

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)



Audit Number: AO-001755

### SITE DETAILS

Site: **British American Tobacco Investment - Romania**

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

Contact Person: Mirela Cojanu

AWS Reference Number: AWS-000499

Site Structure: Single Site

### CERTIFICATION DETAILS

Certification status: Certified Core

Date of certification decision: 2025-Dec-05

Validity of certificate: 2028-Dec-04

### AUDIT DETAILS

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

Audit Type(s): Re-Certification Audit

Audit Start Date: 2025-Oct-28

Audit End Date: 2025-Oct-30

Lead Auditor: Ruth Wandera

Audit team participants:

Kadar Tibor Sandor

Site Participants:

Cristina-Andreea Paturan, Sustainability Coordinator

Claudia-Marilena Costea, Intern Sustainability

Simona-Catalina Frincu, SEE Area & Sustainability Manager

Mirela Cojanu, EHS & Sustainability Manager

Dragos Pisau, Engineer & Site Services Manager

Mihai Ivan, Utilities & Facilities Manager

Iurie Smutin, Area Commercial Finance Senior Manager

Marius Dilimot, Sr. HR Business Partner

Alina Gabriela Nicolescu, SEE Area Senior Quality Manager

George Craciun, IDT Operations Technology Manager

Alexandru Banu, Senior Tax Manager

Alina Pitulice, HP Production Manager

Laura Matei, Production Manager

Andres Funes, Head of Manufacturing

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)



Audit Number: AO-001755

### ADDITIONAL INFO

Summary of Audit Findings: During the recertification audit zero (0) non-conformities and five (5) observations were raised.

The audit team recommends re-certification of BAT Romania Ploiesti at Core level.

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)



Audit Number: AO-001755

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

### **\*\*Site Overview\*\***

The BAT Ploiești facility is located at St. Laboratorului no. 17–19, Ploiești, Prahova County, Romania. The site occupies a built-up area of 39,428 m<sup>2</sup> and employs a total of 955 personnel.

Ploiești is situated on the interfluvium between the Prahova and Teleajen rivers, within a predominantly plain area. The BAT Ploiești factory is not located adjacent to any watercourse; the nearest registered water body is the Dâmbu stream, approximately 3 km from the facility.

### **\*\*Operations and Water Use\*\***

The site's operations include:

- Reception, storage, and preparation of raw materials for production
- Primary processing of tobacco, including dust and leaf vein processing
- Filter and cigarette manufacturing, packing, labeling, and packaging
- Storage, transportation, and shipping of finished goods

Water is used both directly in production processes and indirectly for energy generation and air conditioning.

### **\*\*Water Sources\*\***

BAT Ploiești utilizes two water sources:

- On-site groundwater from two boreholes located within the factory premises
- Municipal supply, managed by APA NOVA S.A.

### **\*\*Water Treatment Facilities\*\***

- Well F1: Treatment via an automatic dosing system with sodium hypochlorite
- Well F2: Treatment via an automatic dosing system with gaseous chlorine dioxide

### **\*\*Wastewater Treatment Facilities\*\***

- MBR-type wastewater treatment plant
- Grease separator
- Petroleum product separator

Rain and stormwater are collected in a basin, pass through a hydrocarbon separator, and are then discharged into the city's sewage network.

Firefighting water is stored in two dedicated tanks.

### **\*\*Wastewater Discharge\*\***

**WSAS**

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

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)



Audit Number: AO-001755

Domestic and stormwater effluent from the BAT Ploiești facility is discharged into the municipal sewer network managed by APA NOVA S.A. Stormwater, after passing through a hydrocarbon separator, enters the same network and subsequently undergoes treatment at the Ploiești City Wastewater Treatment Plant.

**\*\*Audit Details\*\***

The onsite recertification audit was conducted from 28 to 30 October 2025. The assessment included:

- Inspection of water-related infrastructure within the facility, and
- A catchment visit to the Plopeni Forest as part of the evaluation process.

## FINDINGS

NUMBER OF FINDINGS PER LEVEL	
Observation	5

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001755

### FINDING DETAILS

Finding No:	TNR-021374
Checklist Item No:	1.2.1
Status:	Open
Finding level:	Observation
Checklist item:	Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall: <ul style="list-style-type: none"><li>- Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people;</li><li>- Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies;</li><li>- Provide evidence of stakeholder consultation on water-related interests and challenges;</li><li>- Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups;</li><li>- Identify the degree of stakeholder engagement based on their level of interest and influence.</li></ul>
Findings:	In a city with a long history (170 years) of petroleum-related pollution—impacting soil and groundwater and often leading to accidental spills into natural waterways—existing civic action groups advocating against petroleum industry pollution should be recognized as key stakeholder groups.
Finding No:	TNR-021227
Checklist Item No:	1.5.1
Status:	Open
Finding level:	Observation
Checklist item:	Water governance initiatives shall be identified, including catchment plan(s), water-related public policies, major publicly-led initiatives under way, and relevant goals to help inform site of possible opportunities for water stewardship collective action.
Findings:	The site presents an opportunity to strengthen engagement with the farming community and other minority groups, encouraging their active participation in water governance within the catchment.
Finding No:	TNR-021228
Checklist Item No:	1.5.3
Status:	Open
Finding level:	Observation
Checklist item:	The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.
Findings:	The current catchment balance does not accurately reflect actual conditions and requires further investigation.

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001755

Finding No:	TNR-021717
Checklist Item No:	2.4.1
Status:	Open
Finding level:	Observation
Checklist item:	A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.
Findings:	Water Authority (ABA – catchment level & SGA – County level) are especially important stakeholders because they have oversight over the larger catchment and are well informed of the risks to the site from the larger catchment. Progress in meeting with these public sector players will be checked at the next audit.
Finding No:	TNR-021349
Checklist Item No:	4.3.1
Status:	Open
Finding level:	Observation
Checklist item:	Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.
Findings:	The site requested feedback; however, this request was not specifically focused on their water stewardship performance. Instead, feedback was received following the presentation of their overall AWS journey, with some comments indirectly relating to water stewardship performance. For the next audit, the site will need to demonstrate that feedback on water stewardship performance was actively and intentionally sought, rather than obtained incidentally.

