CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-001743

WSAS WATER STEWARDSHIP ASSURANCE SERVICES

SITE DETAILS

Site: **BAT Uzbekistan - Samarkand Cigarette Factory**
Address: 140100, Samarkand region, Farkhad settlement, 140100, Samarkand, UZBEKISTAN
Contact Person: Alisher Mirtashev
AWS Reference Number: AWS-000482
Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Core
Date of certification decision: 2026-Feb-10
Validity of certificate: 2029-Feb-09

AUDIT DETAILS

Audited Service(s): AWS Standard v2.0 (2019)
Audit Type(s): Re-Certification Audit
Audit Start Date: 2025-Nov-17
Audit End Date: 2025-Nov-19
Lead Auditor: Zhanar Faizuldayeva

Site Participants:
Darya Sinegubova, Environmental Manager
Sofya Kim, Sustainability Manager
Patrick Bejjani, Head of Operations
Davlotshokh Usmanov, Sustainability Engineer
Jasur Botirov, Intern
Bakhtovar Usmanov, Engineer Electrician
Shukhrat Zakirov, Utilities Manager
Alisher Mirtashev, Leaf Sustainability and Engagement Manager
Saidmurod Barakaev, CORA Manager
Shadman S. Khattat, Area Sustainability Manager

AUDIT TIMES

Dates	Audit from	Duration	Auditor	Description
2025-Nov-17	09:00:00 - 18:00:00	09:00	Zhanar Faizuldayeva	
2025-Nov-18	09:00:00 - 18:00:00	09:00	Zhanar Faizuldayeva	
2025-Nov-19	09:00:00 - 13:00:00	04:00	Zhanar Faizuldayeva	

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ADDITIONAL INFO

Summary of Audit Findings: During the re-certification audit, 2 non-conformities and 4 observations were raised.

The Client is requested to submit a root cause analysis and corrective actions for each of the non-conformities to WSAS by 05 January 2026.

The non-conformities must be closed within 90 days of the end of the audit (by 20 February 2026). In order to meet this timeline, evidence is to be submitted to WSAS (within 75 days) by 05 February 2026.

The audit team recommends re-certification of BAT Uzbekistan - Samarkand Cigarette Factory at the Core level pending closure of the non-conformities.

Scope of Assessment: The scope of services covers the recertification audit for assessing conformity of the Samarkand Cigarette Factory against the AWS International Water Stewardship Standard Version 2.

BAT Samarkand Cigarette Factory receives dried tobacco leaves and produces cigarettes and exports some processed and blended material. There is primary manufacturing (cut rag tobacco), secondary manufacturing, filter manufacturing, nicotine pouch production, and tobacco heating product (THP) department. The factory was established in 1997. Since 2017, the factory has gone through significant transformations.
The site is located on the outskirts of Samarkand in the South-eastern part of Uzbekistan. The site operates a closed-loop water management system, with no municipal supply or municipal wastewater treatment. There are 4 boreholes onsite, which supply all site and production demands. Two wells are operational, and the other two are not. A new wastewater treatment plant was built in 2024. All treated wastewater is sent via a small canal to an onsite, lined evaporation pond that was reconstructed in 2025. The stormwater pond was also reconstructed in 2025.
The Samarkand Cigarette Factory is located within the Zarafshan River watershed.
The audit was conducted on-site on 17-19 November, 2025. During the audit, the catchment IWRA - Qaratepa water reservoir—was visited.
The onsite site visit included the assessment of the wastewater treatment facility, WASH facilities, on-site IWRA, water source (4 wells) and water treatment station, water discharge point (pond), and firefighting station.

FINDINGS

NUMBER OF FINDINGS PER LEVEL

Observation	4
Non-Conformity	2

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FINDING DETAILS

Finding No:	TNR-022582
Checklist Item No:	1.1.1
Status:	Open
Finding level:	Observation
Checklist item:	The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including: - Site boundaries; - Water-related infrastructure, including piping network, owned or managed by the site or its parent organization; - Any water sources providing water to the site that are owned or managed by the site or its parent organization; - Water service provider (if applicable) and its ultimate water source; - Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies; - Catchment(s) that the site affect(s) and is reliant upon for water.
Findings:	The new study indicates that the site may be abstracting from deeper confined aquifer(s). Further clarity should be sought on the spatial extent of this aquifer and how and where it gets recharged

Finding No:	TNR-022418
Checklist Item No:	1.3.4
Status:	Closed
Finding level:	Non-Conformity
Due date:	2026-Feb-20
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 conducts regular water quality monitoring, including quarterly effluent testing (evidence provided for 2024–2025) and annual source water testing covering an appropriate suite of parameters (total mineralisation, sulphates, chlorides, iron, residual active chlorine, hardness, ammonia, nitrates, nitrites, and odor at 20°C and 60°C). These monitoring activities demonstrate a structured approach to tracking water quality. However, the site does not quantify annual or seasonal high–low variations for either effluent or groundwater quality. No variance analysis, trend assessment, or evaluation of seasonal fluctuations is performed, despite this being a required element of the indicator.
Corrective action:	Change the Environmental management procedure EHS-QP-02 for analysis of water quality parameters and mention the implementation of diagram of quality parameters for trend assessment and variance analysis.
Evidence of implementation:	Hello team. To application "Water quality tracker" of the Environmental management procedure EHS-QP-02 was changed: added diagrams for tracking changes for each water quality parameter

Finding No:	TNR-021883
Checklist Item No:	1.5.3
Status:	Open
Finding level:	Observation
Checklist item:	The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.
Findings:	The site is encouraged to further strengthen and regularly update the catchment water balance to improve accuracy and completeness. In particular, the site should continue working to obtain more reliable groundwater data—given the noted inaccuracies in the UzHydroGeology report—and refine the quantification of inflows, outflows, and storage changes. Considering the strong seasonal variability of the Zarafshan basin (glacier melt and irrigation peaks), the inclusion of clear annual and seasonal variance will be essential.

Finding No:	TNR-021885
Checklist Item No:	1.5.4
Status:	Open
Finding level:	Observation
Checklist item:	Water quality, including physical, chemical, and biological status, of the catchment shall be identified, and where possible, quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be identified.
Findings:	The site is encouraged to continue strengthening its understanding of catchment-level water quality beyond the analysis of its own groundwater source. Current information is limited due to the subcontractor's inability to complete the agreed scope of work, resulting in insufficient data on the Zarafshan River, recharge zones, and seasonal water-quality variations. Given the site's dependence on a river-recharged alluvial aquifer and the high agricultural pressure within the catchment, annual and seasonal variances in physical, chemical, and biological parameters should be further explored using public datasets, academic sources, or additional monitoring.

Finding No:	TNR-021893
Checklist Item No:	1.6.1
Status:	Open
Finding level:	Observation
Checklist item:	Shared water challenges shall be identified and prioritized from the information gathered.
Findings:	The evidence does not clearly demonstrate how the site consolidated shared water challenges from the individual stakeholder challenges and information from site and catchment water data analysis.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-001743

Finding No:	TNR-021935
Checklist Item No:	4.2.1
Status:	Closed
Finding level:	Non-Conformity
Due date:	2026-Feb-20
Checklist item:	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.
Findings:	The steering committee discussed the incident with flooding and reported corrective action; however, the documents did not include root-cause analysis. Proposed preventative and corrective actions and mitigations against future incidents were identified; however, the site did not provide evidence of these preventive actions reflected in instruction, working orders, the water stewardship plan, or similar documents.
Corrective action:	1. Create new apllication to Emergency plan EHS-SP-523-03 with description and step by step actions for flooding incidents, including preparation annual water-related incident report 2. Create the RCA and report for the last flooding incident from irrigation channel.
Evidence of implementation:	Hello team, In attachment - 1. New apllication to Emergency plan EHS-SP-523-03 with description and step by step actions for flooding incidents 2. the RCA and report for the last flooding incident from irrigation channel 2025

Report Details

Report	Value
Report prepared by	Zhanar Faizuldayeva
Report approved by	Sa-Myeong Gim
Report approved on (Date)	2025.Dec.17

Surveillance

Proposed date for next audit
2026-Nov-16

Comment: It is recommended that the site undergo a surveillance audit no later than November 16, 2026, one year from the re-certification audit.

