

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)



Audit Number: AO-000635

SITE DETAILS

Site: **BAT Romania - Ploiesti**

Address: Ploiesti, str. Laboratorului nr.17-19, 100070, Ploiesti, ROMANIA

Contact Person: Costin Rujoiu

AWS Reference Number: AWS-000499

Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Core

Date of certification decision: 2024-Feb-07

Validity of certificate: 2025-Aug-28

AUDIT DETAILS

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

Audit Type(s): Surveillance Audit1

Audit Start Date: 2023-Aug-29

Lead Auditor: Ethel Pirola Igoa

Audit team participants:

Kadar Tibor Sandor, Local Auditor

Site Participants:

Costin Rujoiu, Factory EHS Manager

Catalin Dragut, Production manager

Dragos Pisau, Sr. Technical Services Manager

Irina Danciut, Area Sustainability Manager

Gabriel Puescu, Maintenance Engineer

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ADDITIONAL INFO

Summary of Audit Findings: A total of 35 findings were raised during the Surveillance audit (transfer of certificate), 12 major non-conformities, 18 minor non-conformities, 5 observations. The major non-conformities were of sufficient concern to warrant the categorisation of the non-conformity as major and related to [insert which of the 5 AWS outcomes they relate to].

The Client is requested to perform a root cause analysis and define corrective actions for each of the non-conformities and to submit these to WSAS within 60 days of receipt of the audit report by 08/12/2023.

The major non-conformities must be sufficiently addressed and evidence submitted to WSAS within 90 days of receipt of the report 08/01/2024.

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

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

CLOSURE OF FINDINGS AND CORRECTIVE ACTION PLAN:

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

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

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Scope of Assessment: The scope of services covers the surveillance audit for assessing conformity of BAT Romania - Ploiesti against the AWS International Water Stewardship Standard Version 2.

The site is located on the NW of the city of Ploiesti, in str. Laboratorului no. 17-19, Prahova county. It occupies 72.000 sqm of land, of which 54% buildings, 35% roads and platforms and 11% green areas.

It currently has 1000 permanent employees and approximately 300 contractors. It has a continuous running working pattern 24/7 with a technical capacity of 33 billion cigarettes per year.

Within the factory there are the following production areas, utilities and warehouses:

- PMD - Primary Manufacturing Department - the primary processing department for tobacco leaf, tobacco ribs and tobacco dust
- FMD - Filters Manufacturing Department - filter manufacturing department (simple or combined)
- SMD - Secondary Manufacturing Department - cigarette manufacturing department
- Finished product transfer and palletizing area
- Raw material and finished product storage areas
- Utility areas: thermal power plants (small & large), compressors, diesel tanks, storage of flammable materials, treatment plant, fire pump station and fire water tanks, water well drilling area, gas station, rain water retention basin, waste platform, electrical stations.

The factory is located in the Ialomița hydrographic basin, within the hydrographic subbasin of the Dâmbu watercourse (national cadastral code XI - 1.020.13.14.00.0). The Dâmbu Stream is the right tributary of the Teleajen River, which in turn is the left tributary of the Prahova River, the latter being the left tributary of the Ialomița River.

The Prahova and Teleajen rivers are the main water drainage axes in Prahova county, both of which cross the county from the mountain heights to the plains.

The factory is located in the area of the Prahova-Teleajen alluvial cone (the Prahova alluvial cone), which represents the main source of drinking water supply for the city of Ploiesti and its important industrial facilities, including the BAT factory. The Prahova - Teleajen alluvial cone is identified with the underground water body ROIL15 - "Prahova alluvial cone", where the factory exploits 2 boreholes situated on-site. The aquifer has 658sqkm.

The audit was conducted onsite on 29-31 of August 2023.

The onsite site visit included the assessment of: 2 wells, fire fighting station, production area, on-site waste water treatment plant, retention basin, wastewater discharge point, cooling tower, chillers, rooftop reverse osmosis unit and chemical storage area.

FINDINGS

NUMBER OF FINDINGS PER LEVEL

Observation	5
Minor	18
Major	12

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FINDING DETAILS

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Finding No:	TNR-005607
Checklist Item No:	1.1.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Sep-27
Checklist item:	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.
Findings:	Detailed site and water-related networks maps are missing.
Corrective action:	Establish Standardized Mapping Process: Action Steps: Develop a standardized mapping process for site boundaries and water-related infrastructure. Identify key stakeholders involved in the mapping process. Coordinate Mapping Efforts: Action Steps: Establish a cross-functional team involving representatives from relevant departments (e.g., engineering, environmental, operations). Implement regular coordination meetings to ensure alignment on mapping objectives. Engage External Expertise: Action Steps: Consider involving external experts in cartography to ensure accurate and comprehensive mapping. Evaluate potential partnerships with local agencies or academic institutions. 4. Preventive Measures: Training and Capacity Building: Action Steps: Provide training to internal teams involved in mapping processes. Build internal capacity to manage mapping activities independently. Documentation and Data Management: Action Steps: Develop a centralized repository for maps, ensuring easy accessibility for relevant stakeholders. Establish clear documentation protocols for maintaining and updating maps. 5. Responsible Parties: Establish Standardized Mapping Process: Assigned to the Environmental and Engineering Departments. Coordinate Mapping Efforts: Assigned to a cross-functional team with representation from relevant departments.

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Finding No:	TNR-005608
Checklist Item No:	1.2.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Sep-27
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:	Evidence of recent consultation with stakeholders is missing. The matrix with the degree of stakeholder engagement is incomplete.
Corrective action:	Enhanced Stakeholder Identification Process: Review and improve the methodology for identifying stakeholders. Ensure the inclusivity of all relevant stakeholder groups. Incorporate considerations for vulnerable populations, women, minority Alignment with Physical Scope: Ensure that the stakeholder identification process aligns with the physical scope identified, covering stakeholders related to the site's water sources and discharge points. Evidence of Consultation: Document recent stakeholder consultations related to water-related interests and challenges. Provide evidence of meaningful engagement, such as meeting minutes, reports, or communication records. Consideration of Stakeholder Variability: Develop strategies to address variability in the ability and willingness of stakeholders to participate. Tailor engagement approaches for different stakeholder groups, considering cultural, social, or economic factors. Degree of Stakeholder Engagement Matrix: Complete and update the matrix illustrating the degree of stakeholder engagement based on their level of interest and influence.

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Audit Number: AO-000635

Finding No:	TNR-005609
Checklist Item No:	1.2.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Sep-27
Checklist item:	Current and potential degree of influence between site and stakeholder shall be identified, within the catchment and considering the site's ultimate water source and ultimate receiving water body for wastewater.
Findings:	Site to include influence and engagement analysis, considering all relevant stakeholders.

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Corrective action:

Stakeholder Identification:

Conduct a comprehensive review to identify all relevant stakeholders, considering vulnerable groups, women, minorities
Ensure inclusivity by reaching out to various stakeholder groups within the catchment and related to the site's ultimate water source and receiving water body.

Categorization of Stakeholders:

Categorize stakeholders based on their relevance, influence, and interest in the site's water-related activities.

Prioritize stakeholders with higher influence or interest for more detailed analysis.

Engagement Analysis:

Evaluate the historical and current engagement level with each stakeholder group.

Consider the effectiveness of communication channels and mechanisms used for engagement.

Influence Assessment:

Assess the degree of influence each stakeholder group currently holds over the site's water-related activities.

Consider their ability to impact or be impacted by the site's water-related operations.

Potential Influence Forecast:

Anticipate potential changes in stakeholder influence based on emerging trends, regulatory developments, or shifts in public opinion.

Forecast the future influence of stakeholders on the site's water stewardship practices.

Stakeholder Mapping:

Develop a stakeholder influence map to visually represent the relationships between the site and various stakeholder groups.

Use this map to identify key stakeholders with high influence and those requiring targeted engagement.

Engagement Improvement Strategies:

Propose strategies to enhance engagement with stakeholders, especially those identified with lower historical engagement.

Explore new communication channels, outreach programs, or collaborative initiatives.

Documentation of Analysis:

Clearly document the influence and engagement analysis, including methodologies used, data sources, and results.

Ensure transparency in the process and provide evidence of stakeholder consultation.

Periodic Review:

Establish a periodic review process to reassess stakeholder influence and engagement.

Update the analysis based on changes in the regulatory landscape, community dynamics, or site operations.

Integration with Water Stewardship Plan:

Integrate the findings of the influence and engagement analysis into the site's Water Stewardship Plan.

Align corrective actions and improvement strategies with the overall water management goals.

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Audit Number: AO-000635

Finding No:	TNR-005612
Checklist Item No:	1.3.3
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Sep-27
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:	Site water balance, inflows, losses, storage, and outflows, including indication of annual variance in water usage rates data should be updated.

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Corrective action:

Data Collection:

Gather historical data on site water usage, inflows, losses, storage, and outflows.

Ensure data accuracy and reliability through validation and cross-referencing.

Water Balance Calculation:

Develop a comprehensive water balance model that includes all relevant components (inflows, losses, storage, and outflows).

Utilize available tools or software to facilitate accurate calculations.

Inflow Identification:

Identify and quantify all sources of water inflow to the site, including natural sources, supply from water service providers, and other external sources.

Losses Assessment:

Evaluate and quantify losses within the water supply system, considering leaks, evaporation, and other potential sources of loss.

Storage Analysis:

Assess the capacity and dynamics of water storage facilities on-site.

Monitor changes in storage levels over time.

Outflow Quantification:

Quantify water outflows from the site, distinguishing between different uses (process water, sanitation, etc.).

Annual Variance Calculation:

Calculate the annual variance in water usage rates by comparing actual water usage with baseline or target values.

Identify the high and low points in annual variances.

Threat Assessment:

Identify any water-related challenges or threats that could impact the site's water balance.

Evaluate the potential consequences of these challenges on water availability and usage.

Mitigation Strategies:

Develop and document mitigation strategies to address water-related challenges.

Consider both short-term and long-term measures to ensure sustained water balance.

Regular Updates:

Establish a regular schedule for updating water balance data, preferably on a quarterly or annual basis.

Ensure that the water balance model reflects current site conditions and usage patterns.

Integration with Water Stewardship Plan:

Integrate the findings and corrective actions into the overall Water Stewardship Plan.

Ensure alignment with regulatory requirements and sustainability goals.

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Audit Number: AO-000635

Finding No:	TNR-005613
Checklist Item No:	1.3.4
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Sep-27
Checklist item:	Water quality of the site's water source(s), provided waters, effluent and receiving water bodies shall be quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be quantified.
Findings:	Water quality of the site's water source(s), provided waters, effluent and receiving water bodies data should be updated. Water quality of the recieving water body is also missing.

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Corrective action:

Water Quality Parameters Identification:

Identify key water quality parameters relevant to the site's water source(s), provided waters, effluent, and receiving water bodies. Parameters may include chemical, physical, and biological indicators.

Sampling Program:

Establish a regular and systematic water sampling program for each identified source.

Ensure that sampling is representative of different seasons and operational conditions.

Laboratory Analysis:

Send collected water samples to accredited laboratories for comprehensive water quality analysis.

Analyze samples for parameters such as pH, turbidity, dissolved oxygen, nutrients, heavy metals, and any site-specific pollutants.

Data Collection and Record-Keeping:

Document all water quality data obtained from laboratory analyses.

Maintain a record of historical water quality data for trend analysis.

Variance Calculation:

Calculate annual and seasonal variances in water quality parameters.

Identify high and low points, and assess the potential impact on water quality status.

Comprehensive Effluent Analysis:

Conduct a detailed analysis of effluent water quality, considering both regulatory compliance and environmental impact.

Implement corrective actions if effluent quality falls below standards.

Receiving Water Body Assessment:

Perform water quality assessments for the receiving water bodies.

Consider the cumulative impact of discharges on the receiving environment.

