

Alliance for Water Stewardship (AWS)

Audit Number: AO-001514

SITE DETAILS

Site: West Indian Tobacco - Curepe, Trinidad and Tobago

Address: 45-53 Eastern Main Road, Mt. D'or, 310111, Curepe, TRINIDAD AND TOBAGO

Contact Person: Angie Serrano

AWS Reference Number: AWS-000549

Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Core

Date of certification decision: 2025-Sep-16

Validity of certificate: 2028-Sep-15

AUDIT DETAILS

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

Audit Type(s): Initial Audit Audit Start Date: 2025-Jun-30 Audit End Date: 2025-Jul-02

Lead Auditor: Juan Carlos Cerón Vinueza

Audit team participants:

Juan Carlos Cerón, Lead Auditor

Site Participants:

Richard Nixon, Area Sustainability Manager Avisha Ali, Sustainability Coordinator Hector Martinez, ESS Manager Marlon Ward, Project Engineer



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ADDITIONAL INFO

Summary of Audit Findings: During the certification audit 6 non-conformities and 2 observations were raised.

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 7 days of receipt of the audit report by 21/08/2025.

The non-conformities must be closed within 90 days of the end of the audit. In order to meet this timeline evidence is to be submitted to WSAS (within 75 days) by 15/09/2025.

The audit team recommends certification of West Indian Tobacco - Curepe, Trinidad and Tobago at Core level pending approval of the corrective actions plan and closure of the non-conformities. CLOSURE OF FINDINGS AND CORRECTIVE ACTION PLAN:

The Site has successfully closed all Non-conformities.



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Scope of Assessment: The scope of services covers the Initial certification audit for assessing conformity of West Indian Tobacco - Curepe, Trinidad and Tobago against the AWS International Water Stewardship Standard Version 2.

The West Indian Tobacco Company Limited (WITCO), a subsidiary of British American Tobacco, is situated in Champ Fleurs, Trinidad—approximately 10 km east of Port of Spain and just north of Curepe in the Tunapuna–Piarco region. The 9-hectare site supports around 250 employees and comprises 13 structures, including a two-section primary factory, two reprocessing facilities for non-conforming products, dual warehouses for raw materials and finished tobacco goods, and administrative offices. The facility manufactures cigarettes under 25–26 brand names across 137–166 SKUs, distributing locally and to 16 CARICOM markets. Water infrastructure includes municipal supply, steam-generating boilers, a newly installed wastewater treatment plant that recycles process effluent for toilet flushing, a sewage treatment system discharging treated effluent into municipal drains, small-scale rainwater harvesting (up to 5,000 gal), and a dedicated fire-water reservoir. No cooling towers or stormwater management systems were included in the assessment.

The facility is in Champ Fleurs, a suburb within the Tunapuna–Piarco region of Trinidad, approximately 10 km east of Port of Spain and adjacent to the town of Curepe in the East–West Corridor. The area sits just south of the Northern Range, a rugged, forested mountainous spine of hills and valleys trending east–west across north Trinidad. Geographically, the site occupies part of the Caroni Plain (Caroni Basin), a gently sloping alluvial lowland composed of river deposited sediments between the Northern and Central Ranges. Local hydro-geologically significant features include shallow alluvial aquifers in these foothill plains that support municipal water supply through numerous productive wells, with recharge deriving from both rainfall and Northern Range streams. Surface drainage in the region is characteristic of a grid of small rivers and streams originating in the Northern Range, feeding into the larger Caroni River basin, though no major watercourses run directly through Champ Fleurs or Curepe. The combination of permeable alluvial soils and proximity to a mountainous recharge zone suggests moderate to high local groundwater potential. In summary, WITCO's site lies in a low–lying, alluvial plain just south of steep Northern Range terrain, benefitting from robust groundwater recharge and municipal water infrastructure sourced from this hydrologically active landscape.

The audit was conducted onsite on june 30th, July 1st and 2nd.

The on-site visit included the assessment of visit the water supply line from the municipal service provider, wastewater treatment plant (old and new one), tobacco production area, chemical storage area, waste storage area, on site IWRA, stakeholder interviews and meetings to identify documents submitted as evidence.

FINDINGS

NUMBER OF FINDINGS PER LEVEL Observation 2
Non-Conformity 6



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FINDING DETAILS

Finding No: TNR-018619

Checklist Item No: 1.2.1
Status: Closed

Finding level: Non-Conformity

Due date: 2025-Oct-01

Checklist item: 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.

Findings: (a) While the site has presented some efforts of stakeholder

consultation, it has not presented evidence regarding stakeholder consultation on water-related interests and challenges with the other

stakeholders identified.

(b) The site has not identified Service providers and raw material

providers as stakeholdes.

Corrective action: The site will include the raw materials providers and the service

providers as stakeholders in the stakeholder assessment.

The site will consult with stakeholders on water-related interests and challenges as part of the stakeholder engagement process and provide

evidence of such consultation.

Evidence of implementation: The site included raw materials providers and service providers as

stakeholders. The site engaged/consulted with each identified

stakeholder for feedback on water related interests and challenges. The site's Managing Director created a letter highlighting the site's reasons for consultation/engagement and this letter was attached to each email that was sent to the listed stakeholders alongside the site's Water Strategy and the link to a Questionnaire which was used as a tool to

gather the relevant feedback.



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Audit Number: AO-001514

Findings:

Finding No: TNR-018620

Checklist Item No: 1.2.2 Status: Open

Finding level: Observation

Checklist item: Current and potential degree of influence between site and stakeholder

shall be identified, within the catchment and considering the site's ultimate water source and ultimate receiving water body for wastewater.

The site has defined a methodology for assessing the current and

potential degree of influence between the site and the stakeholder. It should also maintain evidence of each stakeholder's classification.

Corrective action: The site will establish a methodology for classifying the stakeholders

identified into High, Medium or Low potential engagement categories. We will consider the survey conducted with the stakeholders, not just

the perception of the plant.

Finding No: TNR-018621

Checklist Item No: 1.3.2 Status: Closed

Finding level: Non-Conformity

Due date: 2025-Oct-01

Checklist item: Site water balance, including inflows, losses, storage, and outflows shall

be identified and mapped

Findings: The site has not considered water used to moisture and condition the

tobacco leaf for its water balance. Also, rainfall has not been considered

in the water inputs.

Corrective action: The site will consider the water used in the primary manufacturing

process for the conditioning of the tobacco leaf to calculate the site's

water balance.

Rainfall will be considered in the water inflows of the water balance.

Evidence of implementation: The site has considered water used to moisture and condition the

tobacco leaf for its water balance. Also, rainfall has been considered in the water inputs. water balance file titled "WATER BALANCE SEP UPDATE", has been updated with table that shows inputs minus outputs

equal zero.



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Audit Number: AO-001514

Finding No: TNR-018622

Checklist Item No: 1.3.3 Status: Closed

Finding level: Non-Conformity

Due date: 2025-Oct-01

Checklist item: Site water balance, inflows, losses, storage, and outflows, including

indication of annual variance in water usage rates, shall be quantified. Where there is a water-related challenge that would be a threat to good water balance for people or environment, an indication of annual high

and low variances shall be quantified.

Findings: The site could not demonstrate the water balance (water inputs - water

outputs = 0).

Corrective action: The site will review all water inputs and outputs and recalculate the

balance, ensuring that all variables are considered and that the final

result is equal to or very close to zero.

Evidence of implementation: The site has demonstrated that water balance (water inputs - water

outputs = 0). The water balance file titled "water balance Sep update" has been updated to include a table that shows the inputs and outputs that were measured. The table shows the inputs minus outputs equal

zero (0).

Finding No: TNR-018977

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: The site didn't identify the cost of their employees which activities related

to water management and water projects.