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001755

### Report Details

Report	Value
Report prepared by	Ruth Wandera
Report approved by	Carla Schmidt Oberdiek
Report approved on (Date)	03.December.2025

### Surveillance

**Proposed date for next audit**  
2026-Oct-28

### Stakeholder Announcements

Date of publication	Location
19/08/2025	Email sent to stakeholders. Evidence is attached.
20/08/2025	Newspaper ( <a href="https://www.observatorulph.ro/economic/2763830-bat-solicita-recertificare-a-conform-standardului-international-de-administrare-a-apei-aws">https://www.observatorulph.ro/economic/2763830-bat-solicita-recertificare-a-conform-standardului-international-de-administrare-a-apei-aws</a> ) ( <a href="https://republikanews.ro/recertificare-a-bat-conform-standardului-international-de-administrare-a-apei-aws/">https://republikanews.ro/recertificare-a-bat-conform-standardului-international-de-administrare-a-apei-aws/</a> ) ( <a href="https://www.zdp.ro/bat-solicita-recertificarea-conform-standardului-international-de-administrare-a-apei-aws.html">https://www.zdp.ro/bat-solicita-recertificarea-conform-standardului-international-de-administrare-a-apei-aws.html</a> )
20/08/2025	BAT website - Link was not provided

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001755



### Catchment Information

#### Catchment Information



# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001755

### \*\*\*Hydrological Context and Water Sources\*\*\*

The BAT Ploiești site obtains its primary water supply from underground sources within the Prahova–Teleajen alluvial cone area (ROIL15). This is the main source of water for the facility.

A secondary source, used only occasionally, is the municipal water supply provided by APA NOVA S.A.. The municipal supply draws from both underground sources (ROAG12) and surface water sources, including the Prahova and Teleajen Rivers.

The site is situated within the broader Buzău–Ialomița–Prahova hydrographic basin, one of the significant catchments in southern Romania.

### \*\*\*Major Watercourses in the Basin\*\*\*

Buzău River – flows through Buzău County and joins the Prahova River.

Prahova River – flows through Prahova County, including the city of Ploiești.

### \*\*\*Hydrogeological Characteristics\*\*\*

The groundwater body beneath the site is of the phreatic type, characterized by porous and permeable alluvial deposits of Quaternary age. The aquifer consists of alternating layers of sand, gravel, and cobbles arranged in a cross-bedded structure, facilitating efficient groundwater flow and recharge.

### \*\*\*Wastewater Management\*\*\*

The domestic and rainwater effluents from the BAT Ploiești facility are discharged into the urban sewage network managed by APA NOVA S.A.. After collection, the wastewater undergoes treatment at the Ploiești Municipal Wastewater Treatment Plant, after which the treated effluent is released into the Dâmbu stream.

Industrial wastewater is similarly collected and treated through the public sewer system, which directs it to the Ploiești Sud Treatment Plant, also operated by APA NOVA S.A.

The water and sewage services for the site are thus fully managed by APA NOVA S.A., which sources its water from underground aquifers (ROAG12) and surface water bodies, including the Prahova and Teleajen Rivers.

### \*\*\*Areas with Special Regulations in the Catchment\*\*\*

The catchment area surrounding the site includes several zones subject to special environmental and regulatory protections, such as:

- Sanitary protection zones for APA NOVA groundwater abstraction fronts,
- BAT Ploiești groundwater wells,
- “Coridorul Ialomiței” Natura 2000 Site (Community Important Site), and
- Plopeni Forest Natura 2000 Protected Area.

### \*\*\*Climatic Conditions\*\*\*

The region is influenced by a transitional temperate-continental climate typical of southern Romania.

In the plains area, where altitudes range between 200 and 300 meters, the annual precipitation is relatively low, averaging 400–600 mm.

The risk of flooding in the area is low, reflecting the predominantly flat terrain and the balanced hydrological regime.

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001755



Groundwater bodies administered by ABA Buzau-Ialomita.JPG



Prahova – Teleajen alluvial cone.JPG



Buzau-Ialomita hydrographic area.JPG

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001755



### Client Description and Site Details

#### Client/Site Background

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001755

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# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001755



site BAT Ploiesti.png



site BAT Ploiesti.JPG

### Summary of Shared Water Challenges

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The facility provided the following shared water challenges ranked as 'High' or 'Very high':

- Lack of a monitoring plan and data on groundwater quality, according to Government Decision 930/2005
- Lack of sewage network in the Dambu area
- Insufficient water intake capacity in case of torrential rains in the Dambu area
- Deficiencies in sewage and surface water cleaning
- Soil and groundwater pollution in the southern area of the city
- Old, unmaintained networks, with losses that impact the quality and quantity of water along the supply system route
- Insufficient involvement of local authorities in water management issues
- Declining groundwater levels in the river basin
- Low level of public awareness regarding sustainable water management
- Limited capacity of wastewater treatment plants compared to the increasing number of users
- Insufficient green spaces and/or affected by improper waste disposal

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001755

0.0.1	Water Source & Discharge Locations	
0.01	<i>Have any water source or discharge locations been visited during the audit, if so, which and where? If none were visited, please provide justification.</i>	<div><div></div><div>Yes</div></div>

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001755

### Comment Catchment Visit – 30 October 2025

The catchment visit was conducted in the Plopeni Forest, part of which is a protected area included in the Natura 2000 ecological network of the European Union. The forest covers a total area of 170 hectares, of which 88 hectares fall within the ROSCI0164 Padurea Plopeni protected site.

#### \*\*\*Ecological Significance\*\*\*

Plopeni Forest serves as an important protective green belt surrounding the city of Ploiești. Its primary functions include:

- Improving air quality,
- Supporting social well-being, and
- Contributing to water protection and retention within the area.

The forest was designated as a protected area due to its high biodiversity, particularly notable for its coleopteran species. Among these, *Lucanus cervus* (stag beetle) and *Morimus funereus* are protected under both the EU Habitats Directive and Romanian Protected Area Law (OUG 57/2007). According to the IUCN Red List, both species are classified as Near Threatened (NT). Their continued presence is largely attributed to the relatively high number of old-growth native pedunculate oak trees found within the forest.

#### \*\*\*Site Visit Observations\*\*\*

The audit team was accompanied by Mr. Liviu Tudor, a representative of the Environmental Agency's Protected Areas Department, acting in his capacity as Protected Area Manager and stakeholder of BAT Romania.

During the visit, Mr. Tudor provided an overview of:

- The history and current condition of the forest,
- The applicable legal framework, and
- The environmental challenges affecting the area.

The main challenges identified include:

- Illegal dumping of waste by local inhabitants, and
- Heat stress and drought conditions during summer months, which place significant pressure on trees.

Many trees show visible signs of drying and decline, a process that could be mitigated by enhancing water retention measures within the forest through various ecological techniques.

#### \*\*\*Water and Biodiversity Aspects\*\*\*

Within the forest, there is a small artificial lake that plays an essential ecological role, particularly during hot and dry summer periods.

The lake:

- Provides a vital water source for wildlife,
- Enhances soil moisture retention, and
- Acts as a biodiversity hotspot, attracting a variety of species ranging from amphibians to mammals.

