

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)



Audit Number: AO-001788

SITE DETAILS

Site: **American Snuff - Clarksville**

Address: 4583 Guthrie Highway, 37040, Clarksville, Tennessee, UNITED STATES

Contact Person: Janae Wells

AWS Reference Number: AWS-000515

Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Core

Date of certification decision: 2025-Nov-26

Validity of certificate: 2028-Nov-25

AUDIT DETAILS

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

Audit Type(s): Re-Certification Audit

Audit Start Date: 2025-Nov-04

Audit End Date: 2025-Nov-06

Lead Auditor: Monserrath Zamora

Site Participants:

Estefany Acuna, Lead Manager-Sustainability

Lee Smith, Senior Manager EHS

Rae Mindock, Director of Water Programs, Fresh Coast

Jillian Olsen, President, Cherry Ridge

Adriano Rusak, VP-Manufacturing

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)



Audit Number: AO-001788

ADDITIONAL INFO

Summary of Audit Findings: During the re-certification audit, no non-conformities and two observations were raised.

The audit team recommends re-certification of American Snuff - Clarksville at Core level.

Scope of Assessment: The scope of services covers the recertification audit for assessing conformity of American Snuff - Clarksville against the AWS International Water Stewardship Standard Version 2.

The site is located at 4583 Guthrie Highway, 37040, Clarksville, Tennessee, United States (coordinates: 36.621076, -87.223695), in the Spring Creek catchment, within the Lower Cumberland-Red River basin.

The primary manufacturing department (PMD) at the site produces smokeless tobacco products including moist snuff, dry snuff, twist, plug and loose leaf. The Secondary Manufacturing Department (SMD) is responsible for packaging the moist snuff.

The facility sources its water from the City of Clarksville, which derives its municipal water supply from the surface waters of the Cumberland River. Wastewater generated by the site is discharged into the City of Clarksville's sanitary sewer system, subsequently treated at the municipal wastewater treatment plant, and ultimately released into the Red River, a tributary to the Cumberland River.

The audit was conducted onsite on November 4-6, 2025.

The onsite visit included the assessment of: water inlet points (fire line and main water line) and water-related infrastructure, such as water tanks, the boiler room, administrative offices, restrooms, showers, chemical storage areas, stormwater outfall, retention pond, and the water discharge point.

FINDINGS

NUMBER OF FINDINGS PER LEVEL

Observation 2

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-001788

FINDING DETAILS

Finding No: TNR-021510
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:
- 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: The site has strengthened its engagement with several stakeholders. Although outreach efforts—such as email communications—have been initiated with additional stakeholders, the response rate has been limited. This presents an opportunity to enhance stakeholder engagement through more proactive follow-up and improved communication strategies.

Additionally, the interviewed stakeholders do not consider that they have been directly consulted to contribute to the identification of water challenges.

Finding No: TNR-021559
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: One of the stakeholders mentioned not receiving updates on the site's Water Stewardship performance. This suggests the site could evaluate its consultation methods, especially considering the lack of feedback received from other stakeholders.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-001788

Report Details

Report	Value
Report prepared by	Monserrath Zamora
Report approved by	Lorenzo Brioschi
Report approved on (Date)	24/11/2025

Surveillance

Proposed date for next audit
2026-Nov-03

Stakeholder Announcements

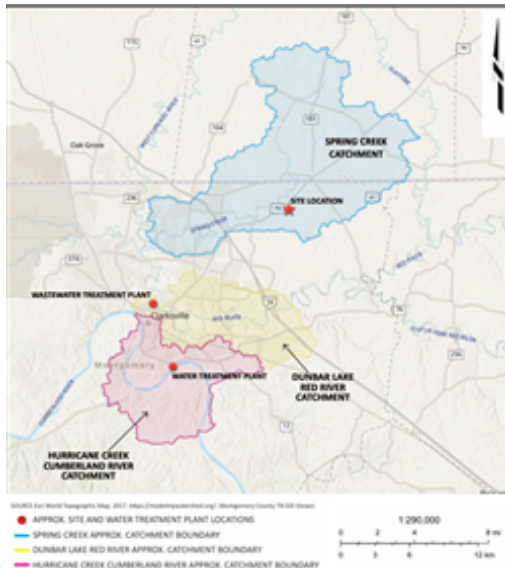
Date of publication	Location
29/08/2025	https://americansnuffco.com/public-stakeholder-announcement-asc-clarksville-pursuing-alliance-for-water-stewardship-re-certification/
02/09/2025	https://x.com/RAI_News/status/1962872797589328178

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-001788

Catchment Information



Catchment.png

Catchment Information

The site is located in the Spring Creek catchment, within the Lower Cumberland-Red River basin.

The facility sources its water from the City of Clarksville, which derives its municipal water supply from the surface waters of the Cumberland River. Wastewater generated by the site is discharged into the City of Clarksville’s sanitary sewer system, subsequently treated at the municipal wastewater treatment plant, and ultimately released into the Red River, a tributary to the Cumberland River.

Spring Creek flows into the Red River, which is part of the Dunbar Lake–Red River catchment. The source water treatment plant is located in the Hurricane Creek–Cumberland River, adjacent to the Red River catchment. The flow direction of the Cumberland River varies due to its winding path, affecting the relative positions of the water intake and wastewater discharge points.