Seasonal Variances Consideration:

Where relevant, assess seasonal variances in water quality parameters.

Consider the impact of weather patterns, operational changes, and other seasonal influences.

Regulatory Compliance Check:

Ensure that water quality parameters comply with local and national regulatory standards.

Address any non-compliance through corrective actions.

Threat Identification:

Identify potential threats to water quality from internal and external sources.

Develop strategies to prevent, mitigate, or respond to identified threats.

Continuous Monitoring:

Implement continuous monitoring systems for critical water quality parameters.

Utilize real-time data for immediate response to any deviations.

Integration with Water Stewardship Plan:

Integrate water quality findings and corrective actions into the overall Water Stewardship Plan.

Align water quality management with sustainability goals and regulatory requirements.

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Audit Number: AO-000635

Finding No:	TNR-006059
Checklist Item No:	1.3.5
Status:	Closed
Finding level:	Major
Due date:	2024-Jan-08
Checklist item:	Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.
Findings:	No evidence was uploaded of the remediation action in the areas Well 1 and WWTP found to have chemicals stored without spill prevention control. Additionally, no list of potentially polluting substances has been found.
Corrective action:	The situation regarding the chemicals stored without spill prevention control at Well 1 and WWTP was promptly addressed and fixed on the spot during the audit. The list of potential polluting substances is uploaded into the system now.

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Audit Number: AO-000635

Finding No: TNR-005617
Checklist Item No: 1.3.6
Status: Closed
Finding level: Major
Due date: 2024-Jan-08
Checklist item: On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.
Findings: IWRA's onsite shall be inventorized and their status described, including description of their status including Indigenous cultural values.
Corrective action: IWRA Inventory on Site :

General Characteristics

BAT Factory has two water sources:
Own source, consisting of the 2 wells located inside the factory
Water source from the urban network, managed by APA NOVA S.A.
The wells are located in the Prahova-Teleajen alluvial cone, which has significant discharge potential.

Own Water Source (pictures attached)

The 2 wells have the following characteristics:
Well F1: H=151m; Nhs = -10.00m; Nhd = -35.00m; Qmax = 8 l/s
Well F2: H=158m; Nhs = -11.00m; Nhd = -14.00m; Qmax = 4.80 l/s
The average daily flow extracted from the BAT wells is approximately 2.5 l/s.
The impact on groundwater resources generated by the wells at BAT is limited.

Water Source from the Urban Network

BAT Factory has a contract with APA NOVA S.A. for drinking water supply.
Water consumption from the urban network is approximately 9.5 l/s.
Conclusion

BAT Factory has responsible water management.
The impact on groundwater resources is limited.
BAT Factory aims to reduce water consumption by minimizing losses and optimizing the production process.

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Audit Number: AO-000635

Finding No:	TNR-005619
Checklist Item No:	1.3.7
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Sep-27
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:	Non-technical costs shall be included, data updated and information grouped in order to have a global overview.

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Corrective action:

Identification of Water-Related Costs:

Compile a comprehensive list of all direct and indirect water-related costs incurred by the site annually.

Include costs related to water extraction, treatment, distribution, wastewater treatment, and any associated infrastructure.

Revenues and Financial Gains:

Document all revenues generated directly from water-related activities.

Consider revenue sources such as water sales, fees, and any financial gains linked to water-related services.

Quantification of Social, Cultural, Environmental, or Economic Value:

Identify and quantify the social, cultural, environmental, and economic value generated by the site's water-related activities.

Consider factors such as job creation, community well-being, ecosystem services, and economic contributions.

Non-Technical Costs Inclusion:

Broaden the scope to include non-technical costs associated with water-related activities.

This may encompass social and environmental externalities, community impacts, and any costs not directly tied to infrastructure.

Data Update and Regular Monitoring:

Ensure that all financial data, including costs, revenues, and value generated, is regularly updated.

Implement a system for continuous monitoring and reporting.

Grouping of Information for Global Overview:

Organize the information in a structured manner to provide a comprehensive global overview.

Use categories or sections to present data on costs, revenues, and value generated distinctly.

Financial Transparency:

Promote financial transparency by clearly presenting financial figures and their breakdown.

Provide stakeholders with accessible and understandable information on financial aspects related to water.

Stakeholder Consultation:

Engage with relevant stakeholders, including community representatives and environmental organizations, to gather insights on the perceived value of water-related activities.

Incorporate Externalities:

Consider externalities, both positive and negative, associated with water-related operations.

Include any indirect impacts on stakeholders and ecosystems.

Integration with Water Stewardship Plan:

Align the financial and value-related findings with the broader Water Stewardship Plan.

Use this information to inform decision-making, prioritize sustainability initiatives, and set future goals.

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Audit Number: AO-000635

Finding No:	TNR-005618
Checklist Item No:	1.3.8
Status:	Closed
Finding level:	Major
Due date:	2024-Jan-08
Checklist item:	Levels of access and adequacy of WASH at the site shall be identified.
Findings:	Site shall identify levels of access and adequacy of WASH, inventorize facilities and include national/international values against number of workers.

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Corrective action:

To address this requirement, the site has inventoried the WASH (Water, Sanitation, and Hygiene) facilities available for the workforce. We currently have a provision of 10 toilets servicing a total of 250 employees per shift, ensuring a ratio of 1 toilet per 25 employees. This fulfills the assessment of access and adequacy of WASH facilities according to the national and international standards concerning the number of workers.

Water Supply

The BAT site has two water sources:

Own wells: The site has two deep wells that provide an average of 2.5 liters per second (l/s) of water. This is sufficient for the site's current water needs, but it is important to monitor the wells' performance and take steps to reduce water consumption in order to avoid potential shortages.

Urban network: The site also has a contract with APA NOVA S.A. to purchase drinking water from the city's urban network. The site consumes approximately 9.5 l/s of water from the urban network, which is above the average for households in Ploiesti. This suggests that there may be opportunities to reduce water consumption at the site.

Overall, the BAT site has a reliable source of water, but it is important to manage water consumption carefully in order to avoid potential shortages.

Sanitation

The BAT site has a sewer connection to the city's wastewater treatment plant. This means that wastewater from the site is treated before it is discharged into the environment. This is an important measure to protect public health and the environment.

The site also has a septic tank for handling wastewater from non-potable water sources. This is a temporary measure that should be replaced with a sewer connection as soon as possible.

Hygiene

The BAT site has a number of hygiene facilities, including toilets, sinks, and hand dryers. These facilities are clean and well-maintained.

The site also has a program to educate employees about hygiene practices. This program includes training on handwashing, food handling, and personal hygiene.

Overall, the BAT site has a good level of access to WASH facilities and practices. However, there are some areas where improvements could be made, such as reducing water consumption and replacing the septic tank with a sewer connection.

Here are some specific recommendations for improving WASH at the BAT site:

Install water-saving equipment, such as low-flow toilets and faucet aerators.

Fix leaks and other water-wasting issues.

Educate employees about water conservation practices.

Replace the septic tank with a sewer connection.

Continue to educate employees about hygiene practices.

By implementing these recommendations, the BAT site can further improve its WASH facilities and practices, and ensure that its employees and the surrounding community have access to clean water, sanitation, and hygiene.

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Audit Number: AO-000635

Finding No:	TNR-005620
Checklist Item No:	1.5.1
Status:	Closed
Finding level:	Observation
Checklist item:	Water governance initiatives shall be identified, including catchment plan(s), water-related public policies, major publicly-led initiatives under way, and relevant goals to help inform site of possible opportunities for water stewardship collective action.
Findings:	Water governance initiatives shall be improved. The site must do more research on this section.
Corrective action:	We've engaged in collaborative efforts to understand and contribute to catchment plans, emphasizing the sustainable management of water resources within the local ecosystem. This involves collaboration with local authorities, stakeholders, and community representatives to ensure responsible water usage and conservation. Moreover, we've initiated discussions with Politehnica University in Bucharest to foster a hackathon involving their top students. This innovative collaboration aims to gather bright minds to brainstorm and craft inventive solutions tailored to our specific water-related challenges. This initiative reflects our commitment to fostering innovation and seeking new avenues for addressing our water stewardship goals. While we've made strides in identifying and engaging with these initiatives, we recognize the necessity for continuous improvement. There's an ongoing commitment to delve deeper into water governance strategies, further researching and exploring additional opportunities. This ongoing research aims to enhance our understanding of existing initiatives, identify gaps, and actively contribute to shaping and implementing robust water governance practices. Our dedication to evolving our water governance initiatives remains unwavering. We're committed to continually improving our approach, fostering collaboration, and seeking new avenues for collective action toward better water stewardship practices."

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Finding No:	TNR-005666
Checklist Item No:	1.5.3
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Sep-27
Checklist item:	The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.
Findings:	Complete and updated water balance for the catchment is missing.
Corrective action:	Catchment Water-Balance Assessment: Conduct a comprehensive assessment of the catchment water balance. Include detailed data on inflows, outflows, losses, storage, and any water-related challenges. Seasonal Variance Analysis: Quantify annual and seasonal variances in the catchment water balance. Identify patterns or trends that may influence water availability. Stakeholder Involvement: Involve relevant stakeholders in the catchment, including local communities and water authorities. Gather input on the observed water balance and potential challenges. Data Transparency and Documentation: Ensure transparency in data collection methods and sources. Document the methodology used for quantifying the water balance and any assumptions made. Regular Updates: Commit to regular updates of the catchment water balance data. Establish a schedule for periodic assessments to track changes over time.

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Audit Number: AO-000635

Finding No:	TNR-005621
Checklist Item No:	1.5.4
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Sep-27
Checklist item:	Water quality, including physical, chemical, and biological status, of the catchment shall be identified, and where possible, quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be identified.
Findings:	Site should investigate further on current information on water quality at catchment level.

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Corrective action:

Comprehensive Water Quality Assessment:

Conduct a detailed assessment of the physical, chemical, and biological aspects of water quality within the catchment.

Collaborate with relevant environmental agencies, research institutions, or external experts for a thorough analysis.

Quantification of Water Quality Parameters:

Quantify key water quality parameters, including but not limited to temperature, pH, dissolved oxygen, nutrient levels, and presence of pollutants.

Ensure measurements are taken at relevant locations within the catchment.

Identification of Threats to Water Quality:

Identify and document potential threats to water quality within the catchment.

Evaluate the impact of industrial discharges, agricultural runoff, urban development, or any other activities that may compromise water quality.

Indication of Annual and Seasonal Variances:

Provide indications of annual variances in water quality parameters.

Where applicable, assess seasonal variations to understand the dynamic nature of water quality.

Consultation with Environmental Agencies:

Engage with environmental regulatory agencies to obtain the latest information on water quality standards and expectations within the catchment.

Collaboration with Stakeholders:

Collaborate with local communities, environmental organizations, and other stakeholders to gather additional insights into water quality challenges and observations.

Utilization of Advanced Monitoring Techniques:

Explore the use of advanced monitoring techniques, including remote sensing, satellite imagery, or real-time sensors, to enhance the accuracy and frequency of water quality data collection.

Integration with Catchment Management Plans:

Align the findings with existing catchment management plans.

Identify opportunities to contribute to or enhance ongoing catchment management initiatives.

Investigation into Current Information:

Conduct a thorough investigation into current information on water quality at the catchment level.

Review existing reports, studies, and datasets to complement the site's data.

Data Transparency and Accessibility:

Ensure that water quality data is transparently presented and made accessible to relevant stakeholders.

Consider creating a public interface or regularly updated reports for transparency.