Corrective action: The site will identify the costs of the employees who are responsible for

activities related to water management on a daily basis. The site will also provide the costs related to water projects that were implemented.



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Audit Number: AO-001514

Finding No: TNR-018625

Checklist Item No: 1.5.6 Status: Closed

Finding level: Non-Conformity

Due date: 2025-Oct-01

Checklist item: Existing and planned water-related infrastructure shall be identified,

including condition and potential exposure to extreme events.

Findings: The site has not identified potential exposure to extreme events for the

identified water-related infrastructure.

Corrective action: The site will consider the potential exposure to extreme event for all the

identified existing and planned water-related infrastructure and state

these potential threats.

Evidence of implementation: The site has identified potential exposure to extreme events for the

identified water-related infrastructure.

Finding No: TNR-018631

Checklist Item No: 2.4.1 Status: Closed

Finding level: Non-Conformity

Due date: 2025-Oct-01

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 not developed the plans to mitigate or adapt to identified

water risks with relevant public-sector and infrastructure agencies, or

communicated such plans to them.

Corrective action: We will identify the relevant public sector and infrastructure

organizations that have a major role as it relates to plans to mitigate or adapt to water risks. We will engage with these organizations via email seeking existing plans to mitigate or adapt to water risks. This will open a dialogue which would also allow us to explore how our mitigation

planning can align or contribute to ongoing efforts.

Evidence of implementation: The site engaged/consulted with the relevant Government Organizations

in an attempt to obtain existing plans to mitigate or adapt to identified water risks. The site's sole water supplier (the only supplier for the Country) is The Water and Sewerage Authority. This company has the responsibility for supplying water country-wide and the management of all water related infrastructure. After weeks of continuous engagements with WASA, they stated that they could not accede to our requests. We have alternatively reached out to other Organizations that play a key role in the development of these plans with WASA, however, we were

referred back to WASA. In light of WASA's response, the site

communicated its internal water related emergency response to WASA.



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Audit Number: AO-001514

Finding No: TNR-018635

Checklist Item No: 3.9.1
Status: Closed

Finding level: Non-Conformity

Due date: 2025-Oct-01

Checklist item: Actions towards achieving best practice, related to water governance, as

applicable, shall be implemented.

Findings: The site has not provide evidence of implementation of the relevant

catchment best practice for water governance:

-Fondes Amandes Community Reforestation Project (FACRP): A community-driven initiative focused on reforesting degraded hillsides, preventing forest fires, and restoring the watershed to enhance water quality, availability, and catchment resilience / No information provided -National Water Sector Transformation Program / No information

provided

Corrective action: The plant will gather and provide evidence together with FACRP to

support the good practice, such as reports.

The site did not implement any best practice as it relates to the National Water Sector Transformation Program and as such no information was provided. The site has no plans in the near future to implement such programs and therefore this point will be removed from the best

practices list for the site.

Evidence of implementation: The two areas highlighted under water governance ie engagement with

Fondes Amandes and National water sector have been actioned. The site has removed NWS as an action and has shared evidence of activities with Fondes Amandes, evidence relating to other identified

areas for good water governance were shared in first upload.



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Report Details

Report	Value	
Report prepared by	Juan Carlos Cerón Vinueza	
Report approved by	Carla Schmidt Oberdiek	
Report approved on (Date)	29.July.2025	

Surveillance

Proposed date for next audit

2026-Jul-01

Comment

Initial audit was carried out according to the audit plan, the opening meeting of the event was held with staff from the organization in which the guidelines of the process were indicated, the closing meeting was held with staff from the organization in which the findings and next steps were communicated. Throughout the process, the auditor team complied with health and safety issues.

Stakeholder Announcements

Date of publi	cation	Location
02/06/2025		Email
02/05/2025		https://www.westindiantobacco.com/s earch-results?query=stakeholder
Commont	West Indian Tobacco Curono Trinidad and To	shage has published his Stakeholder

Comment

West Indian Tobacco - Curepe, Trinidad and Tobago has published his Stakeholder Announcement through:

- Email

Email to interested parties from 03-06-2025 (Doc 001 a)

- Webpage

 $https://www.westindiantobacco.com/content/dam/endmarkets/westindies/en/download/sustain\ ability-and-responsibility/AWS-Stakeholder-Announcement-2025.pdf$

Date: 02 may 2025



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Catchment Information

Catchment Information

Catchment Name: Caroni River Basin

Sub-catchment is the site located: Santa Cruz micro basin

Water Supply & Discharge Catchment: The main source of water for distribution and consumption in the Caroni River Basin is the Arena Reservoir which shares waters from the Arena and Tumpuna basins. The municipal drains that the site discharges into lead to the San Juan river within the same catchment.

Groundwater Aquifers: not applicable, the site does not take any water from groundwater aquifer.

Catchment Water Service Providers: The water supplier for the site is WASA (Water and Sewerage Authority). The Caroni/Arena Water Treatment Plant treats water from the Arena and Tumpuna Basins for distribution. The treated sewage and the stormwater flows into the municipal drains which leads to the San Juan River.

Catchment Features

1. water shortage:

There are two seasons: wet season and dry season. During the wet season water from the Tumpuna River is pumped into the Arena Reservoir to ensure its water supply. During the dry season pumping into the Caroni/Arena Treatment Plant maintains the levels of the Caroni River.

2. if areas are prone to flooding:

Not applicable, the area is not prone to flooding.

3. environmentally protected areas,

The Caroni Swamp is the most significant environmentally protected area within the catchment.

4. are there inter-basin transfers,

No. no transfers are made.

5. if the catchment is in arid / semi-arid / tropical climates,

The climate in San Juan, Trinidad and Tobago is a tropical climate.

6. if the drainage basin is dominated by specific water uses such as intensive agriculture, heavy industry, forests.

The drainage basin is dominated by agriculture and forests.



Catchment pic.png

WSAS



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Client Description and Site Details

Client/Site Background

Site location

-Company Name: The West Indian Tobacco Company Limited

-Country: Trinidad -Region: Champ Fleurs -City/Town: Curepe

The site is located in semi-industrial setting: residential houses located on the western and northern perimeter and industrial establishments are located on the eastern and southern perimeter.

The West Indian Tobacco Company Limited produces cigarettes for local and end markets. Water is used in boilers for the production of steam in the Primary Manufacturing Department.

Water-related infrastructure

- 1. Any water sources on site (wells, connection to municipal water supply, etc): There is a main water supply line from the municipal service provider that supplies the site with the water.
- 2. Water treatment facilities: There is a newly implemented wastewater treatment plant that treats process/factory discharge for reuse to flush toilets, and, there is one sewage treatment plant that treats a percentage of sewage waste before the effluent stream enters into the municipal drains.
- 3. Water use for production where relevant: Water is used for the production of steam via boilers as part of the manufacturing process.
- 4. Water use in energy facilities if relevant: NA
- 5. Wastewater treatment facilities: There is a newly implemented wastewater treatment plant that treats process/factory discharge for reuse to flush toilets, and, there is one sewage treatment plant that treats a percentage of sewage waste before the effluent stream enters into the municipal drains.
- 6. Cooling towers: not in place
- 7. Rainwater harvesting infrastructure: The site performs rainwater harvesting on a small scale. The site harvest up to 5000 gals of rainwater for reuse to flush toilets onsite.
- 8. Stormwater management infrastructure: stormwater gets discharged together with process water.
- 9. Fire water: There is a separate water supply line from the same water supplier that supplies water to hydrants. The site has a fire water storage tank to ensure that a water reserve is available at all times.
- 10. Any other: not applicable

The wastewater from the new wastewater treatment plant is used for the flushing of toilets. The effluent from the sewage treatment plant is discharged into the municipal drains after treatment. In specific cases the sewage wastewater can be sent to external service providers for treatment/disposal accordingly. The service provider has their own approved wastewater treatment plant located at Lot A5 Herriera Trace Kelly Village Caroni. The treated wastewater is then discharged into a nearby ravine (municipal pond).