Stakeholder Announcements

Date of publication	Location
05/09/2025	BAT website: https://bat.uz/uploads/files/stakeholders-of-the-SMF2025.pdf

Comment: https://bat.uz/uploads/files/stakeholders-of-the-SMF2025.pdf - announcement was sent for publishing on September 5.

Comment: Two interviews with Samarkand State University and pharmaceutical company Samarkand England Eco-Medical. SuvTaminod, water supplier did not respond to invitation to stakeholder interview.

Catchment Information

Catchment Information
Catchment Name:
Zarafshan River Catchment

Water Supply & Discharge Catchment:
Not applicable since the site relies on its own boreholes and on-site evaporative pond (closed system).

Groundwater Aquifers:
Boreholes on the site are 60 meters deep.
Lithological profile: loam, gravel, and boulders.
The site is located in a groundwater transit zone formed by seepage losses from the right bank of the Zarafshan River.

Catchment Water Service Providers:
The factory has closed system: own boreholes, wastewater treatment plant, and storage pond-evaporator for wastewater.
Stormwater also goes to the pond.

Catchment Features:
Water scarcity area with seasonal shortages.
Most water is used for irrigation and intensive agriculture.
Water generation comes from glaciers, increasing in summer when temperatures exceed 25°C.
Shortage peaks in May during crop transplanting season.
Environmentally protected area: Zarafshan National Park.
No inter-basin transfers (the Zarafshan basin is closed by mountains).
Climate: semi-arid to arid.
The drainage basin is not dominated by heavy industry or forestry; agriculture use is controlled and limited.

Catchment map (BAT Samarkand site).png

Comment: The site has provided information on the catchment area in the questionnaire, which is summarized in the window below. Drinking water is supplied as bottled water sourced from the Zaravshan River catchment.

Client Description and Site Details

Client/Site Background
Site Summary

Location: Farkhad, Samarkand, Uzbekistan (industrial zone).
Operations: Produces cigarettes, tobacco heating products (THP sticks), filter rods, and semi-finished tobacco goods. Water is used for boilers, humidification, kitchen, and household needs.
Water Infrastructure:
- 4 wells (2 active, 2 reserve).
- Reverse osmosis water treatment system.
- Complex wastewater treatment (physical, chemical, biological) with optional RO treatment.
- Cooling tower for compressors.
- Rainwater channels discharge to a pond.

Discharge: Process water goes to WWTP; RO reject water goes to pond; treated water is reused for toilets and cooling towers.
Site Size & Workforce: ~380 employees; site area 253,968 m²; building area 55,660 m².

Site map (BAT Samarkand site).png

Comment: Information about site is provided information on the Questionnaire and Opening presentation. Among changes apart from the reconstruction of stormwater and WWTP discharge pond - Jamboy cement factory has closed next to the site.

Summary of Shared Water Challenges

Summary of Shared Water Challenges
The site listed and prioritized the shared water challenges that were communicated and agreed upon with the selected stakeholders during the meeting in September 2025. The only addition to the list was a shared water challenges added after consultation with SamGU

Shared water challenges identified by the site include:
- Channel overflow
- Water scarcity
- Poor quality of drinking water
- Water supply interruptions
- Water contamination
- Water sustainability in the catchment
- Low awareness of water stewardship
- Unsustainable regulation of water balance
- Lack of constant supply of clean drinking water
- Lack of infrastructure
- Low awareness of catchment water-related issues

Comment: Site updated the list of share water challenges summarised below in the box

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	During site visit the water source - 4 boreholes and water pre-treatment was visited. Treated wastewater (RO reject water) is discharged to the newly reconstructed lined pond. Photos of the water treatment and discharge pond are attached.

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.

Obs.

Comment

The site provided evidence showing site boundaries, water-related infrastructure, including a piping network that is fully owned and managed by the site, water sources (four wells), and ultimate receiving water (pond on-site).
It's noted that there have been no changes in the site boundaries since the last audit.
The piping network was updated following the new wastewater treatment plant installation to connect the wastewater flowing to the WWTP and back out to the boiler at the plant. Irrigation pipelines were added to the piping network map.
The site confirmed that no sludge is generated from the treated wastewater discharged to the evaporative pond. The wastewater treatment process is designed so that solids are either removed earlier in the upstream treatment stages or are not produced in quantities that require separate sludge handling. As a result, there is no sludge accumulation or off-site disposal associated with the evaporative pond. The pond functions solely for evaporation of treated effluent, and the site conducts periodic visual inspections to ensure that no unexpected sediment build-up occurs. If any solids were to accumulate in the future, the site would manage them in accordance with local regulatory requirements.

Since the site relies exclusively on groundwater abstraction, they have contracted Uzhydrogeology to improve their understanding of groundwater conditions and submitted a hydrogeological report at the 2025 audit. The report from UzHydroGeology (in Russian) found that the main sources of groundwater recharge are infiltration losses from the Zarafshan River, underground inflow from the Penjikent area, and the sides (third floodplain terraces) of the modern valley. The groundwater flow formed near the Pervomayskaya dam generally moves in a northwestern direction. The groundwater transit zone covers a large area. The report also confirms that the Samarkand site abstracts groundwater from a deeper semi-confined Quaternary aquifer at approximately 60 meters depth.

The report provides partial information on recharge mechanisms, lithology, and general groundwater flow direction. However, while the aquifer type and abstraction depth are described, the spatial extent and boundaries of the groundwater aquifer on which the site depends have not been identified or mapped. No aquifer extent, boundary delineation, or equivalent hydrogeological mapping is provided to show the area over which the aquifer is recharged, flows, or is shared with other users. As a result, the physical scope of the site in relation to its ultimate groundwater source is not fully defined.

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

1.2.1	*Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall:* *- Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people;* *- Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies;* *- Provide evidence of stakeholder consultation on water-related interests and challenges;* *- Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups;* *- Identify the degree of stakeholder engagement based on their level of interest and influence.*	Yes

Comment

The site has identified stakeholders and their water-related challenges, as documented in the attached evidence -SCF Stakeholders. A stakeholder meeting was held on September 23, 2025, with new participants, including JV 'Samarkand England Eco-Medical.' Samarkand State University (SamGU) expressed interest in collaborating on water awareness initiatives, and the site delivered a lecture there on October 21, 2025. SamGU also requested investment for additional studies on regional water resources.

Local neighborhoods, Chopon Ota and Bunyod mahallas, requested assistance with reinstalling a water well, although SuvTaminod (the water provider) currently supplies water to these areas. While the site could not provide financial support, it assisted by submitting a formal request to the government and raising awareness of the issue.

The site's stakeholder identification process includes indirect engagement with vulnerable groups through the mahalla committees, which maintain the official "Iron Notebook" registry of underprivileged households, single mothers, and persons with disabilities. Although these groups are not listed separately in the stakeholder register, engagement with mahalla representatives ensures their interests are captured. Women and minority groups are also represented through this mechanism. There are no Indigenous peoples in the region. Past stakeholder interviews confirm active communication between the site and mahalla committees, supporting inclusive stakeholder coverage.

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

Comment

The site has identified stakeholders within the Zarafshan River catchment, considering its ultimate water source and the receiving water body for wastewater. The analysis evaluates both current and potential influence between the site and stakeholders, using a structured table with the following headings:

Category – Type of stakeholder (e.g., Academia, Community, Private Sector, Utility Provider).
Stakeholder/Organization – Name of the stakeholder or organization.
Responsible – Site representative accountable for engagement.
Level of Interest (1–3) – Stakeholder's interest in water-related issues (3 = high, 1 = low).
Stakeholder Influence to BAT (1–3) – Degree of stakeholder influence on the site's Best Available Techniques (BAT) or operations.
BAT Influence to Stakeholder (1–3) – Degree of site influence on stakeholder decisions or actions.
Openness to Engagement – Engagement approach: Partner (P), Involve (I), Consult (C), Inform (In).
Issue Area / Expertise – Stakeholder's area of focus (e.g., water supply, research, industrial use).
Stakeholder Requirements – Legal or contractual obligations relevant to water management.
Stakeholder Expectations – Anticipated support or collaboration beyond legal requirements.
Fulfillment / Engagement – Status of meeting stakeholder expectations (fulfilled, pending, or non-fulfilled).
Water Challenge – Key water-related issue identified by the stakeholder.
Best Practice – Actions or strategies adopted to address challenges and strengthen engagement.

