information on water management initiatives, catchment plan(s), relevant public water policies, ongoing major public-led initiatives, and potential opportunities for collective action in water management, including relevant targets to support this information.

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



Comment

The shared document identifies and describes both national and regional water-related legal/regulatory requirements applicable to Philip Morris Tütün Mamulleri Sanayi ve Ticaret A.Ş (PMTM)'s catchment areas, and consequently to PMTM itself.

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



Comment

The site has shared a document called 1"1.5.3_PMTM_catchment_water_balance_2024.xls as proof document for this indicator. The document includes detailed catchment water balance results and graphs. Also, the references to the data used in the calculation are given in detail. For some data, estimations have been made, and detailed information on how these estimations were conducted has also been provided in the Excel file.

The catchment's status in 2024 has been found to be positive, with the water quantity being slightly higher compared to 2023.

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1.5.4 Water quality, including physical, chemical, and biological status, of the

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



Comment

The site has addressed the requirements of this indicator by assessing groundwater and surface water quality separately. Threshold values have been defined based on the collected data. Both water sources are monitored through continuous measurements by the General Directorate of State Hydraulic Works (DSI); however, the most recent publicly available DSI report dates back to 2019, and updated raw data has not been provided despite formal requests. Only some verbal updates have been shared during stakeholder workshops. Additionally, the site conducts its own monitoring activities voluntarily on the Fetrek Stream, performing water quality analyses every three months. Seasonal variances are monitored based on this data. The results are shared with the relevant authorities and stakeholders. Water quality has been classified and rated according to the DSI report. Considering these actions and the available evidence, the site is considered to meet the requirements of this

1.5.5 Important Water-Related Areas shall be identified, and where appropriate, mapped, and their status assessed including any threats to people or the natural environment, using scientific information and through stakeholder engagement.



Comment

The site has identified and mapped the IWRAs. The document called "1.3.6-1.5.5_PMTM_IWRAs_Assessment_&_Location.25.03.23.xlsm" outlines the type, classification, and value of each identified IWRA (Important Water-Related Area), as well as the relationship with the site. The status of each IWRA has been described. For each area, a risk assessment has been conducted under the following categories: habitat loss, invasive species, pollution, over-extraction of water, drought occurrence, flood occurrence, and erosion.

All this information has been analyzed and determined based on scientific research and stakeholder engagement outcomes. The methodology used for the assessment is also described within the same document.

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



Comment

Under this indicator, the facility has shared a presentation titled "1.5.6 - a. PMTM Catchment Water-Related Infrastructures 2025.ppt," which summarizes the current situation. The presentation sequentially describes the existing water supply system, water sources, water treatment plants, package drinking water treatment plants, withdrawal infrastructures, sewage system, and wastewater treatment plants. Additionally, the same slide outlines water-related infrastructure risks—such as water scarcity, freshwater biodiversity loss, flood risk, and nitrate-sensitive areas—and presents the facility's approach to addressing these anticipated risks.

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



Comment

The site has shared a document called "1.5.7_PMTM_catchment_WASH.02.2025" ppt. In this document, the facility has provided information on "Drinking Water Adequacy," "Sanitation Adequacy," and "Hygiene Adequacy" for both the overall country and the İzmir province. The data is based on information collected from institutions such as the Turkish Statistical Institute, the Turkish Water Institute (SUEN), and the Ministry of Environment, Urbanization, and Climate Change of Turkey.