The number of employees – 250

Size of the site - 9 ha

There are 13 buildings on the site. There is one factory that is split into two sections, two buildings where the site reprocess non-conforming product, two warehouses where they store materials to make cigarettes and store product, and the remaining buildings are general office spaces etc. There is one IWRA onsite. According to their local legislation, site's WASH provisions are deemed suitable and sufficient.

WSAS



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Site pic.png

Summary of Shared Water Challenges

Summary of Shared Water Challenges

The site has identified the following Shared water challenges with their stakeholders :

- -Unknown quality of the supplied water
- -Insufficient capacity for wastewater treatment
- -Conflicts over water supply
- -Bad Quality of Rivers in Caroni Basin
- -Low index of basic sanitation in Trinidad.



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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.





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Comment

West Indian Tobacco - Curepe, Trinidad and Tobago has presented:

- -111 a 1 00 GSC-SVA-WITCO-DOCUMENT 1.1 2025
- -111 a Presentation
- -111 b 01 WITCOs boundaries
- -111 c 1 03_Site Water Supply Layout -111 c 2 04_Witco Site plan Drainage
- -111 c 3 05 Water lines & drains layout combined
- -111 c 4 Rainwater Harvesting
- -111 d 06 Narrative on Arena Reservoir catchment affected by WITCO
- -111 e ragbar treatment plant map.

Site boundaries

The scope of the site covers WITCO processing of raw materials, manufacturing, and distribution of tobacco, and its manufacturing plant is located in Champs Fleurs, Trinidad Island, Republic of Trinidad and Tobago. (Doc 111 a) (Doc 111 a 1).

- Site Limits

WITCO is located in Champs Fleurs, Trinidad Island, Republic of Trinidad and Tobago. (Doc 111 a).

- Water source

The water supply for the WITCO plant is provided by WASA and comes from the Arena Reservoir, located in the Caroni River Basin. (Doc 111 a pag2) (Doc 111 d).

- Water-related infrastructure

The site has all the hydrosanitary plans for its pipelines, such as Water Supply (111 c 1), Sewerage, Drainage (111 c 2) and fire system (111 c 3). Also there is on site a rain water harvesting system (111 c 4), water storage (308 m3 - Fire tank / 75.7 m3 Potable water / 18.9 m3 Rain Water) and a WWTP.

All the water-related infrastructure belongs to WITCO.

- Water supply

The water supply for the WITCO plant is provided by WASA and comes from the Arena Reservoir. No water wells are located on site (Doc 111 a pag2).

- Water piping

The site has all the hydrosanitary plans for its pipelines, such as Water Supply (111 c 1), Sewerage, Drainage (111 c 2) and fire system (111 c 3).

- Water discharge and treatment

The wastewater is treated internally in a sewage treatment plant (biodigester system). The site has 3 wastewater discharge points to into a municipal network. Ultimate receiving water body is: Caroni RIver (Doc 111 a pag5).

Occasionally (for WWTP maintenance), wastewater is sent to the RAGBAR supplier located in PIARCO. Waste water is treated in Rajbar treatment plant. The wastewater is discharged into the Caroni Swamp (Doc 111 e).

- Discharge points

WITCO has three effluent discharge points on the southern edge of the plant. Points ED1 and ED2 receive only rainwater drainage, while ED3 receives water from the Sewage Treatment Plant. (Doc 111 a pag5).

- Ultimate receiving water body or bodies

Ultimate receiving water body is: Caroni Swamp before reaching the Gulf of Paria (Doc 111 a pag6.)

- Catchment(s) that the site affect(s) and is reliant upon for water

The site has identified its basin as Caroni River Basin. The water from the reservoir flows into the Arena River, which joins the Tumpuna River, a tributary of the Caroni Riverin (Doc 111 a pag1).



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- 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.

Comment

West Indian Tobacco - Curepe, Trinidad and Tobago has presented:

- -121 a Resume
- -121 b Stakeholder Engagement Plan
- -121 c AWS Stakeholder Minutes of Meeting
- Stakeholder identification (Doc 121 a & Doc 121 b)

The site has presented a list of stakeholders that includes 33 stakeholders; they have grouped together some stakeholders such as government agencies, academia, NGOs, etc. The site has identified relevant stakeholder groups, in the catchment site there are not vulnerable, women, minority, or Indigenous people. Additionally, migrants and local small farmers have been identified as potentially vulnerable due to their proximity to and impact on the San Juan River.

The site has identified them by considering the physical scope and the site's ultimate water source and ultimate receiving water body or bodies.

The site has not identified Service providers and raw material providers as stakeholders.

- Stakeholder Consultation

The site has presented some efforts of stakeholder consultation: Sample:

- Meeting on 13-05-2025 in which CPI, EMA, WASA, CARIB BREWERY, PIRANHA participated. In the meeting they have discussed about water shared challenges within the catchment and water-related interests (Doc 121 c).
- The site has not presented evidence regarding stakeholder consultation on water-related interests and challenges with the other stakeholders identified.
- Degree of stakeholder engagement (Doc 121 a & Doc 121 b)

The Site describes the roles of the different stakeholders, also, the site has described the relationship between the site and the stakeholders with an interest and influence.

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

Q Obs.



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Comment

West Indian Tobacco - Curepe, Trinidad and Tobago plant has presented:

- -121 a Resume
- -121 b Stakeholder Engagement Plan

The Site has established the curent degree of influence of the stakeholders analizing the interest in water and influence of the site. The site has classified the stakehokders according their engagement potential in:

- HIGH: They have a key economic impact, strengthen or influence reputation, grant or limit licenses or access or create the future of the sector. For example, suppliers of key raw materials, workers, etc.
- MEDIUM: Medium impact on business results, which may partially affect reputation, but which in some way affect the company's key processes. For example: Suppliers, etc.
- LOW: They have a minimal economic impact, barely influence reputation and can provide complementary services or products.

Sample of High engament potential stakeholders: Water & Sewerage Authority (WASA), Water Resources Agency (WRA), Environmental Management Authority (EMA).

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

West Indian Tobacco - Curepe, Trinidad and Tobago plant has presented:

- -130 Resume
- -131 a Emergency Plan AWS
- -131 b Contingency Plan
- -131 c Building Evacuation Plan TT
- -131 d Natural Disaster Plan_TT
- -131 e Site Premises Recovery_BCP

Identified situations (Doc 131 a): Water supply by WASA suspended due to issues with their infrastructure, Failure of water storage tanks, Contamination of water resources (rainfall drainage) due to a chemical spill, Contamination of effluent discharge points by chemical spill, Failure of the WWTP(Sewage), Extreme drought, Flood.

Water-related Incident. Specific steps that will be taken during and after a water-related incident are listed. Also, the site has identified resources (Anti-spill brigade, absorption systems and infrastructure)

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



Comment

West Indian Tobacco - Curepe, Trinidad and Tobago plant has presented:

- -130 Resume
- -132 a Watermap_Sankey Diagram_Corrective Actions Plan
- -132 b Water meter readings 2025 Main potable line
- -132 c Water meter readings previous years

Water inputs: municipal water (hydrant line + Main potable supply) + Rainfall harvesting + Product humidity

Storage: fire water tank (308 m3)+ potable water tank (75.7 m3)

Losses: not losses in the process

Process: Not considered

Water outputs: WWTP + 3 discharges (ED1 / ED2 / ED3)

Period: yearly and daily

The site has not considered water used to moisture and condition the tobacco leaf for its water balance. Also, rainfall has not been considered in the water inflows.