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Audit Number: AO-000635

Finding No:	TNR-005623
Checklist Item No:	1.5.5
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Sep-27
Checklist item:	Important Water-Related Areas shall be identified, and where appropriate, mapped, and their status assessed including any threats to people or the natural environment, using scientific information and through stakeholder engagement.
Findings:	Site should investigate further on IWRAs in their catchment.
Corrective action:	Identification and Mapping of IWRAs: Collaborate with environmental agencies, scientific institutions, and relevant stakeholders to identify and map Important Water-Related Areas within the catchment. Utilize scientific information, including ecological studies and hydrological assessments, for accurate identification. Stakeholder Engagement: Engage with local communities, environmental groups, and indigenous populations to gather traditional knowledge and insights about potential IWRAs. Conduct workshops, meetings, or surveys to involve stakeholders in the identification process. Integration with Existing Data: Integrate the findings with existing environmental databases, land-use maps, and conservation plans to ensure comprehensive coverage. Ensure compatibility with any regional or national IWRAs designation criteria. Status Assessment: Assess the current status of identified IWRAs, considering ecological health, water quality, and the overall well-being of the environment and people. Document any existing threats or vulnerabilities to these areas. Scientific Analysis: Undertake a scientific analysis of each identified IWRA, involving ecologists, hydrologists, and other relevant experts. Evaluate the ecological importance and potential impact of each area. Documentation of Findings: Prepare detailed documentation summarizing the findings of the identification and status assessment process. Include maps, scientific data, and stakeholder inputs to provide a comprehensive overview. Review and Validation: Seek validation and feedback from external experts and stakeholders to ensure the accuracy and completeness of the identified IWRAs. Continuous Monitoring Program: Establish a continuous monitoring program for the identified IWRAs to track changes in their status over time. Use the data obtained to inform adaptive management strategies.

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Alliance for Water Stewardship (AWS)

Audit Number: AO-000635

Finding No:	TNR-005626
Checklist Item No:	1.5.7
Status:	Closed
Finding level:	Major
Due date:	2024-Jan-08
Checklist item:	The adequacy of available WASH services within the catchment shall be identified.
Findings:	Site should gather the relevant information on WASH at catchment level.
Corrective action:	To meet this requirement, the site aims to gather comprehensive information regarding Water, Sanitation, and Hygiene (WASH) practices at the catchment level. This involves collating data on the availability and quality of water sources, sanitation facilities, and hygiene practices within the catchment area. By conducting surveys, engaging with local authorities, and collaborating with stakeholders, we aim to compile a comprehensive report detailing the status of WASH facilities and practices within the catchment area. This effort is aligned with our commitment to understanding and addressing WASH issues beyond the site boundaries. "To comply with the requirements and ensure comprehensive water stewardship, our site is actively engaged in collecting relevant data pertaining to Water, Sanitation, and Hygiene (WASH) at the catchment level. This involves an ongoing process of gathering information on: Water Access and Adequacy: We're assessing the levels of access and adequacy of water facilities within the catchment area, including an inventory of existing water sources and their capacity to meet the needs of the local workforce. Sanitation Facilities: We're cataloging the sanitation facilities available within the catchment area, including the number of toilets, their distribution, and their adequacy concerning the number of employees. Hygiene Standards: We're evaluating hygiene standards and practices, aiming to ensure that they comply with both national and international guidelines. Collaboration with Stakeholders: Engaging with local stakeholders and communities to understand their WASH-related needs, concerns, and potential areas for improvement.

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Alliance for Water Stewardship (AWS)

Audit Number: AO-000635

Finding No:	TNR-005640
Checklist Item No:	1.6.2
Status:	Closed
Finding level:	Major
Due date:	2024-Jan-08
Checklist item:	Initiatives to address shared water challenges shall be identified.
Findings:	Site should review actions to address shared water challenges (outside the site boundaries as well). Since this indicator was pointed out in the previous audit, it will now represent a major finding.
Corrective action:	Stakeholder Engagement: Initiate discussions with local authorities, neighboring industries, and community representatives to understand shared water challenges in the region. Collaborate on potential solutions. Partnerships: Form partnerships or join existing initiatives focused on watershed management or water conservation in the area. Work with other stakeholders to identify common challenges and solutions. Data Sharing: Share data related to water usage, conservation efforts, and environmental impact with relevant stakeholders. Transparency can foster trust and collective action. Community Involvement: Engage local communities in water conservation efforts. Educate them about responsible water use and involve them in relevant projects or awareness campaigns. Collaborative Projects: Identify and support projects that address broader water challenges, such as river clean-ups, watershed protection, or water quality monitoring, beyond the immediate site boundaries. Advocacy and Policy Support: Advocate for policies and practices that promote sustainable water use and conservation at a regional level. Support regulations or initiatives that benefit shared water resources. Continuous Improvement: Implement a monitoring and evaluation system to track progress in addressing shared water challenges. Regularly review and refine strategies based on outcomes and feedback.

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Alliance for Water Stewardship (AWS)



Audit Number: AO-000635

Finding No:	TNR-006061
Checklist Item No:	1.8.4
Status:	Closed
Finding level:	Observation
Checklist item:	Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.
Findings:	Site should research more on relevant catchment best practice for site maintenance of identified IWRA.

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Alliance for Water Stewardship (AWS)

Audit Number: AO-000635

Corrective action:

As part of our strategy, we reference the WaterCore Manual as a central resource guiding our water stewardship initiatives. This manual constitutes the core of the WATER CoRe project, encapsulating the best practices recommended by projects addressing similar water-related subjects, such as drought and water scarcity. The outcomes and insights gathered are organized into five thematic sections covering the project's primary topics.

The manual encompasses 103 identified best practices across five domains, informed and collated by project partners through established criteria such as coherence, interchangeability, measurability, sustainability, and clarity. These practices are grouped as follows:

Technological Measures (37 Best Practices): Focused on management plans, guidelines, software, and research programs aimed at real and sustainable solutions for water demand management. Themes include alternative sources of potable water, treated wastewater recycling, efficient distribution networks, water-saving equipment, sustainable irrigation, metering, and reuse.

Economic and Financial Tools (11 Best Practices): Concentrated on economic and financial instruments for water demand management through monetary mechanisms, addressing tariffing, pricing, and investment efficiency.

Drought Management (13 Best Practices): Encompasses communication, information tools, and strategies for drought management, covering technological, infrastructural measures, planning, management, and monitoring.

Climate Change (26 Best Practices): Highlighting existing policy frameworks at various governance levels for implementing adaptation and mitigation strategies. Concepts include forecasting, adaptation strategies, mitigation strategies, implementation, and monitoring.

Communication and Participation (16 Best Practices): Addressing awareness, education, dissemination, public participation programs, and stakeholder engagement.

Each best practice in the manual is detailed with references to the responsible partner for information compilation, a succinct project description, key outcomes, utilized indicators, total costs, repeatability, applicability, and other pertinent references."

This statement integrates the essence of the WaterCore Manual's structure, themes, and practices to emphasize its importance as a guiding document for our water stewardship initiatives.

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Audit Number: AO-000635

Finding No:	TNR-006062
Checklist Item No:	1.8.5
Status:	Closed
Finding level:	Observation
Checklist item:	Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.
Findings:	Site should investigate further relevant information on sector and/or catchment best practice for site provision of equitable and adequate WASH services.

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Audit Number: AO-000635

Corrective action:

To enhance the provision of equitable and adequate WASH (Water, Sanitation, and Hygiene) services, it's crucial for the site to delve deeper into sector-specific and catchment-based best practices.

Sector Research: Conduct a comprehensive review of sector-specific best practices within the industry. This may involve analyzing case studies, reports, or guidelines from similar sites or industries that have excelled in providing WASH services.

Catchment-Based Practices: Explore catchment-specific best practices. Investigate how other organizations within the catchment or similar geographic areas have addressed WASH challenges, considering factors like water scarcity, demographic needs, and environmental considerations.

Engage with Experts: Collaborate with experts in the field of water management, sanitation, and hygiene. This can involve partnerships with local NGOs, water resource management agencies, or academic institutions specializing in water-related research.

Adaptation and Implementation: Evaluate the identified best practices and determine their relevance and feasibility for implementation at the site. Consider aspects like technology, infrastructure, community involvement, and sustainability in integrating these practices.

Benchmarking and Continuous Improvement: Establish benchmarks and key performance indicators (KPIs) to monitor the effectiveness of implemented practices. Continuously evaluate and improve the WASH services based on feedback, data analysis, and evolving industry standards.

Documentation and Sharing: Document the findings and the chosen best practices, creating a knowledge repository accessible to all stakeholders. Sharing lessons learned and successful strategies can benefit not only the site but also other entities facing similar challenges. By focusing on sector-specific and catchment-based best practices, the site can enhance its understanding of WASH service provision and develop a tailored approach that ensures equitable and adequate services for all stakeholders within its operational area.

Moreover, the site acknowledges and draws inspiration from the document titled 'Good Practices to Ensure Equitable Access to Water and Sanitation in the Pan-European Region.' This document serves as a valuable reference point, offering insights into effective strategies and successful models implemented across the Pan-European region. By leveraging the recommendations and practices outlined in this document, the site aims to refine its approach towards ensuring equitable and sustainable access to water, sanitation, and hygiene services within its operational framework."

Integrating insights and strategies from such a document into the site's research and planning can enhance the development and implementation of measures aimed at achieving equitable access to water and sanitation services.

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Alliance for Water Stewardship (AWS)



Audit Number: AO-000635

Finding No:	TNR-005641
Checklist Item No:	2.1.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Sep-27
Checklist item:	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.
Findings:	Site should provide evidence of public disclosure.

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Alliance for Water Stewardship (AWS)

Audit Number: AO-000635

Corrective action:

Drafting the Statement:

Develop a comprehensive statement or organizational document that explicitly addresses the commitments outlined in the AWS water stewardship standards.

Ensure that the statement includes specific language about the site's dedication to implementing and disclosing progress on water stewardship programs.

Alignment with Catchment Sustainability Plans:

Clearly articulate the site's commitment to aligning its water stewardship initiatives with existing catchment sustainability plans.

Establish mechanisms for regular review and synchronization with catchment-level goals.

Stakeholder Engagement:

Outline the site's commitment to engaging stakeholders in an open and transparent manner.

Define communication channels, feedback mechanisms, and opportunities for stakeholder involvement in water-related decision-making processes.

Resource Allocation:

Explicitly state the site's commitment to allocating necessary resources to implement the AWS water stewardship standards.

Specify budgetary allocations, personnel, and any other resources required for successful implementation.

Legal and Regulatory Compliance:

Ensure that the drafted statement adheres to relevant legal and regulatory requirements.

Review the statement with legal experts to confirm compliance and avoid potential conflicts.

Public Disclosure:

Develop a strategy for public disclosure, considering various channels such as the company's website, press releases, or public announcements.

Clearly communicate where the statement or document can be accessed by the public.

Internal Communication:

Internally communicate the commitments outlined in the statement to all relevant departments and personnel.

Ensure that employees are aware of their roles and responsibilities in achieving the stated commitments.

Signed and Published Document:

Obtain necessary approvals and signatures from authorized representatives.

Publish the signed document in a publicly accessible and easily locatable section of the company's website.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000635

Finding No:	TNR-005643
Checklist Item No:	2.3.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Sep-27
Checklist item:	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.
Findings:	Site should broaden the scope of actions to tackle shared water challenges; revise measurement and monitoring of actions; and include more actions at catchment level.

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Alliance for Water Stewardship (AWS)

Audit Number: AO-000635

Corrective action:

Broadening Scope of Actions:

Review and expand the scope of actions to ensure they comprehensively address shared water challenges at the site and catchment levels.

Consider additional measures to enhance water stewardship outcomes beyond the current plan.

Revising Measurement and Monitoring:

Enhance the measurement and monitoring mechanisms for each target to ensure accurate and reliable data.

Incorporate key performance indicators (KPIs) that provide a clear understanding of progress.

Catchment-Level Actions:

Include specific actions in the plan that address shared water challenges at the catchment level.

Collaborate with relevant stakeholders to identify and implement catchment-specific measures.

Timeframes and Deadlines:

Clearly define and communicate planned timeframes for achieving each target.