The Cumberland River stretches 688 miles, beginning on the Cumberland Plateau in eastern Kentucky. It winds through southeastern Kentucky, enters Tennessee at Clay County, and then curves back into western Kentucky before emptying into the Ohio River—a tributary of the Mississippi River. The Cumberland River Basin spans approximately 18,000 square miles and is home to nearly 2 million people.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-001788

Client Description and Site Details



Site boundaries.png

Client/Site Background

The facility is located in Montgomery County, Tennessee, USA. The site includes:

-Manufacturing Departments:

- Primary Manufacturing Department (PMD): Produces smokeless tobacco products such as moist snuff, dry snuff, twist, plug, and loose leaf.
- Secondary Manufacturing Department (SMD): Handles packaging of moist snuff.

-Water Use & Source:

- Water is supplied by the City of Clarksville, and it's sourced from the Cumberland River.
- PMD uses water for boilers (drying processes), maintenance/cleaning, and tobacco hydration.
- SMD uses water for maintenance/cleaning and tobacco hydration.
- No additional on-site water treatment or monitoring is performed.

-Wastewater, Rainwater & Discharge:

- Effluent is discharged to the Clarksville Wastewater System.
- Final discharge flows into the Red River, a tributary of the Cumberland River.
- The site holds a permit for stormwater discharge into Spring Creek.

-Water is primarily used in manufacturing processes and for steam generation in the boilers.

-The facility is equipped with on-site water storage for the fire protection system, as well as a rainwater collection tank that supplies irrigation to the pollinator garden.

Summary of Shared Water Challenges

Summary of Shared Water Challenges

The following shared water challenges were identified:


- Maintain good catchment water quality: the catchment currently has good water quality and that is to be maintained.
- Watershed's future water availability: increased urbanization and population growth in the surrounding community may lead to future stress on the public water system.
- Protect watershed water quality and biodiversity: protect waterway quality and biodiversity within the watershed, specifically those within the footprint of the site.
- Continued on-site WASH compliance: Ensure facilities maintenance so that existing WASH facilities are kept in satisfactory operating conditions to avoid impacting local water quality.
- Support the protection of the environment and water quality: active engagement and support of local water related governance and protection.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-001788

0.0.1 Water Source & Discharge Locations

0.01 *Have any water source or discharge locations been visited during the audit, if so, which and where? If none were visited, please provide justification.* 
Yes

Comment -Outfall 01: this flow discharges into the Spring Creek.
-The effluent discharge point to the city sewer.

Audit Number: AO-001788

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 site has identified and mapped its physical scope, including:

-Map with site boundaries, including water-related infrastructure and piping network: the site has mapped the following water-related infrastructure: water inflow and outflow points, stormwater outfalls, fire suppression system water storage tank, rainwater collection system tank, the retention pond, sewer manholes, surface drains, water lines. Piping network for potable water and sewer lines were provided.

-Water is utilized in various stages of the production process, including:

-Blending Process: PMD: Water is used during the blending stage to ensure proper consistency.

SMD: Water is incorporated during the mixing phase to achieve the desired formulation.

-Drying Process: Steam generated by the boilers is employed to support the drying operation.

-Equipment Cleaning: Water is used for washing and maintaining equipment.

-Map of the Catchment:

-Site: the site is situated in the Spring Creek sub-watershed, within the Lower Cumberland-Red River basin.

-Sources: the water service provider is the City of Clarksville, which sources water from the Cumberland River. The source water treatment plant is located in the Hurricane Creek-Cumberland River catchment.

-Discharge: the wastewater is discharged into the City of Clarksville's sanitary sewer system subsequently treated at the municipal wastewater treatment plant, and ultimately released into the Red River (Dunbar Lake Red River catchment) a tributary to the Cumberland River.

The site holds a permit for stormwater discharge into Spring Creek.




-The receiving and ultimate receiving water bodies have been mapped: Spring Creek, the Red River and the Cumberland River.

-The site impacts the Spring Creek and Dunbar Lake catchments and relies on water sourced from the Hurricane Creek-Cumberland River catchment.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-001788

1.2	<i>Understand relevant stakeholders, their water related challenges, and the site's ability to influence beyond its boundaries.</i>	
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"> <i>- Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people;</i> <i>- Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies;</i> <i>- Provide evidence of stakeholder consultation on water-related interests and challenges;</i> <i>- Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups;</i> <i>- Identify the degree of stakeholder engagement based on their level of interest and influence.</i> 	 Obs.
Comment	<p>The stakeholder identification process has remained unchanged from the previous year. The method used to identify stakeholders, as well as the level of engagement based on their interest and influence, has been clearly defined.</p> <p>The site has identified over 20 distinct stakeholders and their respective water-related challenges, including regulators, the agricultural sector, industry, vendors, and non-governmental organizations (NGOs). No vulnerable groups or indigenous populations have been identified in the area. Since the last audit, two new stakeholders have been added: a private consulting firm that supports water permitting and environmental health and safety compliance; and an internal group responsible for managing tobacco leaf sourcing and coordination with farmers and growers.</p> <p>Evidence of stakeholder consultations regarding water-related interests and challenges has been documented.</p> <p>The site has strengthened its engagement with several stakeholders. Although outreach efforts—such as email communications—have been initiated with additional stakeholders, the response rate has been limited. This presents an opportunity to enhance stakeholder engagement through more proactive follow-up and improved communication strategies.</p> <p>Additionally, the interviewed stakeholders do not consider that they have been directly consulted to contribute to the identification of water challenges.</p>	
1.2.2	<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>	 Yes
Comment	<p>The degree of influence between the site and its stakeholders has been identified, encompassing four levels: very low, low, high and very high.</p>	
1.3	<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>	
1.3.1	<i>Existing water-related incident response plans shall be identified.</i>	 Yes

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-001788

Comment The site has identified these water-related response plans:

-EAP-01 Emergency Action Plan: this plan applies to emergencies that could be reasonably expected in the workplace such as fire, severe weather, earthquakes, spills, etc. Last reviewed: August, 2025. Updates have been made to team members and to the contact information for Montgomery County Fire Services.