Evidence is attached in indicator 1.2.1

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

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

Comment

The Water-Related Emergency Response Plan, which forms part of the Business Continuation Plan, is provided as supporting evidence. The document outlines the purpose - Decrease time of water supply interruption and possibility of stop production - Scope, responsible team members, as well as a prevention action plan and an emergency response plan. It was last updated in 2025 and is classified as confidential.
Examples of identified potential emergencies include:
- In case of borehole pump failure. Decrease in water level in reservoirs.
- Leakage in the water supply system line.
- Failure of water treatment plants
- Hazardous material contamination of the water pumping station area
- Decline in groundwater level

Plan is reviewed annually.

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

Comment

The water balance reflected changes related to wastewater treatment facility, stormwater ponds, return water, and irrigation. Engineering team provided evidence - annual water balance and monthly breakdown as well as seasonal.

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

Comment

The site provided a spreadsheet with water balance and annual water withdrawn and intensity since 2022. The evidence also includes the estimates based on monthly monitoring that allows tracking seasonal variance.
The site also tracks water use per million cigarettes equivalent (MCE) annually. The water intensity has improved since 2022 - decreasing from 2.56 MCE to 1.76 MCE. Wastewater treatment upgrade that improved the water withdrawn and recycled performance.

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.*

closed

Comment

Coming groundwater from the production well is tested annually, overseen by the site's medical team in accordance with the EHS roadmap. Evidence was provided in Russian.
Annual source water testing includes the following parameters: Total mineralisation, Sulphates, Chlorides, Iron, Residual active chlorine, Hardness, Ammonia concentration, Nitrates, Nitrites, Odor at 20°C, Odor at 60°C.
These parameters are adequate for characterizing the site's source water quality, and the annual testing frequency is reasonable given the stable groundwater supply. However, the site does not conduct variance analysis on source water data. Therefore, while test results meet relevant standards, the indicator is only partially met due to the absence of variance assessment.

The site monitors wastewater quality on a quarterly basis and provided monitoring results for 2024 and 2025. Effluent parameters are assessed against national legal maximum allowable concentrations.
- pH measured at 5.9 (below the minimum legal limit of 6.0),
- Dissolved oxygen measured at 5.18 mg/L (also below the required minimum of 6.0 mg/L).
The site prepared an action plan to address these deviations, which led to the installation of aeration equipment at the treated-water discharge pond. The aerators were confirmed to be in operation during the site visit.

Although quarterly and annual monitoring data are available, the site does not quantify annual or seasonal high–low variations for either effluent or groundwater (source water). No variance analysis or trend assessment has been conducted, which remains a gap against indicator requirements.

Finding No: TNR-022418

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

Yes

Comment

Site provided identified sources of pollution on map and separately list (inventory) of potential pollutants within each identified location on the map, it's use, location, volumes. The storage of chemicals on site is with secondary containment, the spill kits are available.

1.3.6 *On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.*

Yes

Comment

Site provided a presentation on the pond and garden as an IWRA that includes it's location on site and description of environmental importance, risks, status and community and cultural importance. Trees in the garden a subject to inventory. Pond was re-constructed and divided into two separate ponds - stormwater collection pond and pond for collection of discharge of treated water.

1.3.7 *Annual water-related costs, revenues, and a description or quantification of the social, cultural, environmental, or economic water-related value generated by the site shall be identified and used to inform the evaluation of the plan in 4.1.2.*

Yes

Comment	Annual water-related costs for 2024 and 2025 included in the a table included in the evidence. Capital cost in 2024 and 2025 included wastewater treatment plan modernisation and re-construction of stormwater pond and WWTP discharge water pond, as well as associated infrastructure on-site (channels, irrigation pipeline).	
1.3.8	*Levels of access and adequacy of WASH at the site shall be identified.*	Yes
Comment	The site's evaluation of WASH access and adequacy against legal requirements confirms compliance. No changes have occurred that would affect the adequacy of WASH provisions. Drinking water is supplied through bottled water, and cleaning services are provided by an external contractor.	
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 site has identified the embedded water use for all primary inputs and, where possible, estimated both water quantity and associated water risk. The only primary input within the site's catchment is Ugrut GLT - the embedded water use, quality and water risk is provided in the table. All other primary inputs originate outside the site's catchment, and their original locations have been verified to confirm this assessment.	
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	The site does not have embedded water use of outsourced services that are located outside of site boundaries. Following services are provided within the site boundaries - catering, laundry, cleaning and engineering services.	
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 provided presentation with identified water governance initiatives. The site has identified water governance initiatives at both regional and national levels, including relevant policies, plans, and legislative changes. For each initiative, the site has provided an assessment of its relevance and potential opportunities for engagement or compliance.

Examples provided in the presentation include:
- Uzbekistan's 2030 Strategy - prioritizes water as a critical resource.
Key measures include:
Improving water use efficiency by 25% through water-saving technologies.
Converting 50% of irrigation networks to closed systems.
Developing a national water resource balance and continuous monitoring system.
Engaging the private sector in water processing, delivery, and distribution.
Upgrading 13,100 km of canals with concrete lining (+46%).
Replacing 1,069 pumps and 1,079 motors with energy-efficient models.
- The Global Environment Facility has allocated $26 million for Central Asian projects, of which $18.6 million involving Uzbekistan will be directed toward restoring land in vulnerable ecosystems and improving the management of natural and water resources of the Amu Darya, Zarafshan, Panj, Syr Darya, and Naryn rivers.
- new Water Code and how it impacts the site
- A Presidential Decree (May 15, 2025) approved the Concept for Raising Environmental Awareness until 2030. Goals include:
Instilling ecological culture in 3.3 million preschoolers and 4.2 million schoolchildren.
Strengthening environmental education for 400,000 vocational students and 1.9 million university students.
Improving ecological awareness among 90% of government and enterprise employees.
Starting in 2025, an annual national eco-championship "New Tree – New Breath" will be held.

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 developed a comprehensive register of all environmental regulatory and legal requirements, including those related to water. In addition to listing the requirements, the register specifies potential consequences for non-compliance, such as applicable penalties.

The site has 'special water use' permit, for extracting water from the onsite boreholes, from the Ministry of Geology, Zarafshan Department of Hydrogeology. The site is permitted to extract 304.85 m3 per day and 111,271m3 per year. There are three conditions set by the permit: water meter instalment, keeping the well area clean, and monitoring of groundwater levels. The permit is for 2020-2025 and the site pays quarterly compensation for extraction. The site is not required to report back on extraction rates, but the Department can undertake spot checks to review records.

Site will renew the special water use' permit next year as the permit will expire this year (2025).

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

Obs.

Comment

The site quantified the Zarafshan catchment water balance using publicly available data, including statistics from the Ministry of Water Resources (2018–2019), Zarafshan River inflow volumes (2023), and a groundwater report from UzHydrogeology. The catchment maintains a negative water balance, indicating severe scarcity of both surface and groundwater resources—a situation well understood by the site and expected to worsen. This insight is shaping the site's water stewardship priorities. Analysis shows that nearly all generated surface water is consumed for irrigation, leaving no surplus for other uses, further confirming the extent of water scarcity in the catchment.
The submitted water balance data demonstrate for both the vegetation season and the non-vegetation season. This seasonal separation reflects the key hydrological differences within the basin and provides an adequate basis for understanding seasonal variation in water availability and use.

