

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)



Audit Number: AO-001728

SITE DETAILS

Site: **BAT Croatia (TDR d.o.o.) - Kanfanar**
Address: Burići 9b, 52952, Kanfanar, CROATIA (local name: Hrvatska)
Contact Person: Kristijan Rabar
AWS Reference Number: AWS-000479
Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Gold
Date of certification decision: 2026-Feb-04
Validity of certificate: 2029-Feb-03

AUDIT DETAILS

Audited Service(s): AWS Standard v2.0 (2019)
Audit Type(s): Re-Evaluation Audit
Audit Start Date: 2025-Dec-15
Audit End Date: 2025-Dec-18
Lead Auditor: Aleksandar Simic

Site Participants:
Kristijan Rabar, Sustainability Manager
Matea Hervat Dobrila, Sustainability Coordinator
Marko Ferjančić, Facility Coordinator
Kristijan Racan, Sustainability Specialist

AUDIT TIMES

Dates	Audit from	Duration	Auditor	Description
2025-Dec-15	08:00:00 - 16:00:00	08:00	Aleksandar Simic	
2025-Dec-16	08:00:00 - 16:00:00	08:00	Aleksandar Simic	
2025-Dec-17	08:00:00 - 16:00:00	08:00	Aleksandar Simic	
2025-Dec-18	08:00:00 - 16:00:00	08:00	Aleksandar Simic	

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ADDITIONAL INFO

Summary of Audit Findings: During the re-evaluation audit one non-conformity and six observations were raised.

The Client is requested to submit a root cause analysis and corrective actions for the non-conformity to WSAS within 7 days of receipt of the audit report, by 05 February 2026.

The non-conformities must be closed within 90 days of the end of the audit. In order to meet this timeline evidence is to be submitted to WSAS (within 75 days) by 03 March 2026.

The audit team recommends certification of BAT Croatia (TDR doo) Kanfanar at Gold level pending closure of the non-conformity.

Scope of Assessment: The scope of services covers the re-evaluation audit for assessing conformity of BAT Croatia (TDR d.o.o.) - Kanfanar against the AWS International Water Stewardship Standard Version 2.

Kanfanar tobacco factory produces cigarettes for local and export markets. The maximum capacity for the site is 30 billion cigarette equivalents in PMD and 25 billion cigarette equivalents in SMD. The working scheme is 3 shifts 24 hours /5 days a week with temporary adjustment to 24 hours /7 days. BAT employs 506 people at this factory. Additionally, approximately 50 people are present from 3rd parties and provide auxiliary services like cleaning, kitchen, security, etc. Factory owns a roughly 120,000 m2 plot, roughly 44,000 m2 of which is a green field including a roughly 5,000 m2 water reservoir (in the form of an artificial lake).

The factory headquarters is registered in the town of Rovinj, Croatia. The factory is located in Kanfanar, in an industrial zone, approximately 1 km away from Kanfanar city center and 18 km from the town of Rovinj.

The facility is located Istian Peninsula, known for its indented, limestone coastline, karst topography and Mediterranean climate.

The audit was conducted onsite on 15-18.12.2025.

The onsite site visit included the assessment of whole production process (three production halls-PMD and SMD), reverse osmosis and ultrafiltration process and the boiler room.

FINDINGS

Observation	6
Non-Conformity	1

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FINDING DETAILS

Finding No: TNR-022457
Checklist Item No: 1.3.4
Status: Open
Finding level: Observation
Checklist item: Water quality of the site's water source(s), provided waters, effluent and receiving water bodies shall be quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be quantified.
Findings: The site's water permit defines that mineral oils and total oils and fats (as laboratory parameters) do not need to be monitored in wastewaters entering and leaving oil separators, but, since these parameters have a direct financial implication for the site (oily water from 4 oil separators that is taken by waste operator), the site should reconsider including these in the regular monitoring. This will also allow them to adequately assess separators efficiency rate.

Finding No: TNR-022842
Checklist Item No: 1.4.3
Status: Open
Finding level: Observation
Checklist item: Advanced Indicator
The embedded water use of primary inputs in catchment(s) of origin shall be quantified.
Findings: The embedded water use of primary inputs in catchments of origin is partially captured by site. The quantification of embedded water use of all the relevant suppliers shall be reviewed during the next audit.

Finding No: TNR-022773
Checklist Item No: 1.5.9
Status: Open
Finding level: Observation
Checklist item: Advanced Indicator
The adequacy of WASH provision within the catchments of origin of primary inputs shall be identified.
Findings: The site did not completely identify the adequacy of WASH provision within the catchments of origin of primary inputs as the identified suppliers account for only 17% of total suppliers for the site (document 1.4.1_1.4.2_1.4.3_1.5.9_Input_suppliers-2, column "Weight %").

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Finding No: TNR-022462
Checklist Item No: 2.3.5
Status: Closed
Finding level: Non-Conformity
Due date: 2026-Mar-18
Checklist item: Advanced Indicator
Stakeholder consensus shall be sought on the site's water stewardship plan. Consensus should be achieved on at least one target. A list of targets that have consensus and in which stakeholders are involved shall be identified.

Findings: The site's communication with stakeholders via questionnaire is still too general, without a concrete list of targets for which the consensus is sought.

Corrective action: Create a new questionnaire that will contain existing questions (from the previous questionnaire) and expanded with the list of targets in order to include all requirements from the indicator.
New questionnaire form will be resent to stakeholders for their feedback.

Evidence of implementation: in attachment modified filled questionnaires are uploaded

Finding No: TNR-022763
Checklist Item No: 2.4.2
Status: Open
Finding level: Observation
Checklist item: Advanced Indicator
A plan to mitigate or adapt to water risks associated with climate change projections developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.

Findings: The site assessed climate risks within different climate projections, but the plan to address them wasn't developed in coordination with relevant public-sector and infrastructure agencies.

Finding No: TNR-022761
Checklist Item No: 5.3.1
Status: Open
Finding level: Observation
Checklist item: A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.

Findings: The site's water stewardship performance has only been communicated to the identified stakeholders but not to the wider audience

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Finding No:	TNR-022762
Checklist Item No:	5.4.1
Status:	Open
Finding level:	Observation
Checklist item:	The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.
Findings:	The site's shared water-related challenges have only been communicated to the identified stakeholders but not to the wider audience.

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Report Details

Report	Value
Report prepared by	Aleksandar Simić
Report approved by	Amit Singh
Report approved on (Date)	29.01.2026

Surveillance

Proposed date for next audit
2026-Oct-01

Comment The proposed date for the next audit is 01.10.2026.