-Stormwater Pollution Prevention Plan (SWPPP): this plan identifies and evaluates sources of pollutants associated with industrial activities that may affect the quality of stormwater discharges. Last reviewed: October, 2024.

-Spill Prevention Control and Countermeasure Plan (SPCC): this plan has been prepared to meet the requirements of the Title 40, Code of Federal Regulations, Part 112 (40 CFR Part 112). The purpose of this SPCC Plan is to establish and maintain a program to prevent the discharge of oils, into the waters of the United States. Original date of plan: January, 2011; last revised: October, 2024 (the review and evaluation is performed every 5 years).

-Business Continuity Plan: this plan addresses the recovery of significant Clarksville processing functions, including water loss. Within the plan, there is a document titled Clarksville Water Emergency Plan, which defines the process for supplying water in the event of an outage. This information was revised during the audit and it is considered confidential. Last revised in September, 2025.

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

Comment The site has identified and mapped its inflows, losses, storage, and outflows for 2024 in a schematic diagram. Additionally, a map has been provided that includes the locations of water meters and condensate returns.

Furthermore, the site has supplied a general process diagram encompassing the Primary Manufacturing Department (PMD) and Secondary Manufacturing Department (SMD) to facilitate understanding of these processes.

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.* ✔
Yes

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-001788

Comment The site has quantified its water balance for 2024. There are concerns regarding the accuracy of city water consumption reporting and the presence of leaks in the fireline. Total water usage for 2023 and 2024 has been quantified.


Seasonal fluctuations in water usage are most noticeable during the winter months (December–February), when freezing conditions can cause pipe breaks, resulting in temporary increases in water withdrawal.

The site began monitoring water recycling values in October 2024. These values are recorded using three condensate return meters, one located in each boiler room. The site has quantified the recycled water.

Water meters are part of the EnerCon initiative. Meetings were held in February and during various months throughout 2025 to review progress. The data was assessed to ensure proper understanding and to verify that the meters were installed correctly. Two meters were identified for replacement, and one stakeholder is assisting with their reinstallation. The site received a quote via email in November 2025 for the re-installation of water meters. An email from Engineering regarding the Level 2 Metering Project was issued in October 2025.

In 2024, the site reported a positive water balance, closely matching the 2023 figure. This suggests that more water is entering the facility than leaving, which is expected given the steam-intensive nature of the process. Nevertheless, there is still an opportunity to assess potential leaks or inaccuracies in water consumption reporting.

Precipitation data was provided for 2024.

1.3.4 *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.* 
Yes

Comment -Water quality of the provided waters was quantified, including physical, microbiological, and chemical parameters. The "2024 Annual Drinking Water Quality Report" from the City of Clarksville was provided. Although monitoring detected the presence of contaminants in small quantities, they tested well below the Maximum Contaminant Levels (MCL) established by the Environmental Protection Agency (EPA) and regulated by Tennessee Department of Environment and Conservation (TDEC). A parameter of concern for the site is the pH level of the water, as it can impact product quality. Currently, the pH is within acceptable limits.

-The water quality of the water source and receiving water bodies (Cumberland River, Spring Creek and Red River) was identified. According to state information, some bacterial levels, specifically E. coli, exceed state standards due to farming practices. The site does not contribute to E. coli levels. Additionally, the catchment is considered low physical risk according to the WWF Risk Filter tool.

-Wastewater quality was assessed, with reports provided for 2025. The site is in compliance with its permit. Reports for April and June 2025 were reviewed on-site, covering monthly parameters such as Total Suspended Solids (TSS), Biochemical Oxygen Demand (BOD), oil and grease, and pH. Metals are monitored on a semi-annual basis, and the report for March 2025 was reviewed. All parameters are within compliance.





-Stormwater testing for Total Suspended Solids was conducted in March 2025, as required annually by the Tennessee Stormwater Multisector General Permit for Industrial Activities. Total Suspended Solids are within limits. The report is submitted to the Tennessee Department of Environment and Conservation (TDEC). An email from March 2025 confirming this submission was reviewed.

-Legionella monitoring began in 2025. The report for April 2025 was reviewed, and no Legionella was detected. This monitoring aligns with BAT Group global requirements for potable water.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-001788

1.3.5	<i>Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.</i>	 Yes
Comment	<p>The site has identified and mapped the potential sources of pollution, including the chemicals used or stored on-site. The locations of spill kits have been mapped.</p> <p>-The Spill Prevention, Control, and Countermeasure (SPCC) includes a map with potential sources of pollution (diesel and gasoline storage tanks, maintenance oil storage area, blending box presses, and transformers containing oil, refer to indicator 1.3.1). Each area where petroleum products are stored is provided with adequate secondary containment.</p> <p>-Stormwater Pollution Prevention Plan (SWPPP): sources of pollution are identified and mapped (refer to indicator 1.3.1).</p> <p>-Alcohol storage area: this area was inspected during the on-site audit.</p> <p>-Additionally, during the on-site tour, areas containing tanks with diesel and fuel oil were verified. These tanks are double-walled and have a containment area beneath them.</p> <p>-Monthly inspection forms of storage areas for 2025 were reviewed.</p>	
1.3.6	<i>On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.</i>	 Yes
Comment	<p>The site has identified and mapped two IWRA's:</p> <p>-Retention Pond: this pond functions as a stormwater retention system to reduce direct flow from Outfall 1 into Spring Creek during heavy storms. The pond has remained empty for most of the year.</p> <p>-Spring Creek: it runs adjacent to the ASC site, along both the southwest boundary and northeast corner. Since 2014, the TCEQ has classified Spring Creek as impaired due to elevated bacteria levels, specifically E. coli, which are attributed to nearby agricultural (animal) practices. The ASC site does not contribute E. coli to the waterway.</p> <p>The two IWRA's are properly maintained.</p> <p>Quarterly Visual Assessment and inspection forms for outfalls for 2025 were reviewed on-site.</p>	
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>	 Yes
Comment	<p>The site has identified the water-related costs associated with the operation of the facility from 2021 to 2025. These costs include: AWS certification, water and sewer usage, boiler infrastructure, among others.</p> <p>There are not water-related revenues generated by the site.</p> <p>A description of the social, cultural, environmental, or economic water-related value generated by the site has been identified.</p>	
1.3.8	<i>Levels of access and adequacy of WASH at the site shall be identified.</i>	 Yes
Comment	<p>The site has mapped and identified all WASH facilities, including urinals, showers, toilets, bathroom sinks, and break room sinks. The site is in compliance with OSHA regulations.</p>	