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



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1.6.1	Shared water challenges shall be identified and prioritized from the information gathered.	⊘ Yes
Comment	The site has identified 9 shared water challenges. For each identified challenge, prioritization was carried out by assessing the frequency of occurrence and the magnitude of impact. In addition, mitigation initiatives have been defined for each shared water challenge. To identify and prioritize these challenges, the site not only conducted scientific research by also distributed a survey to stakeholders, asking them to complete it. In the survey, potential shared water challenges were listed, and stakeholders were asked to rate their level of importance. Moreover, an additional question invited respondents to identify any other water-related challenges not mentioned in the survey that they believe are relevant.	ut
1.6.2	Initiatives to address shared water challenges shall be identified.	⊘ Yes
Comment	The site has identified 9 shared water challenges. For each identified challenge, prioritization was carried out by assessing the frequency of occurrence and the magnitude of impact. In addition, mitigation initiatives have been defined for each shared water challenge.	on
1.7	Understand the site's water risks and opportunities: Assess and prioritize the water risks and opportunities affecting the site based upon the status of the site, existing risk management plans and/or the issues and future risk trends identified in 1.6.	
1.7.1	Water risks faced by the site shall be identified, and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.	₹
Comment	Water-related risks have been identified in the PMTM_Risks_and_Opportunities documents. These risks have been diversified and categorized under physical, legal, and reputational aspects. Furthermore, they have been prioritized based on their potential impacts and the estimated costs to the site.	3.
1.7.2	Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.	₹
Comment	Water-related opportunities have been identified and prioritized, with their potential savings assessed.	
1.8	Understand best practice towards achieving AWS outcomes: Determining sectoral best practices having a local/catchment, regional, or national relevance.	
1.8.1	Relevant catchment best practice for water governance shall be identified.	⊘ Yes



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Comment

The site has identified best practices through the Excel file titled

"1.8.1-1.8.5._PMTM_Sector-catchment_best_practices_2024-2025." In this file, each best practice is presented along with its description and category, the reason it is considered a best practice, the method by which it was identified as such, the relevant link, its applicability, and the associated sector.

Some of the relevant catchment best practices for water governance identified by the site are given below:

New regulation on water efficiency

- · Create a sustainable, resilient water management plan
- · Water efficiency certification

Collaborative and inclusive approach to long-term city of Izmir planning

- '• Create a sustainable, resilient, and innovative vision for the city of Izmir
- · Access to talent and expertise
- Involvement of experts as well as community members in discussion related to the environment
- · Promotion of water conservation measures and encouragement of behavioural change
- · Use of dedicated tool to facilitate discussion between stakeholders

Stakeholder engagement and awareness-raising campaigns on water-related thematic

- · Build trust and credibility
- Provision of valuable insights and diverse perspective for better decision-making and of networking opportunities
- · Address mitigation of shared challenges/water-related risks
- Raise awareness on issues such as climate crisis, tackling water scarcity and related risks
- Encourages participation in sustainability initiatives and campaigns focused on water
- 1.8.2 Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.



Comment

The site has identified best practices through the Excel file titled

"1.8.1-1.8.5._PMTM_Sector-catchment_best_practices_2024-2025." In this file, each best practice is presented along with its description and category, the reason it is considered a best practice, the method by which it was identified as such, the relevant link, its applicability, and the associated sector.

Some of the relevant sector/catchment best practices for water balance identified by the site are given below:

Commitment to an efficient water use:

- Promotion of water conservation measures, encouragement of behavioural change and education on avoiding harmful substances disposal (i.e., oils, expired medicines, and chemicals) into water systems
- · Investment in modern irrigation systems, automation in irrigation and wastewater recycling
- Implementation of efficient water use by i.e., volumetric metering and pressure system
- · Use of AI to optimize water consumption and prevent waste
- · Support tree-planting activities
- Investment in large-scale projects such as dams, ponds, and wastewater treatment

'The 'Agricultural Irrigation' module has been added to the 'Agriculture in My Pocket' application

- Reduces potable water use for agricultural irrigational purposes
- Improves growth and yields due to greater control over water supply and timings
- **1.8.3** Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.





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Comment

The site has identified best practices for water quality.