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)



Audit Number: AO-001755

In a region that has experienced increasing drought and water scarcity over the past decade, forests with native vegetation (such as oak and hornbeam) are critical to maintaining local climate stability. They contribute through oxygen production, air filtration, and microclimate regulation via evapotranspiration, providing key ecosystem and climate services for the surrounding urban area.

### \*\*\*Additional Observations\*\*\*

The surrounding landscape also includes abandoned former oil drilling sites, which are now naturally reclaimed by forest vegetation, further contributing to habitat restoration in the area.



# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001755

### 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.



Yes

**Comment** The indicator has been fulfilled as follows:

Site boundaries:

Provided in the files "Site BAT Ploiești" (JPG and PNG formats).

Water-related infrastructure (including piping network) owned or managed by the site or its parent organization:

Documented in "1.1.1 Map of On-site Piping Network and Water-related Infrastructure."

Water sources supplying the site that are owned or managed by the site or its parent organization:

Detailed in "1.1.1 Site Catchment Area, Water Sourcing Points and Discharge Points."

Water service provider (if applicable) and its ultimate water source:

Information available in "1.1.1 Site Catchment Area, Water Sourcing Points and Discharge Points."

Discharge points, wastewater service provider (if applicable), and ultimate receiving water body or bodies:

Presented in slides 9–12 of "1.1.1 Site Catchment Area, Water Sourcing Points and Discharge Points."

Catchment(s) affected by and relied upon by the site for water:




Identified in "1.1.1 Site Catchment Area, Water Sourcing Points and Discharge Points."

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

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)






Audit Number: AO-001755

1.2.1	<p><i>Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall:</i></p> <ul style="list-style-type: none"> <li><i>- Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people;</i></li> <li><i>- Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies;</i></li> <li><i>- Provide evidence of stakeholder consultation on water-related interests and challenges;</i></li> <li><i>- Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups;</i></li> <li><i>- Identify the degree of stakeholder engagement based on their level of interest and influence.</i></li> </ul>	 Obs.
Comment	<p>Indicator fulfillment:</p> <p>Inclusive stakeholder coverage: All relevant stakeholder groups were considered, including vulnerable populations, women, minorities, and Indigenous people. Fundatia Pancuantic, an environmental NGO active in the basin, was identified; however, the interview indicated that their primary focus is on air quality. The facility provided additional evidence of outreach efforts to NGOs and minority-focused organizations, although these attempts have not yet been successful. Supporting documentation is available in the attached ZIP file "1.2.1 NGOs – minorities, sensitive groups, etc." This needs to be looked into further at the next audit.</p> <p>Consideration of physical scope: The identified stakeholders represent the site's ultimate water source and receiving water bodies. The Prahova Water Management Service and Buzău-Ialomița Water Basin Administration are responsible for the Ialomița basin and are listed among the key stakeholders for the site.</p> <p>Evidence of stakeholder consultation: Stakeholder workshops were conducted on 19 February 2025 and 25 September 2025. Additional meetings and consultations with relevant authorities, including the Environmental Agency on Important Water Related Areas (IWRAs), took place during the year.</p> <p>Stakeholder participation: The facility noted that stakeholders' ability and willingness to participate vary across groups. Relevant details are provided in Columns P and Q of the attachment "1.2.1 – a Stakeholders List 2025."</p> <p>Degree of stakeholder engagement: The level of stakeholder engagement, based on their interest and influence, is outlined in Columns T and U of the attachment "1.2.1 – a Stakeholders List 2025."</p>	
1.2.2	<p><i>Current and potential degree of influence between site and stakeholder shall be identified, within the catchment and considering the site's ultimate water source and ultimate receiving water body for wastewater.</i></p>	 Yes
Comment	<p>The facility assessed and documented both the current and potential degrees of influence between the facility and its stakeholders, considering the full catchment area, including the site's ultimate water source and ultimate receiving water body for wastewater discharge.</p>	
1.3	<p><i>Gather water-related data for the site, including: water balance; water quality, Important Water-Related Areas, water governance, WASH; water-related costs, revenues, and shared value creation.</i></p>	
1.3.1	<p><i>Existing water-related incident response plans shall be identified.</i></p>	 Yes

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)





Audit Number: AO-001755

Comment	An emergency response plan has been established by the facility to manage potential incidents related to chemicals, hazardous materials, and severe weather events (e.g., heavy rainfall, snow, and ice conditions). This plan is documented in Sections 2.5 and 2.8 of the "Plan for Accidental Pollution."	
<b>1.3.2</b>	<i>Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped</i>	 Yes
Comment	The facility has established a comprehensive water balance that identifies and maps all inflows, losses, storage, and outflows. Over time, the site has achieved a reduction in total water withdrawal through the systematic implementation of water efficiency initiatives and recycling practices.	
<b>1.3.3</b>	<i>Site water balance, inflows, losses, storage, and outflows, including indication of annual variance in water usage rates, shall be quantified. Where there is a water-related challenge that would be a threat to good water balance for people or environment, an indication of annual high and low variances shall be quantified.</i>	 Yes
Comment	The facility monitors annual water efficiency per unit of production, with data indicating consistent improvement year over year. This improvement results from the systematic quantification of all inflows, losses, storage, and outflows, along with regular evaluation of annual variances in water usage.	
<b>1.3.4</b>	<i>Water quality of the site's water source(s), provided waters, effluent and receiving water bodies shall be quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be quantified.</i>	 Yes
Comment	The water quality of the facility's water sources, supplied water, effluent, and receiving water bodies has been quantified. The University of Ploiești provided water quality results for the Dâmbu River, presented on pages 46–47 of the report "RAPORT_UPG_BAT_1 and 2_AWS Study English."	
<b>1.3.5</b>	<i>Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.</i>	 Yes
Comment	The facility has identified and mapped all potential pollution sources, as documented in "1.3.5 Site Source of Pollution." Information on chemicals used and stored on site is comprehensively detailed in "1.3.5 List of Hazardous Substances BAT Romania."	
<b>1.3.6</b>	<i>On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.</i>	 Yes
Comment	There were no on site IWRAs.	
<b>1.3.7</b>	<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>	 Yes
Comment	Annual water-related costs, revenues, and the social, cultural, environmental, and economic value generated by the facility have been identified and documented in "1.3.7 Ploiești BAT Site Water-Related Cost (2)."	
<b>1.3.8</b>	<i>Levels of access and adequacy of WASH at the site shall be identified.</i>	 Yes

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)