Separately it was noted that UzHydroGeology did not provide the report in line with the scope of work, and some results were not correct - which the site brought up with UzHydroGeology. UzHydroGeology cited a lack of capacity to meet the site's expectations.

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.*

Obs.

Comment

The site has initiated a study by UzHydroGeology to improve understanding of the water quality of its underground water source. The tests done on-site provide water quality analysis. No further studies were conducted; the site used the information from publicly available sources.

The main outcomes of the study are provided below:
Groundwater in the Upper Zarafshan area is primarily recharged by infiltration from the Zarafshan River, making surface water quality critical. Chemical tests show low mineralization (≤0.49 g/L), moderate hardness, and a bicarbonate-calcium composition with neutral to slightly acidic pH. Chlorides and sulfates are within safe limits, and toxic metals are far below permissible concentrations. Uranium and thorium are present in trace amounts; radium is absent. Water is clear, odorless, and safe, with temperatures between 9–18°C. Bacteriological tests confirm no pathogenic contamination.

UzHydroGeology did not have the capacity to provide data on water quality and did not fulfill the full scope of work agreed to in the contract—seasonal variance on water quality could not be provided; the scope was limited to the site's underground water quality.

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

The identified Important Water-Related Areas (IWRAs) include Zaravshan National Park, Qaratepa Reservoir, and Shervok Ota Well. The supporting evidence provides descriptions, ecological and social values, current status, and water-related risks for Zaravshan National Park. Maps illustrate all three IWRAs, while additional details on status, values, and risks are provided for Qaratepa Reservoir and Shervok Ota Well.

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

Yes

Comment

The site has identified existing water-related infrastructure within the catchment, including sewerage systems, wastewater treatment plants, and pumping stations, along with their condition and exposure to risks in the provided presentation
Summary of Findings:
- Existing Infrastructure:
The region operates 19 sewerage systems, including 5 managed by district and city authorities, 2 by NGMK, and others by the Ministry of Agriculture and Uzdonmahsulot.
Centralized sewerage exists only in Samarkand (including Farkhad and Geofizika settlements), Kattakurgan, and Bulungur.
There are 5 wastewater treatment plants and 7 pumping stations with a combined capacity of 163,500 m³/day. Sewerage collectors span 79.5 km, and networks cover 318.9 km.
- Major facilities include:
Samarkand (Zagorodnye, 1964) – 139,000 m³/day
Farkhad (1983) – 3,500 m³/day
Geofizika (1991) – 1,000 m³/day
Kattakurgan – 20,000 m³/day
Bulungur – 700 m³/day
The current load is 37.3% (61,000 m³/day), indicating underutilization due to limited network coverage.

- Condition and Risks
Aging Infrastructure: 204.6 km of sewerage networks exceed 25 years of service; 92.5 km require immediate replacement.
Failure Rates: Accidents have increased dramatically—from 836 incidents in 2005 to 1,693 in 2010 (202% rise), mainly due to wear and tear.
Treatment Efficiency Decline: At Boynazar WWTP (Kattakurgan), efficiency dropped from 30.7% in 2008 to 12.9% in 2009.
Exposure to Extreme Events: High vulnerability due to deteriorated infrastructure and insufficient coverage.

- Water Supply Coverage
Population (2011): 3.18 million; projected 2020: 3.65 million (+117%).
Official coverage: 84.6% (urban 99.8%, rural 78%), but actual coverage is lower—64.2% overall, 58.7% rural.
Lowest coverage in Koshrabad district: 31.4% (rural 26%). Out of 137 settlements, 113 lack a centralized water supply.

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

Yes

Comment

The site updated the presentation on WASH services that were identified based on national assessment. Key findings from the Water Risk Filter data:

Access to safe water:
Rural areas: 71%
Urban areas: 89%
Access to sanitation: 60%
Schools with WASH infrastructure: 50%

Local neighborhoods, Chopon Ota and Bunyod mahallas, requested assistance with reinstalling a water well, although SuvTaminod (the water provider) currently supplies water to these areas. While the site could not provide financial support, it assisted by submitting a formal request to the government and raising awareness of the issue

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.*

Obs.

Comment

The site listed and prioritized the shared water challenges that were communicated and agreed upon with the selected stakeholders during the meeting in September 2025. The only addition to the list was a shared water challenge added after consultation with SamGU.

Shared water challenges identified by site include:
- Channel overflow
- Water scarcity
- Poor quality of drinking water
- Water supply interruptions
- Water contamination
- Water sustainability in the catchment
- Low awareness of water stewardship
- Unsustainable regulation of water balance
- Lack of constant supply of clean drinking water
- Lack of infrastructure
- Low awareness of catchment water-related issues

However, the evidence does not clearly demonstrate how the site consolidated individual stakeholder challenges into shared water challenges. While stakeholder-specific issues are listed, the documentation does not show which concerns are common across multiple stakeholders or how the site analyzed these inputs to identify shared, catchment-level challenges. As a result, the requirements of Indicator 1.6.1 are only partially met.

To address this gap, the site should clearly distinguish stakeholder-specific challenges from those that are genuinely shared, provide justification for why each identified issue qualifies as a shared challenge, and document the analytical steps used to move from individual stakeholder input to the final prioritized list of shared water challenges.

1.6.2 *Initiatives to address shared water challenges shall be identified.*

Yes

Comment

Site has identified the initiatives to address the identified shared water challenges with the status for each initiative, due date and communication method.
Site expanded the list of initiatives that were identified in where response was provided in collaboration with stakeholders. Site expressed frustration with the lack of response from the stakeholders in cooperating on water stewardship initiatives, however the initiatives that were consulted with stakeholders include:
- Control over the modernization of the drainage ditch by the Farkhad shifer JSC
- Pipeline diagnostics, restoration of 2 destroyed water towers, modernization of water intake equipment
to ensure uninterrupted water supply with local communities at Farkhad community
- Budgeting financing of equipment purchase for SamGU to carry out studies on groundwater resources

Previously identified intiative include:
Kurbanabad stakeholder engagement – channel modification
Restoration of 2 destroyed water towers
Modernization of water intake equipment to ensure uninterrupted water supply
Laying waterways to dry areas
Control over modernization of drainage ditch by Farkhod Shifer JSC
Engaging with peer organizations and stakeholders to promote water stewardship
Promotion to increase awareness
A comprehensive water stewardship plan that is routinely reviewed and updated
Training on the principles of water stewardship and how to incorporate them into daily tasks and responsibilities
Meeting with stakeholders for awareness about water scarcity and regional water issues
Organization of meetings and briefings on responsible water regulation
Participation in open dialogue and other meetings, PR
Exceeding norms / detection of chemical elements in treated wastewater
Budget allocation for equipment

1.7 *Understand the site's water risks and opportunities: Assess and prioritize the water risks and opportunities affecting the site based upon the status of the site, existing risk management plans and/or the issues and future risk trends identified in 1.6.*

1.7.1 *Water risks faced by the site shall be identified, and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.*

Yes

Comment

The site has identified and prioritized its water-related risks through a structured risk assessment process. Each risk was evaluated based on likelihood, impact severity, and potential business cost within a defined timeframe. The assessment includes risk classification (internal/external), causes, consequences, risk scoring, assigned risk owners, existing controls, planned mitigation measures, progress since the previous review, and estimated financial impacts.

Key water-related risks identified include:
- Declining groundwater levels and groundwater contamination
- Water-quality deterioration, including risks related to the on-site pond and treatment facilities
- Non-compliance with legislative requirements
- Infrastructure-related risks, such as leaks, ruptures, storage overflow, and unintentional water losses
- External risks, including earthquakes, impacts from the Zarafshan River, adjacent enterprises, and Zarafshan National Park (IWRA)
- Risks arising from insufficient information on the wider water intake area (within a 25 km radius)

This risk assessment informs the site's prioritization of mitigation actions and water stewardship planning.