The best practices related to water quality, as shared by the site in the Excel file titled "1.8.1-1.8.5._PMTM_Sector-catchment_best_practices_2024-2025," are as follows:

- Cleaning of water-related infrastructures
- Upgrade and improvement of water-related infrastructures in Küçük Menderes River catchment
- Collection of liquid waste
- Integrated pollution control and monitoring in Torbali

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

Yes

Comment

The site has identified best practices for site maintenance of Important Water-Related Areas. The best practices related to IWRAs, as shared by the site in the Excel file titled

"1.8.1-1.8.5. PMTM Sector-catchment best practices 2024-2025," are as follows:

- Clean-up campaigns
- Conservation of water-related ecosystems
- Creation of biodiversity hotspots
- Tree-planting campaigns

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



Comment

The site has identified best practices from the relevant sector and/or catchment to ensure the provision of equitable and adequate WASH services on site.

The best practices related to WASH, as shared by the facility in the Excel file titled "1.8.1-1.8.5. PMTM Sector-catchment best practices 2024-2025," are as follows:

Equitable access to clean water:

Promotion of access to clean water for the community.

Improvement of sanitation facilities, awareness, and educational programmes on proper hygiene practices, such as handwashing and sanitation, to prevent waterborne diseases. Multi-stakeholder collaboration (governmental bodies, private sector, communities, etc.) to achieve sustainable WASH outcomes.

WASH provision to local communities:

Protection and restoration of common wetlands and aquatic ecosystems to maintain the hygiene conditions of local people in the catchment.

Provision of free access to clean water for neighbouring communities.

Collaboration with local organizations to facilitate water distribution in vulnerable areas Establishing long-term, sustainable solutions for water accessibility. Good maintenance and upgrading of water wells.

WASH self-assessment and monitoring tool:

- Tool successfully used by other global PMI Affiliates
- Structured framework for organizations to assess performance and practices related to water, sanitation, and hygiene offering a comprehensive evaluation of WASH conditions
- Train employees about effective cleaning procedures within the facility



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2 STEP 2: COMMIT & PLAN - Commit to be a responsible water steward and develop a Water Stewardship Plan

2.1 Commit to water stewardship by having the senior-most manager in charge of water at the site, or if necessary, a suitable individual within the organization head office, sign and publicly disclose a commitment to water stewardship, the implementation of the AWS Standard and achieving its five outcomes, and the allocation of required resources.

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



- That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes
- That the site implementation will be aligned to and in support of existing catchment sustainability plans
- That the site's stakeholders will be engaged in an open and transparent way
- That the site will allocate resources to implement the Standard.

Comment

The site has provided the commitment. The content of this commitment aligns with the requirements of the indicator. It is publicly accessible via the company's website and has also been displayed on noticeboards within the factory office.

- **2.2** Develop and document a process to achieve and maintain legal and regulatory compliance.
- 2.2.1 The system to maintain compliance obligations for water and wastewater management shall be identified, including:
 Identification of responsible persons/positions within facility organizational structure



- Process for submissions to regulatory agencies.
- Comment

The site presented an overview of the legal compliance system implemented at PMTM, highlighting key functionalities of the Red-on-Line system, including its alert and notification features. The presentation also outlined the procedures for communicating with regulatory authorities. Additionally, the site shared a sample monthly environmental activity report and the factory-specific water management procedure. This procedure identifies the internal roles and responsibilities related to various aspects of water management at PMTM.

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



Comment

PMTM's strategic plan, signed by the Managing Director, outlines the company's mission and vision. The plan clearly defines goals such as water quality protection and water conservation. There is strong alignment between the targets and actions described in the Water Stewardship Plan (WSP).

At PMTM, the water stewardship strategy is reviewed and updated on a quarterly basis to ensure its continued relevance and effectiveness



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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.

Comment

The site has developed a comprehensive Water Stewardship Plan (WSP) that includes clearly defined, measurable targets and corresponding actions. Each target is supported by a specific timeframe, a dedicated budget, and a designated responsible person to ensure accountability and progress. The plan effectively links these targets to shared water challenges, aligns with the outcomes of the Alliance for Water Stewardship (AWS), and supports the achievement of best practices in water stewardship.