WSAS



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Finding No: TNR-018621

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

closed

and low variances shall be quantified.

Comment

West Indian Tobacco - Curepe, Trinidad and Tobago plant has presented:

- -130 Resume
- -132 a Watermap Sankey Diagram Corrective Actions Plan
- -132 b Water meter readings 2025 Main potable line
- -132 c Water meter readings previous years

The document includes quantification for:

For water intake, there are meters which are verified by the maintenance area. Data is recorded periodically to keep track of access to water.

For the water outlet, there are meters in several areas which are verified by the maintenance area. Data is recorded periodically to keep track of access to water.

Sample:

For 2024:

Inflows: 6438.10 m3 (WASA) + 414 (RAINFALL)

Outflows: 2015.49m3 (ED1) + 98499 m3 (ED2) + 4152.05 m3 (ED3)

Balance: 984311 m3

The site could not demonstrate the water balance (inflows - outflows = 0), there is a significant difference between the outflows and the inflows.

There is not a water-related challenge that would be a threat to good water balance for people or environment.

Finding No: TNR-018622

Water quality of the site's water source(s), provided waters, effluent and 1.3.4

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

West Indian Tobacco - Curepe, Trinidad and Tobago plant has presented:

- 130 Resume
- 134 a CARIRI Water Test Results June 10th 2025

The site has provide:

- Water source: 06-03-2025 water test for physicochemical parameters (pH, Oxygen, phosphate, TSS, Oil) and microbilogical parameters (e coli) (Doc 130 pg 12)
- Provider water (WASA): 07-10-2024 water test for physicochemical parameters (floating matter, pH, BOD, Cyanide, Chromium, COD, Fats and Oils, Total solids, Arsenic, Cadmium, copper, mercury, nickel, lead, Zinc) (Doc 130 pg 13)
- Provider water (drinking water): 02-06-2025 water test for microbiological parameters (e coli). Only one sample does not complies. The site has presented an action plan (Doc 134 a) - Effliuent (ED1- ED2 - ED3): 15-01-2025 water test for physicochemical parameters (TSS pH, BOD, ammoniacal nitrogen) and microbiological (e coli) (Doc 130 pg 15)

According to the internal analysis, actually there is not a challenge related to water quality into the site, but in the catchment water quality is a shared challenge. However the site has an internal water treatment plant to provide safe water to its process.

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



Yes

Yes



Alliance for Water Stewardship (AWS)

Audit Number: AO-001514

Comment

West Indian Tobacco - Curepe, Trinidad and Tobago plant has presented:

- 130 Resume
- 135 a 2024 Site Inventory
- 135 b 00_GSC_SVA_WITCO_DOCUMENT 1.3.5_WITCO updates
- 135 c Pollution Sources & Risks

West Indian Tobacco - Curepe, Trinidad and Tobago plant has identified potential sources pollution (Doc 135 a and 135 b) based in:

a) Hazards given in their Safety Data Sheets (MSDS)

b) stored volume

For the site high risk sources pollution are: diesel storage, septic tanks, sewage treatment plant and system. (Doc 135 a and 135 c)

During the visit to the site, the important H&S measures, which are rigorously implemented, could be observed and there are no reports of accidents. In the chemical storage areas, the MSDS are stored and the person responsible was trained to comply with local regulations. Hazardous Waste and waste storage areas are identified with risk signals to comply with local regulations.

During the visit to the key areas, the audit team was required to wear safety equipment and was always accompanied by staff.

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

West Indian Tobacco - Curepe, Trinidad and Tobago plant has presented:

- 130 Resume (page 22)
- 136 a 1.3.6, 1.5.5 and 1.5.6
- 136 b 02_IWRA on site
- 136 c 01_GSC_SVA_WITCO_DOCUMENT_1.5.5_Jul2023

The site does not have IWRA on-site, they have only the green area for staff enjoyment. Indigenous cultural values: not applicable

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

West Indian Tobacco - Curepe, Trinidad and Tobago plant has presented:

- 130 Resume (page 22)
- 137 a Water Related Costs Updated
- 137 b GSC_SVA_WITCO_DOCUMENT_1.3.7_2025

West Indian Tobacco - Curepe, Trinidad and Tobago plant has budgets for maintenance of the internal network system and treatment plant, quality monitoring, wastewater monitoring, water usage and discharge fees, advice on water issues, projects

Environmental value: compliance with extraction and discharge regulations to avoid fines associated with environmental sanctions

Social value: the saving of water in the WITCO Plant represents an increase in the availability of resources for the surrounding communities. This can be highlighted as an important social value.

The organization does not have a revenue for water use

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





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Comment

West Indian Tobacco - Curepe, Trinidad and Tobago plant has presented:

- 130 Resume (page 24)

The site has performed a self-assessment of the WASH infraestructure. Also the site has an internal water dispensers (filters) to provide safety water to its process. The site has performed microbiological analysis according to local legislation to ensure water quality

Also the site provides bottled water for the consumption of its workers, the access sites are distributed in the common areas of the plant.

The organization has complied with access to potable water and access to sanitation (In the interview carried out with the production personnel, it is verified that there is drinking water at the work site and that the workers uses the nearby bathrooms).

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



Comment

West Indian Tobacco - Curepe, Trinidad and Tobago plant has presented:

- -140 Resume (page 24)
- -141 a Raw Material Suppliers Locations on map -141 b Tobacco Suppliers (from Brazil and Mexico)
- -141 c Raw Material supplied

The products used as inputs for production are not manufactured in the basin of origin as is presented in Document 140.

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

West Indian Tobacco - Curepe, Trinidad and Tobago plant has presented:

- -140 Resume (page 24)
- 142 a Indirect_Water_Use Offsite Based Companies
- 142 b GSC_SVA_WITCO_DOCUMENT_1.4_2025
- 142 c Indirect_Water_Use Offsite Based Companies

The company does not have any outsourced services.

The site has identified two service suppliers (Ramdass Transport Company Limited and Massy Distribution Trinidad) that are located in catchment area.

For Ramdass Transport Company Limited the site has evidenced efforts to obtain information regarding their water use, but not response has been obtained. For Massy Distribution

Trinidad the water consuption is quantified in 5636 m3/yr.

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.





Alliance for Water Stewardship (AWS)

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Comment

West Indian Tobacco - Curepe, Trinidad and Tobago plant has presented:

- -151 a Resume
- -151 b Description
- -151 c OPPORTUNITIES WITCO
- -151 d GSC SVA WITCO DOCUMENT 1.5.1 2025

Also, the site has identified some water governance initiatives (Sample):

-Vision 2030: National Development Strategy. It provides direction to government ministries, private sector, civil society and labor and nongovernmental organizations to ensure alignment with the national development agenda.

-The National Integrated Water Resources Management Policy 2022. To approach for improving the water sector by meeting present demands of all, while ensuring continued sustainability and availability of water resources to meet the needs of future generations.

-The National Policy and Programs on Wetland Conservation for Trinidad and Tobago. The goal is to protect, manage and restore wetlands in order to sustain and enhance their ecological and socio-economic values and function for current and future generations.

-"The National Protected Areas Policy. The purpose of this National Protected Areas Policy is to establish an appropriate framework for the selection, legal designation and management of a national

system of PAs."