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-001788

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

Comment The primary input at the site is tobacco. The embedded water use of primary inputs, including their quantity and quality, as well as the level of water risk within the site’s catchment area, have been identified.

The packaging material provider is located outside the catchment area.
- 1.4.2** *The embedded water use of outsourced services shall be identified, and where those services originate within the site’s catchment, quantified.* ✔
Yes

Comment There are no outsourced service providers operating within the catchment. The laundry service used by the site is located in Nashville.
- 1.5** *Gather water-related data for the catchment, including water governance, water balance, water quality, Important Water-Related Areas, infrastructure, and WASH*
- 1.5.1** *Water governance initiatives shall be identified, including catchment plan(s), water-related public policies, major publicly-led initiatives under way, and relevant goals to help inform site of possible opportunities for water stewardship collective action.* ✔
Yes

Comment The site has identified different water governance initiatives; some examples include:

 - Clean Water Nashville Overflow Abatement Program focuses on reducing sewer overflows, benefiting downstream water quality. The latest audit report was completed on September 30, 2025.
 - Cumberland River Compact runs restoration and education initiatives in the Cumberland River basin, including the ongoing West Fork Red River Restoration near the site’s Spring Creek catchment and the location of the site’s 2025 cleanup event.
 - TDEC (Tennessee Department of Environment and Conservation) manages water protection through watershed-based plans for 55 watersheds. Programs include the Clean Water SRF for wastewater infrastructure and enforcement of the Tennessee Safe Drinking Water Act and Water Quality Control Act. TDEC’s Division of Water Resources published the FY 2025–2026 Surface Water Monitoring and Assessment Program Plan to track trends and implement improvements in surface water quality.
- 1.5.2** *Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.* ✔
Yes

Comment The site has identified the following water-related legal and regulatory requirements:

 - Wastewater permit: valid until March 31, 2026.
 - Tennessee Stormwater Multi-Sector General NPDES Permit for Industrial Activities: valid until June 30, 2030
 - OSHA WASH regulations
- 1.5.3** *The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.* ✔
Yes

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-001788

Comment The site has quantified the water balance (in AF=Acre Foot) of the Spring Creek catchment for 2024, including:

- Inflow and outflow
- Precipitation
- Evapotranspiration

The site has used the Model My Watershed tool to obtain recent data, identifying monthly variances. On average, no water scarcity has been detected in the catchment area. However, some months exhibit negative values, indicating periods of stress.

On average, the catchment maintained a positive water balance. This value suggests that the assessed catchment may have surplus water available to meet the needs of its users.

1.5.4 *Water quality, including physical, chemical, and biological status, of the catchment shall be identified, and where possible, quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be identified.* ✔
Yes

Comment The site has updated the water quality data for 2025. The site has used the How My Watershed tool to understand the water quality of community waterways in the watershed through their monitoring reports. Monitoring results are evaluated against EPA-approved water quality standards or limits. Water may be impaired, which means it cannot be used for certain purposes.

Some impairments have been identified for E. coli originating in the state of Kentucky, as confirmed by one of the stakeholders during interviews. However, the site does not contribute to this problem.

Water quality data for sediment, total nitrogen, and total phosphorus were identified for the catchments. These levels are typical of runoff from agricultural areas.

In addition, the site identified "Tennessee's Clean Water Act Monitoring and Assessment Report" (updated 2024) where information on E.Coli and other parameters was identified (<https://storymaps.arcgis.com/stories/dd05f7aa5fe24fd7b2bb17e52a968070>, [https://dataviewers.tdec.tn.gov/dataviewers/f?p=9034:34510:::\)](https://dataviewers.tdec.tn.gov/dataviewers/f?p=9034:34510:::)

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

Comment Important Water-Related Areas have been identified, some examples are:

- Spring Creek
- Cumberland River
- McGregor Park
- Billy Dunlop Park: new IWRA identified in 2025.

These areas have been mapped, and their status assessed including any threats to people or the natural environment.

On September 25, 2025, in collaboration with the City of Clarksville, an internal website update documented activities at Billy Dunlop Park, where the Red River crosses through the area. The focus of the initiative included the removal of trash and overgrown vegetation to support environmental maintenance and community engagement. Evidence was seen on-site.

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

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Audit Number: AO-001788

Comment Existing water-related infrastructure in the catchment has been identified, including its condition. Examples include wastewater plant capacity, pump stations, and sewer lines. Communications with the City of Clarksville in October 2024 confirm that the system is currently meeting their needs; however, they are planning to expand their infrastructure due to increased demand.


The site visited the City of Clarksville’s wastewater treatment plant in August 2025. A description of the treatment process was provided during the visit.