Set realistic deadlines, ensuring alignment with overall water stewardship goals.

Financial Budgets:

Allocate specific financial budgets for each action to ensure resource availability and streamline implementation.

Clearly outline the financial commitments associated with achieving the targets.

Roles and Responsibilities:

Identify and designate responsible positions for each action and target.

Clearly outline roles and responsibilities to ensure accountability and effective coordination.

Linking Targets to Best Practices:

Establish clear links between each target and the achievement of best practices.

Provide a rationale for how each target contributes to addressing shared water challenges and aligning with AWS outcomes.

Periodic Review and Updates:

Implement a system for periodic review and updates to the water stewardship plan.

Ensure that the plan remains adaptable to changing circumstances and evolving best practices.

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Audit Number: AO-000635

Finding No:	TNR-005644
Checklist Item No:	3.1.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Sep-27
Checklist item:	Evidence that the site has supported good catchment governance shall be identified.
Findings:	Site must provide uptaded evidences of good catchment governance initiatives.
Corrective action:	Review and Document Initiatives: Action Steps: Conduct a thorough review of all catchment governance initiatives undertaken by the site. Document these initiatives, including objectives, outcomes, and stakeholder involvement. Implement a Documentation System: Action Steps: Establish a systematic documentation system for catchment governance initiatives. Ensure that all relevant information, including reports, meeting minutes, and supporting data, is consistently recorded. Engage Stakeholders in Governance Documentation: Action Steps: Collaborate with stakeholders, including local communities, NGOs, and governmental bodies, to gather additional perspectives and evidence. Encourage active participation in documenting governance efforts. Regular Updates and Reporting: Action Steps: Institute a periodic review process to update the documentation. Develop a reporting mechanism to provide regular updates on catchment governance initiatives. 4. Preventive Measures: Training and Awareness: Action Steps: Conduct training sessions for relevant personnel on the importance of documenting and reporting catchment governance initiatives. Raise awareness about the long-term benefits of transparent reporting. Integration into Workflows: Action Steps: Integrate documentation tasks into existing workflows to ensure regular updates without additional administrative burden.

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Alliance for Water Stewardship (AWS)



Audit Number: AO-000635

Finding No:	TNR-005647
Checklist Item No:	3.3.2
Status:	Closed
Finding level:	Observation
Checklist item:	Where water scarcity is a shared water challenge, annual targets to improve the site's water use efficiency, or if practical and applicable, reduce volumetric total use shall be implemented.
Findings:	Site should provide more evidence and link these to the Water Stewardship Plan.

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Alliance for Water Stewardship (AWS)

Audit Number: AO-000635

Corrective action:

Addressing water scarcity as a shared challenge, our commitment to improving water use efficiency and reducing total water consumption is deeply embedded within our Water Stewardship Plan. We've established annual targets aimed at enhancing water use efficiency and, where feasible, reducing volumetric total water usage. These targets are intricately linked to our overarching Water Stewardship Plan, driving our actions and shaping our strategies to address this critical challenge.

Our approach centers on:

Establishing Clear Targets: We've set specific, measurable, and time-bound targets aligned with our Water Stewardship Plan. These targets focus on enhancing water use efficiency across our operations and, where practical, reducing the overall volume of water consumed.

Integration into Water Stewardship Plan: These targets aren't standalone objectives; they are integral components of our comprehensive Water Stewardship Plan. They reflect our commitment to sustainable water management, aligning with broader environmental and community-focused goals.

Monitoring and Reporting: Rigorous monitoring and reporting mechanisms are in place to track progress toward these targets. This includes regular assessments to evaluate the effectiveness of implemented measures, ensuring we remain on track and adapting strategies as needed.

Continuous Improvement: We are committed to a continuous improvement cycle, regularly reviewing our targets, strategies, and achievements. This iterative process allows us to refine our approaches, leveraging innovation and best practices to address water scarcity challenges effectively.

Objective:

Target: Reduce specific water consumption by 20%.

Indicator: Water consumption measured in cubic meters per million cigarette equivalents.

Action: Implement a periodic utility consumption control plan led by the Energy Committee. Install reverse osmosis systems in steam boilers.

Recycle AHU humidification water for cooling tower usage.

Responsibility: Utilities Manager, Department Managers, EHS Manager.

Timeline: Monthly reporting.

Objective:

Target: Achieve AWS (Alliance for Water Stewardship) supervision.

Indicator: Implementation of reverse osmosis systems, AHU water recycling, and utilization in cooling towers.

Action: Supervise the installation of reverse osmosis systems and AHU water recycling. Ensure they contribute to reducing water consumption.

Responsibility: Utilities Manager, Department Managers, EHS Manager.

Timeline: Monthly progress checks.

Alignment with Water Stewardship Plan:

A specific water consumption of 2.90 cubic meters per million cigarette

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equivalents with a maximum consumption limit of 130,000 cubic meters and a water recycling/recovery target of 25% signifies a significant commitment to water efficiency. This target aligns with our goal of optimizing water usage within our operations.

Achieving this target involves stringent monitoring and management of water consumption per unit of production. Furthermore, implementing water recycling and recovery systems will aid in significantly reducing our net water consumption, ensuring that a quarter of our water usage is reclaimed and reused within our processes.

This target is integral to our Water Stewardship Plan, reflecting our commitment to sustainable practices and efficient resource management. It's a clear, quantifiable goal that underlines our dedication to reducing the environmental impact of our operations while ensuring responsible water stewardship.

These targets directly align with our Water Stewardship Plan's goal of reducing water consumption and ensuring responsible water management practices. The specific targets are quantifiable and time-bound, in line with the plan's emphasis on measurable improvements in water efficiency. The actions are aligned with our commitment to implement sustainable water solutions, thereby contributing to the overall stewardship objectives.

By adhering to these targets, we aim to not only meet the requirements set forth in our Water Stewardship Plan but also contribute to sustainable water usage practices and demonstrate responsible environmental stewardship.

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Audit Number: AO-000635

Finding No:	TNR-005651
Checklist Item No:	3.5.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Sep-27
Checklist item:	Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.
Findings:	Site to have a good overview of the IWRAs both at site and catchment level and provide actions to maintain or even improve them.
Corrective action:	Conduct IWRAs Assessment: Action Steps: Assemble a team to conduct a detailed assessment of IWRAs both at the site and catchment levels. Identify key indicators and criteria for assessing the status of IWRAs. Review and Update Water Stewardship Plan: Action Steps: Based on the assessment, review and update the water stewardship plan to explicitly address the maintenance and enhancement of IWRAs. Integrate specific actions, timelines, and responsible parties. Establish Monitoring Mechanisms: Action Steps: Develop robust monitoring mechanisms to regularly assess the condition of IWRAs. Utilize technology for data collection and analysis. Engage Stakeholders: Action Steps: Engage with relevant stakeholders, including local communities, environmental organizations, and regulatory bodies, to gather input on IWRAs. Incorporate stakeholder perspectives into the plan. 4. Preventive Measures: Capacity Building: Action Steps: Conduct training sessions to enhance the understanding of employees regarding the importance of IWRAs. Raise awareness about the role of IWRAs in sustainable water management. Regular Audits and Assessments: Action Steps: Implement regular audits and assessments to ensure ongoing compliance with IWRAs-related practices. Establish a feedback loop for continuous improvement.

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Alliance for Water Stewardship (AWS)

Audit Number: AO-000635

Finding No:	TNR-005652
Checklist Item No:	3.6.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Sep-27
Checklist item:	Evidence of the site's provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers onsite shall be identified and where applicable, quantified.
Findings:	Site to provide updated evidence for this indicator.
Corrective action:	Updated WASH Infrastructure Documentation: Ensure that the site possesses comprehensive documentation outlining WASH infrastructure, including safe drinking water facilities, sanitation facilities, and hygiene measures. Provide updated records and evidence showcasing the adequacy and functionality of these facilities. Quantification of WASH Services: Quantify the provision of WASH services by detailing the capacity and usage of drinking water sources, sanitation facilities, and hygiene measures. Include specific numbers related to the availability of safe drinking water, sanitation services, and hygiene provisions. Employee Awareness Programs: Implement or enhance employee awareness programs related to WASH. Provide evidence of educational initiatives and campaigns that promote proper hygiene practices among workers. Regular Maintenance and Monitoring: Demonstrate a system for regular maintenance and monitoring of WASH facilities. Provide records or reports indicating the frequency of maintenance checks and any corrective actions taken. Employee Feedback Mechanism: Establish a mechanism for employees to provide feedback on WASH facilities and services. Include evidence of feedback collection and any improvements made based on employee suggestions. Compliance with Regulatory Standards: Ensure that WASH facilities and services comply with relevant regulatory standards and guidelines. Provide documentation confirming adherence to health and safety regulations.

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Audit Number: AO-000635

Finding No:	TNR-005653
Checklist Item No:	3.9.1
Status:	Closed
Finding level:	Major
Due date:	2024-Jan-08
Checklist item:	Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.
Findings:	The site has not provided any evidence for this indicator.
Corrective action:	Organization of the first tree planting event organized by BAT INVESTMENT in Ploiești!

During the event there were 40 trees planted in the Mihai Viteazul Park. This action was part of an environment initiative supported by BAT INVESTMENT through which 410 trees were planted in Ploiești.

Tree planting represents an extraordinary gesture and an example of being actively involved in protecting the environment and raising the quality of life in the community.

Through this activity, the participants demonstrated their commitment to a greener future and inspired all of us to get involved in similar initiatives in the future.

Together, we planted the first trees in Ploiești and the seeds for A Better Tomorrow!

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Audit Number: AO-000635

Finding No:	TNR-005654
Checklist Item No:	3.9.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Sep-27
Checklist item:	Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.
Findings:	Site should provide solid evidences of implementation for actions towards achieving best practice.
Corrective action:	Conduct Best Practice Review: Action Steps: Assemble a team to conduct a thorough review of best practices related to water balance. Identify industry benchmarks and standards. Develop Implementation Plan: Action Steps: Based on the review, create a detailed implementation plan for adopting identified best practices. Clearly define actions, responsibilities, and timelines. Enhance Monitoring Systems: Action Steps: Strengthen monitoring mechanisms to track the progress of best practice implementation. Utilize technology for real-time data collection and reporting. Engage External Experts: Action Steps: Seek guidance from external experts or consultants with expertise in water stewardship and best practices. Establish partnerships with organizations involved in water management. 4. Preventive Measures: Continuous Education and Training: Action Steps: Implement ongoing education and training programs to keep the workforce informed about best practices. Foster a culture of continuous improvement. Regular Audits and Assessments: Action Steps: Conduct regular audits and assessments to ensure adherence to best practices. Use external auditors or certification bodies for impartial evaluations.

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Audit Number: AO-000635

Finding No:	TNR-005655
Checklist Item No:	3.9.3
Status:	Closed
Finding level:	Major
Due date:	2024-Jan-08
Checklist item:	Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.
Findings:	The site has not provided any evidence for this indicator.
Corrective action:	We have actively undertaken measures to implement best practices in achieving our water quality targets. Our initiatives include regular monitoring, implementing advanced filtration technologies, instituting strict quality control measures, and collaborating with regulatory bodies to ensure compliance. Additionally, ongoing employee training and engagement programs further reinforce our commitment to maintaining and surpassing the stipulated water quality benchmarks. Having monthly water analysis bulletins is an essential part of our monitoring and compliance process. These bulletins provide a detailed breakdown of the water quality parameters, ensuring we maintain strict adherence to standards and swiftly address any deviations or emerging trends. They serve as crucial documentation reflecting our commitment to consistent quality and regulatory compliance in our water management practices. In addition to our regular monthly water analysis bulletins, we include thorough testing for Legionella bacteria. Legionella testing is an integral part of our water quality monitoring efforts, ensuring that our systems remain free from this harmful bacterium. These tests are conducted periodically as per established protocols to maintain a safe and healthy environment for all stakeholders involved.