The site evaluated the potential costs of each identified water-related risk through a cross-functional process involving the Sustainability, Engineering, and Financial departments. As part of the risk assessment, the site estimated business impacts by combining gross margin loss per day with the expected duration of disruption associated with each risk scenario. The Engineering department contributed by estimating the expected time required to respond to or recover from each risk, including repair time, operational downtime, or reduced production capacity. The sustainability team integrated these inputs into the risk table.
As a result, the potential cost for each risk is calculated as: Gross margin loss (GBP/day) × Estimated duration of impact (days).

1.7.2 *Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.*

Yes

Comment

he site has identified water-related opportunities and documented them in a structured table that includes:

Opportunity description and explanation
Internal/External classification
Associated process
Potential impact and expected result
Detection date
Planned actions, responsible person, due date, realization date, and status
Estimated potential savings (GBP)

Key Water-Related Opportunities Identified:
Modernization of wastewater treatment plant (WWTP)
Reduction of groundwater level
Collaboration on water regulation with neighboring enterprises in the same water horizon
Projects to prevent risks of Zarafshan River deepening and biodiversity loss
Addressing groundwater pollution
Tackling problems of the Zarafshan River (drought, pollution, ecosystem disturbance)
Mitigating negative impacts from nearby enterprises
Improving information availability on the water intake area (25 km)
Implementation of strategy to reduce water consumption by 30% by 2025
Adoption of best practices in water regulation

1.8 *Understand best practice towards achieving AWS outcomes: Determining sectoral best practices having a local/catchment, regional, or national relevance.*

1.8.1 *Relevant catchment best practice for water governance shall be identified.*

Yes

Comment

The site has identified and documented best practices for water governance within the catchment. Evidence includes a presentation outlining these practices.
Best Practices Identified:

AWS Standard Implementation – Adoption of international water stewardship principles.
Annual ESG Reporting – Transparency in environmental, social, and governance performance.
Collaboration with Qaratepa Reservoir (Public Sector) – Joint efforts to improve water management.
Regular Meetings with Water-Related Stakeholders – Strengthening dialogue and shared responsibility.
Seminar in Samarkand State University - to raise awareness of water stewardship and share best practices

1.8.2 *Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.*

Yes

Comment

The site has identified and implemented best practices to maintain a sustainable water balance within the catchment. Evidence provided includes operational monitoring and infrastructure improvements.
Best Practices Identified:

Daily monitoring of internal water KPIs by the Engineering team, weekly review at plant DDS, and monthly reporting at plant level.
Routine maintenance and control of the water system on a daily basis to prevent leaks and inefficiencies.
Modernization of the wastewater treatment plant (WWTP) and reuse of treated water for irrigation purposes, reducing freshwater demand.
Water savings initiatives: sensors mixers, reusing water (condensate recovery, treated water for irrigation & cooling tower
Water-saving training sessions conducted for contractors, including cleaning staff and gardeners, to promote responsible water use practices.

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

Yes

Comment

The site has adopted best practices consistent with sector standards to maintain and improve water quality:
-Continuous monitoring of wastewater quality parameters to ensure compliance with internal and regulatory standards.
- The facility operates a closed water system, eliminating discharge into sewer networks or natural terrain, thereby preventing contamination risks
- Treated water is reused for irrigation, reducing freshwater demand and minimizing environmental impact
- A Business Continuity Plan (BCP) for water supply is in place to safeguard operations and maintain water quality during emergencies

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

Yes

Comment

The site has adopted best practices for maintaining and restoring Important Water-Related Areas within the catchment:
- Plogging Activity at Qaratepa Reservoir
- Shirvok Ota restoration activity
- Pond modernization (on-site IWRA)

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

Yes

Comment

The site has adopted practices that align with recognized WASH (Water, Sanitation and Hygiene) best practice:
- Bottled drinking water provided on-site to ensure continuous access to potable water that meets quality standards
- Bathrooms for men and women are provided, supporting gender-responsive, safe, and dignified sanitation including the needs for religious group

2	STEP 2: COMMIT & PLAN - Commit to be a responsible water steward and develop a Water Stewardship Plan	
2.1	*Commit to water stewardship by having the senior-most manager in charge of water at the site, or if necessary, a suitable individual within the organization head office, sign and publicly disclose a commitment to water stewardship, the implementation of the AWS Standard and achieving its five outcomes, and the allocation of required resources.*	
2.1.1	*A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:* *- That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes* *- That the site implementation will be aligned to and in support of existing catchment sustainability plans* *- That the site's stakeholders will be engaged in an open and transparent way* *- That the site will allocate resources to implement the Standard.*	Yes
Comment	The site commitment to water stewardship is published on the site's website and be accessed and viewed by the following link: https://bat.uz/uploads/files/obyazatelstvo-Samarqand.pdf. The statement was signed by head of Samarkand Branch and published in 2023. There were no changes to the statement since 2023.	
2.2	*Develop and document a process to achieve and maintain legal and regulatory compliance.*	
2.2.1	*The system to maintain compliance obligations for water and wastewater management shall be identified, including:* *- Identification of responsible persons/positions within facility organizational structure* *- Process for submissions to regulatory agencies.*	Yes
Comment	The site maintains an environmental regulatory and legal requirements register and conducts internal audits to verify full compliance with water-related regulations. Additional water uses and water discharge is managed under Instructions #141 that was updated this year to include monitoring of water well levels. The instruction also outlines responsibilities and outlines the management of water use and water discharge, laboratory control of water quality, reporting, emergency situations.	
2.3	*Create a water stewardship strategy and plan including addressing risks (to and from the site), shared catchment water challenges, and opportunities.*	
2.3.1	*A water stewardship strategy shall be identified that defines the overarching mission, vision, and goals of the organization towards good water stewardship in line with this AWS Standard.*	Yes

Comment	The site has provided an Environmental Policy Statement that includes a stand-alone Water Stewardship Policy with overarching SMART goals and objectives. Key Goals and Commitments: Reduce water withdrawal and increase recycling across operations to support freshwater ecosystem conservation. By 2025, achieve a 36% reduction in water withdrawal and increase the water recycling rate to 30%, compared to 2017 baseline. Promote access to safe WASH across facilities, farms, and supply chain communities, recognizing the human right to water. Collective action for water stewardship across the value chain, including supporting directly contracted farmers to use water more efficiently. Prevent, minimize, and control water pollution and discharges in operations, and collaborate with the wider value chain to achieve the same standards. The policy is publicly available on the site's website in three languages (English, Uzbek, and Russian): Occupational Health and Safety Policy Future Updates: The Global BAT Water Stewardship Policy is scheduled for revision in 2026 to update targets that expire next year. Policy is available to review by this link: https://bat.uz/uploads/files/occupational-health-and-safety-policy.pdf	
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 developed a comprehensive Water Stewardship Plan (WSP) that outlines actions, targets, and responsibilities to achieve water-related objectives in alignment with AWS outcomes and sector best practices. The plan includes the following elements for each target: Measurement and Monitoring: Each action specifies measurable targets (e.g., % reduction in water withdrawal, recycling rate, WASH improvements). Progress is tracked through KPIs and documented in the WSP under columns such as Target, Achieved, and Actual Timeframe. Actions to Achieve and Maintain Targets: Detailed actions are listed under the Action column (e.g., modernization of wastewater treatment, groundwater monitoring, WASH facility upgrades). Linkages to AWS outcomes and shared water challenges are captured in the Action Linkage and AWS Outcome columns. Planned Timeframes: Initial and actual timeframes for each action are recorded in the WSP (Initial Timeframe and Actual Timeframe columns), ensuring accountability and timely delivery. Financial Budgets: Budget allocations for each action are documented in the Budget (UZS) column, supporting resource planning and transparency. Roles and Responsibilities: The WSP clearly identifies roles under Responsible, Accountable, Consulted, and Informed columns, ensuring clarity in execution and governance. Value Creation and Priority: Each action includes an assessment of Value Creation, Scope, and Priority, aligning with strategic objectives and stakeholder expectations. Link to Best Practice and AWS Outcomes: The WSP explicitly connects each action to AWS outcomes (e.g., sustainable water balance, good water quality, WASH access) and shared water challenges, reinforcing alignment with global water stewardship standards.
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	The site has engaged with public-sector and infrastructure stakeholders to explore shared water challenges and identify opportunities for collaborative action. While the site operates a closed water loop and does not rely on municipal supply or wastewater infrastructure, collaboration has focused on knowledge-sharing and capacity-building within the catchment. Collaborative initiatives to date include: - Engagement with Samarkand State University (SamGU): The site delivered a lecture on water stewardship and site water management practices to SamGU students and faculty, strengthening academic–industry cooperation. The engagement also initiated discussions on the potential for additional joint studies related to groundwater, catchment hydrology, and local water challenges. - Participation in public-sector stakeholder discussions: As part of the site's shared water challenge assessment, the site met with local authorities and infrastructure agencies (e.g., SuvTa'minot, environmental regulators, and municipal representatives) to exchange information on water risks, catchment pressures, and opportunities for joint action. These engagements demonstrate the site's efforts to collaborate with public-sector and institutional stakeholders, even though the facility does not depend on external water infrastructure. Further collaborative opportunities may emerge from ongoing dialogue with SamGU and local authorities.