Planned water-related infrastructure has been identified through the following initiative: Progress on the City of Clarksville’s second water treatment plant.

The site has identified that severe weather events—including tornadoes and flooding—could impact the area.

The City of Clarksville provides water and sewer services to the site and is responsible for managing exposure to extreme events. The site has discussed infrastructure concerns with the city. In response, the city has prepared the Clarksville Water System Emergency Response Plan (ERP), which includes information on both water and wastewater services. This document is not publicly available.

Wastewater and water infrastructure statistics for fiscal year 2025 were obtained from the City of Clarksville website, which was provided during the audit.

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


Comment The site has identified and mapped the WASH services within the catchment. All locations in the catchment have access to water and sanitary services.

Wastewater and water infrastructure statistics for fiscal year 2025 were obtained from the City of Clarksville website, which was provided during the audit.

The Clarksville Water System (CWS), a division of the Clarksville Gas & Water Department, is one of the largest drinking water utilities in Tennessee. CWS currently provides safe drinking water—meeting or exceeding regulations established by the Environmental Protection Agency (EPA) and the Tennessee Department of Environment and Conservation (TDEC)—to an estimated population of over 250,000 in the Clarksville-Montgomery County area.

The Clarksville Wastewater System is also among the largest in Tennessee, serving approximately 170,000 people. The physical wastewater system and its operations staff are recognized for their effective management and maintenance in accordance with TDEC Water Pollution Division and EPA regulations.



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

1.6.1 *Shared water challenges shall be identified and prioritized from the information gathered.* 
Yes

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)




Audit Number: AO-001788

Comment	<p>The following shared water challenges were identified and prioritized:</p> <ul style="list-style-type: none"> -Maintain good catchment water quality: the catchment currently has good water quality and that is to be maintained. -Watershed's future water availability: increased urbanization and population growth in the surrounding community may lead to future stress on the public water system. -Protect watershed water quality and biodiversity: protect waterway quality and biodiversity within the watershed, specifically those within the footprint of the site. -Continued on-site WASH compliance: Ensure facilities maintenance so that existing WASH facilities are kept in satisfactory operating conditions to avoid impacting local water quality. -Support the protection of the environment and water quality: active engagement and support of local water related governance and protection. 	
1.6.2	<i>Initiatives to address shared water challenges shall be identified.</i>	 Yes
Comment	<p>Initiatives to address the shared water challenges have been identified, some examples include:</p> <ul style="list-style-type: none"> -Quarterly stormwater inspections are conducted by the internal Environmental team. Any issues identified during these inspections must be addressed promptly, in compliance with permit requirements. -ASC and its affiliates has reached out to local NGO's and public entities to develop a river cleanup event. -Continue dialogue with the municipal water utilities provider to address water-related risks, opportunities, and governance. Maintain records of all engagements to support progress tracking and reporting. -Engage with local NGO stakeholders to contribute to improved catchment governance in the watershed. Identify relevant NGOs and participate in meetings to collaborate with local stakeholders and enhance the health of nearby waterways. 	
1.7	<i>Understand the site's water risks and opportunities: Assess and prioritize the water risks and opportunities affecting the site based upon the status of the site, existing risk management plans and/or the issues and future risk trends identified in 1.6.</i>	
1.7.1	<i>Water risks faced by the site shall be identified, and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.</i>	 Yes
Comment	<p>Water risks have been identified and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact. The risks have been classified as regulatory, reputational, and physical risks.</p>	
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	<p>Water-related opportunities have been identified and prioritized. The Water Stewardship Plan includes the projects and opportunities the site has been implemented or will be implementing.</p> <p>The basis for the ranking of the potential savings and business value has been identified.</p>	
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

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-001788

Comment	<p>Relevant catchment best practices for water governance have been identified, some examples are:</p> <ul style="list-style-type: none"> -Support the Tennessee Department of Environment & Conservation in promoting the Watershed Management Approach: this is a strategy for managing water quality by focusing on entire watersheds, involving stakeholders, and identifying cost-effective solutions. It includes permitting, planning, and monitoring. -Engage with the Tennessee Green Star Partnership to promote sustainable practices and water stewardship. -Engage with the City of Clarksville to support local water stewardship activities. 	
1.8.2	<p><i>Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.</i></p>	 Yes
Comment	<p>The site identified relevant sector/catchment best practices for water balance, for example:</p> <ul style="list-style-type: none"> -Use the GIA Executive Summary program to monitor water use across ASC and other global BAT Group facilities, with monthly data reviewed by the Executive Team via Power BI. -Educate employees and promote the adoption of water efficiency practices. -Recycled water used for condensate is measured, tracked and shared with the Executive Committee. 	
1.8.3	<p><i>Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.</i></p>	 Yes
Comment	<p>The site identified relevant sector and/or catchment best practices for water quality, some examples are:</p> <ul style="list-style-type: none"> -Installation of condensate return systems to collect and reuse water in the process, reducing the need for potable water. -Collection and use of rainwater for landscape irrigation, reducing the need for potable water. -Collection of potable water samples to test for Legionella, following global BAT Group guidelines. 	
1.8.4	<p><i>Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.</i></p>	 Yes
Comment	<p>Examples of the best practices identified for the maintenance of the Important Water-Related Areas are:</p> <ul style="list-style-type: none"> -Protecting Spring Creek (IWRA) from polluting runoff. -Monitoring Spring Creek to be aware of any impacts on the IWRA. -Participate with a local stakeholder in cleanup events. 	
1.8.5	<p><i>Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.</i></p>	 Yes
Comment	<p>Examples of the relevant sector and/or catchment best practices for provision of equitable and adequate WASH are:</p> <ul style="list-style-type: none"> -Providing sufficient, high-standard toilet and washroom facilities for both men and women, as well as other relevant needs. -Ensuring an adequate supply of safe drinking water for workers, taking into account the demands of a hot climate. -The Fill it Forward program supports WASH initiatives by providing water to underserved communities, offering educational programs, and improving sanitary services. 	