Stakeholder Announcements

Date of publication	Location
06/10/2025	https://tdr.hr/hr/esg.html https://watersas.org/wp-content/uploads/2025/09/AWS-000479_BAT-Croatia-Kanfanar_StakeAnn_WSAS-PUBLISHED.pdf https://a4ws.org/wp-content/uploads/2025/10/AWS-000479_BAT-Croatia-Kanfanar_StakeholderAnnouncement.pdf

Comment A stakeholder announcement was published on the company website (<https://tdr.hr/hr/esg.html>), as well as on AWS and WSAS websites. At the moment of the audit end, no comments were forwarded by AWS.

Comment A meeting with the representative of the Hunting Association was also scheduled, but then canceled due to its unavoidable obligations.

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Catchment Information

Catchment Information

According to legal document "Pravilnik o granicama područja podslivova, malih slivova i sektora" in the territory of the Republic of Croatia, areas of small watersheds and six sectors are defined, and sector E consists of the areas of 6 small watersheds. The Kanfanar municipality in which factory is located belongs to small watershed "Mirna – Dragonja" marked with number 23 in "Pravilnik o granicama područja podslivova, malih slivova i sektora".

Catchment consist of dislocated area (approx 25 km straight line distance from factory) Butoniga lake watershed (surrounding of Butoniga lake is defined as area that contributes to watersource), pipeline that brings water from Butoniga lake to the location of the factory (Burići 9b, Kanfanar), site location (including surface area from which rainwater is harvested), a pipeline that discharges water into the factories accumulation lake, the site accumulation lake, and area around the sites accumulation lake that potentially could be affected by a water discharged from the lake or eventual overflow.

Water supply for the wider Istria region is achieved from the water supply system "Butoniga" operated by Istarski vodovod d.o.o. Buzet. The water supply system "Butoniga" is based on the surface water reservoir (accumulation lake) of the same name – Butoniga (capacity 1.000 l/s), from which the water

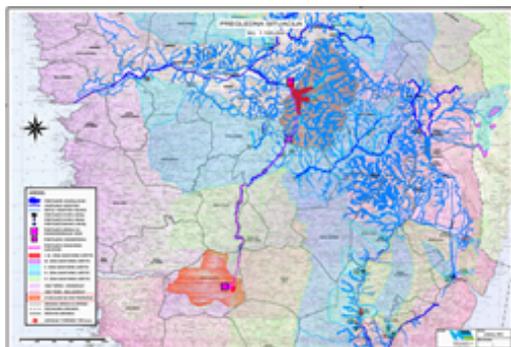
(after conditioning) is pumped by high-pressure pumps to the Ladavci distribution reservoir located above the lake. From this reservoir, water is transported by gravity in several directions:

(a) branch for Pazin, from the direction of Beram to the east to the water reservoir Pazinka to be used in the wider area of Žminj;

(b) from the direction of Beram towards the south in the direction of extending the Butoniga pipeline towards the Kanfanar reservoir, where the main pipeline forks in two directions: the branch for Rovinj and in the direction of Pula.

Water scarcity (leading to water shortages) is not a problem in the Istria area, which is confirmed with the representative of a water supply company. Also, the area is not prone to floods (occasional flash floods were possible in the past, but with the new WWTP in Rovinj, these are a thing of the past). No international (e.g. Natura 2000) or national environmentally protected areas are identified in the site's catchment. No inter-basin transfers exist. The site's headquarters is situated in Mediterranean climate, influenced heavily by the Adriatic Sea.

Main source of income for the whole region stems from tourism.



Catchment.png

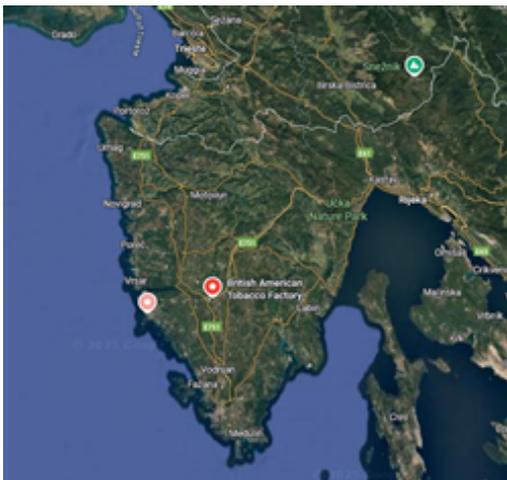
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Client Description and Site Details

Client/Site Background

Kanfanar Tobacco factory produces cigarettes for local and export markets. The maximum capacity for the site is 30 billion cigarette equivalents in PMD and 25 billion cigarette equivalents in SMD. The working scheme is 3 shifts 24 hours /5 days a week with temporary adjustment to 24 hours /7 days. BAT employs 506 people at this factory. Additionally, approximately 50 people provide auxiliary services like cleaning, kitchen work, security, etc. Factory owns a roughly 120,000 m2 plot, roughly 44,000 m2 of which is a green field including a roughly 5,000 m2 water reservoir (in the form of an artificial lake). There is a 3-story Office block and a production/storage building, which consists of three sections. The factory headquarters is registered at Obala Vladimira Nazora 1 in the Town of Rovinj. The factory is located in Kanfanar, Burići 9b, in an industrial zone, approximately 1 km away from Kanfanar city center and 18 km from the Town of Rovinj. The closest inhabited object is approximately 60 m distant from the subject property. The subject property is situated in the east-west direction and enclosed by Istarski Epsilon highway in the north, undeveloped land and Divača – Pula railway from the east, and local road from the south and south-west. It is located at an altitude of 240 meters above sea level.

The site is partially reliant on public water supply for its operation (water treated in the WWTP is recycled in the industrial process by the use of ultra filtration/ reverse osmosis). The factory uses water for sanitary, industrial, and fire-fighting purposes. The factory has a closed internal sewage system. Sanitary and industrial wastewater are collected and discharged into the biological WWTP (MBR). Stormwater from manipulative surfaces, internal transportation routes and kitchen is collected via a separate system and treated in four oil separators before being released into the artificial lake that is located on the site premises. Treated sanitary and industrial wastewater, together with treated stormwater and clean run-off water from building roofs is also discharged into the lake. This water is further used for firefighting systems and, after aforementioned treatment, in industrial steam production processes. Four cooling towers are used in the production process.