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Audit Number: AO-000635

Finding No:	TNR-005656
Checklist Item No:	3.9.4
Status:	Closed
Finding level:	Major
Due date:	2024-Jan-08
Checklist item:	Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.
Findings:	The site has not provided any evidence for this indicator.
Corrective action:	To achieve best practices concerning our targets for maintaining Important Water-Related Areas, we've implemented a comprehensive approach. Our strategy encompasses: Regular Assessment and Monitoring: We conduct routine assessments to identify Important Water-Related Areas, ensuring they meet environmental standards. Collaboration with Local Authorities: We engage with local environmental authorities to align our efforts with regional water conservation strategies. Education and Awareness: Continuous efforts to educate employees on the significance of these areas and the importance of their preservation. These actions demonstrate our commitment to safeguarding and responsibly managing Important Water-Related Areas, aligning with our broader sustainability goals.

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Audit Number: AO-000635

Finding No:	TNR-005657
Checklist Item No:	3.9.5
Status:	Closed
Finding level:	Major
Due date:	2024-Jan-08
Checklist item:	Actions towards achieving best practice related to targets in terms of WASH shall be implemented.
Findings:	The site has not provided any evidence for this indicator.
Corrective action:	Leveraging the PULSAR program to address water-related safety concerns promptly. Employees use this platform to report unsafe conditions or acts regarding water, ensuring rapid investigation and mitigation by our EHS department. This initiative enhances our proactive approach to maintaining WASH standards by swiftly addressing potential risks or hazards. Sanitation Infrastructure: Upgrading and maintaining sanitation facilities to meet high standards of hygiene and accessibility. Water Quality Assurance: Regular testing and analysis of water quality to ensure it meets safety and hygiene standards. Hygiene Promotion: Conducting awareness campaigns and training sessions to promote good hygiene practices among employees. Emergency Response Preparedness: Developing plans and resources for addressing water-related emergencies promptly and efficiently. Compliance Monitoring: Consistently monitoring our operations to ensure compliance with WASH-related regulations and standards. Continuous Improvement: Regularly reviewing and enhancing our WASH initiatives based on feedback, technological advancements, and best practices in the industry.

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Audit Number: AO-000635

Finding No:	TNR-005660
Checklist Item No:	4.1.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Sep-27
Checklist item:	Value creation resulting from the water stewardship plan shall be evaluated.
Findings:	Site to provide a good overview and estimate the value creation in monetary terms where possible.
Corrective action:	Define Key Value Drivers: Identify and define the key value drivers associated with the water stewardship plan. Examples include improved water efficiency, reduced operational costs, enhanced reputation, and strengthened stakeholder relationships. Quantifiable Metrics: Establish quantifiable metrics for each key value driver. Metrics may include water savings (cubic meters), cost reductions (%), community impact, and other relevant indicators. Baseline Assessment: Conduct a baseline assessment to establish the starting point for each value driver. Gather data on water usage, costs, stakeholder perception, and other relevant factors. Implementation Tracking: Track the implementation of actions outlined in the water stewardship plan. Regularly monitor progress against set metrics and targets. Value Creation Measurement: Measure the impact of implemented actions on each value driver. Use performance indicators and benchmarks to quantify improvements. Stakeholder Feedback: Incorporate stakeholder feedback on perceived value creation. Conduct surveys or interviews to gather qualitative insights on the perceived impact. Financial Impact Analysis: Conduct a financial impact analysis to estimate the overall financial benefits derived from the water stewardship plan. Include direct and indirect financial gains. Risk and Opportunity Assessment: Assess any potential risks and opportunities associated with the implemented actions. Consider the resilience and adaptability of the site to changing water-related scenarios. Documentation and Reporting: Document the entire evaluation process, including methodologies, data sources, and assumptions. Prepare a comprehensive report summarizing the value created, both qualitatively and quantitatively.

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Alliance for Water Stewardship (AWS)

Audit Number: AO-000635

Finding No:	TNR-005661
Checklist Item No:	4.1.3
Status:	Closed
Finding level:	Major
Due date:	2024-Jan-08
Checklist item:	The shared value benefits in the catchment shall be identified and where applicable, quantified.
Findings:	The site has not provided any evidence for this indicator.
Corrective action:	Our commitment extends beyond the boundaries of our site. We actively seek to recognize and delve into the shared value benefits present in the catchment area, endeavoring to comprehensively understand, quantify, and harness these advantages. This encompasses a multifaceted approach, examining how our water-related initiatives not only impact our operations but also contribute positively to the local environment, communities, and stakeholders. Through collaborative engagements, assessments, and ongoing evaluations, we are dedicated to identifying the tangible and intangible benefits that our practices bring to the catchment. These might include improvements in water quality, ecosystem enhancements, socio-economic advancements, and community well-being. Furthermore, we recognize the importance of quantifying these benefits where possible. We seek to implement robust methodologies that measure and express the positive outcomes, whether through quantitative metrics or qualitative assessments, to provide a comprehensive overview of our impact. Our ongoing commitment is not only to identify but to maximize these shared value benefits, ensuring that our operations continue to be a positive force within the catchment area, aligning with our broader sustainability objectives and fostering a mutually beneficial relationship with the environment and the community.

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Audit Number: AO-000635

Finding No:	TNR-005662
Checklist Item No:	4.3.1
Status:	Closed
Finding level:	Major
Due date:	2024-Jan-08
Checklist item:	Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.
Findings:	The site has not provided any evidence for this indicator.

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Corrective action:

beside the municipality consultations with external stakeholders we have minutes of meetings with union representatives and members of top team where we discussed the followings

Certification:

- 1.1. AWS Compliance Certification at 100%.
- 1.2. Reduction of water consumption by 35% by the end of 2025.
- 1.3. Increase recycled water quantity by 30% by the end of 2025.
- 1.4. Certification of the Ploiesti factory within the scope of Europe in alignment with the AWS standard by the end of 2022.
- 1.5. Preparation of five-year plans and periodic monitoring within the ESG Agenda.
- 1.6. Inclusion of water consumption and reclaimed water targets in the factory's compelling business needs - CBN targets and performance evaluation within objective scope.
- 1.7. Achievement and monitoring of human, budgetary, CAPEX, REVENUE intentions to achieve AWS certification within the DRBU-Ploiesti operation scope.

Policy and Commitment:

- 2.1. Preparation of policies within the scope of AWS standard clauses and vision-mission.
- 2.2. Collaboration of the AWS system with existing environmental management standards as per the AWS standard.
- 2.3. Supporting and adhering to the Alliance for Water Stewardship (AWS) principles of good governance for sustainable balance and water quality, conserving important water-related areas, sanitation, and hygiene for all.
- 2.4. Engaging stakeholders in an open and transparent manner.
- 2.5. Complying with legal requirements and regulations regarding water rights, including adequate access to safe drinking water, sanitation, and hygiene for all employees in all company-controlled units.
- 2.6. Collaborating with public sector agencies for water-related plans and policies, including collaboration to ensure people's right to access water networks.
- 2.7. Continuously improving and adapting water management actions and plans within the company.
- 2.8. Maintaining the necessary organizational capacity for successful AWS requirement implementation, ensuring employees have the time and resources for AWS implementation and maintenance.
- 2.9. Supporting national and international water-related treaties and disclosing relevant water-related information or materials to the public.

Action Plans for Water Resource Management:

- 3.1. Assessing industrial wastewater quality at the source is crucial for pollution reduction and industrial wastewater management.
- 3.2. Limited water resources used in industrial activities during a hydrological drought can impact the Ploiesti economy. Therefore, it's important to prepare alternative plans for water-deficient conditions in industrial units and coordinate plans among industrial units.
- 3.3. Preparing for industrial use of treated wastewater during drought conditions would be beneficial.
- 3.4. Factory water supply comes from a well + network; during issues with any well, supply will switch to the network system.

Management of Wastewater Discharge and Water:

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4.1. Recording the quantity of water used & discharged by respective operations is required (relevant figures are made up of Water Withdrawn, Water Used, and Water Discharged) and reporting, as applicable, to relevant authorities and the Group (Water Withdrawn Total). Water Withdrawn targets must be established annually.

4.2. Where possible and unless otherwise specified by the local regulatory authority, discharging untreated effluents directly into the natural environment (soil, surface and/or groundwater) should be avoided.

4.3. Where available, effluent should be discharged into a municipal wastewater collection system.

4.4. Companies must strive to reduce environmental impact by treating and recycling wastewater within the facility.

4.5. All solid waste streams from any primary treatment must be characterized and discharged appropriately as per current waste management regulations.

4.6. Rainwater running off buildings should be collected through a separate drainage system and directed to nearby rivers, streams, and other waterways. In terms of Abnormal Events, any spills of oil or chemicals, floating residues, and debris, such as tobacco and dust particles or household waste from the unit, could be absorbed in drainage channels and discharged into surface waters, negatively impacting the surrounding environment. Companies must strive to reduce environmental impact by recycling rainwater within the factory.

4.7. Units must investigate the feasibility and, where possible, have the necessary capacities to isolate the unit in the event of an Abnormal Event (e.g., chemical or oil spill). Suspected contaminated rainwater should be tested and discharged appropriately.

4.8. Spill kits and emergency cleanup procedure instructions must be available in all factory points where there is a risk of a spill. Temporary dams must be placed around rainwater drain covers where they are close to unguarded storage tank filling points and liquid handling areas.

4.9. Special attention must be given to prevention measures in areas such as:

- Volumetric storage tank filling operations.
- Vehicle parking (oil spillage) and washing areas.
- Rainwater entering uncovered waste areas resulting in infiltrations, which can seep from the bin into the surrounding environment.

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Audit Number: AO-000635

Finding No:	TNR-005663
Checklist Item No:	4.4.1
Status:	Closed
Finding level:	Observation
Checklist item:	The site's water stewardship plan shall be modified and adapted to incorporate any relevant information and lessons learned from the evaluations in this step and these changes shall be identified.
Findings:	Site to work further on lessons learned after evaluation of indicators and include them in the WSP.

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Corrective action:

Here is a synthesized version of the information regarding the site's water stewardship plan:

Water Management and Governance:

Regular Inspections of Separators: Conduct periodic inspections of oil, grease, and adhesive separators to ensure proper functioning and undertake necessary repairs.

Compliance Monitoring: Regular tests and measurements of water and wastewater parameters according to the monitoring schedule.

Additional Water Meters: Install supplementary meters to monitor areas with the highest water usage.

Sanitation Area Checks: Monthly quality checks of hygiene services provided by Sodexo in selected zones.

Legal Compliance Updates: Regularly monitor legal regulation changes and maintain current water permits.

New Employee Environmental Training: Provide environmental training, including AWS standards and water conservation, for newly hired BAT employees.

Staff Training on New Water Management Technologies: Regularly educate ST department employees on new water management technologies.

Water Recovery: Implement a process to recover wastewater generated from the RO process, aiming for a 70% recovery rate.

Regular Water Consumption Monitoring: Perform regular water consumption monitoring to detect potential leaks using telemetry tools.

Water-Related Awareness Campaigns: Organize campaigns for World Water Day, educating about pharmaceuticals in water and collaborating with interested parties for project engagement.

Forest Cleaning and Reforestation: Conduct forest cleaning near the factory and engage in annual pine seedling planting.

Lake Refurbishment Support: Aid the Fishing Association in lake restocking.

Environmental Accidents Response Training: Conduct periodic annual training on using spill containment pads to minimize the impact of potential hazardous substance spills.

Control of Invasive Tree Species: Improve habitat conditions and reduce the spread of invasive tree species like the American cherry.

Enhancing Water Retention in Forest Areas: Increase water retention in forested areas by modifying artificial deviations.

World Cleanup Day Participation: Collaborate with local authorities for the global cleanup initiative.

Farmer Training on Water Resources: Conduct informational campaigns to educate farmers on water resources and compliance with the law.