Audit Number: AO-001788

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	<p><i>A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:</i></p> <ul style="list-style-type: none"> - <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> 	
Comment	<p>A site commitment to water stewardship, signed by the VP of Manufacturing in November 2024, has been identified.</p> <p>This commitment has been publicly disclosed in the site's website: https://americansnuffco.com/leadership-commitment-to-water-stewardship-and-adoption-of-water-stewardship-strategy/</p>	
2.2	<i>Develop and document a process to achieve and maintain legal and regulatory compliance.</i>	
2.2.1	<p><i>The system to maintain compliance obligations for water and wastewater management shall be identified, including:</i></p> <ul style="list-style-type: none"> - <i>Identification of responsible persons/positions within facility organizational structure</i> - <i>Process for submissions to regulatory agencies.</i> 	
Comment	<p>The system to maintain compliance obligations for water and wastewater management was identified, including:</p> <ul style="list-style-type: none"> - Identification of responsible persons/positions within the facility organizational structure: the Senior Manager EHS is responsible for water compliance. - Process for submissions to regulatory agencies: submission reports to regulatory agencies were provided. <p>The site has implemented an environmental compliance calendar. The current version of this calendar was reviewed during the on-site audit.</p>	
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	<p><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></p>	
Comment	<p>The site has identified a strategy including the mission, vision and goals. The goals for the site are set in the Water Stewardship Plan.</p>	


CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-001788

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.



Yes

Comment The site has presented its Water Stewardship Plan including targets linked with the 5 AWS outcomes. The plan includes for each target:

- How actions will be measured and monitored
- Actions and description
- Planned time-frames to achieve actions/targets
- Financial budgets allocated for actions
- Positions of persons responsible for action
- The link between each action to help address shared water challenges

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.*


Yes

Comment Plans to mitigate and adapt to water risks have been developed in coordination with relevant public-sector entities. Specific details for some of these plans are outlined in indicator 1.3.1.

The Emergency Action Plan provides information on actions to be taken to address water-related risks such as environmental emergencies, severe weather, and national disasters. This plan was shared with the City of Clarksville, the fire department, Montgomery County Water Division, and the stormwater department in August 2025.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-001788

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.* ✔
Yes

Comment Evidence that the site has supported good catchment governance has been identified. Some examples of ongoing activities are:

-The site has maintained its active participation in the Tennessee Green Star Partnership, promoting sustainable practices and water stewardship in 2025. Best practices in environmental management and energy reduction were discussed. An open discussion was held in July 2025, with follow-up in August 2025, supporting emails were reviewed during the audit.

-Engagement with water infrastructure provider to improve catchment water governance: the site has provided evidence of engagement with the city of Clarksville during 2025 for different water related topics .

-Participate in the Billy Dunlop Park cleanup, which supports recreational river activities such as canoeing, kayaking, and fishing (refer to indicator 1.5.5).

3.1.2 *Measures identified to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be implemented.* ✔
Yes

Comment The site ensures compliance with human rights by adhering to all water-related laws and regulations, and it is implementing best practices as documented in criteria 3.9.

There are no indigenous peoples or others with infringed-upon water rights within the site's catchment area. Water is supplied by the City of Clarksville and regulated at the state level.

3.2 *Implement system to comply with water-related legal and regulatory requirements and respect water rights.*

3.2.1 *A process to verify full legal and regulatory compliance shall be implemented.* ✔
Yes

Comment The implementation of the process to verify full legal and regulatory compliance was verified in indicator 2.2.1.

3.2.2 *Where water rights are part of legal and regulatory requirements, measures identified to respect the water rights of others including Indigenous peoples, shall be implemented.* ✔
Yes

Comment Water rights are not part of the legal and regulatory requirements for the site. The site's water usage is managed through the Clarksville Municipal System, which operates under Tennessee state law. Tennessee follows the riparian law doctrine, which grants landowners whose property borders a waterway equal rights to use the water passing through or by their property. This doctrine is derived from English common law and has been adapted into U.S. common law. Many states, including Tennessee, have enacted statutes to modify the riparian doctrine, classifying them as "regulated" riparian states.





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

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)