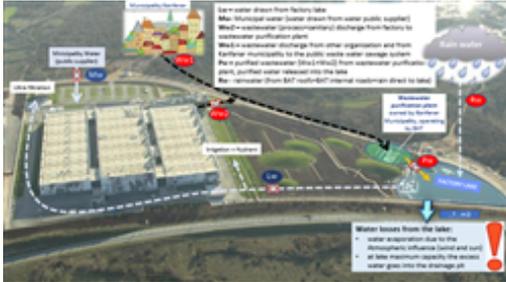


Location.png



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Factory 1.png



Factory 2.png

Summary of Shared Water Challenges

Summary of Shared Water Challenges

The site didn't identify any new shared water challenges compared to the last year. Two new stakeholders didn't provide any new insight on this topic aside from ones already established. According to the document "1_Shared_water_challenges_and_prioritisation_KF", shared water challenges are:

- Increased scarcity of sanitary and drinking water in times of drought and tourist season,
- Deterioration of groundwater quality due to pollution,
- Deterioration of water quality due to drought,
- Increased damage to water supply and discharge due to obsolete infrastructure,
- Discharge of wastewater from households without appropriate waste water treatment, especially during tourist season,
- Loss of operation of Municipal WWTP.

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 Primary water supply for the wider Istrian Peninsula area, Lake Butoniga (around 25km from the site's location), was visited during the audit. Water discharge location (artificial lake within organisational boundaries) was visited during the audit. The site's effluent generally does not leave the site since all wastewater is being released into the lake after the treatment from which is then being reused in the industrial process. Water level in the lake was rather low, indicating no possibility of water leaving the site through the overflowing well.

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1 STEP 1: GATHER AND UNDERSTAND

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

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

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


Yes

Comment The inlet water-related infrastructure is connected to the main inlet water pipes providing water supply from Lake Butoniga (the water supplier is Istarski vodovod d.o.o. Buzet), and they serve an industrial (partial) and potable water network. The site has two separate sewage networks- one for industrial and communal wastewaters discharges and the other for rainwater collection. There is also a separate firefighting system that sources from the lake water.

The WWTP (owned by the municipality and operated with TDR) is located outside the site limit but is connected to the site. The lake (recipient) is designed to store the municipality's domestic water discharges and all the site's waste industrial and communal wastewaters. It has its own aerators (sprinklers).

Municipality stormwater is not part of this system because Kanfanar has separate system for it.

The use of water from an artificial lake for irrigation purposes (not active anymore) and the technological needs of the factory are foreseen by the construction of a pumping station. The pumping station facility is located on the eastern edge of the lake. In a concrete manhole located below the water level, there are submerged pumps that independently work for a particular need.

Recycled water is consumed in technology process, in the boiler room, as sanitary and cooling water.

Technological wastewater from the tobacco production process is treated in the WWTP (MBR technology). Stormwater from roofs and asphalted surfaces is collected through a separate drainage system and discharged into the lake via a oil separators.

The lake area is 5.000 – 7.000 m², depth 3-5 m, capacity around 20.000 m³.

All the water from the lake is used for recycling (ultra filtration and reverse osmosis) inside the plant. In case of heavy precipitation, there is an overflow well in the eastern corner of the lake that discharges into underground karst (included in the site's catchment). At the bottom of the lake there is a outlet valve for emergency or major lake maintenance which has not been used for the last 20 years (last lake cleaning).

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

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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> 	<p> Yes</p>
Comment	<p>Compared to the last year, new stakeholders are IVS doo and Lovačko društvo Golub Kanfanar.</p> <p>A hybrid meeting (Teams) with stakeholders was held on 14.11.2025. The results are presented 1_2.3.3. WITHIN CATCHMENT area (pg 6, 7, 8). No MoM available. Separate meetings with some of the stakeholders involved in the current actions were also held (e.g. Natura Histrica 14.10.2025). Feedback mails from stakeholders only confirm receipt of invitation to the meeting and/or accompanying documents.</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>	<p> Yes</p>
Comment	<p>Within the stakeholders map, the site has assessed and documented the stakeholders current and potential ability to influence and be influenced.</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>	<p> Yes</p>
Comment	<p>The site identified all water-related incidents and documented plans to address them. Part of this documentation is legally binding (Operational plan of measures in case of extraordinary and sudden water pollution and schemes for WWTP and KF Plant, State plan of measures for the case of extraordinary and sudden water pollution, Emergency response plan for sudden marine pollution) while the part is described within site's internal procedures (ISO 14001). Business Continuity Plan also gives detailed instructions in case of occurrence of water-related incident.</p> <p>The site has no water outlet (overflow well is rarely used and the water in the lake is regularly tested), and all drain are connected to the WWTP discharging only to the internal lake used for recycling.</p>	
1.3.2	<p><i>Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped</i></p>	<p> Yes</p>
Comment	<p>The usage of water being important factor in the site's production, water balance is monitored in detail and the results are analysed regularly. The site sets monthly goals for water recycling and uses Water Glidepath to document and analyse results.</p> <p>The amount of rainwater in water balance is not estimated based on the precipitation but calculated as the difference in of several water streams.</p>	
1.3.3	<p><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></p>	<p> Yes</p>

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Comment	As the part of BAT internal monitoring system, all water- related data is gathered and analysed on the monthly bases. With the financial aspect being relevant (amount of water taken from the public potable water network), the site considers water- recycling efforts in detail.	
1.3.4	<i>Water quality of the site's water source(s), provided waters, effluent and receiving water bodies shall be quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be quantified.</i>	 Yes
Comment	<p>The site monitors all waters (entering and within the system). The results are aggregated in 3_očevnik-sanitarne i otpadne vode pogon Kf + UPOV. Frequency of testing is defined within water permit (generally twice a year for all types of wastewaters and once for surface water- lake). As required by the law, laboratory testing is preformed by the external authorized laboratories.</p> <p>The water provider in the area Istarski vodovod d.o.o. Buzet is obliged to monitor the quality of water at the pumping point and the quality of water in the water supply system. TDR d.o.o. additionally conducts tests of water at the site inlet point which are done by authorized laboratories. Additionally, the site also has internal chlorination station at the public water inlet (mainly because of Legionella). The stormwater from roofs and paved surfaces, as well as the oily water from the restaurant is treated within oil separators before going into WWTP.</p>	
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 all chemical products.</p> <p>The document " Kol 303-0816-List of hazardous substances on site contains information on where chemicals are located and information about them (CAS number, flashpoint, etc.). The locations where the risk of pollution is present, are mapped in the documents "NACRTI".</p> <p>The documents "Operativni plan pravne osobe koja djelatnost obavlja korištenjem opasnih tvari" and "Procjena rizika pravne osobe koja obavlja djelatnost korištenjem opasnih tvari" are legal requirements.</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	Artificial lake within site's boundaries, functioning like a factory recipient and the water storage, has been identified as the only on-site IWRA. The description of its status is provided.	
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 water-related costs (drinking water- canisters, public water supply, WWTP, water analysis, sludge treatment...) and revenues (from selling steam). Indirect costs related to stakeholder engagement (events, activities), energy that is used to move, treat, heat or cool water or procurement of the technical studies have also been included.</p>	
1.3.8	<i>Levels of access and adequacy of WASH at the site shall be identified.</i>	 Yes
Comment	<p>TDR d.o.o. provides for employees and other persons on site adequate WASH services. A sufficient number of taps and toilets are also provided for all employees and others present at the site and a sufficient number of showers for workers for whom this is necessary, which is defined in the legal document "Pravilnik o zaštiti na radu za mjesta rada".</p> <p>The quality of the potable water is shown in the analysis which are partially provided directly by TDR while the official ones are provided by the water provider. Additional chlorination at the access point of potable water from public network is also performed.</p>	