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.



Comment

PMTM has active, structured, and documented engagement with DSI (State Hydraulic Works) and IZSU (Izmir Water and Sewage Administration), both critical public infrastructure bodies for water resources and wastewater management.

Engagement includes meetings, data sharing, joint workshops, and reforestation projects. Joint Risk Identification and Mitigation Planning:

PMTM is an active contributor to the TÜBİTAK Circular Water Management Project for the Küçük Menderes Basin—coordinated with DSİ, academia, and infrastructure agencies. Risk topics such as water scarcity, groundwater depletion, wastewater contamination, and drought are all addressed through this multistakeholder platform.

Evidence of Stakeholder Coordination:

Regular coordination and data-sharing meetings are held with DSİ, İZSU, and other provincial authorities (e.g., Environment, Health, Agriculture).

Workshops and site visits (e.g., 15 Aug 2023 TUBITAK Project Team visited PMTM site, on 8 Oct 2024 PMTM participated in their workshop, 21 Feb 2025 DSI and IZSU meetings) show coordinated efforts on both strategy and implementation.

Participation in Infrastructure and Policy Planning Discussions:

PMTM is not only informed about but also contributes feedback on regional infrastructure projects and regulatory frameworks (e.g., crop switch programs, disaster plans, catchment planning).

Engagement extends to local governance (mukhtars) and municipalities, indicating community-scale awareness and integration.

Public-Private Limitations Acknowledged, But Effectively Bypassed:

Despite legal limits on formal public-private partnerships in Turkey, PMTM has ensured informal and functional collaboration, which is explicitly recognized by public institutions. Conclusion:

PMTM clearly meets the requirements of AWS Standard 2.4.1. The water risk mitigation plan is developed with active participation and alignment with public-sector and infrastructure agencies, including technical collaboration, data exchange, and community engagement.



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3	STEP 3: IMPLEMENT - Implement the site's stewardship plan and improve impacts
3.1	Implement plan to participate positively in catchment governance.
3.1.1	Evidence that the site has supported good catchment governance shall be identified.
Comment	The site has actively engaged with stakeholders across various platforms and participated in multiple initiatives to raise awareness and effectively identify and address shared water challenges within the basin. A detailed summary of these efforts is included in the supporting documentation. Key activities include the AWS partnership with Socotab for certification, the Circular Water Management Project for the Küçük Menderes Basin, tree planting initiatives, a cleanup event along the Fetrek Creek, and voluntary water quality analyses conducted at the same location
3.1.2	Measures identified to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be implemented. Yes
Comment	The site has demonstrated its commitment to respecting the water rights of others by aligning with PMI's WASH objectives, which recognize access to water, sanitation, and hygiene as fundamental human rights. The initiative sets clear targets for the tobacco supply chain: 100% of farmers' homes and accommodations for workers are to have basic water access by 2025, and basic sanitation and hygiene by 2030. In 2024, WASH questionnaires were completed by Turkish tobacco suppliers, and the data was uploaded into PMI's system in line with the packing schedule. According to the outcomes, full compliance is anticipated.
	The site's actions reflect a structured and target-oriented approach to ensuring the WASH rights of individuals connected to its supply chain. Although the primary focus is on supplier-level implementation, the site has provided relevant documentation and status updates that demonstrate proactive alignment with this commitment. This supports compliance with 3.1.2 regarding measures taken to respect water rights of others beyond those addressed in 3.2
3.2	Implement system to comply with water-related legal and regulatory requirements and respect water rights.
3.2.1	A process to verify full legal and regulatory compliance shall be implemented. Yes
Comment	The site has delivered a presentation detailing the legal compliance system in place at PMTM. The presentation included practical examples demonstrating how the Red-on-Line system functions, such as its alerts and notification features. It also outlined the communication procedures for regulatory submissions. Furthermore, the site shared a sample monthly environmental control activity report and the site-specific water management procedure for the PMTM factory, which identifies the roles and responsibilities related to different aspects of water management within the organization.
3.2.2	Where water rights are part of legal and regulatory requirements, measures identified to respect the water rights of others including Indigenous peoples, shall be implemented. Yes
Comment	The site complies with legal and regulatory requirements (refer to 3.2.1), and it is not considered to infringe upon water rights.