1.5.2

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



Comment

West Indian Tobacco - Curepe, Trinidad and Tobago plant has presented:

- -152 a Resume
- -152 b 1.5.2 y 3.1.2 Absence of customary rights
- -152 c Legal and regulatory compliance

The site describes the status of legal compliance of: Water Pollution Permit, Water and Sewerage Act

Waterworks and water conservation Act, Water Pollution Rules 2019, Certificate of Environmental Clearance Rules, Environmentally Sensitive Area Rules, National Integrated water Resources Management Policy, Marine Areas Preservance and Enhancement Act, Strategies and Policy Guidelines for the Efficient Use of Water in Trinidad and Tobago, Public Health Ordinance (Chapter 12 No.4), Standards and Guidelines for Water Quality (Trinidad and Tobago Bureau of Standards)

The site has included a study 9Doc 152 b) which states that no customary rights is presented in Trinidad and Tobago.

1.5.3

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



Comment

West Indian Tobacco - Curepe, Trinidad and Tobago plant has presented:

- -153 a Resume
- -153 b GSC_SVA_WITCO_DOCUMENT 1.5.3_Jun2023_V2
- -153 c Water balance Caroni Basin
- -153 d Water Balance Evidence
- -153 e Water Balance Explanation
- -153 f NIWRM 2022

Based on the information on the catchment the site has gathered qualitative and quantitative data on the catchment water balance Caroni Basin.

For Caroni Basin: scarcity has not been detected (Doc 153 f)

For Aquifer: Not analyzed because the site does not used aquifer groundwater wells.



Alliance for Water Stewardship (AWS)

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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

West Indian Tobacco - Curepe, Trinidad and Tobago plant has presented:

- -154 a Resume
- -154 b GSC SVA WITCO DOCUMENT 1.5.4 Jul2023 V2
- -154 c Water quality data for region 2019
- -154 d Academic Data for water Quality in the Caroni River Basin 2019
- -154 e Water quality data on the Caroni River System 2023
- -154 f R1-WITCO Riverine Water Quality Report 6th March 2025

Water quality in the region is currently classified as medium to low risk, according to assessments from the Aqueduct Water Risk Atlas and the WWF Water Risk Filter - Maps. Data from the United Nations Sustainable Development Goal (SDG) 6 Database indicates that Trinidad and Tobago ranks relatively high in "good ambient water quality," with an estimated 88% "proportions of body of water" are within compliance as of 2023.

According to some studies of 2019 (Example: Spatial Variational Characteristics Analysis of Heavy Metals Pollution in the Water of the Caroni River System: Case Study from a Tropical River) they reported heavy metal concentrations in the Caroni River. Dou to the lack of recent information, as an action plan, the site has performed its own monitoring in 2025 were the results indicates compliance with local legislation.

However, the site has identified a water related challenge related to water quality and presented an analysis of seasonality variances.

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

West Indian Tobacco - Curepe, Trinidad and Tobago plant has presented:

- 155 a Resume
- 155 b IWRA identification
- 155 c GSC SVA WITCO DOCUMENT 1.5.5 Jul2023

Important Water-Related Areas has been identified and mapped. For all IWRA their status has been assesed using official information obtained from webpages and stakeholder participation.

The site has described general condition, assesses risks and vulnerability to events.

The identified Important Water-Related Areas are, for example:

- -Arena Reservoir and Reserve
- -Caroni Swamp Reserve
- -Tacarigua Reserve.

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



Comment

West Indian Tobacco - Curepe, Trinidad and Tobago plant has presented:

- 156 a Resume
- -156 b WRI
- -156 c GSC_SVA_WITCO_DOCUMENT_1.5.6_2025
- -156 d Water Infrastructure Sources

The site identifies and describes existing and planned water-related infrastructure. The site has made an analisys of the condition but It has not considered the potential exposure to extreme events.

Finding No: TNR-018625



Alliance for Water Stewardship (AWS)

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1.5.7 The adequacy of available WASH services within the catchment shall

Yes

West Indian Tobacco - Curepe, Trinidad and Tobago plant has presented: Comment

-157 a Resume

-157 b GSC_SVA_WITCO_DOCUMENT_1.5.7_Jul2023_V1

The site has identified:

- 93% of the population has access to potable water - 90% of the population is connectedd to sewerage system - 90% of the population has access to basic hygiene services

1.6 Understand current and future shared water challenges in the

catchment, by linking the water challenges identified by stakeholders

with the site's water challenges.

1.6.1 Shared water challenges shall be identified and prioritized from the

information gathered.



Comment West Indian Tobacco - Curepe, Trinidad and Tobago plant has presented:

160 a SWC

161 a SHC_Shared_Challenges 161 b GSC_SVA_WITCO_DOCUMENT_1.6.1_2025 161 c NIWRM 2022

The site has identified the following Shared water challenges with their stakeholders

-Unknown quality of the supplied water

-Insufficient capacity for wastewater treatment.

-Conflicts over water supply

-Bad Quality of Rivers in Caroni Basin -Low index of basic sanitation in Trinidad

The site has adapt a methodology for identifying challenges related to its stakeholders. All

Water Shared water challenges are classified as priority - High.

1.6.2 Initiatives to address shared water challenges shall be identified.





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Comment West Indian Tobacco - Curepe, Trinidad and Tobago plant has presented:

160 a SWC 162 a Initiatives

162 b GSC_SVA_WITCO_DOCUMENT 1.6.1_Aug2023_V1

The site identifies several local initiatives to address shared challenges:

-WASA's efforts ensure that the water supplied to customers complies with WHO's guidelines for drinking water quality

-EMA publishes all legislative requirements according to the EMA ACT2000 and all updates are published on the website with reinforcement by the legislative body by contacting organizations to ensure that they are abreast of all changes.

-WASA published many water conservation related articles over the years to support the country with ways to implement water conservation programs. The reduced water schedule during the dry season serves to ensure that all areas throughout the country have a water supply during the dry season.

-WASA publications emphasize that the Caroni River Basin is one of most important sources of potable water supply and highlights how deforestation can affect the optimal status of the river basin.

-EMA publishes all legislative requirements according to the EMA ACT2000 and all updates are published on the website with reinforcement by the legislative body by contacting organizations to ensure that they are abreast of all changes.

-People using at least basic sanitation services (% of population) in Trinidad and Tobago was reported at 93.92% in 2022. There is a significant improvement from 2011 to date and organizations who continue to improve WASH provisions contribute to the growing statistics.

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.





Alliance for Water Stewardship (AWS)

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Comment

West Indian Tobacco - Curepe, Trinidad and Tobago plant has presented:

- -170 Resume
- -171 a water risks template
- -171 b GSC SVA WITCO DOCUMENT 1.7.1 2025
- -171 c Indicator 1.7.1

The organization has identified risks for 2024, has prioritized them using likelihood and severity of impact and has identified an action plan:

- -It is unknown whether the municipal water supply fails to meet drinking water standards
- -Compliance with the Ministry of Energy and Energy Industries Letter regarding the Diesel tanks in the Plant must be ensured
- -At point ED1, due to low / no flow in the drains, the values of 2021 and part of 2022 are not available.
- -At point ED1 (October-2022) showed that the Faecal Coliform parameter significantly exceeded the permissible limits, with a maximum limit of 400 MPN/100 ml.
- -At point ED2, the values that exceeded the allowed limit during the last five years corresponded to the parameters: Chemical Oxygen Demand, Total Suspended Solids, Five Day Biological Oxygen Demand, and Dissolved Oxygen.
- -At point ED3, the physical-chemical analyses showed that among the parameters that were not found within the limits of the applicable regulations: Five Day Oxygen Demand, Dissolved Oxygen, Ammoniacal Nitrogen, Faecal Coliform, and Total Phosphorus.
- -The Sewage Treatment Plant has operational challenges.
- -The highest-risk sources are Diesel tanks, the Sewage Treatment Plant and Septic Tanks, as they contain a larger volume of potentially hazardous pollutants.
- -The transferring of substances into smaller containers in the Oil & Lubricant Storage is done using a hand pump within the storage area.
- -Potential infrastructure failure by the municipal water supply and rationing during times of drought
- -Lack of information regarding the operation and maintenance of the septic tanks used within WITCO.
- -Some of the older bathrooms in the plant have micro-leaks

The site has analyzed the potential costs and business impact of each water risk using an analysis in conjunction with the plant manager

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

West Indian Tobacco - Curepe, Trinidad and Tobago plant has presented:

- -170 Resume
- -172 a Opportunities for the site

The organization has identified opportunities for 2024, has prioritized them, and has identified potential savings, and business opportunities:

- -Improving the wastewater treatment system
- -To establish a proper procedure for transferring hazardous materials into smaller containers in Oil & Lubricant Storage
- -Monitoring the quality of water supplied by WASA
- -Performing an evaluation and update of the sewerage system

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.