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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 site's suppliers have been identified, but, considering that procurement is handled globally, they are all located outside the catchment.	
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 only outsources service for the site outside of their own boundaries (and own water usage) is car washing. Its water use has been quantified.	
1.4.3	<i>Advanced Indicator The embedded water use of primary inputs in catchment(s) of origin shall be quantified.</i>	 Obs.
Comment	The site has provided quantification of embedded water use of some primary inputs in catchments of origin (where data was available).	
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>	 Yes
Comment	Water governance initiatives are recognized on the regional level (Istra). Main document in this regard is Novelacija vodoopskrbnog plana istarske županije do 2030 which gives strategic approach on water governance. There's also Prijedlog izmjena i dopuna prostornog plana istarske županije (Spatial Plan). Since Istarski vodovod is the public authority for water distribution, its annual reports and business plans (2025) cover all relevant initiatives. The need to transfer the management of WWTF to Kanfanar municipality, which is a legal obligation, is close to completion and should be resolved in 2026 (correspondence attached).	
1.5.2	<i>Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.</i>	 Yes
Comment	The site has developed a comprehensive legal register and performs annual assessment of its compliance with legal and regulatory requirements according to the principles of its internal management ISO 14001 system (6_KOL 012-117 Lista zakonskih i drugih zahtjeva). Water permits cover all relevant water-related topics. Management of WWTP, as it is processing public wastewater, should be passed on to the public water supplier (according to the controversial law from 2019), but the site doesn't have any control over this procedure. Latest discussions with the Kanfanar municipality indicate that this transfer should take place in 2026.	
1.5.3	<i>The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.</i>	 Yes

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Comment	The document "Novelacija vodoopskrbnog plana istarske županije" provides an analysis of the current state of water supply and, based on the processing of all elements, provides correct solutions for the water supply system. IVB - Godišnje izvješće 2024 contains a report on the water service provider's business operations for 2024. where information about water distribution, water losses, and water production are available (1_IVB-godisnje-izvjesce-2024_pg 17-22). The total quantity of water flowing through the catchment is almost constant and there are no remarkable seasonal fluctuations. No scarcity in the area is identified (high-level assessment and relevant stakeholders opinion also).	
1.5.4	<i>Water quality, including physical, chemical, and biological status, of the catchment shall be identified, and where possible, quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be identified.</i>	 Yes
Comment	Public agencies and water service provider (Istarski vodovod) monitor regularly the status of surface and ground waters in the catchment (IVB-godisnje-izvjesce-2024) and especially the overall water quality of the Butoniga Lake. Results are satisfactory. The site provided annual reports for surface and groundwater quality in 2024. published by the Water Institute "Josip Juraj Strossmayer" for the whole Croatia where the catchment water quality has been quantified. The annual variance of the water quality is described in the document "2_IVB-godisnje-izvjesce-2024_str_27-28_analiza_vode_2024.pdf" (page 27, Table 1). Relevant results can be found in Butoniga column, Neobrađena (raw water from the lake Butoniga), RASPON REZ. (range of results). Within column % SUKL. (% of conformance), percentage of results within legal ranges is given.	
1.5.5	<i>Important Water-Related Areas shall be identified, and where appropriate, mapped, and their status assessed including any threats to people or the natural environment, using scientific information and through stakeholder engagement.</i>	 Yes
Comment	The site identified and mapped 7 IWRA's in the catchment using https://www.biportal.hr/gis/ and stakeholder information (Natura Histrica). Their status is assessed.	
1.5.6	<i>Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.</i>	 Yes
Comment	Istra county (istarska zupanija) has documented detailed information on existing and planned water-related infrastructure (Spatial Plan, Decision of development of water infrastructure). Extreme events are especially considered in relation to the water supply (Novelacija vodoopskrbnog plana istarske županije). The site has additionally identified relevant extreme events (as described in 1.6.3).	
1.5.7	<i>The adequacy of available WASH services within the catchment shall be identified.</i>	 Yes
Comment	The adequacy of available WASH services within the catchment has been evaluated by Istarski vodovod (6_Odvodnja - Plan razvoja Istarske Županije - Prilog 2 Stanje plana 2022-2027, pg. 153-155; 1_IVB-godisnje-izvjesce-2024_pg. 15-31) as satisfactory. Some households in Kanfanar municipality are not directly connected to the sewer system and the municipality provides truck tanks for emptying services with final discharge to the WWTP.	
1.5.8	<i>Advanced Indicator Efforts by the site to support and undertake catchment level water-related data collection shall be identified.</i>	 Yes