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Comment	The facility's levels of access to and adequacy of WASH (Water, Sanitation, and Hygiene) facilities were found to meet the indicator requirements. Compliance was demonstrated through references to applicable legislation and photographic evidence of the current state. Additionally, the facility provided data comparing the number of employees to available WASH facilities, benchmarked against legal requirements.	
1.4	<i>Gather data on the site's indirect water use, including: its primary inputs; the water use embedded in the production of those primary inputs the status of the waters at the origin of the inputs (where they can be identified); and water used in out-sourced water-related services.</i>	
1.4.1	<i>The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be identified.</i>	 Yes
Comment	The facility confirmed that there are no suppliers operating within its catchment area.	
1.4.2	<i>The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.</i>	 Yes
Comment	The facility has verified the absence of service providers within its catchment area, as illustrated in the document "1.4.2 – Indirect Water Use Service Providers."	
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	<p>Water Governance Initiatives:</p> <p>Dâmbu for the People: The Ploiești for the People Association organized the Dâmbu for the People initiative (13 August – 14 September 2025) in the Mihai Bravu neighborhood of Ploiești. The program aims to revitalize the banks of the Dâmbu River through community-focused events, including creative workshops for adults and children, sports activities, outdoor film screenings, discussions on the history and future of the area, and greening/ecologization activities.</p> <p>Apa Nova – Water and Sewage Network Expansion: Apa Nova invested in the expansion of water and sewage networks across ten neighborhoods in Ploiești, covering approximately 30 km. The project employs advanced mechanical and biological treatment technologies, modern equipment for sludge management, and a biogas line providing over 50% energy self-sufficiency for the plant. GIS and smart metering solutions were implemented to optimize consumption and infrastructure management.</p> <p>Apa Nova – Tap Water Awareness Initiative: Apa Nova launched a project to promote the quality of tap water and its importance in urban life. The initiative emphasizes education and awareness, encouraging residents of Ploiești to recognize the value of a local, safe, and sustainable water resource. Water quality is monitored daily at 15 fixed points throughout the city, with approximately 7,000 physical, chemical, and bacteriological tests conducted annually.</p>	
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	Applicable water-related legal and regulatory requirements have been identified in the sheet "MEDIU Register of Legal Requirements" within the document "1.5.2_BAT_Ploiesti_Legislation_Register_Environment_-Catchment_Water_Legal_Requirements(Eng)." Requirements highlighted in blue specifically pertain to water.	

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)




Audit Number: AO-001755

<b>1.5.3</b>	<i>The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.</i>	 Obs.
Comment	The catchment water balance was prepared by the University of Petroleum and Gas (UPG) and is presented on pages 70–77 of the document “RAPORT_UPG_BAT_1 and 2_AWS Study English.” The study estimates the water balance for the catchment area at 1,092.52 million m³ per year, indicating that all groundwater bodies, including the ROIL 15 body, are in good quantitative condition. However, this result showing large amount of water available does not align with observed conditions on the ground, especially in visiting Plopeni forest where certain tree species are endangered due to persistent drought. Therefore further investigation is required.	
<b>1.5.4</b>	<i>Water quality, including physical, chemical, and biological status, of the catchment shall be identified, and where possible, quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be identified.</i>	 Yes
Comment	The UPG report indicates that water quality is monitored by the local drinking water supplier, Apa Nova, with the drinking water source comprising approximately 85% groundwater and 15% surface water (hydrotechnical node Movila Vulpiei). The treatment applied is limited to chlorination. Relevant data are available at: <a href="https://www.apanova-ploiesti.ro/despre-noi/cu-ce-ne-ocupam/producem-apa-potabila">https://www.apanova-ploiesti.ro/despre-noi/cu-ce-ne-ocupam/producem-apa-potabila</a>  Additionally, the facility provided the following water quality data:  - Water quality analyses from Unilever, derived from their on-site groundwater well  - Water quality analyses from Dekonta, derived from their monitoring groundwater well  - UPG report on Dâmbu River surface water quality  - Water quality analyses for groundwater sampled from BAT's on-site wells F1 and F2  Based on these datasets, the status of both surface and groundwater quality appears to be good.	
<b>1.5.5</b>	<i>Important Water-Related Areas shall be identified, and where appropriate, mapped, and their status assessed including any threats to people or the natural environment, using scientific information and through stakeholder engagement.</i>	 Yes
Comment	Important Water-Related Areas (IWRAs) were identified in “1.3.6–1.5.5 – a. Site and Catchment IWRAs Status Assessment” and mapped in “1.3.6–1.5.5 – b. Site and Catchment IWRAs.” Their status was evaluated using scientific information (Document: Sit-ului NATURA 2000 – Pădurea Plopeni) and through stakeholder engagement, particularly with public institutions and UPG University.	
<b>1.5.6</b>	<i>Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.</i>	 Yes
Comment	Existing and planned water-related infrastructure was identified in “1.5.6 Catchment Water-Related Infrastructures,” including an assessment of their condition and potential exposure to extreme events.	
<b>1.5.7</b>	<i>The adequacy of available WASH services within the catchment shall be identified.</i>	 Yes

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001755





Comment	<p>The adequacy of available WASH services within the catchment was assessed in “1.5.7 Catchment WASH Provision.”</p> <p>Apa Nova Ploiești has been responsible for the extraction, treatment, and distribution of drinking water, as well as the collection of wastewater, serving over 200,000 residents of the Municipality of Ploiești.</p> <p>Since the beginning of the concession agreement, Apa Nova Ploiești has invested approximately €48 million in the water supply and sewerage systems. The company's efforts have improved the water network yield from 48.3% in 2002 to 78.8% in 2020, and 163 km of new network has been commissioned since 2000.</p> <p>Despite these improvements, Apa Nova reported in 2023 that the city still loses over 28% of distributed water due to aging infrastructure, delayed repairs, inaccurate metering, and unauthorized consumption. To address these challenges, the company aims to reduce water losses to below 20% by 2037 through network modernization and the implementation of smart technologies.</p> <p>In 2025, Apa Nova plans to invest €9 million to upgrade and expand the water and sewer networks, construct a more energy-efficient wastewater treatment plant, and further implement smart water management solutions.</p>	
1.6	<p><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></p>	
1.6.1	<p><i>Shared water challenges shall be identified and prioritized from the information gathered.</i></p>	 Yes
Comment	<p>The facility provided the following shared water challenges ranked as 'High' or 'Very high' based on discussions with various stakeholders:</p> <ul style="list-style-type: none"> <li>- Lack of a monitoring plan and data on groundwater quality, according to Government Decision 930/2005</li> <li>- Lack of sewage network in the Dambu area</li> <li>- Insufficient water intake capacity in case of torrential rains in the Dambu area</li> <li>- Deficiencies in sewage and surface water cleaning</li> <li>- Soil and groundwater pollution in the southern area of the city</li> <li>- Old, unmaintained networks, with losses that impact the quality and quantity of water along the supply system route</li> <li>- Insufficient involvement of local authorities in water management issues</li> <li>- Declining groundwater levels in the river basin</li> <li>- Low level of public awareness regarding sustainable water management</li> <li>- Limited capacity of wastewater treatment plants compared to the increasing number of users</li> <li>- Insufficient green spaces and/or affected by improper waste disposal</li> </ul>	
1.6.2	<p><i>Initiatives to address shared water challenges shall be identified.</i></p>	 Yes
Comment	<p>Initiatives to address shared water challenges were presented in the document “1.6.1–1.6.2 Shared Water Challenges Eng New,” referenced in section 1.6.1.</p>	
1.7	<p><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></p>	
1.7.1	<p><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></p>	 Yes



# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)



Audit Number: AO-001755

Comment	Water-related risks faced by the site were identified and prioritized in the document "1.7.1–1.7.2 Site Water Risks and Opportunities." The assessment considered the likelihood and severity of impacts within a defined timeframe, as well as potential costs and business implications.	
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>	 Yes
Comment	Water-related opportunities were identified in the document "1.7.1–1.7.2 Site Water Risks and Opportunities." These include opportunities for site participation, the assessment and prioritization of potential water savings, and the identification of related business opportunities.	
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	<p>The facility identified the following best practices for water governance:</p> <p>Collaboration with the Ploiesti City Hall to initiate regulatory proposals aimed at improving the use and protection of water resources.</p> <p>Implementation of educational and awareness campaigns focused on promoting efficient water consumption, reducing pressure on wastewater treatment plants, and encouraging tree planting initiatives.</p> <p>Engagement of students and environmental specialists (in air, soil, and water fields) in identifying and researching pollution sources that impact community health.</p>	
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	<p>The facility identified the following best practices for water balance:</p> <p>Enercon Water Implementation – Integrating renewable energy into water infrastructure helps reduce operational costs and CO<sub>2</sub> emissions, enhances energy resilience for water operators by lowering dependence on the national grid, supports sustainability goals, ensures compliance with European energy efficiency directives, and fosters technological innovation in the public utilities sector.</p> <p>Staff education and engagement – Training personnel on efficient water use and promoting sustainable behaviors throughout the organization.</p> <p>Continuous monitoring and evaluation of water resources – Installing localized meters enables more accurate tracking of water consumption, helps identify opportunities for optimization, and supports real-time management of water use.</p>	
1.8.3	<i>Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.</i>	 Yes

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001755




Comment	<p>The facility identified the following best practices for water quality:</p> <p>Implementation of local water quality monitoring systems to enable rapid detection of potential pollution sources.</p> <p>Regular inspection and maintenance of infrastructure – Periodic cleaning of pipes, tanks, and filtration systems to prevent scale buildup and maintain water quality.</p> <p>Enhanced stakeholder collaboration – Engaging relevant stakeholders in the collection and sharing of groundwater quality data.</p>	
<b>1.8.4</b>	<i>Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.</i>	 <b>Yes</b>
Comment	<p>The facility identified the following best practices for site maintenance of important water-related areas:</p> <p>Promoting environmental education and community responsibility – Encouraging public engagement in protecting water resources, fostering sustainable behaviors, and reducing water waste through awareness and behavior change.</p> <p>Protecting water sources and ecosystems – Controlling human activities in catchment areas to prevent resource degradation, reduce the need for intensive water treatment, and preserve the natural quality of water, fragile ecosystems, and local species.</p>	
<b>1.8.5</b>	<i>Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.</i>	 <b>Yes</b>
Comment	<p>The facility identified the following best practices for WASH (Water, Sanitation, and Hygiene):</p> <p>Supporting NGO initiatives – Providing hygiene solutions to vulnerable populations.</p> <p>Enhancing environmental conditions and public health – Implementing efficient wastewater treatment to improve living conditions, increase residents' quality of life (e.g., in the Mitică Apostol neighborhood), and ensure compliance with European urban wastewater standards.</p> <p>Promoting transparency and community engagement – Increasing access to information on vulnerable areas and WASH needs through an intuitive digital tool that enables reporting, volunteering, and local initiatives, while supporting real-time monitoring of progress and interventions in critical areas.</p>	



# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001755

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> <ul style="list-style-type: none"> <li>- That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes</li> <li>- That the site implementation will be aligned to and in support of existing catchment sustainability plans</li> <li>- That the site's stakeholders will be engaged in an open and transparent way</li> <li>- That the site will allocate resources to implement the Standard.</li> </ul>	 Yes
Comment	The indicator requirements are met as follows:  The site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes – Yes  The site's implementation will be aligned with and support existing catchment sustainability plans – Yes  The site's stakeholders will be engaged in an open and transparent manner – Yes  The site will allocate appropriate resources to implement the Standard – Yes  Commitment BAT disclosed on site BAT25.ro	
2.2	<i>Develop and document a process to achieve and maintain legal and regulatory compliance.</i>	
2.2.1	<i>The system to maintain compliance obligations for water and wastewater management shall be identified, including:</i> <ul style="list-style-type: none"> <li>- Identification of responsible persons/positions within facility organizational structure</li> <li>- Process for submissions to regulatory agencies.</li> </ul>	 Yes
Comment	A system to maintain compliance obligations for water and wastewater management has been identified. This includes:  The identification of responsible persons or positions within the facility's organizational structure.  The process for submissions to relevant regulatory agencies.  All of these elements are detailed in the attached document "Cerinte legale Eng."	
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>	 Yes

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001755

**Comment** A water stewardship strategy has been identified in the document "2.3.1 WS Strategy." This strategy defines the organization's overarching mission, vision, and goals for achieving good water stewardship in alignment with the AWS Standard.

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



**Comment** The facility's Water Stewardship Plan fulfills all target requirements as outlined below:

Measurement and monitoring methods – detailed in Columns R to U

Actions to achieve and maintain (or exceed) targets – provided in Column C

Planned timeframes for achievement – specified in Columns K and L

Financial budgets allocated for actions – indicated in Column J

Positions of responsible persons – listed in Column M

Links between each target, best practices, shared water challenges, and AWS outcomes – referenced in Columns X, Y, Z, I and H

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

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



**Comment** The facility has made several attempts to engage with Apa Nova, but the company has not accepted invitations to attend facility events. The facility has provided email correspondence as evidence of these outreach efforts.

Despite declining meeting invitations, Apa Nova has shared water quality data and information on the treatment applied to raw water.

There remains room for improvement in engaging with public-sector and infrastructure agencies. This aspect will be reviewed during the next audit.