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	The site has actively supported good catchment governance through documented best practices and collaborative actions, aligned with AWS principles and shared water challenges - Plogging Activities: Conducted at three sites around Qaratepa Reservoir (IWRA), collecting over 1 tonne of waste, improving water quality and ecosystem health. - Stakeholder Engagement: Meetings held with public-sector agencies to address shared water challenges and agree on joint actions. - Educational Outreach: Seminar at Samarkand State University (SamGU) attended by 60+ students, focusing on water issues and best practices. - Annual ESG Reports: Published for UZ BAT, including Samarkand Cigarette Factory, demonstrating transparency and governance. - Potential review of investment to support SamGU studies of the catchment water balance and water quality	
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 actively engages with nearby Mahalla settlements—Farkhad, Bunyod, and Chopon Ota—to advocate for and support their water rights. Both Chopon Ota and Bunyod have requested assistance in reinstating a local water well. While SuvTaminot, the regional water provider, remains responsible for supplying potable water, the site has facilitated formal requests to local authorities and raised awareness of community needs, despite being unable to provide direct financial support. No Indigenous peoples have been identified within the site's area of influence. Additionally, the site provides training for subcontractors from local communities, focusing on water-saving practices and responsible water use	
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 site has established a formal process to ensure full compliance with all applicable water-related legal and regulatory requirements, supported by documented controls and internal audits.
Key Elements of the Compliance Process:
- Regulatory Register: The site maintains an environmental regulatory and legal requirements register, listing all relevant health, safety, and environmental legislation applicable to its operations.
Internal Audits: Regular internal audits are conducted to verify compliance with water-related regulatory requirements and BAT policy standards.
- Control Framework:
Procedures exist to identify non-compliance and take effective, proportionate corrective actions.

Roles and Responsibilities:
The Sustainability Manager is responsible for overseeing compliance, tracking legislative changes, and ensuring updates are registered.
Environmental permits and safety instructions are reviewed at intervals defined by legislation.

The site is in full compliance with all applicable water-related legal and regulatory requirements. Although the pH (5.9) and dissolved oxygen (5.18 mg/L) values recorded in Q1 were below the legal limits, this did not constitute a legal violation because the site does not discharge treated wastewater to the environment. The legal standards apply to discharge quality, and since no discharge occurs under the site's closed-loop system, the exceedance triggered no regulatory non-compliance and no penalties or enforcement actions were issued.

The exceedances therefore represent a deviation identified through internal monitoring against legally defined thresholds, rather than a breach of a permit or discharge requirement. The site implemented corrective actions, including installation of aeration equipment, to address these deviations.

Based on the available evidence, there were no legal or permit violations during the audit period, and the site is currently in full legal compliance with all applicable water-related requirements.

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

There are no legal or regulatory requirements obligating the site to directly provide for, or formally ensure, the water rights of others. Nevertheless, the site demonstrates proactive engagement with nearby Mahalla settlements — Farkhad, Bunyod, and Chopon Ota — in support of their access to safe and reliable drinking water.
Chopon Ota and Bunyod Mahallas have requested assistance in reinstating a local water well. Although SuvTaminot, the regional water provider, holds responsibility for supplying drinking water and while the site cannot provide direct financial assistance for infrastructure improvements, it has supported the communities by facilitating formal requests to government authorities and raising awareness of their needs.

Communities have a access to the site's management in case of any issues that the site can assist in resolving.

3.3 *Implement plan to achieve site water balance targets.*

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

Yes

Comment

The site has implemented a range of best practices to achieve water balance targets outlined in its Water Stewardship Plan. Progress is monitored regularly, and the status of each action is assessed as “Complete,” “In Progress,” “Continuous,” or “Cancelled.”

Significant progress has been made in achieving and surpassing the water balance targets outlined in the Water Stewardship Plan. The most substantial measure is the construction of the new Wastewater Treatment Plant (WWTP), which has considerably increased the site’s treatment capacity and improved effluent quality throughout 2024, with full completion in 2025.
The new WWTP incorporates a six-stage treatment process, compared with the previous facility’s two stages (physical filtration and biological treatment). This upgrade represents a major step toward meeting discharge-quality and water-efficiency objectives.
The project reached 100% completion in September 2024, and associated infrastructure — including the stormwater pond and the treated-water discharge pond — was finalized in May 2025.

Site has reached 57% if water recycled compared to baseline of 2017 and -51% of water withdrawn compared to baseline of 2017.

3.3.2 *Where water scarcity is a shared water challenge, annual targets to improve the site’s water use efficiency, or if practical and applicable, reduce volumetric total use shall be implemented.*

Yes

Comment

The site has an overall goal included in the Environmental Policy and in the Water Stewardship Plan by 2025 to reduce the amount of water withdrawn by 36% whilst increasing the water recycling rate to 30% in comparison to 2017.
The following actions are being implemented or were implemented in 2024-2025:
- WWTP modernization completion
- re-use of treated water in toilets and cooling towers
- use of treated water for irrigation on-site

The site has reached 57% of water recycled compared to the baseline of 2017 and -51% of water withdrawn compared to the baseline of 2017.

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

Yes

Comment

The site has confirmed that there are no legally binding requirements in Uzbekistan mandating the reallocation of water for social, cultural, or environmental purposes.
Water withdrawal is conducted strictly in accordance with the conditions specified in the special water use permit, ensuring compliance with national regulations.
Site is pursuing initiatives and providing support in the local community to improve access to water.

3.4 *Implement plan to achieve site water quality targets*

3.4.1 *Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.*

Yes

Comment

Incoming water is monitored on a quarterly basis; the trends are monitored via a table of the results of lab analysis.
The medical team monitors incoming water quality. When the quality is not in compliance with drinking water standards, the medical team informs the EHS department to address the issues and approve the action plan. The other department (Engineering) is informed on such water quality issues.
The water quality target set in the WSP is "Legal compliance - do not exceed MACs". This target is achieved and measured quarterly.

The site set the legally set maximum allowed concentrations as water quality targets for incoming water quality.

3.4.2 *Where water quality is a shared water challenge, continual improvement to achieve best practice for the site's effluent shall be identified and where applicable, quantified.*

Yes

Comment

The site does not discharge treated water, and treated water is reused internally for cooling towers, toilets, and irrigation purposes. This demonstrates that the site does not have an impact on receiving water quality. Nonetheless, the site has implemented measures to ensure continual improvement in effluent management, aligned with best practice and AWS principles.
Infrastructure Upgrade:
- Modernization of the wastewater treatment plant has been completed, enabling reuse of treated water for irrigation and reducing dependency on freshwater sources.
- Ongoing Action:
Continuous monitoring and maintenance of the wastewater treatment system ensure sustained performance and compliance with water quality expectations.
The site identified a slight decrease in treated water against MAC in pH and dissolved oxygen. As a solution, the site has installed an aerator in the treated water pond. This resulted in improved water quality within the set MAC in the second and third quarters.