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Comment	The site conducts regular monitoring of the lake's inflow and outflow volumes, as well as voluntary water quality analyses, including physicochemical and microbiological parameters. These analyses go beyond legal requirements (in frequency and parameters) and are shared with relevant stakeholders (especially since the lake is important for the Kanfanar municipality). In partnership with Natura Histrica, the site supports the voluntary monitoring of a natural pond in the region (Škarpeniž pound), focusing on the identification of potential sensitive or protected species. The initiative aims to generate ecological data relevant to the conservation of local biodiversity.	
1.5.9	<i>Advanced Indicator</i> <i>The adequacy of WASH provision within the catchments of origin of primary inputs shall be identified.</i>	Q Obs.
Comment	The adequacy of WASH provision within the catchments of origin of primary inputs is identified using SDG6 data. Access to drinking water, wastewater treatment and wastewater collection are documented.	
1.6	<i>Understand current and future shared water challenges in the catchment, by linking the water challenges identified by stakeholders with the site's water challenges.</i>	
1.6.1	<i>Shared water challenges shall be identified and prioritized from the information gathered.</i>	✔ Yes
Comment	6 shared water challenges are identified and prioritized (from "Increased scarcity of sanitary and drinking water in times of drought and tourist season" graded by 6 to "Loss of operation of WWTP" graded by 12. Stakeholders with whom the site shares those challenges are also identified.	
1.6.2	<i>Initiatives to address shared water challenges shall be identified.</i>	✔ Yes
Comment	The initiatives related to each water challenge are identified. Those are further operationalized in the WSP.	
1.6.3	<i>Advanced Indicator</i> <i>Future water issues shall be identified, including anticipated impacts and trends</i>	✔ Yes
Comment	Using usual climate projections (RCPs and SSPs), the site identified future climate trends and related water issues- heatwaves, prolonged droughts and reduced summer precipitation, extreme rainfall and floods, increasing water demand in Istria, worsening water quality of key sources and deteriorating condition of water-related infrastructure. Mitigation actions were identified and connections with water challenges, water risks and WSP were made.	
1.6.4	<i>Advanced Indicator</i> <i>Potential water-related social impacts from the site shall be identified, resulting in a social impact assessment with a particular focus on water.</i>	✔ Yes
Comment	Water- focused social impact assessment is documented in 1.6.4 Water-Related Social Impact Assessment.	
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

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Comment	The site's water risks have been identified. Risk prioritization has been made based on severity, likelihood and economic impact. Direct link between risk assessment, shared water challenges (timeframes) and WSP exists. Within WSP, potential costs and business impacts are documented. Water risks are part of ISO 14001 environmental aspects assessment (2_KOL 004-117 LISTA ASPEKATA OKOLIŠA SA PROCJENOM ZNAČAJNOSTI UTJECAJA_2025). The site also uses BAT centralized AME Operational Risk Management Application for site- specific overall risk assessment (WaterRMScoreCroatiaFactory -Q4_2025-1).	
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 are identified both within 1_AWS - Risk Assessment Water and WSP. The link between shared water challenges and opportunities has also been made in 1_Shared water challenges and prioritisation KF.	
1.8	<i>Understand best practice towards achieving AWS outcomes: Determining sectoral best practices having a local/catchment, regional, or national relevance.</i>	
1.8.1	<i>Relevant catchment best practice for water governance shall be identified.</i>	 Yes
Comment	The site provided an abundance of information and documents related relevant catchment best practices for water governance (e.g. 2_Examples of good practices of Karst management, Motovun forest management). Link between those and the planned actions is visible through the water stewardship plan. With its representative in Croatian Water Management Association, it has direct insight into water governance best practice. The site is also sharing information with other BAT factories (11_GEHS-STD - B9 - Environmental Reporting Manual - Oct 2023 v2 (1)).	
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	Since it has a direct financial consequences on BAT functioning (water taken from public supply system), the site puts great effort to preserve water- from recycling from lake for industrial use, regular maintenance to raising awareness among the employees. Some best practices are identified through BAT 1_GEHS-STD - B9 - Environmental Reporting Manual - Oct 2023 v2. Maintenance uses checklists for performing checks of water- related infrastructure.	
1.8.3	<i>Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.</i>	 Yes
Comment	In document "Novelacija vodoopskrbnog plana istarske županije" there are information about best practices for water quality. The site follows procedure for Legionella elimination by chlorination (3_KOP 472-0518 POSTUPAK ZA SUZBIJANJE LEGIONELE).	
1.8.4	<i>Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.</i>	 Yes
Comment	The site's efforts towards IWRA has a huge social (events like Family Day) and operational facet (cleaning waste from IWRA). Best practices are not identified through specific list but through actions. In IWRA Jama kod Burići board was put with the help of Natura Histrica.	
1.8.5	<i>Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.</i>	 Yes

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Comment The legal document "Pravilnik o zaštiti na radu za mjesta rada" defines the exact number of showers and toilets depending on the number of people on site. The organization is fully compliant with it. Pipeline quality/ thickness (potable water and sewage) is measured regularly. Document Summer heat advises employees on proper behavior during the extreme temperatures.

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2	STEP 2: COMMIT & PLAN - Commit to be a responsible water steward and develop a Water Stewardship Plan	
2.1	<i>Commit to water stewardship by having the senior-most manager in charge of water at the site, or if necessary, a suitable individual within the organization head office, sign and publicly disclose a commitment to water stewardship, the implementation of the AWS Standard and achieving its five outcomes, and the allocation of required resources.</i>	
2.1.1	<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> 	 Yes
Comment	The Water Management Policy has been identified as organizational document with all elements prescribed by the standard. Publicly disclosed in notice boards within the factory and, for external stakeholders, on https://tdr.hr/hr/esg.html . The Kanfanar site Policy has been prepared taking into consideration the general BAT group ESG Policy. ESG policy	
2.1.2	<p><i>Advanced Indicator</i></p> <p><i>A statement that explicitly covers all requirements set out in Indicator 2.1.1 and is signed by the organization's senior-most executive or governance body and publicly disclosed shall be identified.</i></p>	 Yes
Comment	Water Management Policy, signed on 01.10.2025. by Pavel Vereshak, Member of the Management Board is publicly disclosed on https://tdr.hr/hr/esg.html .	
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> 	 Yes
Comment	The site has identified an organizational structure responsible for achieving and maintaining compliance obligations for water and wastewater management. This structure is also a part of site's water stewardship performance report and, as such, has been communicated externally (https://tdr.hr/hr/esg.html). The procedure for identification of water-related legal and regulatory requirements, including the process for submission to regulatory agencies is a part of relevant ISO 14001 document. The water discharge permits (for the factory and WWTP) are issued by Croatian Water (Hrvatske Vode) in the name of the company TDR d.o.o. (BAT).	
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
Comment	A water stewardship strategy is a part of WSP and it contains organisation's mission, vision, and goals of the organization towards good water stewardship in line with this AWS Standard.	