Waste Separation Awareness Campaign: Organize campaigns to inform people about proper waste separation.

Cool Water Recovery: Implement a secondary stage of improved reverse osmosis with enhanced filtration for the cooling tower system.

Own Sewage Station Construction Project: Prepare a construction project for a factory sewage station.

To enhance our Water Stewardship Plan (WSP), we'll focus on the following:

Evaluation Insights: Incorporating key insights gathered from the

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evaluations into the plan. This includes analyzing where targets were met, areas needing improvement, and insights into successful initiatives or challenges faced.

Updated Strategies: Identifying and integrating new strategies or modifications to existing ones derived from the evaluations. This might involve adjusting targets, refining approaches, or introducing innovative methods for water conservation and management.

Stakeholder Engagement: Strengthening engagement with stakeholders, possibly based on feedback or insights obtained during evaluations. Ensuring alignment of their expectations and goals with the revised plan.

Clear Action Plans: Providing a detailed action plan within the WSP that outlines the steps to address identified gaps or areas for improvement. This includes timelines, responsible personnel, and measurable outcomes.

Continuous Monitoring: Incorporating a robust monitoring and review system within the revised plan to assess the effectiveness of the updated strategies. This allows for ongoing adjustments and ensures the plan remains dynamic and responsive.

The aim is to create a more refined, adaptable, and effective Water Stewardship Plan that not only reflects our commitment but also evolves with the changing landscape of water management practices and site-specific requirements.

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Finding No:	TNR-005667
Checklist Item No:	5.2.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Sep-27
Checklist item:	The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.
Findings:	Site should communicate WSP to relevant external stakeholders.
Corrective action:	Stakeholder Communication Strategy: Develop a comprehensive strategy outlining how the water stewardship plan will be communicated to external stakeholders. Specify the channels, mediums, and frequency of communication. Publicly Disclosed Statement or Document: Ensure that the water stewardship plan or a summary of it is publicly disclosed. Provide evidence of the disclosure through official communication channels or platforms. Engagement with Local Community: Engage with the local community to share information about the water stewardship plan. Organize informational sessions, meetings, or forums to discuss the plan and address any queries. Collaboration with Water Service Providers: Collaborate with water service providers, if applicable, to ensure they are aware of and aligned with the water stewardship plan. Share relevant portions of the plan that impact or involve water service providers. Stakeholder Feedback Mechanism: Establish a mechanism for stakeholders to provide feedback on the water stewardship plan. Encourage open dialogue and incorporate valuable insights from stakeholders. Documentation of Communication Efforts: Maintain records documenting all communication efforts related to the water stewardship plan. Include details of meetings, presentations, or any publications used for communication.

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Audit Number: AO-000635

Finding No:	TNR-005664
Checklist Item No:	5.3.1
Status:	Closed
Finding level:	Major
Due date:	2024-Jan-08
Checklist item:	A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.
Findings:	Site to provide evidence for this indicator.
Corrective action:	Annually, we provide a comprehensive summary of our water stewardship performance. This includes a quantified assessment against our established targets, showcasing our progress, achievements, and any areas needing improvement in our water management efforts. Report uploaded

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Finding No:	TNR-005665
Checklist Item No:	5.4.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Sep-27
Checklist item:	The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.
Findings:	Site to communicate shared water related challenges to relevant external stakeholders.
Corrective action:	Identification of Shared Water-Related Challenges: Clearly identify and document the shared water-related challenges faced by the site. Categorize challenges based on their nature, impact, and significance. Documented Efforts and Initiatives: Compile a comprehensive list of efforts and initiatives taken by the site to address identified challenges. Provide details on specific actions, projects, or strategies implemented. Quantifiable Results: Include quantifiable results or outcomes of the efforts made to address challenges. Use metrics or key performance indicators to demonstrate improvements. Engagement with Stakeholders: Showcase instances of collaboration and engagement with stakeholders in addressing water challenges. Highlight partnerships, consultations, or joint initiatives with local communities or relevant organizations. Communication Channels: Select appropriate communication channels for disclosure. Consider using official website updates, press releases, or community engagement events. Transparency in Reporting: Ensure transparency in reporting by providing clear, concise, and accurate information. Include visuals or case studies to enhance understanding. Regular Updates: Commit to regular updates on shared water-related challenges and ongoing efforts. Establish a communication schedule to keep stakeholders informed.

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Report Details

Report	Value
Report prepared by	Ethel Pirola Igoa
Report approved by	Lurdes Guerra
Report approved on (Date)	09/10/2023

Surveillance

Proposed date for next audit
2024-Sep-27

Comment Suveillance audit 1.
Surveillance audits must be conducted annually. That is, one year from the initial audit date and one year from the first surveillance audit. A re-certification audit is required three (3) years from the initial audit date.

Stakeholder Announcements

Comment Not applicable for surveillance.

Catchment Information



Prahova Teleajen River basin.png

Catchment Information

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The factory is located in the Ialomița hydrographic basin, within the hydrographic subbasin of the Dâmbu watercourse (national cadastral code XI - 1.020.13.14.00.0). The Dâmbu Stream is the right tributary of the Teleajen River, which in turn is the left tributary of the Prahova River, the latter being the left tributary of the Ialomița River.

The Prahova and Teleajen rivers are the main water drainage axes in Prahova county, both of which cross the county from the mountain heights to the plains.

The factory is located in the area of the Prahova-Teleajen alluvial cone (the Prahova alluvial cone), which represents the main source of drinking water supply for the city of Ploiesti and its important industrial facilities, including the BAT factory. The Prahova - Teleajen alluvial cone is identified with the underground water body ROIL15 - "Prahova alluvial cone", where the factory exploits 2 boreholes situated on-site. The aquifer has 658sqkm.

The Teleajen River, like the Prahova River, runs long through the county from one end to the other, crossing all relief units.

The Teleajen springs from the Ciucaș Mountains under the name Pârâul Berii and only 2 km below it is known as Cheița, in the place where it receives its first tributary, the Tâmpa, after the confluence of which, at the Cheia hydrometric station, it has a multiannual average flow of 0.814 mc/s

Until the confluence with the Teleajenel, over a length of 17 km, the Teleajen collects the waters from the eastern side of the Bobu Mare and Grohotișul mountains and the small streams of the Clăbucet mountains.

From Măneciu to Blejoi, the Teleajen runs through the subcarpathian hills. In this area, the Teleajen receives the most tributaries: Valea Mare, Crasna, Drajna, Stâlpu, Bughea, Vitioara, Vârbilău and Mislea. Their contribution is very significant during the rains and very little significant during the periods with little precipitation when they have little water for a long period of the year or even dry during periods of drought.

In the plain area, the Teleajen receives two more tributaries: the Bucovel and the Dâmbu.

If in the sub-Carpathian area at Gura Vitioarei the multiannual average flow of the Teleajen is 5.82 mc/s, due to the contribution of its tributaries, close to the spillway, at Moara Domneasă it has a flow of 8.36 mc/s. The multiannual average flow of the Teleajen river in the Moara Domneasă section oscillated between 3.46 mc/s in 1987 and 24.40 mc/s in 2005, resulting in a K = 0.41 for 1987 and 2.92 for 2005.

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Client Description and Site Details



delimitare site BAT Ploiesti.JPG

Client/Site Background

The factory is located on the NW of the city of Ploiesti, in str. Laboratorului no. 17-19, Prahova county. It occupies 72.000 sqm of land, of which 54% buildings, 35% roads and platforms and 11% green areas.

It currently has 1000 permanent employees and approximately 300 contractors. It has a continuous running working pattern 24/7 with a technical capacity of 33 billion cigarrets per year.

Within the factory there are the following production areas, utilities and warehouses:

- PMD - Primary Manufacturing Department - the primary processing department for tobacco leaf, tobacco ribs and tobacco dust
- FMD - Filters Manufacturing Department - filter manufacturing department (simple or combined)
- SMD - Secondary Manufacturing Department - cigarette manufacturing department
- Finished product transfer and palletizing area
- Raw material and finished product storage areas
- Utility areas: thermal power plants (small & large), compressors, diesel tanks, storage of flammable materials, treatment plant, fire pump station and fire water tanks, water well drilling area, gas station, rain water retention basin , waste platform, electrical stations.

Comment During the audit, the site showed a comprehensive map of the site which included site boundaries, main assets, legend and compass amongst other, but this document has not been uploaded, therefore, another generic version found under 1.1.1 is being attached.

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Summary of Shared Water Challenges

Summary of Shared Water Challenges

The site has identified the following 20 shared water challenges in consultation with different stakeholders:

- Protection against surface water contamination in the watershed
- Changing urban context / Extending the city limits
- Employees' lack of interest in monitoring water consumption
- Lack of interest of citizens in the watershed to reduce water consumption
- Lack of knowledge on how to proceed in the event of an environmental accident
- Failure to comply with legal requirements
- Failure to carry out measurements, tests and inspections on time - lack of awareness of employees, failure to provide a full range of services by analysis laboratories
- Lack of sufficient metering and the possibility of not detecting leaks
- Protection against groundwater contamination in the watershed
- Improving the principles of water resource management both in the factory and throughout the catchment area
- Ensuring long-term local water supply
- Avoiding the emergence of conflicts of interest in the use of water, both economic and social
- Economic losses due to water scarcity (business interruption)
- The impact of drought on local production capacity
- Ensuring the natural conservation of groundwater
- Reducing drinking water treatment and keeping water pure
- Avoiding the use of organic substances in/on the soil for the conservation of drinking water and groundwater
- Limiting the loading of pipeline networks and retention basins to reduce pollution of watercourses containing these contaminated waters
- Increasing the filtering capacity of forest soils by limiting the impact of storms on drinking water availability

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

0.1.1 Eligibility Criteria

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



Yes

Comment The assessment was to Core level. No advanced indicators were included in the assessment.

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



Yes

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

0.1.1.3 *The scope of the proposed certification shall be homogeneous with respect to primary production system, water management, product or service range, and the main market structures.*



Yes

Comment The site is homogeneous with respect to its primary production system, water management, product range, and the main market structures.

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1 STEP 1: GATHER AND UNDERSTAND

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

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

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


No

Comment The site has provided some maps and documents where the location of the factory within the catchment is shown (Memoriu BAT.doc, pages 5 and 6) . Additionally, the site has provided a Google maps screenshot that shows the sites' boundaries (Delimitare site BAT Ploiesti.jpg). During the audit, the site showed a comprehensive map of the site which included site boundaries, main assets, legend and compass amongst other, and another map where the main water-related networks were shown. Unfortunately, these documents have not been uploaded and therefore a finding has to be risen.

Regarding the water sources, the site has two wells, one in use and the other as back up. The site also has a connection to the municipal water as additional back up, but it's never used (see 2 technical documentation regarding water supply and wastewater disposal.pdf) .

With regards to the effluent water, the site has a wastewater treatment plant for production and sewage water and a retention basin for rain water.

The ultimate receiving water body is the Dambu watercourse, a tributary of the Ialomița River (see Memoriu BAT.doc, pages 4 to 7).

Finding No: TNR-005607

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.


No

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Comment *The site has provided a spreadsheet (Analiza partilor interesate.xls) and a document (Analiza contextului intern si extern.doc) with an analysis of the most relevant stakeholders for the site and the degree of engagement (see indicator 1.2.2) . The mapping of stakeholders has been carried out according to the identified risks. The interested parties are classified according to: Importance (from degree 1 to 5), Effect (Very weak / Weak / Strong / Very Strong) and Conclusion (Information / Supervision / Work together). Nonetheless, the stakeholder engagement matrix does not indicate the stakeholders (Harta partilor interesate).
*Additionally, the site has included some copies of communications, minutes of meetings and screenshots of water-related communications with stakeholders. Nonetheless, most of these communication date one year ago.
*As a result of these consultations a spreadsheet with the main water challenges has been developed (Water challenges Ploiesti.xls).

