CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000268

WSAS WATER STEWARDSHIP ASSURANCE SERVICES

SITE DETAILS

Site: **British American Tobacco Kenya plc (BAT Kenya) - Nairobi factory**

Address: Industrial Area, Likoni Rd, 30000-00100, Nairobi, KENYA

AWS Reference Number: AWS-000460

Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Core

Date of certification decision: 2022-Nov-02

Validity of certificate: 2025-Nov-02

AUDIT DETAILS

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

Audit Type(s): Initial Audit

Audit Start Date: 2022-Jun-20

Lead Auditor: Warrick Stewart

Audit team participants:

Ruth Wandera

WSAS
2 Quality StreetNorth Berwick, EH39 4HW, UNITED KINGDOM

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Site Participants:

Geoffrey Chege, IWS Deployment Manager
Harriet Rwanda, Operations Sustainability Executive Leaf
Stephen Muli, Area Sustainability Manager
Clement Lelei, Operatons Sustainability Executive
Millicent Gikunju, Line Lead FMD
Fredrick Kitsao, Line Lead SMD
Fiona Gogo, Line Lead(Production SMD)
Felix Kibet, Quality Controller
Daniel Kariuki, Senior Quality Manager
Crispin Achola, Managing Director
Lucy Lelo, Legal Counsel Operations
Hector Tamez, Manufacturing Manager
Richard Mbohi, Line lead PMD
Sultan Kiogora, Utilities Manager
Gabriel Owuor, IWS Deployment Manager
Emmanuel Chesire, Engineering Manager
Anthony Kilonzo, Mechanical and Projects Executive
Leila Kurui, Operations Intern
Dennis Machara, Production Co-ordinator
Matin Dosuma, Operations Finance Controller
Priscah Jelagat, Supply chain and Logistcs Manager
Obunji Muturi, Community Engagement Officer – Water Resources Authority
Beatrice Oduor, Snr Human Resources Officer (WRA)
Julius Millimu, Secretary - Kirichwa Water Resource Users Association (WRUA)
Mark Kibet, LEAF Growing Manager
British American Tobacco Kenya plc (BAT Kenya) - Nairobi factory, Leaf Sustainability

AUDIT TIMES

Dates	Audit from	Duration	Auditor	Description
2022-Jun-20	12:30:00 - 17:15:00	04:45	Warrick Stewart	
2022-Jun-21	08:00:00 - 17:15:00	09:15	Warrick Stewart	
2022-Jun-22	08:00:00 - 17:30:00	09:30	Warrick Stewart	

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ADDITIONAL INFO

Summary of Audit Findings: A total of seven major non-conformities, ten minor non-conformities, and eleven observations were raised during the certification audit process. The major non-conformities were of sufficient concern to warrant the categorisation of the non-conformity as major and related to IWRAs and Good Water Quality Status. All major non-conformities must be sufficiently addressed and closed out in order for certification to be awarded.

The Client is requested to perform a root cause analysis and define corrective actions for each of the non-conformities and to submit these to WSAS within 60 days of receipt of the audit report, by 28 September 2022.

The major non-conformities must be sufficiently addressed and evidence submitted to WSAS within 90 days of receipt of the report, by 28 October 2022.

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

CLOSURE OF FINDINGS AND CORRECTIVE ACTION PLAN:

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

Scope of Assessment: The scope of services covers the Initial certification audit for assessing conformity of British American Tobacco Kenya plc (Likoni Road, Nairobi) against the AWS International Water Stewardship Standard Version 2.

The factory is located at 8 Likoni Road, in the Industrial Area of Nairobi, Kenya, and manufactures cigarettes. The manufacturing process includes tobacco, cigarette paper, stamps, cork tipping, foil, labels/hinge lids, glue and plug wrap. The tobacco is sourced from BAT's green leaf threshing (GLT) plant in Thika, Kenya.

The facility is located in the Athi catchment of Kenya, which borders Tanzania to the south, the Indian Ocean coastline around Mombasa to the east, the Tana Basin to the north and the Rift Valley Basin to the west. The total population of the Athi Basin is 13.43 million, which is equivalent to a population density of 202 persons/sqkm. The Athi Basin has the highest ratio of urban to rural population in Kenya.

The audit was conducted onsite from 20 to 22 June 2022.

The onsite site visit included the assessment of the cigarette manufacturing factory and its associated infrastructure, including the on-site potable water reticulation, waste-water reticulation, effluent treatment plant, various potable water and ablution facilities, change room facilities, chemical stores, forklift maintenance workshop, fuel/diesel storage, customer delivery vehicle loading/waiting area, and solid waste management sorting/storage facility.