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2.3.2	<p><i>A water stewardship plan shall be identified, including for each target:</i></p> <ul style="list-style-type: none"> - 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	<p>An appropriate water stewardship plan is identified. Plan is aligned with the BAT Water roadmap that is defined on the corporate level. 27 targets defined in 2025 (of which 10 are accomplished and one is cancelled), some of them carried over from the previous year. Link between risk and opportunities, shared water challenges, AWS outcomes and available best practices is provided.</p>	
2.3.3	<p><i>Advanced Indicator</i></p> <p><i>The site's partnership/water stewardship activities with other sites within the same catchment (which may or may not be under the same organisational ownership) shall be identified and described.</i></p>	 Yes
Comment	<p>The site uses its stakeholder channels to initiate and support water stewardship activities. Examples are ongoing contract with Limska Draga regarding WWTP functioning, numerous activities regarding maintenance of ponds and springs in the catchment (Kašteljir, Škrapeniž) and collaboration with Speleological Society regarding subterranean watercourses.</p>	
2.3.4	<p><i>Advanced Indicator</i></p> <p><i>The site's partnership/water stewardship activities with other sites in another catchment(s) (either under same corporate structure or with another corporate site) shall be identified.</i></p>	 Yes
Comment	<p>Collaboration with the Croatian Chamber of Economy (a lecture on BAT's sustainability principles and the importance of AWS certification), active participation in the work of the Croatian Water Pollution Control Society, a technical-scientific organization dedicated to promoting the sustainable management and protection of water resources in Croatia (BAT has its member in it), close connections with all suppliers and water stewardship-related activities with other BAT sites (e.g. Brasil AWS platinum) are some of the examples of the site's joined actions.</p>	
2.3.5	<p><i>Advanced Indicator</i></p> <p><i>Stakeholder consensus shall be sought on the site's water stewardship plan. Consensus should be achieved on at least one target. A list of targets that have consensus and in which stakeholders are involved shall be identified.</i></p>	 No
Comment	<p>The site asked the stakeholders for their consensus on the targets within the delivered WSP and got feedback (with even one recommendation from IVS).</p> <p style="text-align: right;">Finding No: TNR-022462</p>	
2.4	<p><i>Demonstrate the site's responsiveness and resilience to respond to water risks</i></p>	
2.4.1	<p><i>A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.</i></p>	 Yes

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Comment The document "Operativni plan mjera u slučaju izvanrednog i iznenadnog onečišćenja voda" defines and lists the measures that need to be taken in the event of extraordinary and sudden water and environmental pollution for the company TDR d.o.o. at the location - Pogon Kanfanar - Burići 9b. As part of the operational plan, the scheme is attached . Croatian government published the document "Državni plan mjera za slučaj izvanrednih i iznenadnih onečišćenja voda". Another document "Denial of site Kanfanar" contains action that must be taken in case of scarcity.
The municipality of Kanfanar doesn't have any plan related to water risks as they stated that no risk related to water is detected. MoM attached.

2.4.2 *Advanced Indicator* 🔍
A plan to mitigate or adapt to water risks associated with climate change projections developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified. Obs.

Comment The site assessed climate risks and came up with the appropriate mitigation and adaptation measures. By cross-referencing them with the actions prescribed in the Business Contingency Plan and Croatian Climate Resilience Strategy (<https://www.google.com/url?sa=t&source=web&rct=j&opi=89978449&url=https://mingo.gov.hr/UserDocsImages/KLIMA/Climate%2520change%2520adaptation%2520strategy.pdf&ved=2ahUKEwiV6ODI79WRAXUIIP0HHTcWJT0QFnoECBgQAQ&usg=AOvVaw08h2LyfQ1dz0dv-2ZiRczn>), it is concluded that the targets from the WSP adequately tackle identified risks.

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3	STEP 3: IMPLEMENT - Implement the site's stewardship plan and improve impacts	
3.1	<i>Implement plan to participate positively in catchment governance.</i>	
3.1.1	<i>Evidence that the site has supported good catchment governance shall be identified.</i>	 Yes
Comment	The site supports good catchment governance through participation with the local and national governing agencies and expanding education on AWS and outcomes toward good water governance. Management of the WWTP supports water governance on the municipal level. Active participation in the work of the Croatian Water Pollution Control Society, a technical-scientific organization dedicated to promoting the sustainable management and protection of water resources in Croatia ensures that the site is up-to-date with relevant and newest activities and that it supports them.	
3.1.2	<i>Measures identified to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be implemented.</i>	 Yes
Comment	Zakon o vodama (Water Law) stipulates that water management consists of all tasks, measures, and actions undertaken by the Republic of Croatia, Hrvatske vode, and units of local and regional self-government based on this law and the law governing the financing of water management. The principle is that water is not a commercial product like some other products, but it is a heritage that should be preserved, protected, and used wisely and rationally, and that water should be managed according to the principles of the unity of the water system and sustainable development, which meet the needs of the present generation and do not jeopardize the right and possibility of future generations to achieve this for itself. That law also stipulates that waters are a common good and have the special protection of the Republic of Croatia and that waters in bodies of surface and underground water cannot be the object of property rights and other real rights. The above-mentioned law adequately ensured the water wealth of the Republic of Croatia as Water issues are directly regulated by two other laws: "Zakon o financiranju vodnoga gospodarstva" and "Zakon o vodi za ljudsku potrošnju". The first law determines the sources and use of funds for the financing of water management, and the latter regulates the healthiness of water for human consumption and implementing rules that ensure, among other things, the verification of deviations from the parameters for checking the conformity of water for human consumption, monitoring and other official controls of healthiness water for human consumption and their financing, all to protect human health from the adverse effects of any pollution of water for human consumption and ensure the healthiness of water for human consumption in the territory of Croatia. There are no minority, vulnerable or Indigenous people in the catchment.	
3.2	<i>Implement system to comply with water-related legal and regulatory requirements and respect water rights.</i>	
3.2.1	<i>A process to verify full legal and regulatory compliance shall be implemented.</i>	 Yes
Comment	The site uses already established procedure defined in ISO 14001 system to verify full legal and regulatory compliance. The document KOL 012-117 Lista zakonskih i dr. zahtjeva contains water-related legal and regulatory requirements.	
3.2.2	<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>	 Yes
Comment	Water rights for indigenous people are guaranteed by the Constitution and the Water Law. At the moment there is no threat on water rights and availability.	