Finding No: TNR-005608

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.* 
No

Comment The documents provided by the site do not show evidence of conformity with this indicator.

Finding No: TNR-005609

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

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

Comment The site has provided the following documents as evidence for this indicator:
*Plan de evacuare in situatii de urgenta avizat: a document where the evacuation plan in case of emergency is described, including extreme weather and infrastructural events.
*Plan de prevenire si combatere poluari accidentale apa: a document where the plan to prevent and combat accidental pollution is described.
* Managementul apelor uzate: a document where the management of water and wastewater onsite is described. Additionally, it sets out the monitoring and inspection procedures and principles.
*Procedura privind prevenirea si controlul deversarii: a document that describes the implementation of an organized spill prevention, control and cleanup system for the safety of onsite employees and nearby residents and the environment (soil, water, air) in order to maintain damage to a minimum during such an event.

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

Comment The site has provided several documents as evidence for this indicator, amongst which:
*Water mapping BAT: showing a scheme of the water inflows, storage and outflows.
*Balanta consumari apa: where also the losses (or gap) are shown.

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.* 
No

Comment The site has indicated that they monitor the annual water consumption and the variations in the water use rate according to the flow meter reading logs.
Despite the fact that the site has included a lot of relevant information, none of it includes updated data.

Finding No: TNR-005612

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1.3.4	<i>Water quality of the site's water source(s), provided waters, effluent and receiving water bodies shall be quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be quantified.</i>	 No
Comment	The site has indicated that the Water and Wastewater Management Procedure (indicated in 1.3.3) includes a drinking water and wastewater analysis chart, as well as a chart for monitoring chemical results and analyzing microbiological parameters of incoming and outgoing water (drinking water and wastewater) . Additionally, the site has included relevant water quality information but none of it includes updated data. Additionally, the water quality of the receiving water body is missing. Finding No: TNR-005613	
1.3.5	<i>Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.</i>	 No
Comment	The site has provided a schematic overview of the areas where chemicals are used or stored onsite and the location of intervention kits in case of accidental leak. Although seen during the audit, the list of potentially polluting substances has not been found. Additionally, during the site visit, Well 1(not included in the schematic overview) and WWTP areas had chemicals stored without spill prevention control, and, specially in the case of the WWTP, could easily reach public water bodies. Although by the end of the audit the problem had allegedly been solved, no evidence of this has been uploaded. Mapping of potential sources of pollution was a minor in previous audit. Finding No: TNR-006059	
1.3.6	<i>On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.</i>	 No
Comment	The site has provided two documents with the IWRAs at catchment level, which are not relevant for this section. Finding No: TNR-005617	
1.3.7	<i>Annual water-related costs, revenues, and a description or quantification of the social, cultural, environmental, or economic water-related value generated by the site shall be identified and used to inform the evaluation of the plan in 4.1.2.</i>	 No
Comment	The site has highlighted in the 2022 - 2025 Sustainability Plan (Water Glidepath) the necessary investments to achieve objectives such as: water recovery from the air treatment units, reverse osmosis for the treatment plant, and condensate recovery. Additionally, the site has included a document (Technical assistance in operation and maintenance services) dated June 2022 where a budget with a breakdown of recommended water-related investments is calculated (page 5). Finally, the site has included a document with the breakdown of water management expenses, but these are from 2021. On top of this, no quantification of non-technical items has been found. Finding No: TNR-005619	
1.3.8	<i>Levels of access and adequacy of WASH at the site shall be identified.</i>	 No
Comment	The site has not provided any evidence for this indicator apart from some photos in attachment at the end of the report. Finding No: TNR-005618	
1.4	<i>Gather data on the site's indirect water use, including: its primary inputs; the water use embedded in the production of those primary inputs the status of the waters at the origin of the inputs (where they can be identified); and water used in out-sourced water-related services.</i>	

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1.4.1	<i>The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be identified.</i>	 N/A
Comment	Not for SU1.	
1.4.2	<i>The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.</i>	 N/A
Comment	Not for SU1.	
1.5	<i>Gather water-related data for the catchment, including water governance, water balance, water quality, Important Water-Related Areas, infrastructure, and WASH</i>	
1.5.1	<i>Water governance initiatives shall be identified, including catchment plan(s), water-related public policies, major publicly-led initiatives under way, and relevant goals to help inform site of possible opportunities for water stewardship collective action.</i>	 Obs.
Comment	The site has provided two documents as evidence for this section: * Dezbatere publica AO Buzau II.pdf: a presentation from 2020 on 'Reducing the risk of flooding in the Ialomita river basin - Component Prahova'. * Plan de salvagardare a resurselor de apa ale Europei.pdf: a document dated 2012 from the European Commision on a Plan to safeguard Europe's water resources. Despite this being a good start, the auditor believes that the site could do further research on this section.	
1.5.2	<i>Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.</i>	 Yes
Comment	The site has included three pieces of evidence for this section: *A spreadsheet with title 'Imbunatatire - Mediu' which includes all the environmental legislation (per tab) and how the site keeps track of it. *A spreadsheet with title 'Tematica personala operativ 2022' which gives an overview of the trainings carried out with personnel, including water legislation subjects. *A folder compiling the mentioned legislation. The site indicates that these documents are updated once a year.	
1.5.3	<i>The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.</i>	 No
Comment	Neither of the two documents that the site has provided as evidence for this section provide a good overview of the water balance at catchment level. Nonetheless, under section 1.5.4 there is a document with title 'Lucrare de Disertatie' (a master thesis disertation) where amongst many other analysis, a hydrological model of the basin is simulated using the WEAP software. The study has data until 2015 but it has quite some historical hydrological and meteorological data. The study concludes by saying that the basin is currently (2015) able to meet the water demand, but in views of the projections of future demand (new industries, more irrigation...), this might become challenging in the near future.	
Finding No: TNR-005666		
1.5.4	<i>Water quality, including physical, chemical, and biological status, of the catchment shall be identified, and where possible, quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be identified.</i>	 No

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Comment	The site has provided several documents for this section: *On the one hand, the mentioned document with title 'Lucrare de Disertatie' (master thesis disertation) where amongst many other analysis there are some qualitative data of the catchment: CBO5, total nitrogen (N), and dissolved oxygen (O2). Unfortunately, these data are from 2015. According to the study, back then, the values met the qualitative requirements. *The rest of the documents are older	
		Finding No: TNR-005621
1.5.5	<i>Important Water-Related Areas shall be identified, and where appropriate, mapped, and their status assessed including any threats to people or the natural environment, using scientific information and through stakeholder engagement.</i>	 No
Comment	Under indicator 1.3.6, the site has provided two documents with information on the IWRAs at catchment level. Nonetheless, this information is too broad (includes all the catchment) and does not include indication on the status of the water bodies.	
		Finding No: TNR-005623
1.5.6	<i>Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.</i>	 Yes
Comment	The document with title 'Evaluarea risculi la inundatii' gives an overview of the existing water-related infrastructure at the Buzau-lalomita catchment level (page 13) and potential exposure to flooding of the main types of areas (pages 87 and 88). Additionally, under 1.3.6 the document with title Prezentaera Generala a Spatiului Hidrografic lalomita also includes an overview of the infrastructure in the catchment.	
1.5.7	<i>The adequacy of available WASH services within the catchment shall be identified.</i>	 No
Comment	The site has not provided any evidence for this section.	
		Finding No: TNR-005626
1.6	<i>Understand current and future shared water challenges in the catchment, by linking the water challenges identified by stakeholders with the site's water challenges.</i>	
1.6.1	<i>Shared water challenges shall be identified and prioritized from the information gathered.</i>	 Yes
Comment	The site has provided a spreadsheet (Water challenges Ploiesti), indicating the water challenges both for the site and the catchment. Priority is shown with colours: red = high priority, yellow= medium and green= low.	
1.6.2	<i>Initiatives to address shared water challenges shall be identified.</i>	 No
Comment	The site has provided a spreadsheet with title Plan de gospodadire apa (their water stewardship plan), where an analysis of actions and initiatives are described per year. Nonetheless, not all the shared water challenges are adressed (specially at catchment level). It was a minor finding in previous audit.	
		Finding No: TNR-005640
1.7	<i>Understand the site's water risks and opportunities: Assess and prioritize the water risks and opportunities affecting the site based upon the status of the site, existing risk management plans and/or the issues and future risk trends identified in 1.6.</i>	

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1.7.1	<i>Water risks faced by the site shall be identified, and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.</i>	 N/A
Comment	Not for SU1.	
1.7.2	<i>Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.</i>	 N/A
Comment	Not for SU1.	
1.8	<i>Understand best practice towards achieving AWS outcomes: Determining sectoral best practices having a local/catchment, regional, or national relevance.</i>	
1.8.1	<i>Relevant catchment best practice for water governance shall be identified.</i>	 Yes
Comment	The site indicates that it has identified the relevant best practices for water management which are listed below: - The water stewardship strategy and plan are in force and will be periodically updated with new actions and initiatives for the next years of implementation; - Supporting, participating and/or partnering in common water challenges; - Sharing best practices with other affiliates; Additionally, the site has provided a document at corporate level called the BAT Group Water Standard, where best practices for water and waste water management are described.	
1.8.2	<i>Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.</i>	 Yes
Comment	The site has identified the following best practices for water balance: - Investment in water efficiency projects to reduce water use (eg water recycling/reuse); - The water balance of the site is identified and quantified; - Water monitoring is in place and water-related KPIs are available for tracking; - Water saving actions are measured and evaluated periodically; - The water use anomaly detection system is in place Additionally, the site has provided the following relevant documents: *Best practices Natural Resources APME *Best practice water recycle (Water recycle.pptx) *Water and waste water Glidepath Ploiesti *An email with an initiative for water saving and efficiency.	
1.8.3	<i>Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.</i>	 Yes
Comment	The site has identified the following best practices for water quality: - There are water quality control strategies for incoming water and outgoing water (rainwater and cooling water); - The anti-pollution control and cleaning procedure and the Pollution Response Plan are in force; - Water risk assessment was carried out and mitigating actions were identified; Additionally, the site has included the following documents: *Manual BAT, which has a section on soil and water pollution (pag 47). *Soil and water protection, a document at corporate level. *Spill response, a document at corporate level.	
1.8.4	<i>Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.</i>	 Obs.

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Comment The site has identified the best practices for the maintenance of the IWRAs, which are related to the following two project documents:
* "Strengthening the capacity of the central public authority in the field of water for the purpose of implementing the 2nd and 3rd stages of Cycle II of the Flood Directive"
* "The WATMAN project - information system for integrated water management - Stage I
Investment of 63 million euros whose main objective is to increase the degree of safety of hydrotechnical constructions.

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


Obs.