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3.3

2 Quality StreetNorth Berwick, EH39 4HW, UNITED KINGDOM

Implement plan to achieve site water balance targets.



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

Yes

Comment The Water Stewardship Plan includes water balance targets, and the progress status is

tracked as a percentage. Some examples are given below.

3.3.2 Where water scarcity is a shared water challenge, annual targets to improve the site's water use efficiency, or if practical and applicable.

Yes

reduce volumetric total use shall be implemented.

Comment Water scarcity is defined as a shared water challenge by the site.

The site's annual targets for improving water use efficiency and implementing measures to reduce total volumetric water use are defined in the Water Stewardship Plan (WSP). Some of

these measures are summarized below:

Improvement in the fire system: The main line connection of the fire water system in the boiler room will be revised to prevent potential leaks at the elbows. The targeted water saving is 277

m³ per year.

Optimizing water consumption during Air Handling Unit (AHU) filter washing: To reduce water usage, the site plans to switch from manually washed reusable filters to disposable ones. This change is expected to save approximately 1,953 m³ of water annually.

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



Comment They don't reallocate water.

3.4 Implement plan to achieve site water quality targets

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



Comment The site has established targets and various initiatives aimed at improving water quality, all of which are defined in the Water Stewardship Plan (WSP). These initiatives, as outlined in the

WSP, are supported by SMART targets and include a 'Percentage of Target Achievement (to

date)' indicator to track progress.

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



where applicable, quantified.

Water quality has been identified as a shared water challenge and is addressed under indicator 1.6.1.

PMTM conducts regular analyses of its discharge water, ensuring full compliance with legal requirements. Beyond regulatory obligations, As the area has also been designated as a nitrate-sensitive zone in relevant authority reports, PMTM voluntarily monitors additional parameters—such as ammonia, nitrogen, and oil compounds—in response to threshold exceedances observed in the Fetrek Creek catchment area. In the presentation file titled "1.3.4__d4._PMTM_Analysis_report_on_Fetrek_creek_2024_-_summary," the site has evaluated the observed increase in nitrate levels and outlined the corresponding actions taken

to address this issue.

3.5 Implement plan to maintain or improve the site's and/or catchment's

Important Water-Related Areas.

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



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Comment



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Comment

The site has identified multiple targets and actions in its Water Stewardship Plan related to the maintenance or improvement of Important Water-Related Areas (IWRAs). These include river clean-ups, tree planting activities, and voluntary water quality analyses in the Fetrek stream. The actions are at varying stages of implementation — some are in the proposed phase, others are partially or fully completed. In 2024, the site prepared a presentation including documented evidence of activities related to IWRAs. Based on the actions taken and evidence provided, the site meets the requirements of this indicator.

3.6 Implement plan to provide access to safe drinking water, effective

sanitation, and protective hygiene (WASH) for all workers at all

premises under the site's control.

case, and that these are effective.

3.6.1 Evidence of the site's provision of adequate access to safe drinking

water, effective sanitation, and protective hygiene (WASH) for all workers onsite shall be identified and where applicable, quantified.

Ves

Comment

The site provides adequate access to safe drinking water, sanitation, and hygiene (WASH) facilities for all workers onsite. Drinking water points are available and regularly tested to ensure safety. Sufficient toilets and handwashing facilities are accessible across all work areas, with regular cleaning and maintenance schedules in place. Hygiene supplies such as soap and sanitizers are provided. Facilities are designed to ensure gender equity and accessibility. These practices support the protection of worker health and well-being and meet the requirements of this indicator.