Audit Number: AO-001788

Comment	<p>Status of progress towards meeting water balance targets have been identified. The site is supporting sustainable water balance by:</p> <ul style="list-style-type: none"> -Set targets and report on effort to minimize impact to waterways and municipal infrastructure through usage reduction: Water withdrawal decreased by 7,000 m³ compared to 2024. Washdowns have improved throughout 2025. -Minimize impact to waterways and municipal infrastructure through Condensate Return: on-site condensate recycling system to contribute to recycle 9.3% of total water: the actual volume 6.3% reduction. -Water reduction and recycling through WaterHub suitability assessment: the site has been working with engineering firms and the Factory Team to assess the suitability of a WaterHub facility for the Clarksville location. Emails have been exchanged with engineering companies to advance the project, and a meeting was held in September 2025. -Level 2 metering is used to monitor water usage in distinct process areas: meter calibration records for September 2025 were reviewed on-site. <p>Additional actions can be found in the Water Stewardship Plan.</p>	
3.3.2	<i>Where water scarcity is a shared water challenge, annual targets to improve the site's water use efficiency, or if practical and applicable, reduce volumetric total use shall be implemented.</i>	 Yes
Comment	Water scarcity is not a shared challenge within the catchment area. An annual target to improve the site's water use efficiency was established and successfully met in 2024.	
3.3.3	<i>Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.</i>	 Yes
Comment	The site does not have a legally binding document for reallocation of water to social, cultural and environmental needs.	
3.4	<i>Implement plan to achieve site water quality targets</i>	
3.4.1	<i>Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.</i>	 Yes
Comment	<p>Status of progress towards meeting water quality targets have been identified and evidence of implementation was provided for these actions:</p> <ul style="list-style-type: none"> -Comply with regulatory requirements of Tennessee Multi-Sector Permit (TSMP) for Stormwater and provide analytical tracking to improve understanding of TSS: maintain compliance through annual sample testing (refer to indicator 1.3.4). -Comply with regulatory requirements of Non-Categorical Wastewater Discharge Permit: maintain compliance through monthly and semi-annual sampling (refer to indicator 1.3.4). -The Arbor Day Foundation Collaboration with Fill-It-Forward: no initiatives identified in 2025, evaluate again 2026. -Divert tobacco production waste to appropriate end user: waste diversion to composting is a positive outcome toward water quality protection in the catchment and beyond. Invoice of the service provider collection tobacco dust for August 2025 was reviewed on-site. 	
3.4.2	<i>Where water quality is a shared water challenge, continual improvement to achieve best practice for the site's effluent shall be identified and where applicable, quantified.</i>	 Yes
Comment	Water quality is not a shared water challenge in the catchment.	

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)






Audit Number: AO-001788

3.5	<i>Implement plan to maintain or improve the site's and/or catchment's Important Water-Related Areas.</i>	
3.5.1	<i>Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.</i>	 Yes
Comment	<p>The site has set practices in the water stewardship plan to maintain and/or enhance the Important Water-Related Areas:</p> <p>-Partner with the City of Clarksville to participate in one event annually: on September, 2025, the site participated in a cleanup event focused on removing overgrown vegetation and accumulated debris in the Billy Dunlop Park.</p> <p>-Quarterly observation of Spring Creek (on-site IWRA): records of IWRA status observations and Inspection Forms were reviewed for 2025.</p>	
3.6	<i>Implement plan to provide access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers at all premises under the site's control.</i>	
3.6.1	<i>Evidence of the site's provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers onsite shall be identified and where applicable, quantified.</i>	 Yes
Comment	<p>The provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers on site has been confirmed and verified during the on-site tour. The OSHA WASH requirements are exceeded.</p>	
3.6.2	<i>Evidence that the site is not impinging on the human right to safe water and sanitation of communities through their operations, and that traditional access rights for indigenous and local communities are being respected, and that remedial actions are in place where this is not the case, and that these are effective.</i>	 Yes
Comment	<p>The site does not have direct withdrawal from source water bodies and the site complies with all relevant water-related laws and regulations.</p> <p>In addition, there are no Native American Indian reservations in Tennessee (refer to indicator 3.2.2).</p>	
3.7	<i>Implement plan to maintain or improve indirect water use within the catchment:</i>	
3.7.1	<i>Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.</i>	 Yes
Comment	<p>Evidence that indirect water use targets set in the water stewardship plan have been met was provided:</p> <p>-LEAF use of GAPC program for tobacco farmers: growers participate in the Global GAP program. The GAPC program, managed by the Leaf Division, operates independently from site operations and promotes water conservation through good soil management practices. The information is confidential. All contracted growers (100%) are introduced to and actively engaged in soil management practices.</p> <p>-LEAF program partnering with GS2 to reintroduce multiple species of trees on abandoned mine land within catchment, with proper nevironmental guideliness requirements: 77 000 trees were successfully planted. The tree planting contract from 2024 was verified during the audit.</p>	

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)



Audit Number: AO-001788

3.7.2	<i>Evidence of engagement with suppliers and service providers, as well as, when applicable, actions they have taken in the catchment as a result of the site's engagement related to indirect water use, shall be identified.</i>	 Yes
Comment	The site does not have direct contact with tobacco growers; all communications are handled through the Leaf team, in accordance with the GAPC program guidelines referenced in indicator 3.7.1.	
3.8	<i>Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have.</i>	
3.8.1	<i>Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.</i>	 Yes
Comment	The site has engaged with the City of Clarksville, the owner of shared water-related infrastructure. There is direct communication with the city regarding any concerns the site may have. Evidence of engagement with the city of Clarksville during 2025 for different water related topics was provided.	
3.9	<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>	
3.9.1	<i>Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.</i>	 Yes
Comment	<p>Some of the best practices for water governance that the site has implemented include:</p> <ul style="list-style-type: none"> -ASC Clarksville meetings to review the water stewardship plan and activities: these are conducted weekly, evidence was seen on site. -Participate in the Billy Dunlop Park cleanup, which supports recreational river activities such as canoeing, kayaking, and fishing (refer to indicator 1.5.5). -The site has maintained its active participation in the Tennessee Green Star Partnership, promoting sustainable practices and water stewardship in 2025. Best practices in environmental management and energy reduction were discussed. An open discussion was held in July 2025, with follow-up in August 2025, supporting emails were reviewed during the audit. -Internal Water Governance: An e-learning module covering water-related topics was distributed to internal staff on July 17, 2025. The training supports water management initiatives aimed at meeting the site's sustainability targets. 	
3.9.2	<i>Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.</i>	 Yes
Comment	<p>Actions towards achieving best practice, related to targets in terms of water balance have been implemented, some examples are:</p> <ul style="list-style-type: none"> -The GIA Executive Summary Year to Date has been provided (reviewed on-site). The performance is review during sustainability drive team meetings on a monthly basis. -Employees in the secondary manufacturing department use mats to prevent tobacco from entering floor drains and clean floors efficiently to reduce water use. -Recycled water used for condensate is measured, tracked and shared with the Executive Committee. Evidence was reviewed on-site. 	
3.9.3	<i>Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.</i>	 Yes