Comment The site has identified the following best practices for the on-site provision of equitable and adequate WASH services:
– Control of the quality of water used and drank in BAT areas;
– Sampling, microbiological analysis of water dispensers;
– Legionella testing;
– Hygiene management process;
– The process of certification of safe production for Covid;

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2 STEP 2: COMMIT & PLAN - Commit to be a responsible water steward and develop a Water Stewardship Plan		
2.1	<i>Commit to water stewardship by having the senior-most manager in charge of water at the site, or if necessary, a suitable individual within the organization head office, sign and publicly disclose a commitment to water stewardship, the implementation of the AWS Standard and achieving its five outcomes, and the allocation of required resources.</i>	
2.1.1	<i>A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:</i> <i>- That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes</i> <i>- That the site implementation will be aligned to and in support of existing catchment sustainability plans</i> <i>- That the site's stakeholders will be engaged in an open and transparent way</i> <i>- That the site will allocate resources to implement the Standard.</i>	 Obs.
Comment	The document provided complies with the requirements of this indicator. Nonetheless, no evidence of public disclosure was provided.	
2.2	<i>Develop and document a process to achieve and maintain legal and regulatory compliance.</i>	
2.2.1	<i>The system to maintain compliance obligations for water and wastewater management shall be identified, including:</i> <i>- Identification of responsible persons/positions within facility organizational structure</i> <i>- Process for submissions to regulatory agencies.</i>	 Yes
Comment	The site has provided a spreadsheet with title 'Registru legislatie mediu aplicabila' with all the environmental applicable legislation for the site, including the department that is responsible. The site indicates that monitoring of legal requirements is carried out by the EH&S department. There is a periodically updated list of requirements. The positions of those responsible for maintaining and managing compliance with water and wastewater is available in the Accidental Pollution Prevention and Combat Plan (see indicator 1.3.5). Their environmental permits indicate the specific process for submission to the relevant authorities. Finally, the site has a legal department responsible for reviewing legal requirements and can report an irregularity if necessary.	
2.3	<i>Create a water stewardship strategy and plan including addressing risks (to and from the site), shared catchment water challenges, and opportunities.</i>	
2.3.1	<i>A water stewardship strategy shall be identified that defines the overarching mission, vision, and goals of the organization towards good water stewardship in line with this AWS Standard.</i>	 N/A
Comment	Not for SU1.	

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2.3.2	<i>A water stewardship plan shall be identified, including for each target:</i> - How it will be measured and monitored - Actions to achieve and maintain (or exceed) it - Planned timeframes to achieve it - Financial budgets allocated for actions - Positions of persons responsible for actions and achieving targets - Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.	 No
Comment	The site has included a spreadsheet with title Plan de gospodarire apa where their water stewardship plan is outlined. It includes actions, risks, opportunities, contribution to the AWS outcomes, link to best practices, estimation of costs, estimated timeline and responsible person. The plan is updated at least yearly. Dispite this, the plan can be improved by: *broadening the scope of actions to tackle more shared water challenges. *being more specific with regards to measurement and monitoring of actions (smart indicators) *broadening the actions outside of the site boundaries (at catchment level). Finding No: TNR-005643	
2.4	<i>Demonstrate the site's responsiveness and resilience to respond to water risks</i>	
2.4.1	<i>A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.</i>	 N/A
Comment	Not for SU1.	

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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.	 No
Comment	The site has provided 3 minutes of the meetings but they are from last year and internal, not at catchment level.	
	Finding No: TNR-005644	
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.	 N/A
Comment	Not for SU1.	
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	See indicator 2.2.1. Additionally, the site indicates that the factory does not violate the traditions and water rights of the local people.	
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.	 N/A
Comment	Not for SU1.	
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	The site has provided several documents where status of progress towards water balance targets are shown, amongst them: *Ploiesti ESG KPI. *Master Plan rev. *CES Waste and Water presentation. *Water stewardship plan (Plan gospodarire apa). *CES DRBU Presentation 2	
3.3.2	Where water scarcity is a shared water challenge, annual targets to improve the site's water use efficiency, or if practical and applicable, reduce volumetric total use shall be implemented.	 Obs.
Comment	Water sarcity is currently not a shared water challenge in the basin. Nonetheless, the site has shown its efforts towards water efficiency in a document with title 'LEH FRM Program management Mediu 2023'.	
3.3.3	Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.	 N/A
Comment	Not for SU1 .	

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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 indicates that they carry out a chemical analysis of the effluent water every month. This is done by an external laboratory. These analyses are done at different collection points each time to guarantee good sampling. Additionally, the site has implemented the following activities that are included in the Water Stewardship Plan:

- Water quality control strategies are in place for incoming and outgoing water
- Spill prevention and control procedures
- Water risk assessment was carried out and mitigation actions were identified;

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.



Comment See indicator 3.4.1.

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.



Comment The site has provided different service reports showing that the measuring equipment are working properly and therefore the maintenance of the IWRAs is guaranteed. Nonetheless, the site still needs to have a good overview of the IWRAs both at site and catchment level and provide actions to maintain or even improve them.

Finding No: TNR-005651

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.



Comment During the audit, the site has shown the following pieces of evidence:

- Drinking water analysis
- Legionella analysis (BIOSOL)
- Report from APA Nova on their monthly analysis.

Unfortunately, these documents have not been uploaded.

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 Not for SU1.

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 Not for SU1.

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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.	 N/A
Comment	Not for SU1.	
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.	 N/A
Comment	Not for SU1.	
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.	 No
Comment	The site has not provided any evidence for this indicator.	
	Finding No: TNR-005653	
3.9.2	Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.	 Obs.
Comment	The site indicates that the following actions are being implemented: a) The water balance was determined and mapped: b) Water monitoring is available for consumption flows and quantities: - Water meter installation - Water related KPI, dashboard for daily monitoring c) Water efficient technologies have been installed and water saving settings have been made: - Measured and evaluated water savings d) Additional water meters were installed to improve leak detection and water metering assessment: e) Employees are informed about the importance of water in basic daily activities and awareness campaigns are carried out: - Internal Communication Plan in force, periodically updated with new actions and activities carried out in BAT. Site to provide evidence of implementation.	
3.9.3	Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.	 No
Comment	The site has not provided any evidence for this indicator.	
	Finding No: TNR-005655	
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.	 No
Comment	The site has not provided any evidence for this indicator.	
	Finding No: TNR-005656	
3.9.5	Actions towards achieving best practice related to targets in terms of WASH shall be implemented.	 No
Comment	The site has not provided any evidence for this indicator.	

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Finding No: TNR-005657

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4 STEP 4: EVALUATE - Evaluate the site's performance.	
4.1	<i>Evaluate the site's performance in light of its actions and targets from its water stewardship plan and demonstrate its contribution to achieving water stewardship outcomes.</i>
4.1.1	<i>Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.</i> ✔ Yes
Comment	The Water Stewardship Plan has a column where the evaluation of the actions is commented.
4.1.2	<i>Value creation resulting from the water stewardship plan shall be evaluated.</i> ✘ No
Comment	The Water Stewardship Plan has a column with value creation. Nonetheless, the site does not have a good overview under 1.3.7 and therefore there are some gaps. Additionally, site to estimate the value creation in monetary terms where possible. Finding No: TNR-005660
4.1.3	<i>The shared value benefits in the catchment shall be identified and where applicable, quantified.</i> ✘ No
Comment	The site has not provided any evidence for this indicator. Finding No: TNR-005661
4.2	<i>Evaluate the impacts of water-related emergency incidents (including extreme events), if any occurred, and determine the effectiveness of corrective and preventative measures.</i>
4.2.1	<i>A written annual review and (where appropriate) root-cause analysis of the year's emergency incident(s) shall be prepared and the site's response to the incident(s) shall be evaluated and proposed preventative and corrective actions and mitigations against future incidents shall be identified.</i> ✔ Yes
Comment	There were no events in the last year.
4.3	<i>Evaluate stakeholders' consultation feedback regarding the site's water stewardship performance, including the effectiveness of the site's engagement process.</i>
4.3.1	<i>Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.</i> ✘ No
Comment	The site has not provided any evidence for this indicator. Finding No: TNR-005662
4.4	<i>Evaluate and update the site's water stewardship plan, incorporating the information obtained from the evaluation process in the context of continual improvement.</i>
4.4.1	<i>The site's water stewardship plan shall be modified and adapted to incorporate any relevant information and lessons learned from the evaluations in this step and these changes shall be identified.</i> 🔍 Obs.
Comment	The site indicates that the Water Stewardship Plan is updated every year: site incorporates new actions where needed and finalises actions that have been completed. Site to work further on lessons learned after evaluation of indicators and include them in the WSP.

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5STEP 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.	 N/A
Comment	Not for SU1.	
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.	 Obs.
Comment	The site indicates that the water stewardship plan has been communicated internally. Evidence of this are the minutes of the meetings under 3.1.1. Nonetheless, the site has not communicated it to external stakeholders.	
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.	 No
Comment	The site has not provided any evidence for this indicator.	
Finding No: TNR-005664		
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	The site indicates that the shared water-related challenges have been communicated internally either through trainings to employees or information panels at the factory. Evidence of this are the minutes of the meetings under 3.1.1. Nonetheless, the site has not communicated it to external stakeholders.	
5.4.2	Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.	 N/A
Comment	Not for SU1.	
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.	 Yes
Comment	Site did not incur on any water-related compliance violations this year.	

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5.5.2	<i>Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.</i>	Yes
Comment	Site did not incur on any water-related compliance violations this year.	
5.5.3	<i>Any site water-related violation that may pose significant risk and threat to human or ecosystem health shall be immediately communicated to relevant public agencies and disclosed.</i>	Yes
Comment	Site did not incur on any water-related compliance violations this year.	

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Photographic Evidence from Audit

✓
Yes



Metering_device_water_well_2.jpeg



Chillers_systems.jpeg



Reservoir.jpeg

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Water_well_pumps_2.jpeg



Chemical_substances_WWTP.jpeg

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Inside_water_weel_2.jpeg



Unproper_storage_of_chemical_substances_2.jpeg



Pumps_water_well.jpeg

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Chemical_storage_room.jpeg



Chemical_dosing_system_for_water_treatment_in_cooling_towers.jpeg



WWTP_membrane_system.jpeg

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Retention_basin.jpeg



Chillers_unit.jpeg



Second_water_well.jpeg



WSAS

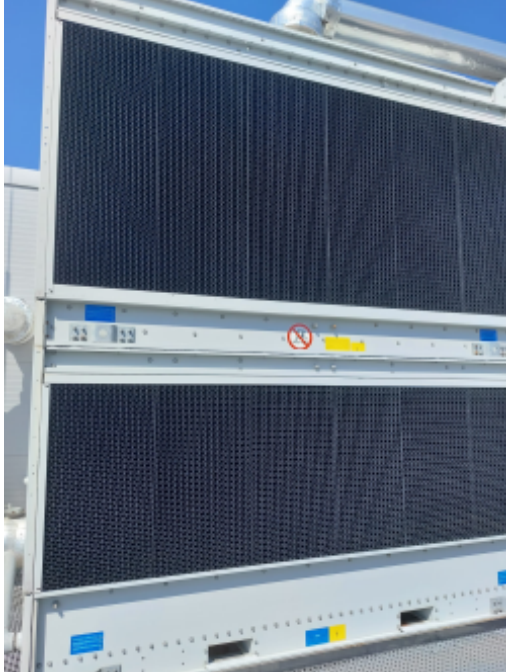
2 Quality Street North Berwick, EH39 4HW, UNITED KINGDOM

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Retention_basin_overview.jpeg



Chiller_1.jpeg



water_well_2.jpeg

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Depol_kit_3.jpeg



REst_room_water_source_2.jpeg

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Fire_fyghting_system_pomps_2.jpeg



Entrance_fire_fyghting_system_pomps.jpeg



Unpropper_storage_of_chemical_substances_1.jpeg

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WWTP.jpeg



Sanitary_protected_area_3.jpeg



Water_Well_1.jpeg



WSAS

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RO_System.jpeg



Water_metering_device.jpeg



water_metering_device_2.jpeg



Inside_discharge_point_4.jpeg

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Depol_kit_2.jpeg



Cooling_tower.jpeg

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Entrance_well_2.jpeg



Protected_area_second_water_well.jpeg



Inside_discharge_point.jpeg



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RO_Pomp.jpeg



Sewage_discharge_point.jpeg



Chemical_storage_used_in_WWTP_2.jpeg



Chemical_substances_used_in_WWTP_1.jpeg

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Fire_pumps.jpeg



Sanitary_protected_area_2.jpeg



Rest_room_water_source.jpeg

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Water_bottles_supply.jpeg

Previous Findings		
	<i>All non-conformities raised in the previous audit have been satisfactorily closed.</i>	 No
Comment	1.3.5 Not all potential sources of pollution were mapped and this still needs to be revised by the site. 1.6.2 Initiatives to address shared water challenges were not defined for each identified water challenge and this still needs to be revised by the site.	