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Comment West Indian Tobacco - Curepe, Trinidad and Tobago plant has presented:

-180 Best Practices

-180 Best Practices Template

Relevant catchment best practice for water governance:

-Engagement with local stakeholders to promote the concept of Water Stewardship and identify opportunities for joint actions.

-Fondes Amandes Community Reforestation Project (FACRP): A community-driven initiative focused on reforesting degraded hillsides, preventing forest fires, and restoring the watershed

to enhance water quality, availability, and catchment resilience.

-National Water Sector Transformation Program

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 West Indian Tobacco - Curepe, Trinidad and Tobago plant has presented:

-180 Best Practices

-180 Best Practices Template

Relevant sector and/or catchment best practice for water balance:

-Rain Water system for sanitary water

-Steam condensate recovery for sanitary water & boiler

-Installation of flow meters with solar energy at the effluent discharge points.

-Metering for incoming flows throughout the site helps with leak detection-Main Building, Pastepot room, Canteen, Carisma, WMS, Main Potable line, Municipal line.

-Flow meters for steam for production processes.

-Water efficient fittings (low flow taps)

-Monitoring of data on precipitation, river flow, groundwater, evaporation, and water quality parameters conducted by the Water Resources Agency (WRA) of WASA.

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



Comment West Indian Tobacco - Curepe, Trinidad and Tobago plant has presented:

-180 Best Practices

-180 Best Practices Template

Relevant sector and/or catchment best practice for water quality

-Implementation of grease trap

-Monitoring of data on precipitation, river flow, groundwater, evaporation, and water quality parameters conducted by the Water Resources Agency (WRA) of WASA.

-Water quality tests according to WHO parameters and Legionella analysis.

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



Comment West Indian Tobacco - Curepe, Trinidad and Tobago plant has presented:

-180 Best Practices

-180 Best Practices Template

Relevant catchment best practice for site maintenance of Important Water-Related Areas:

-Fondes Amandes Community Reforestation Project (FACRP): A community-driven initiative focused on reforesting degraded hillsides, preventing forest fires, and restoring the watershed to enhance water quality, availability, and catchment resilience.

-Adopt A River Programme (AARP): An initiative that engages communities and corporate entities in sustainable activities aimed at improving the health of rivers and watersheds across the nation.

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



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Comment West Indian Tobacco - Curepe, Trinidad and Tobago plant has presented:

-180 Best Practices

-180 Best Practices Template

Relevant sector and/or catchment best practice for site provision of equitable and adequate

WASH services:

-Presence of water fountains with filtration and disinfection systems for employee

consumption.



Alliance for Water Stewardship (AWS)

Audit Number: AO-001514

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	West Indian Tobacco - Curepe, Trinidad and Tobago plant has presented: - 211 Commitment letter Witco The statement presented still complies with the standard
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	West Indian Tobacco - Curepe, Trinidad and Tobago plant has presented: -221 a Legal and regulatory compliance -221 b Template Complete 2.2.1
	The document (Doc 220) includes the following information: - The top management is responsible within the organizational structure in charge of Decision making, Resource allocation, Evaluate and approve proposals for improving water management. - Head of Legal is the responsible for monitoring regulatory compliance
	Also, the site has an internal procedure with the process to legal evaluation in which there is a process for submissions to regulatory agencies. (Doc 221 a & 221b)
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.



Alliance for Water Stewardship (AWS)

Audit Number: AO-001514

Comment West Indian Tobacco - Curepe, Trinidad and Tobago plant has presented:

-231 a Governance

-231 b Mission and Vision

-231 c WITCO's water strategy

The document includes the following information:

Mission: Understanding the critical need for effective water stewardship we will ensure the prevention and minimization of impacts on natural resources derived from our operation. Engaging with our stakeholders, we will promote good water governance, setting as an objective to continuously reduce the amount of water extracted and increase recycled water.

Vision: The vision of West Indian Tobacco Company Limited is to work responsibly and innovatively, protecting the environment, ensuring the sustainability of the business through the development of our talents and brands.

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

West Indian Tobacco - Curepe, Trinidad and Tobago plant has presented:

-232 Water Stewardship Plan

Doc 223 includes the following information:

AWS Outcome / Goal / Target / Actions / Time frame / Person Responsable / Cost / Monitoring Method of Action / Status / Related Risks / Related / Shared challenge / Related Opportunity / Related Best Practice / Value creation (4.1.2) / Shared value benefits

The plan has 8 objectives related to 5 outcomes.

- Ensure compliance with all legal requirements of the site.
- Enhance the site's resilience to potential water supply interruptions.
- Keep stakeholders aligned and engaged regarding issues related to sustainable water management.
- To optimize water usage at the site, making it more efficient.
- Engage and consult with external stakeholders as it relates to indirect water use.
- Ensure that the site does not affect the water quality of the discharge to the municipal drains.
- Ensure adequate access to WASH for employees.
- Engage in monitoring and actively contribute to the preservation of IWRAs.

The WSP complies with AWS standard

- 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.



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Comment West Indian Tobacco - Curepe, Trinidad and Tobago plant has presented:

-241 a Resume -241 b The Plan

-241 c Emergency Plan AWS

-241 d RCL Incidence Response Plan 2025

The site has presented several response plan for water-related incidents (Doc 241x).

However, the site has not developed the plans to mitigate or adapt to identified water risks

with relevant public-sector and infrastructure agencies.

Finding No: TNR-018631



Alliance for Water Stewardship (AWS)

Audit Number: AO-001514

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	West Indian Tobacco - Curepe, Trinidad and Tobago plant has presented: -310 Resume -311 a AWS Evidence attendance sheet stakeholder meeting	
	The West Indian Tobacco Company Limited (WITCO) has established meaningful communication with stakeholders related to the support of water related plans . A stakeholder meeting has been held on 13-05-2025 with the participation of relevant stakeholders (WASA, EMA, CPI, Carib Brewery, Piranha, WITCO) (Doc 311 a)	
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	West Indian Tobacco - Curepe, Trinidad and Tobago plant has presented: -310 Resume	
	According to WITCO analysis, there is no local knowledge or recognition among citizens of any form of customary water rights. Given the centralization of water resource management by WASA and EMA, and the absence of references to customary rights in national legislation, it is concluded that there is no formal recognition of such rights in Trinidad and Tobago. Therefore, no local customary water rights were identified that could impact or be impacted by the site's operations. Also, there was no evidence to suggest the residence of indigenous tribes or communities within the WITCO drainage system. Additionally, no women nor children were notable recognized as vulnerable within this vicinity.	
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.	
Comment	West Indian Tobacco - Curepe, Trinidad and Tobago plant has presented: -320 Resume -321 a Legal and regulatory compliance -321 b Template Complete 2.2.1	
	The site has in place a legal and regulatory compliance process. By June 2025, there is 100% compliance (Doc 321 a and Doc 321 b). Also the site has presented all legal authorizations (Doc 321 a).	
3.2.2	Where water rights are part of legal and regulatory requirements, measures identified to respect the water rights of others including Yes Indigenous peoples, shall be implemented.	