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3.3	<i>Implement plan to achieve site water balance targets.</i>	
3.3.1	<i>Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.</i>	✔ Yes
Comment	The WSP gives detailed information regarding the status of progress towards meeting water balance targets (e.g. collecting condensate from HVAC steam humidifier chamber). An overview is performed every 3-6 months (columns "Comments"). The site successfully merged BAT group ESG targets with AWS outcomes.	
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	The TDR site is located in an area without water scarcity (which is additionally confirmed in stakeholder interview with the representative of Istarski vodovod doo). However, the site has set targets to reduce water consumption annually (water recycling rate increase) as this directly affects bills for potable water taken from the public water supply.	
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	There is no legally enforced reallocation of water to social, cultural, or environmental needs in the region.	
3.3.4	<i>Voluntary Advanced Indicator The total volume of water voluntarily re-allocated (from site water savings) for social, cultural and environmental needs shall be quantified.</i>	⬇ N/A
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	The site's water quality targets are two fold. Proper functioning of WWTP ensures that consequent treatment through reverse osmosis and ultrafiltration of the water drawn from the lake doesn't result in higher costs and chlorination of public water at the inlet, performed as a measure of Legionella prevention, ensures that potable water is adequate. Document 3_očevnik-sanitarne i otpadne vode pogon Kf + UPOV gives an overview of all water laboratory results.	
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	The site performs monitoring of all waters in terms of quality as prescribed in water permits. Current quality status of all waters on site is satisfactory (no exceedances). The quality of treated wastewater from WWTP is paramount, since it has direct economic consequences (amount of potable water used and the functioning of RO and UF), but the upcoming transfer of ownership over WWTP (legal requirement) does not leave the site with feasible options for further water quality improvement.	
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

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Comment	Being active in joined actions with relevant stakeholders (e.g. Natura Histrica) to maintain and enhance IWRAs, the site formulated the target "Perform an assessment of the water resources status for future generations and reduce the risks to the environment and society associated with our use of water resources" which refers to all catchment IWRA- related actions. Examples are cleaning of jama kod Burići and biomonitoring with speleological society. The lake, as the onsite IWRA is maintained through proper functioning of WWTP, lake aerization and the regular water monitoring.	
3.5.2	<i>Advanced Indicator</i> <i>Evidence of completed restoration of non-functioning or severely degraded Important Water-Related Areas including where appropriate cultural values from a site-selected baseline date shall be identified. Restored areas may be outside of the site, but within the catchment.</i>	 N/A
3.5.3	<i>Advanced Indicator</i> <i>Evidence from a representative range of stakeholders showing consensus that the site is seen as positively contributing to the healthy status of Important Water-Related Areas in the catchment shall be identified.</i>	 N/A
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	The provision for WASH access to all workers onsite is legally defined. Therefore, the site has adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers onsite. WASH water quantity has been documented in 1_1.3.2_1.3.3_Water balance 2024_2025 and water quality in 3_očevnik-sanitarne i otpadne vode pogon Kf + UPOV (voda za ljusdku 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	The respect of human rights related to the access to WASH for local communities within the catchment granted by the Constitution and the Water law. The site is not impinging on the human right to safe water and sanitation of communities through their operations, which can be confirmed by comparing amounts of water produced by the water supplier Istarski vodovod (IVB-godisnje-izvjesce-2024) and the quantity of water taken from the public supply system by BAT.	
3.6.3	<i>Advanced Indicator</i> <i>A list of actions taken to support the provision to stakeholders in the catchment of access to safe drinking water, adequate sanitation and hygiene awareness shall be identified.</i>	 N/A
3.6.4	<i>Voluntary Advanced Indicator:</i> <i>In catchments where WASH has been identified as a shared water challenge, evidence of efforts taken with relevant public-sector agencies to share information and to advocate for change to address access to safe drinking water and sanitation shall be identified.</i>	 N/A
3.7	<i>Implement plan to maintain or improve indirect water use within the catchment:</i>	

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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	As documented in 1.4.1, the site's only indirect water use is car washing. With the service providers being informed about the site's water balance and quality targets and the absence of other potential service providers, the site focuses on awareness raising, recognizing that this approach has the greatest potential benefits. Examples are manifestations like Family Day and the mandatory training for the on-site service providers that has a part related to water savings. WSP documents the target "Raising stakeholder awareness of the importance of water resources" that is already achieved for 2025.	
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 mandatory part of the training for contractors, suppliers and service providers are points regarding water savings. The questionnaire has been shared with the suppliers to gather water-related information. The contract with the onsite service providers (e.g. Atalian) has a clause referring to water use.	
3.7.3	<i>Advanced Indicator Actions taken to address water related risks and challenges related to indirect water use outside the catchment shall be documented and evaluated.</i>	 N/A
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 losses in the potable water network are 18.8%, which is well below Croatian average (around 50%) so there is no need for the site to get additionally involved. There is ongoing communication regarding management of WWTP with the Kanfanar municipality (especially since change on WWTP management responsibilities is expected during 2026).	
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	Global BAT has Roadmap 2025/ Water Scoring with a list of BAT best practices. Some of those are included in the WSP. As such, they are monitored and assessed (e.g. participation in teh Croatian Chamber of Commerce activities). Among the other actions, the site took part in the international project BLUE RECHARGE themed at managed aquifer recharge.	
3.9.2	<i>Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.</i>	 Yes
Comment	The linkage between WSP targets and the best practices is documented in the WSP. All water balance targets aim at reducing the amount of water drawn from the public water supply system.	
3.9.3	<i>Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.</i>	 Yes
Comment	The site implements examples of best practices in order to fulfill relevant water quality targets within the WSP which is evident through their linkage (e.g. installing balancing valves to enable a constant flow of water in all parts of the pipeline in order to prevent legionella).	

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3.9.4	<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>	 Yes
Comment	The site maintains its onsite IWRA, artificial lake, very thoroughly because its water is reused in the production process. The catchment IWRAs are managed with the help and advisory of relevant professional bodies (Natura Histrica).	
3.9.5	<i>Actions towards achieving best practice related to targets in terms of WASH shall be implemented.</i>	 Yes
Comment	The site provides clean potable water to its employees (chlorination system to suppress Legionella), has an adequate number of toilets (as prescribed by legislation) and directly (awareness raising) and indirectly (automatic faucets) encourages its workers to preserve current level of WASH services.	
3.9.6	<i>Voluntary Advanced Indicator Achievement of identified best practice related to targets in terms of good water governance shall be quantified.</i>	 N/A
3.9.7	<i>Voluntary Advanced Indicator Achievement of identified best practice related to targets in terms of sustainable water balance shall be quantified.</i>	 N/A
3.9.8	<i>Voluntary Advanced Indicator Achievement of identified best practices related to targets in terms of water quality shall be quantified</i>	 N/A
3.9.9	<i>Voluntary Advanced Indicator Achievement of identified best practices related to targets in terms of the site's maintenance of Important Water-Related Areas have been implemented.</i>	 N/A
3.9.10	<i>Voluntary Advanced Indicator Achievement of identified best practice related to targets in terms of WASH shall be quantified.</i>	 N/A
3.9.11	<i>Voluntary Advanced Indicator A list of efforts to spread best practices shall be identified.</i>	 N/A
3.9.12	<i>Voluntary Advanced Indicator A list of collective action efforts, including the organizations involved, positions of responsible persons of other entities involved, and a description of the role played by the site shall be identified.</i>	 N/A
3.9.13	<i>Voluntary Advanced Indicator Evidence of the quantified improvement that has resulted from the collective action relative to a site-selected baseline date shall be identified and evidence from an appropriate range of stakeholders linked to the collective action (including both those implementing the action and those affected by the action) that the site is materially and positively contributing to the achievement of the collective action shall be identified.</i>	 N/A