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



Comment

The site meets the requirements of Indicator 3.6.2. It demonstrates a commitment to not impinge upon the human right to safe water and sanitation. The site actively supports PMI's WASH commitments.

As of 2024, WASH questionnaires covering drinking water, sanitation, and hygiene have been completed by Turkish tobacco suppliers. Based on the current results, full compliance is expected to be achieved.

This indicates that remedial actions are not currently necessary and traditional access rights are respected, fulfilling the intent of the indicator.

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

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



Comment

The Water Stewardship Plan includes a target focused on the detailed investigation of indirect water use. As part of this target, communication was to be established with 10 active stakeholders within the same catchment area by May 2025. This target has been fully achieved (100%).

Additionally, there is a separate target aiming for a 5% reduction in water consumption (measured in m³ per car-year) in the truck parking area. This target is ongoing, with a 10% percentage of target achievement to date and target is under review.

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.



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3.7.2



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Comment

The site monitors its indirect water use. During stakeholder interviews, one supplier mentioned that the site had requested them to calculate the water footprint of their products, and that they have started taking the necessary steps to initiate these calculations. Additionally, various projects are being carried out by the site's LEAF team to reduce indirect water use. One example is the Digital Early Warning System project. This project aims to digitally monitor precipitation and pest/disease control in order to optimize irrigation and pesticide use. In doing so, unnecessary irrigation is avoided.

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

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

Yes

Comment

PMTM has delivered a presentation on the topic, summarizing water-related activities carried out in collaboration with both public and private organizations from 2024 to the present. This fulfills the requirement of the indicator. Please see the file named "Step 3_Evidence of 5 outcomes".

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

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



Comment

The site has taken the necessary actions to implement the best practices defined in the Water Stewardship Plan (WSP) about water governance. Some of the actions that were implemented by the site are given below:

AWS Partnership with Socotab for AWS certification:

Socotab is one of the leading oriental leaf Tobacco merchants in the world, supplying quality, compliant oriental tobacco to the world's top cigarette manufacturers. Also, leaf supplier of PMTM.

Socotab decided to start the AWS process in 2023 and wanted to collaborate with PMTM, whose expertise in this area was already well known. In 2024, the collaboration is being taken a step further through the organization of benchmark studies and meetings on AWS. Both the Socotab Türkiye and Bulgaria teams have received support from PMTM.

Circular Water Management Project for Küçük Menderes basin:

Objective: To develop a comprehensive plan to mitigate or adapt to identified water risks in coordination with relevant public-sector and infrastructure agencies, in alignment with AWS Standard 2.4.1. indicator.

Background: PMTM participated in the TÜBİTAK Circular Water Management Project (TUBITAK 121 Y 570 – COST 2519 Project), which focuses on developing a basin-scale circular water management framework to provide safe and sustainable water to urban, industrial, and agricultural users.

Project Coordinators:

DSI (State Water Hydraulic Works), Public Sector-Water Service/Infrastructure Provider TUBITAK (Scientific Research and Research Board Affiliated to the Ministry of Industry and Technology)

İstanbul Aydın University Dokuz Eylül university Private consultancy company

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



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Comment

The site has taken the necessary actions to implement the best practices defined in the Water Stewardship Plan (WSP) about water balance targets. Some of the actions that were implemented by the site are given below:

Water metering optimization:

Project Description: PMTM is 100% monitored at levels 1, 2, and 3. To better improve the internal consumption tracking, the installation of new water meters will improve the monitoring system.

Percentage of Target achievement (to date): 50%.

Improvement in the fire system:

Project Description: To secure the condition of the infrastructure and avoid water loss, PMTM carries out periodic controls during the year. Based on the controls, the main line connection of the boiler room fire water line will be revised, and possible water leaks in the elbows will be prevented.