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001755

3 STEP 3: IMPLEMENT - Implement the site's stewardship plan and improve impacts
<p><b>3.1</b> <i>Implement plan to participate positively in catchment governance.</i></p>
<p><b>3.1.1</b> <i>Evidence that the site has supported good catchment governance shall be identified.</i> <span style="float: right;">✔ Yes</span></p>
<p>Comment The facility identified "Communication of water management methods, challenges, and good practices to stakeholders" as one of its implemented targets under Water Governance.</p> <p>A stakeholder meeting was organized on 19 February 2025, during which participants:</p> <p>Identified at least five common water-related challenges;</p> <p>Exchanged good practices in water management; and</p> <p>Analyzed opportunities for reapplying effective practices.</p> <p>Workshop minutes, photographs, and an attendance register with signatures were provided as supporting evidence.</p>
<p><b>3.1.2</b> <i>Measures identified to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be implemented.</i> <span style="float: right;">✔ Yes</span></p>
<p>Comment There are no measures identified to respect the water rights of others including Indigenous peoples, that are outside legal requirements. The site has however made the effort to reach out to vulnerable communities as indicated here below.</p> <p>On 1 October 2025, the facility held an employee awareness event highlighting BAT's commitment to a sustainable water environment. The event featured an engaging contest that included an interactive quiz and a creative ideas challenge, both aimed at promoting water conservation practices at the BAT Ploiesti factory. Employees tested their knowledge of water sustainability and contributed innovative proposals for reducing water consumption within the facility. As part of the initiative, aerators were distributed to all employees.</p> <p>The project's targets included distributing 1,200 aerators to all permanent employees, contractors, and event stakeholders, along with informational leaflets explaining how aerators can reduce water use by 50–70% and lower related costs. The overall target achievement was 80%.</p> <p>The site indicated here that the participants included contractors who perform cleaning activities on site and are mainly from minority/vulnerable communities.</p>
<p><b>3.2</b> <i>Implement system to comply with water-related legal and regulatory requirements and respect water rights.</i></p>
<p><b>3.2.1</b> <i>A process to verify full legal and regulatory compliance shall be implemented.</i> <span style="float: right;">✔ Yes</span></p>
<p>Comment The facility provided email documentation reporting the wastewater analysis results for July 2025, along with confirmation of compliance with the applicable license requirements.</p>
<p><b>3.2.2</b> <i>Where water rights are part of legal and regulatory requirements, measures identified to respect the water rights of others including Indigenous peoples, shall be implemented.</i> <span style="float: right;">✔ Yes</span></p>

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001755

**Comment** The facility performs periodic inspections of separators (hydrocarbons, greases), to ensure proper functioning and that contaminated effluent does not leave the site. The site ensures 100% adherence to the verification plan and performs inspections of separators in accordance with internal requirements and authorizations.  
The evidence attached is of hydrocarbon separator unclogging and treatment services.

**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 facility reported on its progress toward meeting the water balance targets outlined in the water stewardship plan. This includes the installation of a new reverse osmosis system with an additional treatment stage for boilers and AHU units. The target focuses on reducing overall water consumption by increasing the recycling rate by approximately 3,000 m<sup>3</sup>, as well as enhancing water reuse from the boilers and AHU units. At the time of the audit, the facility had achieved 50% of this target.

**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.*

  
Yes

**Comment** The facility streamlined and modified its washing program, reducing the water required for this process. As a result, water consumption for washing decreased by up to 30%. This target was fully achieved (100%).

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

  
Yes

**Comment** This was not applicable for the site.

**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.*

  
Yes

**Comment** Progress toward meeting the water quality targets set in the water stewardship plan involved conducting regular inspections of separators and performing the necessary maintenance and repairs. Periodic checks of hydrocarbon and grease separators were carried out to ensure proper functioning.

The target was to achieve 100% adherence to the verification plan by performing all inspections in accordance with internal requirements and authorizations. At the time of the audit, the achievement level was 75% because the end date is December 2025.

**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.*

  
Yes





**Comment** With UPG Collaboration, the facility undertook a comprehensive analysis of the catchment area, which included delineating the area in relation to surface water bodies, groundwater resources, and the relevant basin administration boundaries. The assessment also covered an evaluation of surface and groundwater quality, identification of IWRA-designated zones, and an analysis of the water balance within the area of interest.

The target was to obtain a complete report on the water quality parameters of the Dambu stream and to perform all required tests and measurements of water, wastewater, and other relevant parameters in accordance with permit requirements. This target was fully achieved (100%).

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)



Audit Number: AO-001755

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| <b>3.5</b>   | <i>Implement plan to maintain or improve the site's and/or catchment's Important Water-Related Areas.</i>  |   |
| <b>3.5.1</b> | <i>Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.</i>   | <br><b>Yes</b>   |
| Comment      | <p>On 14 June 2025, the facility organized a cleaning and greening campaign in the Plopeni Forest, a Natura 2000 protected area within the BAT catchment. As part of the initiative, an informational panel was created and installed to highlight the importance of the Plopeni Forest community site. The ecologization activities were carried out in collaboration with APM – Protected Areas, recognizing the forest as an IWRA area of interest.</p> <p>The target was to protect the IWRA area and raise public awareness about its significance, reduce the risk of water contamination, preserve and restore ecological sites, and encourage community involvement—including authorities, industry, academic institutions, and NGOs. The target was fully achieved (100%).</p>  |   |
| <b>3.6</b>   | <i>Implement plan to provide access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers at all premises under the site's control.</i>  |   |
| <b>3.6.1</b> | <i>Evidence of the site's provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers onsite shall be identified and where applicable, quantified.</i>  | <br><b>Yes</b>   |
| Comment      | <p>The facility conducts periodic inspections of hygienic and sanitary areas to ensure proper hygiene and sanitary conditions. These inspections include monthly checks of the quality of cleaning services performed by the Utilities department in selected areas.</p> <p>The target is to provide employees with adequate WASH (Water, Sanitation, and Hygiene) conditions and to maintain high levels of employee satisfaction.</p>  |   |
| <b>3.6.2</b> | <i>Evidence that the site is not impinging on the human right to safe water and sanitation of communities through their operations, and that traditional access rights for indigenous and local communities are being respected, and that remedial actions are in place where this is not the case, and that these are effective.</i>  | <br><b>Yes</b> |
| Comment      | <p>The facility is conducting an ongoing awareness campaign aimed at educating populations from disadvantaged communities about the sustainable use of water resources. The campaign focuses on providing access to information on responsible water use, as well as supplying essential hygiene and sanitation products to vulnerable groups. As part of this initiative, the facility invited local NGOs to participate in the awareness activities and provides sponsorship in the form of hygiene and sanitary materials.</p> <p>The target is to carry out at least one action per year to support community engagement related to health education and access to essential hygiene materials for sensitive groups. The target status is ongoing.</p> <p>The site has also provided effluent quality results to show that they are meeting legal requirements. Furthermore, the site has a waste water treatment facility on site which is not a legal requirement.</p> |   |
| <b>3.7</b>   | <i>Implement plan to maintain or improve indirect water use within the catchment:</i>  |   |
| <b>3.7.1</b> | <i>Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.</i>   | <br><b>Yes</b> |