Regarding the potential impact of the on-site irrigation on the groundwater, the irrigation volumes are limited and applied within the facility boundary, and the treated effluent quality meets the parameters required for on-site reuse. Given the small scale of irrigation, the absence of infiltration pathways leading to a vulnerable aquifer, and the lack of any regulatory concerns raised to date, the risk of groundwater impact is considered low.

3.5 *Implement plan to maintain or improve the site's and/or catchment's Important Water-Related Areas.*

3.5.1 *Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.*

Yes

Comment

The site provided evidence, and it was verified during the site visit of the following:
- The stormwater pond and treated water discharge ponds were reconstructed.
- The channel leading from the WWTP to the pond was reconstructed.
Both ponds are lined with geomembrane to prevent any seepage to the groundwater.

Additionally, the site participated in a plogging exercise with the team at the Qaratepa Reservoir, which is located within the catchment. This activity resulted in the removal of approximately 1 tonne of waste from the reservoir surroundings. The site remains in ongoing communication with the reservoir administration and is exploring opportunities for further collaboration to enhance this IWRA, including potential support for tree planting initiatives around the reservoir.

3.6 *Implement plan to provide access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers at all premises under the site's control.*

3.6.1 *Evidence of the site's provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers onsite shall be identified and where applicable, quantified.*

Yes

Comment

Provided evidence for this indicator includes:
- information on site's quantification of wash measures across the site in a spreadsheet, including evidence of the relevant regulatory requirements.
- sub-contractor agreement for provision of bottled drinking water

Since last year site did not have an increase of employees on site. The estimation of toilets, wash rooms, showers provided in tabular form.
During audit the tea rooms and kitchens were shown that were equipped with bottled water dispensers. Water is supplied by a sub-contractors.

3.6.2	*Evidence that the site is not impinging on the human right to safe water and sanitation of communities through their operations, and that traditional access rights for indigenous and local communities are being respected, and that remedial actions are in place where this is not the case, and that these are effective.*	Yes
Comment	The site confirms that its operations do not impinge on the human right to safe water and sanitation for surrounding communities and that traditional access rights for local and indigenous communities are respected. The information provided as evidence includes the water challenges and potential solutions discussed during meeting with stakeholders that included representative from Mahalla settlement Farkhad, Bunyod and Chopon Ota. The results of coordination with the mahallas of Farkhad, Bunyod, Chupon Ota to solve the water problems of stakeholders were discussed, all legislative aspects were also discussed with representatives of the municipal water utility.	
3.7	*Implement plan to maintain or improve indirect water use within the catchment:*	
3.7.1	*Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.*	Yes
Comment	Portion of the site's indirect water use (primary input within the same catchment) is managed through the same EHS management systems and water use targets with BAT Urgut site. The overall goal for both sites is included in the Environmental Policy and in the Water Stewardship Plan by 2025 to reduce the amount of water withdrawn by 36% whilst increasing water recycling rate to 30% in comparison to 2017. Urgut Fermentation Plant has implemented several actions to reduce water use: - Daily tracking of internal water KPIs by the Engineering team. - Weekly monitoring through the plant DDS system. - Modernization of the wastewater treatment plant to enable reuse of treated water for irrigation. - Installation of sensors and mixers to optimize water consumption. - Condensate recovery and reuse of treated water for irrigation -Water-saving training for contractors, including cleaning staff and gardeners, to promote responsible water use practices. The UFP has achieved 34% water recycling and a 79% reduction in water extraction, significantly surpassing its water balance targets. These results were primarily driven by a 55% reduction in production volume, combined with modernization of the wastewater treatment plant and reuse of treated water for irrigation.	
3.7.2	*Evidence of engagement with suppliers and service providers, as well as, when applicable, actions they have taken in the catchment as a result of the site's engagement related to indirect water use, shall be identified.*	Yes
Comment	Site engages with UFP for water stewardship and holds regular meetings. Site provided some evidence of such meetings scheduled through Teams. Site shares the same sustainability team overseeing water stewardship plans	
3.8	*Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have.*	
3.8.1	*Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.*	Yes

Comment	The site has a closed-loop water system, with a self-owned water supply and treated water discharged into an on-site pond. Consequently, the site does not have any shared water-related infrastructure. However, the site is actively promoting the water rights of the local Mahalla settlements—Farkhad, Bunyod, and Chopon Ota—by exploring and developing projects to restore infrastructure, such as a water pump. Site had a flooding in August 2025 caused by blocked drainage channels outside of the site boundaries. Site engaged with local authorities and resolved the cause of flooding.
3.9	*Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.*
3.9.1	*Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.* ✓ Yes
Comment	The site provided a presentation outlining completed actions that demonstrate its commitment to good catchment governance, including: - Plogging Activities: Conducted at three locations around the Qaratepa Water Reservoir (IWRA), resulting in the collection of over 1 tonne of waste in May 2025. - Stakeholder Engagement: Regular meetings with water-related authorities and local stakeholders to address shared water challenges. - Educational Outreach: Seminar at Samarkand State University, attended by more than 60 students, focused on water issues and best practices. -Identification key water governance initiatives, goals and directions
3.9.2	*Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.* ✓ Yes
Comment	The site is implementing a series of best practices to meet its water balance objectives: - Continuous Monitoring: Daily tracking of internal water KPIs by the Engineering team. Weekly monitoring through the plant DDS system. Monthly reviews at the plant level. - Operational Controls: Daily maintenance and control of the water system to ensure efficiency and prevent losses. -Infrastructure Improvements: Modernization of the wastewater treatment plant to enable reuse of treated water for toilets, cooling towers and irrigation. Re-construction of stormwater pond and treated water discharge pond. - Water-Saving Initiatives: Installation of sensors and mixers to optimize water consumption. Condensate recovery and reuse of treated water for toilets, cooling towers and irrigation. Capacity Building: Water-saving training for contractors, including cleaning staff and gardeners, to promote responsible water use practices.
3.9.3	*Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.* ✓ Yes

Comment	The site has adopted and implemented best practices to maintain and improve water quality: -Continuous monitoring of wastewater quality parameters to ensure compliance with internal and regulatory standards. - The facility operates a closed water system, eliminating discharge into sewer networks or natural terrain, thereby preventing contamination risks - Treated water is reused for irrigation, reducing freshwater demand and minimizing environmental impact - A Business Continuity Plan (BCP) for water supply is in place to safeguard operations and maintain water quality during emergencies

3.9.4 *Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.* ✓ Yes

Comment	In 2025, the site implemented an action to maintain and enhance its Important Water-Related Area (IWRA) at the Qaratepa Water Reservoir. The activity involved plogging at three locations around the reservoir, resulting in the collection of over 1 tonne of waste during May 2025. This initiative contributed to improving water quality and improving IWRA. Site provided evidence and it was verified during site visit of following: - stormwater pond and treated water discharge ponds were re-constructed. - channel leading from WWTP to pond was re-constructed. Both pond are lined with geomembrane to prevent any seepage to the groundwater.

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

Comment	Provided evidence for this indicator includes evidence of implementation of following actions: -Zero unplumbed losses - Water sensors/ mist taps, dry urinals, optimized water irrigation technology on site mapped and assessed and implemented where applicable. -Water Recycling 60%

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

The site evaluates its performance against the targets set in the Water Stewardship Plan (WSP) and measures its contribution to achieving AWS outcomes. The WSP includes actions under headings such as Achieved, Actual Timeframe, Value Creation, Scope, Priority, AWS Outcome, Budget, Category, and Responsible Parties.
Status Overview:

Actions marked as Done indicate completed initiatives aligned with water stewardship objectives.
Actions marked as In Progress represent ongoing activities contributing to medium- and long-term goals.
Actions marked as Cont. (Continuous) reflect recurring or sustained efforts, such as awareness programs, stakeholder engagement, and monitoring activities.