Percentage of Target achievement (to date): 100%.

3.9.3 Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.



Comment

The site has taken the necessary actions to implement the best practices defined in the Water Stewardship Plan (WSP) about water quality targets. Some of the actions that were implemented by the site are given below:

Digital chemical management system usage: • Use a digital chemical management tool to assess and manage chemical-related risks, including water-related ones.

Disinfection for irrigational water: Automatic chlorine disinfection system usage for irrigational water.

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



Comment

The site has taken the necessary actions to implement the best practices defined in the Water Stewardship Plan (WSP) in relation to IWRAs. Some of the actions that were implemented by the site are given below:

Anti-littering campaign "Show up, Team up, Clean up!": Making the site cleaner and greener, and raising awareness on the negative impacts on water quality. Comprehensive awareness communication campaign that also includes a sculpture exhibition within the main cafeteria area to support behavioral change and sustainability culture. Execution of a clean-up event in order to mitigate quality water-related risks.

Fetrek creek voluntary water quality analysis: Monitoring campaign to analyse and assess water quality in Fetrek Creek. Increase awareness regarding water quality conditions of a shared catchment-based water resource. Mitigation of water-born health issues for both animals and humans.

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





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Comment

The site has taken the necessary actions to implement the best practices defined in the Water Stewardship Plan (WSP) in relation to its WASH-related targets. The best practices outlined in the WSP and the corresponding actions carried out by the facility during the monitoring period are as follows:

1)Best practices: Research/data-driven analysis (i.e., review of academic literature, case studies, publications, guidelines, manuals and reports)

Description: To increase the wash availability and decrease the cleaning chemical consumption, reduction, WS renewals started.

Action 1: Canteen + TF2 WC renewal for WASH improvement - %100 completed Action 2: WASH facility installation in glue washing department - %100 completed

2) Action: WASH assessment for farmers by Leaf Department

Description: • A pilot scale drip irrigation system implementation to local farmer

- Engagement with relevant stakeholders
- Awareness passed on local community members regarding environmental issues such as water depletion



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4	STEP 4: EVALUATE - Evaluate the site's performance.
4.1	Evaluate the site's performance in light of its actions and targets from its water stewardship plan and demonstrate its contribution to achieving water stewardship outcomes.
4.1.1	Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be Yes evaluated.
Comment	In the Excel document titled "PMTM Water Stewardship Plan and Evaluation", each objective is presented alongside its alignment with best practices. For every objective, the document outlines the corresponding actions, budget, start date, frequency of evaluation, responsible personnel, and the percentage of achievement. Additionally, the value created is assessed separately for both the facility and the catchment. A dedicated column for lessons learned is also included to support the continuity and improvement of future contributions.
4.1.2	Value creation resulting from the water stewardship plan shall be evaluated.
Comment	The value generated through the actions outlined in the Water Stewardship Plan has been evaluated at both the site and catchment levels, considering economic, environmental, and social/cultural aspects.
4.1.3	The shared value benefits in the catchment shall be identified and where applicable, quantified. Yes
Comment	The site has identified shared value benefits within the Water Stewardship Plan (WSP), categorizing value creation into two areas: site-level and catchment/stakeholder-level. The value generated through actions in the WSP has been assessed in terms of both environmental and social/cultural dimensions.
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 yes response to the incident(s) shall be evaluated and proposed preventative and corrective actions and mitigations against future incidents shall be identified.
Comment	There were no incidents during the auditing period. The evidence has been provided. If any incident occurs, it is recorded in the PMS (Performance Management System), where monthly performance data is also entered. All types of incidents are tracked through this system. In 2024, no incidents have been reported.
	When an incident does occur, it is reported through the incident reporting system, which documents both the root cause and the preventive measures taken. These incidents are reviewed and necessary analysis and actions discussed and defined during the daily direction setting meetings.
	If the same type of incident reoccurs, an IPS (Initial Problem Solving) process is initiated, involving a detailed "Why-Why Analysis" to identify the root cause and ensure the issue is fully resolved and prevented in the future.
	If the problem persists despite these measures, a UPS (Unified Problem Solving) process is

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triggered. This involves cross-functional collaboration to analyze the incident, its causes, and

possible solutions in depth, with the goal of achieving a comprehensive resolution.