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001755






Comment	<p>The facility employs a contractor for floor cleaning at the company premises. The contractor has replaced traditional chemical floor cleaners with ecH2O NanoClean, a detergent-free cleaning technology for floor scrubbers that transforms ordinary water into an electrically activated solution containing millions of nanobubbles.</p> <p>The target of this initiative is to reduce water consumption by up to 25% and eliminate the use of chemicals for floor cleaning. At the time of the audit, this target had been fully achieved (100%).</p>	
<b>3.7.2</b>	<p><i>Evidence of engagement with suppliers and service providers, as well as, when applicable, actions they have taken in the catchment as a result of the site's engagement related to indirect water use, shall be identified.</i></p>	 Yes
Comment	<p>On 1 October 2025, the facility held an employee awareness event highlighting BAT's commitment to a sustainable water environment. The event featured an engaging contest that included an interactive quiz and a creative ideas challenge, both aimed at promoting water conservation practices at the BAT Ploiesti factory. Employees tested their knowledge of water sustainability and contributed innovative proposals for reducing water consumption within the facility. As part of the initiative, aerators were distributed to all employees.</p> <p>The project's targets included distributing 1,200 aerators to all permanent employees, contractors, and event stakeholders, along with informational leaflets explaining how aerators can reduce water use by 50–70% and lower related costs. The overall target achievement was 80%.</p> <p>The site indicated here that the participants included contractors who perform cleaning activities on site are mainly from minority/vulnerable communities.</p>	
<b>3.8</b>	<p><i>Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have.</i></p>	
<b>3.8.1</b>	<p><i>Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.</i></p>	 Yes
Comment	<p>The facility provided evidence of email correspondence sent to Apa Nova inviting them to workshops, events, and on-site meetings to explore opportunities for collaboration on water sustainability. Apa Nova shared some information regarding water quality and the treatment methods applied to raw water even though they did not attend the events.</p> <p>The facility indicated that they shared meeting minutes with Apa Nova and, to their knowledge, both parties recognized a common challenge highlighted during the February workshop: the aging and poorly maintained water networks, which experience significant leakage and negatively impact water quality throughout the supply system.</p> <p>According to the facility, Apa Nova has recently initiated investment projects to expand water and sewage networks across 10 neighborhoods in Ploiesti, totaling approximately 30 km. The adopted technical solution includes advanced mechanical and biological treatment technologies, modern equipment for managing sludge from the wastewater treatment process, and a biogas system capable of providing over 50% energy self-sufficiency for the plant. Additionally, the plan includes the implementation of GIS and smart metering solutions to improve consumption management and optimize the existing infrastructure.</p> <p>The facility noted that this information is publicly available on Apa Nova's website: <a href="https://phonline.ro/apa-nova-ploiesti-investitii-de-9-milioane-de-euro-in-2025-pentru-modernizarea-si-extinderea-infrastructurii-de-apa-si-canalizare/">https://phonline.ro/apa-nova-ploiesti-investitii-de-9-milioane-de-euro-in-2025-pentru-modernizarea-si-extinderea-infrastructurii-de-apa-si-canalizare/</a></p>	
<b>3.9</b>	<p><i>Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.</i></p>	



# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001755

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| <b>3.9.1</b> | <i>Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.</i>   | <br><b>Yes</b>   |
| Comment      | <p>The facility provided information on BAT's community integration initiative through its partnership with ARTOWN. On 25 September 2025, BAT organized a workshop titled "Genius Loci – Water: The Hidden Treasure," marking the second local AWS water stewardship stakeholder event. The facility also participated in events organized by ARTOWN and its partners, including the City Hall and the UZUC SA factory. As part of the engagement, BAT distributed aerators and branded bottles to participants.</p> <p>The targets for this initiative included expanding the stakeholder list to at least 35 participants, discussing three common challenges identified following the first workshop, and advancing the discussions, topics, and actions initiated during the February session. The facility reported that all targets were fully achieved (100%).</p> |   |
| <b>3.9.2</b> | <i>Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.</i>  | <br><b>Yes</b>   |
| Comment      | <p>The facility provided evidence of the Enercon Water Implementation, a system used for recording water consumption within energy reports, reporting data in CR360, and conducting periodic data analysis through the EHS Pillar and Enercon platform. The aim of this initiative is to implement a comprehensive system for monitoring and analyzing water consumption across zones and modules (Level 4 Water Consumption) to support the 2025 objective of achieving 100,000 cubic meters of water recycling, equivalent to 18.5%. (3.3.1-3.3.2-3.9.2 presentation slides 2 &amp; 3)</p>  |   |
| <b>3.9.3</b> | <i>Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.</i>  | <br><b>Yes</b> |
| Comment      | <p>The facility launched a research project focused on water quality by collecting samples from various points across the catchment area in collaboration with UPG researchers. The initiative included sampling and analyzing data from BAT drilling points, enabling comparisons between surface and subsurface water quality. The facility also worked with stakeholders to cross-reference results against their existing analysis bulletins, ensuring a comprehensive and validated understanding of water quality trends throughout the region.</p> <p>The target was to obtain groundwater quality data from at least two different sources in distinct areas. This target was fully achieved (100%).</p>  |   |
| <b>3.9.4</b> | <i>Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.</i>  | <br><b>Yes</b> |
| Comment      | <p>The facility carried out maintenance activities along the BAT property border belt, which is part of the hydrogeological protection area for the Crangu lui Bot feed wells. In June 2025, BAT conducted weed clearance and collected improperly disposed waste in the area adjacent to the BAT property, which forms part of the hydrogeological protection zone for the city's water supply boreholes managed by Apa Nova.</p> <p>The target was to protect the designated IWRA area—the hydrogeological protection zone of the city's water intake. This target was fully achieved (100%).</p>   |   |
| <b>3.9.5</b> | <i>Actions towards achieving best practice related to targets in terms of WASH shall be implemented.</i>  | <br><b>Yes</b> |

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)



Audit Number: AO-001755

**Comment**      The facility is conducting an ongoing awareness campaign aimed at educating populations from disadvantaged communities about the sustainable use of water resources. The campaign focuses on providing access to information on responsible water use, as well as supplying essential hygiene and sanitation products to vulnerable groups. As part of this initiative, the facility invites local NGOs to participate in the awareness activities and provides sponsorship in the form of hygiene and sanitary materials.