Alliance for Water Stewardship (AWS)

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Comment West Indian Tobacco - Curepe, Trinidad and Tobago plant has presented:

-320 Resume

According to WITCO analysis, there is no local knowledge or recognition among citizens of any form of customary water rights. Given the centralization of water resource management by WASA and EMA, and the absence of references to customary rights in national legislation, it is concluded that there is no formal recognition of such rights in Trinidad and Tobago. Therefore, no local customary water rights were identified that could impact or be impacted by the site's operations.

Also, there was no evidence to suggest the residence of indigenous tribes or communities within the WITCO drainage system. Additionally, no women nor children were notable recognized as vulnerable within this vicinity.

3.3 Implement plan to achieve site water balance targets.

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

Yes

Comment West Indian Tobacco - Curepe, Trinidad and Tobago plant has presented:

-330 Resume

The site has identified an indicator related to water reuse (Doc 330 slide 4 and 5):

- From dec 23 to nov 24: 351 m3 (9%)

- From dec 24 to may 25 (YTD): 130 m3 (13%)

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.

West Indian Tobacco - Curepe, Trinidad and Tobago plant has presented:

-330 Resume

Comment

There is not water scarcity in the area.

3.3.3 Legally-binding documentation, if applicable, for the re-allocation of

water to social, cultural or environmental needs shall be identified.



Comment This site does not perform water reallocation. There is no stipulated limits for water use from

the water supply company. There are no legislations applicable for water relocation.

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 West Indian Tobacco - Curepe, Trinidad and Tobago plant has presented:

-340 Resume

The site has identified an indicator related to compliance with the legislative parameters for effluent disposal (Doc 330 slide 6):

Indicator: Ensure 100% (EMA guidelines).

- From 04-12-2024 / 8 parameters / 8 compliance: 100% (Doc 341 a)

- From 07-05-2025 / 8 parameters / 8 compliance: 100% (Doc 341 b)

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.



WSAS



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Comment West Indian Tobacco - Curepe, Trinidad and Tobago plant has presented:

-340 Resume

The site has identified an best practice related to improve waste water discharge (Doc 340

slide8):

The new wwtp is scheduled to be commissioned in June 2025. This means that ED1 and ED2 will now go to this plant for treatment and as such, they will no longer be bound by the water

pollution permit for these EDs.

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.

Yes

Comment West Indian Tobacco - Curepe, Trinidad and Tobago plant has presented:

-350 Resume

The site has presented evidence of communication with WASA regarding a pottential

partnerships to maintain and/or enhance the catchment's IWRAs.

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

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

premises under the site's control.

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

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



Yes

Comment West Indian Tobacco - Curepe, Trinidad and Tobago plant has presented:

-360 Resume

Activity:

- Characterize internal water as often as possible to allow assertive action to be taken, maintaining levels of potability (Doc 361 e)

- Maintanance of drinking water coolers for employee consumption (Doc 361 a & Doc 361 b)

- Maintanance of sanitary facilities (Doc 361 a & Doc 361 b)

- Housekeeping shedule for all WITCO facilities.

3.6.2 Evidence that the site is not impinging on the human right to safe water

and sanitation of communities through their operations, and that traditional access rights for indigenous and local communities are being respected, and that remedial actions are in place where this is not the

case, and that these are effective.

Comment West Indian Tobacco - Curepe, Trinidad and Tobago plant has presented:

-360 Resume

-362 a 1.5.2 y 3.1.2 Absence of customary rights

-362 b Indigenous Communities in Trinidad

-362 c SOW-WaterTreatmentPlant

The plant does not affect the human right to drinking water as it has its own permit to use municipality water which are monitored to ensure the volume consumed.

By performing water reduction usage programs, the plant intends to reduce the affectation of the water distribution system to the population reducing its water consumption.

According to the presented information, there area not traditional access rights for indigenous and local communities in the catchment.

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

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3.7.1 Evidence that indirect water use targets set in the water stewardship

plan, as applicable, have been met shall be quantified.

Yes

Yes

Comment West Indian Tobacco - Curepe, Trinidad and Tobago plant has presented:

-370 Resume

-371 a Stakeholder engagements -371 b Indirect_Water_Use_2025

The site has identified an indicator related to service providers indirect use of water

engagement (Doc 370 slide 1):

Indicator: 100% actiones to engange service providers

- 2025: 9 of 12 service provideres engaged

3.7.2 Evidence of engagement with suppliers and service providers, as well

as, when applicable, actions they have taken in the catchment as a result of the site's engagement related to indirect water use, shall be

identified.

Comment West Indian Tobacco - Curepe, Trinidad and Tobago plant has presented:

-370 Resume

-371 a Stakeholder engagements

The site has engage with suppliers and service providers via email and meetings (Doc 370

slide 3-4 & Doc 371 a):

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 West Indian Tobacco - Curepe, Trinidad and Tobago plant has presented:

-381 Comunication with WASA

The site has submitted an email communication (March 21, 2025) requesting information on the status of water treatment plants in the San Juan region. The email receipt from WASA

(March 27, 2025) is verified.

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.

closed

Comment West Indian Tobacco - Curepe, Trinidad and Tobago plant has presented:

-390 Resume

-391 a Stakeholder meeting

Relevant catchment best practice for water governance:

-Engagement with local stakeholders to promote the concept of Water Stewardship and

identify opportunities for joint actions. / Meeting held 13-05-2025 (Doc 391 a)

-Fondes Amandes Community Reforestation Project (FACRP): A community-driven initiative focused on reforesting degraded hillsides, preventing forest fires, and restoring the watershed to enhance water quality, availability, and catchment resilience / No information provided

-National Water Sector Transformation Program / No information provided

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



Comment West Indian Tobacco - Curepe, Trinidad and Tobago plant has presented:

-390 Resume

-392 a Rainwater System -392 b Condensate Recovery

-392 c Flowmeters -392 d Water Meters

-392 e Pictures of Compressed Air and Steam Flowmeters

-392 f Water conservative taps

Relevant sector and/or catchment best practice for water balance:

-Rain Water system for sanitary water / The is a Rain Water catchment system in place (Doc 392 a)

-Steam condensate recovery for sanitary water & boiler / The organization recovers the condensate of steam to use it for sanitary water (Doc 392 b)

-Installation of flow meters with solar energy at the effluent discharge points. / Site has in place 3 solar power meter in place (Doc 392 c)

-Metering for incoming flows throughout the site helps with leak detection-Main Building, Pastepot room, Canteen, Carisma, WMS, Main Potable line, Municipal line. / During the site visit it is evidenced that the site has several water meters in all areas (Doc 392 d)

-Flow meters for steam for production processes. / There are 2 steam flow meter (Doc 392 e) -Water efficient fittings (low flow taps) / During the site visit it is evidenced that the site has installed water efficient taps in bathroom areas (Doc 392 f)

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



Comment West Indian Tobacco - Curepe, Trinidad and Tobago plant has presented:

-390 Best Practices-393 a Grease Trap-393 c Potable water

Relevant sector and/or catchment best practice for water quality:

-Implementation of grease trap / Doc 393 a

-Water quality tests according to WHO parameters and Legionella analysis. / Doc 393c.