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-001788

Comment	<p>Some of the best practices for water quality that the site has implemented include:</p> <ul style="list-style-type: none"> -The site has installed condensate return systems to collect and reuse water in the process, thereby reducing the need for potable water (see indicator 1.3.2). -As detailed in indicator 3.9.2, the site employs floor mats to cover floor drain lines, preventing tobacco from entering the drains during startup and equipment cleaning. This practice ensures that the water entering the drains remains uncontaminated by tobacco. -Legionella reports for potable water in 2025 were reviewed on-site. 	
3.9.4	<p><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></p>	 Yes
Comment	<p>Actions towards achieving best practice related to maintenance of Important Water-Related Areas have been implemented:</p> <ul style="list-style-type: none"> -The site has established a buffer zone for Spring Creek (IWRA) at the southern boundary of the property, creating a protective space between the production buildings and runoff. -The site has voluntarily included the monitoring of Spring Creek in the SWPPP quarterly inspection program to observe any changes or impacts to the IWRA, even though this is not a regulatory requirement. -The site participated in the Billy Dunlop Park cleanup event which provides river activities such as canoeing, kayaking and fishing. 	
3.9.5	<p><i>Actions towards achieving best practice related to targets in terms of WASH shall be implemented.</i></p>	 Yes
Comment	<p>The site has implemented the following best practices for provision of equitable and adequate WASH:</p> <ul style="list-style-type: none"> -The site exceeds the WASH regulatory requirements (OSHA). Also, it has a mother room and complimentary feminine products in women's restrooms. -The site offers water coolers in various production areas for employee use. -The Fill it Forward program supports WASH initiatives by providing water to underserved communities, offering educational programs, and improving sanitary services outside the catchment area. The site is actively participating in the Fill it Forward program. 	

Audit Number: AO-001788

4 STEP 4: EVALUATE - Evaluate the site's performance.

- 4.1** *Evaluate the site's performance in light of its actions and targets from its water stewardship plan and demonstrate its contribution to achieving water stewardship outcomes.*
- 4.1.1** *Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.* Yes
- Comment Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes have been evaluated. Some examples of evaluation are:

 - The site has set a water recycling target of 9.3%, utilizing on-site condensate recycling; the current reduction achieved is 6.3%.
 - The Billy Dunlop cleanup event was completed in 2025.
 - The Fill-it-Forward program has been implemented, resulting in over 2,600 reuses, 16 pounds of ocean plastic diverted, and 85 pounds of waste diverted from landfill.

Weekly meetings are held between the site and consultants to review progress, initiatives, and improvement opportunities. Evidence of these meetings was provided.
- 4.1.2** *Value creation resulting from the water stewardship plan shall be evaluated.* Yes
- Comment Value creation resulting from the water stewardship plan has been evaluated. Some examples of value creation are:

 - In 2024, water was recycled on-site, reducing demand on the city's water infrastructure and generating cost savings for the site.
 - Quarterly inspections incur minimal cost; however, they can provide valuable insight into issues that may arise at IWRA and prompt timely corrective action.
 - Increased engagement with the municipality created value with a better understanding of site operation and sewer condition.
- 4.1.3** *The shared value benefits in the catchment shall be identified and where applicable, quantified.* Yes
- Comment The shared value benefits within the catchment area have been identified. Examples include:

 - Composting tobacco dust offers benefits such as reducing runoff and evaporation. Additional advantages include improving soil structure and porosity, enhancing water retention, supporting microbial life, and strengthening root systems.
 - Water conservation is promoted through soil and water management standards that encourage responsible irrigation and runoff control, implemented by practicing growers.
 - Improving water use efficiency at the site enhances local, site-specific water infrastructure. By reducing the overall water demand, the site lessens its impact on nearby waterways and municipal systems.
- 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

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-001788

Comment No water-related emergencies have occurred since the last audit. In the event of an incident, the site is required to report it to both the city and the state.

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.

Comment Consultation efforts with stakeholders regarding the site's Water Stewardship performance for this year have been identified. The performance was shared via email, including a presentation outlining the site's results. However, no feedback has been received to date.

The site's Water Stewardship performance was shared in October 2025 with key stakeholders.

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 During the on-site audit, changes to previous Water Stewardship Plan were reviewed, and the site implemented updates to the current plan. Changes have been identified.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-001788

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>	✔ Yes
Comment	The current internal governance related to water management at the site, including the roles and responsibilities of those accountable for compliance with water-related laws and regulations, has been disclosed.	
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>	✔ Yes
Comment	The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, has been communicated to relevant stakeholders. This was confirmed during the stakeholder interviews.	
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>	✔ Yes
Comment	A summary of the current site's water stewardship performance, including quantified metrics against targets, has been disclosed.	
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>	✔ Yes
Comment	The water-related challenges and the corresponding efforts to address them have been communicated to relevant stakeholders through email correspondence.	
5.4.2	<i>Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.</i>	✔ Yes
Comment	The efforts undertaken by the site to engage stakeholders, including public-sector agencies are documented.	
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>	
5.5.1	<i>Any site water-related compliance violations and associated corrections shall be disclosed.</i>	✔ Yes

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-001788

Comment Water-related compliance violations are publicly accessible on the U.S. Environmental Protection Agency (EPA) website.

There were no water-related violations reported: <https://echo.epa.gov/detailed-facility-report?fid=110054892416>

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

Comment There were no water-related 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 There were no water-related 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.