The target is to carry out at least one action per year to support community engagement related to health education and access to essential hygiene materials for sensitive groups. The target status is ongoing.



# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001755

4 STEP 4: EVALUATE - Evaluate the site's performance.	
4.1	<i>Evaluate the site's performance in light of its actions and targets from its water stewardship plan and demonstrate its contribution to achieving water stewardship outcomes.</i>
4.1.1	<i>Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.</i> <span style="float: right;">✔ Yes</span>
Comment	<p>Performance against targets is monitored regularly through several mechanisms:</p> <p>EHS Pillar Masterplan – outlines the key water-related projects and activities planned for the year.</p> <p>EHS Pillar Scorecard – a monthly monitoring tool that tracks water parameters against established objectives.</p> <p>90 DAP – specific actions are reviewed monthly during EHS Pillar Meetings and Water Drumbeats.</p> <p>Daily meetings: Enercon DDS, EHS DDS, FDDS → Monthly: POLT.</p> <p>The contribution to achieving water stewardship outcomes is detailed in columns Y and Z of the Evaluated Water Stewardship Plan.</p>
4.1.2	<i>Value creation resulting from the water stewardship plan shall be evaluated.</i> <span style="float: right;">✔ Yes</span>
Comment	Value creation resulting from the water stewardship plan has been evaluated in columns V, W and X of the evaluated Water Stewardship Plan.
4.1.3	<i>The shared value benefits in the catchment shall be identified and where applicable, quantified.</i> <span style="float: right;">✔ Yes</span>

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001755

**Comment** The Water Stewardship Plan (WSP) has generated tangible shared-value benefits for both the site and external stakeholders.

Examples include:

\*\*\*Water Awareness Campaign\*\*\*

As part of the WSP, a comprehensive water awareness initiative was carried out. The campaign included the distribution of sink faucet aerators to employees, permanent contractors, and stakeholders who attended the second workshop organized by BAT. Each aerator pouch was accompanied by an informative flyer outlining the benefits of aerators and encouraging sustainable water use at home and in the community.

900 employees received aerators, enabling them to reduce water consumption at home.

150 permanent contractors were engaged—including representatives from minority groups (e.g., Atalian).

40 aerators were distributed to NGOs, authorities, UPG representatives, and other stakeholders during the Genius Loci – Water workshop.

\*\*\*Plopeni Forest Clean-Up\*\*\*

The clean-up initiative at Plopeni Forest delivered significant shared-value outcomes:

15 tonnes of waste collected

More than 100 participants, including:

Local authorities (APM, Ocolul Silvic, Primăria Plopeni)

UPG teachers and students

BAT teams (Inv, Trading, GBS, ARSC)

In addition, two educational panels showcasing information about protected species were installed at the entrance to the preserved area. Sponsored by BAT, these panels are accessible to all community members, including minorities and vulnerable groups living nearby.

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

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



Yes

**Comment** There were no incidents. The facility also provided a presentation outlining the incident status for 2024.

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

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



Obs.

Audit Number: AO-001755

Comment      The facility sought feedback during one of its meetings with stakeholders. Although comments related to water stewardship were received, the facility did not explicitly request feedback on its water stewardship performance.

The number of stakeholders engaged increased, demonstrating progress in the overall engagement process. In addition, the site evaluated the feedback received and identified several key conclusions:

Participants recommended additional stakeholders who should be involved in future initiatives to enhance effectiveness and impact. As a result, BAT considered expanding its stakeholder group. Water quality data was obtained from new stakeholders, including ABA Buzău and Argeş.

More than 90% of stakeholders expressed interest in participating in another similar event and highlighted the value of a coordinated approach to water-related challenges. In response, BAT organized Workshop 2 on 25 October 2025.

4.4      *Evaluate and update the site’s water stewardship plan, incorporating the information obtained from the evaluation process in the context of continual improvement.*

4.4.1      *The site’s water stewardship plan shall be modified and adapted to incorporate any relevant information and lessons learned from the evaluations in this step and these changes shall be identified.*

  
Yes

Comment      The site’s Water Stewardship Plan was revised to incorporate relevant information and lessons learned from the evaluations conducted in this step. All updates are highlighted in yellow in column B.

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)


Audit Number: AO-001755

5 STEP 5: COMMUNICATE & DISCLOSE - Communicate about water stewardship and disclose the site's stewardship efforts	
5.1	<i>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.</i>
5.1.1	<i>The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.</i> <span>✓</span> Yes
Comment	The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations were disclosed here: <a href="https://bat25.ro/certificarea-fabricii-BAT-din-Ploie%C8%99ti-conform-AWS.html">https://bat25.ro/certificarea-fabricii-BAT-din-Ploie%C8%99ti-conform-AWS.html</a>
5.2	<i>Communicate the water stewardship plan with relevant stakeholders.</i>
5.2.1	<i>The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.</i> <span>✓</span> Yes
Comment	Pages 18 to 53 of the document "5.2.1–5.3.1–5.4" present the facility's disclosure of the Water Stewardship Plan, including an explanation of how the plan contributes to AWS Standard outcomes. This information was shared during the stakeholder workshops held in February and September 2025.
5.3	<i>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.</i>
5.3.1	<i>A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.</i> <span>✓</span> Yes
Comment	The document "5.2.1–5.3.1–5.4" present the facility's disclosure of a summary of the site's water stewardship performance, including quantified performance against targets.
5.4	<i>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.</i>
5.4.1	<i>The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.</i> <span>✓</span> Yes
Comment	Page 20 of the document "5.2.1–5.3.1–5.4" present the facility's disclosure of the site's shared water-related challenges and efforts made to address these challenges.
5.4.2	<i>Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.</i> <span>✓</span> Yes
Comment	The facility carried out a cleaning and greening campaign in the Plopeni Forest, a Natura 2000 protected area within the BAT catchment area. As part of the initiative, an informational panel was created and installed to highlight the community importance of the Plopeni Forest. The campaign also included ecologization activities, recognizing the area as one of interest under the IWRA framework, in collaboration with APM – Protected Areas. This activity was carried out in corporation with the environmental agency, and UPG, a public university, on 14 June 2025.
5.5	<i>Communicate transparency in water-related compliance: make any site water-related compliance violations available upon request as well as any corrective actions the site has taken to prevent future occurrences.</i>


# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)


Audit Number: AO-001755

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

Comment There were no violations on site.


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

Comment Not Applicable because there were no violations.

**5.5.3** *Any site water-related violation that may pose significant risk and threat to human or ecosystem health shall be immediately communicated to relevant public agencies and disclosed.*   
Yes

Comment Not Applicable because there were no violations.

### Previous Findings

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

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