Summary of Progress:
A significant portion of actions are continuous, demonstrating ongoing commitment to water stewardship practices.
Several key initiatives have been completed, including infrastructure upgrades, awareness campaigns, and stakeholder engagement activities.
In-progress actions focus on implementing best practices, improving water efficiency, and enhancing collaboration within the catchment.

4.1.2 *Value creation resulting from the water stewardship plan shall be evaluated.*

✓ Yes

Comment

The site has enhanced its assessment of value creation from the Water Stewardship Plan (WSP), quantifying benefits where possible. The sustainability team, supported by the finance team, evaluated value creation through measurable indicators such as water savings (calculated based on tax payments per cubic meter), carbon reduction from tree planting (monetized via CO□ absorption), and waste removal from Important Water-Related Areas (IWRA) expressed per tonne.
Where direct financial value could not be assigned—such as identifying government initiatives—the site assessed qualitative benefits, including risk avoidance (e.g., prevention of penalties under new policies and legislation) and knowledge-sharing with stakeholders. This approach was validated during a stakeholder interview with JV 'Samarkand England Eco-Medical,' where the chief engineer emphasized the positive impact of adopting best practices shared by the site during its water stewardship journey.
For new or incomplete actions, value is currently marked as 'TBD (to be defined)

4.1.3 *The shared value benefits in the catchment shall be identified and where applicable, quantified.*

✓ Yes

Comment

The Water Stewardship Plan (WSP) has generated measurable and non-measurable value across economic, environmental, and social dimensions. The evaluation considered direct financial benefits, avoided costs, and intangible gains such as stakeholder engagement.
Below is a list of actions that created shared value benefits:
- Conducting AWS informational sessions and awareness training
- Collaboration with NGOs and international institutes
- Plogging activity at Qaratepa Reservoir
- Identification of key water governance initiatives, goals, and management directions

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.*

closed

Comment

The site did not prepare an annual review of the year's emergency incidents as a separate document. The site did provide the note from the security services informing the EHS department of the flooding on August 20, 2025. The note indicated that the gardeners were instructed to help divert water to the stormwater channels.

The steering committee discussed the incident with flooding and reported corrective action; however, the documents did not include root-cause analysis, and no proposed preventative and corrective actions and mitigations against future incidents were identified.

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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.*

Yes

Comment

A stakeholder meeting was held on 23 September 2025 with participation from new stakeholders, including JV Samarkand England Eco-Medical. Samarkand State University (SamGU) expressed interest in collaborating on water awareness initiatives, and the site subsequently delivered an AWS-focused lecture there on 21 October 2025. SamGU also expressed interest in potential investment support for additional studies on regional water resources.

During the stakeholder consultation, the site shared its water stewardship performance using the stakeholder brochure provided in the evidence. The brochure summarized the site's key actions and achievements, including reductions in water consumption, increased water recycling, modernization of the evaporative pond, commissioning of new treatment facilities, reuse of treated water for toilets and irrigation, participation in collective activities such as the Qaratepa Reservoir plogging event, and the site's five-step AWS stewardship approach. Stakeholder interviews confirmed that this information was clearly communicated and generally well received. Stakeholders expressed positive feedback, recognizing the site's leadership, long-term commitment, and transparency in managing water resources.

Some stakeholders also raised constructive concerns: while they acknowledged the value of the site's completed and ongoing actions, several noted that such measures require significant financial investment, which may not be feasible for all local enterprises or community organizations to replicate. This feedback reflects perceived differences in capability rather than concerns about the site's own performance.

Overall, stakeholders demonstrated strong support for the site's actions, and the combination of positive and constructive feedback has been reflected in the audit narrative.

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

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

Yes

Comment	The Water Stewardship Plan (WSP) is reviewed and discussed quarterly during Steering Committee meetings. During these sessions, the status of implementation is updated and progress toward targets is evaluated as needed. Meeting minutes, provided in Russian, were reviewed during audit an. The review of these minutes confirms that the WSP was discussed, and updates or revisions were made where required.

5	**STEP 5: COMMUNICATE & DISCLOSE - Communicate about water stewardship and disclose the site's stewardship efforts**
5.1	*Disclose water-related internal governance of the site's management, including the positions of those accountable for legal compliance with water-related local laws and regulations.*
5.1.1	*The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.* ✓ Yes
Comment	Site's water-related internal governance including positions of those accountable for compliance with water-related laws and regulations was included on the slide during presentation to the stakeholder meeting in September 2025. Presentation is attached. Additionally the internal governance is displayed on the boards at the shops at the plant.
5.2	*Communicate the water stewardship plan with relevant stakeholders.*
5.2.1	*The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.* ✓ Yes
Comment	The site shared the water stewardship plan during a meeting with stakeholders in September 2025. Additionally, the site delivered the AWS brochure and water stewardship plan in Uzbek to the stakeholders - photos and documents are attached. The site provided a list of stakeholders that have personally received the AWS brochure and water stewardship plan.
5.3	*Disclose annual site water stewardship summary, including: the relevant information about the site's annual water stewardship performance and results against the site's targets.*
5.3.1	*A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.* ✓ Yes

Comment

As stated under Indicator 5.2.1, the site shared its water stewardship plan and performance during the stakeholder meeting held in September 2025. During this consultation, the site distributed the AWS brochure and the water stewardship plan in Uzbek. The materials summarized:

- the AWS framework and the site's five-step stewardship approach;
- reductions in water consumption (49% compared to 2017) and increases in water recycling (57%);
- operational improvements, including modernization of the evaporative pond, commissioning of new treatment facilities, and reuse of treated water for irrigation and toilets;
- identification of shared water challenges within the Zarafshan catchment;
- collective action initiatives such as the plogging event at the Qaratepa Reservoir;
- upcoming water management commitments and next steps.

Photos and documentation are attached as evidence.

This information was presented and discussed with a broad group of relevant stakeholders, including neighboring enterprises, public-sector agencies (e.g., SuvTa'minot and municipal authorities), mahalla representatives, and academic institutions such as Samarkand State University (SamGU).

The site also provided a list of stakeholders who personally received the AWS brochure and water stewardship plan. The diversity of recipients demonstrates that disclosure was made to a sufficiently broad and relevant audience to meet the AWS requirements for performance disclosure, even though the information is not currently posted on a public website.

5.4 *Disclose efforts to collectively address shared water challenges, including: associated efforts to address the challenges;engagement with stakeholders; and co-ordination with public-sector agencies.*

5.4.1 *The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.*

Yes

Comment

The site has shared a presentation and AWS brochure that was disclosed to the stakeholders during the meeting in September and the in-person meeting. The documents include discussion of shared water challenges, the site's Water Stewardship Plan, and efforts the site made to address the shared water challenges.

The site disclosed its annual summary of water stewardship performance directly to a broad group of relevant stakeholders during the September 2025 consultation meeting. Recipients included neighboring industrial enterprises, public-sector agencies (including SuvTa'minot and municipal authorities), mahalla representatives, and academic institutions such as Samarkand State University (SamGU). The site also provided an attendance list and evidence of brochure distribution.

5.4.2 *Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.*

Yes

Comment

The site invited SuvTaminod (water supply company) and SamGU (Samarkand State University) to the meeting in September 2025. The meeting was also attended by local communities (Mahallya), and the site has encouraged a discussion between SuvTaminod and Mahallya on shared water challenges—particularly access to water.
The lecture at SamGU was encouraged by the university and attracted students that were actively engaged in the discussions.
Plogging at Qaratepa reservoir in coordination with Qaratepa reservoir administration.
These were confirmed during a stakeholder interview with the SamGU representative.

5.5 *Communicate transparency in water-related compliance: make any site water-related compliance violations available upon request as well as any corrective actions the site has taken to prevent future occurrences.*

5.5.1	*Any site water-related compliance violations and associated corrections shall be disclosed.*	Yes
Comment	Site did not have compliance violations in 2025.	
5.5.2	*Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.*	Yes
Comment	Site did not have compliance violations in 2025.	
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	Site did not have compliance violations in 2025.	

	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