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4 STEP 4: EVALUATE - Evaluate the site's performance.		
4.1	<i>Evaluate the site's performance in light of its actions and targets from its water stewardship plan and demonstrate its contribution to achieving water stewardship outcomes.</i>	
4.1.1	<i>Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.</i>	✓ Yes
Comment	As documented in the WSP, the site performs two reviews per year (resulting in comments to compare progress against target milestones) and one evaluation at the beginning of the calendar year aiming to, among other things, assess the contribution to achieving water stewardship outcomes.	
4.1.2	<i>Value creation resulting from the water stewardship plan shall be evaluated.</i>	✓ Yes
Comment	Column K in WSP "Value creation (include numerical and financial benefit)". Where reasonable, results of a financial cost-benefit analysis are presented.	
4.1.3	<i>The shared value benefits in the catchment shall be identified and where applicable, quantified.</i>	✓ Yes
Comment	Column S in WSP "Shared Benefit" documents the shared value benefits in the catchment.	
4.1.4	<i>Advanced Indicator A governance or executive-level review, including discussion of shared water challenges, water risks, and opportunities, and any water-related cost savings or benefits realized, and any relevant incidents shall be identified.</i>	↓ N/A
4.2	<i>Evaluate the impacts of water-related emergency incidents (including extreme events), if any occurred, and determine the effectiveness of corrective and preventative measures.</i>	
4.2.1	<i>A written annual review and (where appropriate) root-cause analysis of the year's emergency incident(s) shall be prepared and the site's response to the incident(s) shall be evaluated and proposed preventative and corrective actions and mitigations against future incidents shall be identified.</i>	✓ Yes
Comment	The site performs on management level AWS Evaluation and Review annually with all criteria relevant to AWS indicators, including water-related emergency incidents. No incidents occurred since the last audit.	
4.3	<i>Evaluate stakeholders' consultation feedback regarding the site's water stewardship performance, including the effectiveness of the site's engagement process.</i>	
4.3.1	<i>Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.</i>	✓ Yes
Comment	After the hybrid meeting with the stakeholders organized on 14.11.2025. the site shared a presentation with their water stewardship performance asking for feedback. Only verbal communication resulted, mostly as the part of the ongoing activities (Natura Histrica, Istarski vodovod). Follow-up questionnaire sent on 17.12.2025. focused on the site's targets.	

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4.3.2	<i>Voluntary Advanced Indicator</i> <i>The site's efforts to address shared water challenges shall be evaluated by stakeholders. This shall include stakeholder reviewing of the site's efforts across all five outcome areas, and their suggestions for continual improvement.</i>	 N/A
4.4	<i>Evaluate and update the site's water stewardship plan, incorporating the information obtained from the evaluation process in the context of continual improvement.</i>	
4.4.1	<i>The site's water stewardship plan shall be modified and adapted to incorporate any relevant information and lessons learned from the evaluations in this step and these changes shall be identified.</i>	 Yes
Comment	The WSP is assessed and, if needed, updated at every management meeting. Columns "Comments" represent results of regular assessment based in internally defined milestones. Potential changes in WSP arise from these comments.	

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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 site published on https://tdr.hr/hr/esg.html its water-related internal governance in 1_Organizational chart AWS management 011025_HR.pdf.	
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	After the meeting held on 14.11.2025. the site shared with all stakeholders presentation Alliance+Water+Stewardship+-+prezentacija+listopad+2025 in which WSP has been embedded. WSP already contains contribution of the site's targets to AWS Standard outcomes.	
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>	🔍 Obs.
Comment	After the meeting held on 14.11.2025. the site shared with all stakeholders presentation Alliance+Water+Stewardship+-+prezentacija+listopad+2025-1 in which a summary of the site's water stewardship performance (AWS Evaluation and Review) has been embedded.	
5.3.2	<i>Advanced Indicator The site's efforts to implement the AWS Standard shall be disclosed in the organization's annual report.</i>	⬇️ N/A
5.3.3	<i>Voluntary Advanced Indicator Benefits to the site and stakeholders from implementation of the AWS Standard shall be quantified in the organization's annual report.</i>	⬇️ N/A
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>	🔍 Obs.
Comment	After the meeting held on 14.11.2025. the site shared with all stakeholders presentation Alliance+Water+Stewardship+-+prezentacija+listopad+2025-1 in which the site's shared water-related challenges and efforts made to address these challenges have been embedded.	
5.4.2	<i>Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.</i>	✓ Yes

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Comment	Aside from the stakeholder meeting on 14.11.2025. and the online questionnaire sent on 17.12.2025, the site took part in work of the Croatian Water Protection Society and the Croatian Chamber of Commerce, organized public events (e.g. Family Day), multiple IWRA activities (Speleological Society at Jama kod Burići) and maintained communication with Istarski vodovod (water supply) and Kanfanar municipality (WWTP).	
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
Comment	There were no water-related compliance violations.	
5.5.2	<i>Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.</i>	 Yes
Comment	Since there were no compliance violations, there were no corrective actions.	
5.5.3	<i>Any site water-related violation that may pose significant risk and threat to human or ecosystem health shall be immediately communicated to relevant public agencies and disclosed.</i>	 Yes
Comment	During the period from the last audit there was no site water-related violation that may pose significant risk and threat to human or ecosystem health.	

Upgrade or Downgrade of Certification

Justification for Upgrade or Downgrade
 Decision on upgrade of AWS certification is made on the global BAT level and it is based on the site's previous good results during AWS- related activities.

Summary of Evidence which led to change
 The site's previous good results during AWS- related activities led to change of AWS certification level.

Previous Findings

	<i>All non-conformities raised in the previous audit have been satisfactorily closed.</i>	 Yes
Comment	All non-conformities raised in the previous audit have been satisfactorily closed.	