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 West Indian Tobacco - Curepe, Trinidad and Tobago plant has presented:

-390 Resume

-394 b RE FW Reforestation project Wets Indian Tobacco FONDES AMANDES

-394 c Reforestation project adopt a river

Relevant catchment best practice for site maintenance of Important Water-Related Areas

-Fondes Amandes Community Reforestation Project (FACRP): A community-driven initiative focused on reforesting degraded hillsides, preventing forest fires, and restoring the watershed to enhance water quality, availability, and catchment resilience. / Doc 394 b

-Adopt A River ProgrammeAdopt A River Programme (AARP): An initiative that engages communities and corporate entities in sustainable activities aimed at improving the health of rivers and watersheds across the nation / Doc 394 c

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



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Comment West Indian Tobacco - Curepe, Trinidad and Tobago plant has presented:

-390 Resume

- 395 a Water coolers

Relevant sector and/or catchment best practice for site provision of equitable and adequate

WASH services:

-Presence of water fountains with filtration and disinfection systems for employee

consumption. / Doc 395 a



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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

Comment

West Indian Tobacco - Curepe, Trinidad and Tobago has presented evaluation of the performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes of his WSP of YTD 2025:

evaluated.

- Ensure compliance with all legal requirements of the site. / Completed: 0% (to be performed up to dec 2025)
- Enhance the site's resilience to potential water supply interruptions. / Completed: 100%
- Keep stakeholders aligned and engaged regarding issues related to sustainable water management / Completed: 0% (to be performed up to dec 2025)
- To optimize water usage at the site, making it more efficient. / Completed: 50% (to be performed up to dec 2025)
- Incentivize efficient water usage throughout the production chain. / Completed: 0% (to be performed up to dec 2025)
- Ensure that the site does not affect the water quality of the region. / Completed: 0% (to be performed up to dec 2025)
- Ensure adequate access to WASH for employees. / Completed: 66% (to be performed up
- Engage in monitoring and actively contribute to the preservation of IWRAs. / Completed: 0% (to be performed up to dec 2025)
- Value creation resulting from the water stewardship plan shall be 4.1.2 evaluated.



Comment

According to West Indian Tobacco - Curepe, Trinidad and Tobago analysis, the site has a value creation resulting from the water stewardship plan:

- By discharging effluents below the acceptable parameters into the river, we are reducing our impact on local water quality and ensuring that the population has access to cleaner and higher quality water.
- By reducing the volume of water captured, we are ensuring greater water availability for the basin.
- By protecting the IWRA, we ensure that the population enjoys a higher quality of life and that ecosystems are healthier and more prosperous.
- By promoting responsible water use among stakeholders, we contribute to greater water security for communities and industries, ensuring the availability of this critical resource for
- By ensuring access to WASH for our employees, we promote better health, well-being, and productivity in the workplace, creating a safer and more dignified environment.
- 4.1.3 The shared value benefits in the catchment shall be identified and where applicable, quantified.



Comment

According to West Indian Tobacco - Curepe, Trinidad and Tobago analysis, the site has a value creation in the catchment:

- As part of the steam condensate recovery project, we recovered 245.87 cubic meters of water and expect an additional 10 cubic meters per annum (PA) from the installation of a new plant. The project also resulted in annual energy savings of 112,443 KJ (532.8 MMBtu PA), a reduction of 3.34 tCO2 emissions PA. Total saved: \$12037.42 PA.



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

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

incidents shall be identified.

Comment West Indian Tobacco Company Limited declares that there has been no water related

emergency incidents such as floods, droughts, contaminant spills, in recent times, namely the last five (5) years.

There are existing plans in place to address any incidents that may arise in the future.

Evaluate stakeholders' consultation feedback regarding the site's water stewardship performance, including the effectiveness of the site's engagement process.

4.3.1 Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.

Yes

Yes

Yes

Comment To engage stakeholders and demonstrate its commitment to responsible water management,

WITCO reached out via email to key stakeholders, sharing its strategy, objectives, and challenges. The company also invited feedback, the exchange of experiences, and information on initiatives stakeholders are undertaking to strengthen local water governance.

Sample: Doc 431 b

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.

The sustainable water management plan is periodically reviewed and updated in 2025 (first

version). For 2026 it will be updated in December 2025 and January 2026

Comment



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5	STEP 5: COMMUNICATE & DISCLOSE - Communicate about water stewardship and disclose the site's stewardship efforts	
5.1	Disclose water-related internal governance of the site's management, including the positions of those accountable for legal compliance with water-related local laws and regulations.	
5.1.1	The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.	⊘ Yes
Comment	West Indian Tobacco - Curepe, Trinidad and Tobago has presented has presented: -511 a Signed water strategy -511 b WITCO Website link (https://www.westindiantobacco.com/sustainability-and-responsibility/water-as-a-priority) -511 c Published docs -511 d Stakeholder engagements	
	All site governance actions are disseminated via email and webpage to the stakeholders.	
5.2	Communicate the water stewardship plan with relevant stakeholders.	
5.2.1	The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.	⊘ Yes
Comment	West Indian Tobacco - Curepe, Trinidad and Tobago has presented has presented: -511 c Published docs -511 d Stakeholder engagements	
	The site has communictaed its WSP: - link: (https://www.westindiantobacco.com/) - Email (Doc 511 d)	
	Also, according to the interviews carried out with the stakeholders, they indicated that they have been communicated information relevant to the site's water stewardship plan.	
5.3	Disclose annual site water stewardship summary, including: the relevant information about the site's annual water stewardship performance and results against the site's targets.	
5.3.1	A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.	⊘ Yes
Comment	West Indian Tobacco - Curepe, Trinidad and Tobago has presented has presented: -531 a Water stewardhip KPI tracker -531 b Signed Water Performance Report AWS -511 d Stakeholder engagements -511 c Published docs	
	The site has: - Email with WSP performande sended in 2025 with the summary of the site's water stewardship performance, including quantified performance against targets (Doc 531 b) - WEB page, communicating the WSP (511 c)	

WSAS

2 Quality StreetNorth Berwick, EH39 4HW, UNITED KINGDOM

stakeholder has a basic knowledge of the site's performance.

According to the stakeholder interview the site has communicated the water stewardship plan and how the water stewardship plan contributes to AWS Standard outcomes. Also, the



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5.4

	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.	⊘ Yes
Comment	West Indian Tobacco - Curepe, Trinidad and Tobago has presented has presented: -531 a Water stewardhip KPI tracker -531 b Signed Water Performance Report AWS -511 d Stakeholder engagements -511 c Published docs	
	The site has: - Email with site's shared water-related challenges sended in 2025 with the information of site's shared water-related challenges and the site's action plan (Doc 531 b) - WEB page, communicating the WSP (511 c)	
	According to the stakeholder interview the site has communicated the site's shared water-related challenges and the site's efforts made to address these challenges. Also, the stakeholder has a basic knowledge of the water related challenges.	
5.4.2	Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.	⊘ Yes
Comment	West Indian Tobacco - Curepe, Trinidad and Tobago has presented has presented: -542 a resume -542 b AWS-WASA-Communication	
	The site has made some efforts to engage stakeholders and coordinate and support public-sector agencies like WASA: - Performing meeting with relevant stakeholder to engage them and participate in WASA activities	

Disclose efforts to collectively address shared water challenges, including: associated efforts to address the challenges; engagement with

water-related compliance violations available upon request as well as

any corrective actions the site has taken to prevent future occurrences.

Communicate transparency in water-related compliance: make any site

- Participating in Wasa initiative "adopt a river and tree planting".

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

Yes

Yes

Comment It does not apply to the site, there has been no violation related to compliance with water

regulations, therefore no disclosure or communication is required.

5.5.2

Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable. Yes

It does not apply to the site, there has been no violation related to compliance with water Comment

regulations, therefore no disclosure or communication is required.

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.

Comment It does not apply to the site, there has been no violation related to compliance with water regulations, therefore no disclosure or communication is required.

5.5.3

5.5



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	Previous Findings	
	All non-conformities raised in the previous audit have been satisfactorily closed.	N/A
Comment	First audit process, not applicable	