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4.3	Evaluate stakeholders' consultation feedback
	regarding the site's water stewardship performance, including the
	effective and a fitter site to an arrangement and a second

effectiveness of the site's engagement process.

4.3.1 Consultation efforts with stakeholders on the site's water stewardship

performance shall be identified.

Ves

Comment A stakeholder survey was shared with all stakeholders to gather feedback on PMTM's water

management performance. Unlike previous years, the survey included multiple-choice options

for certain question sets to increase the response rate.

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.

Ves

Comment The Water Stewardship Plan includes a column titled "Lessons Learned/Changes in the WS

Plan," through which lessons learned are documented and corresponding updates are made

to the plan accordingly.



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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.
Comment	A local organizational chart outlining the AWS team and their responsibilities has been provided. This chart is also included in the Water Stewardship Report shared with stakeholders, ensuring that it has been communicated to all relevant parties.
	The Water Stewardship Report has been shared with 61 stakeholders via email.
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 Yes relevant stakeholders.
Comment	The Water Stewardship Report has been shared with 61 stakeholders via email.
	Additionally, the site invited all 61 stakeholders to an online meeting dedicated to the Water Stewardship Plan. During the meeting, PMTM disclosed its water strategy plan and provided a detailed explanation based on the entire plan to those in attendance, effectively addressing the risk that some stakeholders may not have read or reviewed the document beforehand.
	The shared document includes information under the following headings: AWS Commitment, AWS Strategy, AWS Team, Water-related Roles and Responsibilities, Overview of Water Risks and Challenges for the Site and Its Catchment Area, Water Management Performance and Results, and the Water Stewardship Plan aligned with the five AWS outcomes.
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.
Comment	The Water Stewardship Plan, which was shared with 61 stakeholders, includes a summary of the site's water management performance, incorporating a quantitative assessment as well.
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.
Comment	As part of the Water Stewardship Plan shared with 61 stakeholders via e-mail, the section titled 'Water Risk & Challenges Overview for the Site and its Catchment Area' outlines the common water-related challenges identified at both the site and catchment levels. In addition, the site organized a meeting with stakeholders during which the Water Stewardship Plan was presented. However, in the document shared via e-mail with all stakeholders, although the challenges are identified, the site's efforts to address these challenges are not clearly linked to them.

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5.4.2	Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.
Comment	PMTM co-organized a special event on Water and Stewardship topics together with the Torbali Chamber of Industry and Trade (TTO) and brought together various institutional and industrial stakeholders from the region: two different sessions were carried out, one dedicated for public sector and second focused on industrial best practice.
	A water workshop was held by the site on 20.03.2024, with the participation of around 40 different stakeholders.
5.5	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.
5.5.1	Any site water-related compliance violations and associated corrections shall be disclosed.
Comment	PMTM had no compliance violations between the two AWS audit periods. As evidence, the organization provided the 2023–2024 PMTM Incident and Penalty Tracking document. Any violations, if they had occurred, would have been addressed during the management review process.
5.5.2	Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.
Comment	The site did not experience any compliance violations between audit periods; however, mechanisms for corrective action, reporting, and change management are in place.
5.5.3	Any site water-related violation that may pose significant risk and threat to human or ecosystem health shall be immediately communicated to Yes relevant public agencies and disclosed.
Comment	The site complies with applicable regulations, and no violations have been recorded. Therefore, no risks are currently foreseen to environmental health or the surrounding ecosystem.
	Previous Findings
	All non-conformities raised in the previous audit have been satisfactorily

closed.

Yes