FINDINGS

NUMBER OF FINDINGS PER LEVEL	
Observation	11
Minor	10
Major	7

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FINDING DETAILS

Finding No:	TNR-000938
Checklist Item No:	1.1.1
Status:	Closed
Finding level:	Minor
Due date:	2023-Jun-19
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 ultimate receiving water body or bodies of storm water from the plant were not mapped in the evidence provided. The site staff are aware of the Ruai Effluent Water Treatment Plant, which they have visited, and that the treated effluent from the Ruai Effluent Water Treatment Plant is discharged into the Nairobi River. However, the stream into which the site's storm water discharges has not been mapped and is not known by the site, who are under the incorrect impression that their storm water is conveyed with their waste water to the Ruai Effluent Water Treatment Plant. The site must gain knowledge of the route of the stormwater and map this.
Corrective action:	Conduct a stormwater flow verification exercise by seeking the input of regulatory body Map out site's storm water discharge flows and the ultimate water receiving body
Evidence of implementation:	Files attached

Finding No:	TNR-000778
Checklist Item No:	1.2.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Jun-19
Checklist item:	Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall: - Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people; - Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies; - Provide evidence of stakeholder consultation on water-related interests and challenges; - Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups; - Identify the degree of stakeholder engagement based on their level of interest and influence.
Findings:	Vulnerable, women, minority, and Indigenous people were not clearly identified. Important stakeholders such as vulnerable communities like Kibera were not considered as stakeholders because the mapping of stakeholders did not look at the entire catchment which shows source and discharge areas. The client indicated the challenge of engaging vulnerable communities because they are mostly under 18 and the Tobacco Law prohibits engaging with 'under 18s'. However, they can be engaged through the Kirichwa Water Resources Users Association.
Corrective action:	Conduct a thorough stakeholder consultation within the catchment through established frameworks such as Water Resources Users Associations
Evidence of implementation:	Attached files

Finding No:	TNR-000921
Checklist Item No:	1.3.1
Status:	Closed
Finding level:	Minor
Due date:	2023-Jun-19
Checklist item:	Existing water-related incident response plans shall be identified.
Findings:	Water Emergency Situations Response Plan (20220219 Water Emergency situations.docx) reflects all key water risks and responses (e.g., pollution and contamination, flooding, drought etc.). However, the BCP does not mention drought or potential water access/provision interruptions. The BCP specifies stoppages due to "No municipal water supply and borehole cannot supply water due to pump failure", but not due to drought and/or over-abstraction of the groundwater source.
Corrective action:	Review the BCP to align it to the water related emergency situations.

Finding No:	TNR-000923
Checklist Item No:	1.3.3
Status:	Closed
Finding level:	Minor
Due date:	2023-Jun-19
Checklist item:	Site water balance, inflows, losses, storage, and outflows, including indication of annual variance in water usage rates, shall be quantified. Where there is a water-related challenge that would be a threat to good water balance for people or environment, an indication of annual high and low variances shall be quantified.
Findings:	The Water Balance pptx reflects the water inflows, flows through the production process, production losses (e.g., boiler), storage and outflows. However, the site water balance reflects unaccounted water losses of 17% of total water abstracted (excluding anticipated losses from the boiler etc.) An indication of annual variance in water usage rates was also not quantified, nor an indication of annual high and low variances quantified.
Corrective action:	Daily monitoring of water inflows and outflows with the help of submetering, up to level 3 on the minimum. Continuous tracking of variances.
Evidence of implementation:	As per attached files 2022 Water Balance Final Annual High and Low Variances Water Balance(usage) 2018-2022

Finding No:	TNR-000763
Checklist Item No:	1.3.4
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Jun-19
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 samples municipal source water, borehole abstracted water, and the waste water it discharges. No indication of annual, and where appropriate, seasonal, high and low variances were quantified. The site stated that they are not seeing substantial variations in water quality between seasons, which are only likely to manifest during major drought.
Corrective action:	Develop and establish a system to carryout water related data analysis including investigation of water quality variances.

Finding No:	TNR-000861
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:	BAT should consider engaging with the WRA, the Nairobi City County, and Nairobi City Water and Sewage Company to determine if the catchment water balance is in fact correct, particularly due to losses within the Nairobi City County and Nairobi Water and Sewage Company infrastructure systems.
Corrective action:	Engage with the WRA, the Nairobi City County, and Nairobi City Water and Sewage Company to determine if the catchment water balance is in fact correct, particularly due to losses within the Nairobi City County and Nairobi Water and Sewage Company infrastructure systems.

Finding No:	TNR-000980
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:	No indication of seasonal, high and low variances were identified. The site noted challenges in obtaining such data from the Water Company, however, if possible seasonal variance in water quality data should be obtained.
Corrective action:	Obtain additional data from credible sources

Finding No:	TNR-000779
Checklist Item No:	1.5.5
Status:	Open
Finding level:	Observation
Due date:	2023-Jun-19
Checklist item:	Important Water-Related Areas shall be identified, and where appropriate, mapped,and their status assessed including any threats to people or the natural environment, using scientific information and through stakeholder engagement.
Findings:	Natural and built (e.g., dams) IWRAs are identified, categorised, and their status assessed. Key IWRAs are mapped (e.g., Nairobi River, Kikuyu Springs, major lakes, swamps and wetlands. However, forested hills (water towers) are not mapped in the evidence provided.
Corrective action:	Include forested areas in the catchment IWRAs

Finding No:	TNR-000924
Checklist Item No:	1.7.2
Status:	Open
Finding level:	Observation
Due date:	2023-Jun-19
Checklist item:	Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.
Findings:	The 'Water related Opportunities Register(NEW) (1) (002)' document identified various key opportunities, including obtaining permits for over-abstraction to improve legal compliance. Costs were indicated for the opportunity, but no financial savings were shown.
Corrective action:	Expand the initiatives descriptions to include financial savings

Finding No:	TNR-000780
Checklist Item No:	1.8.2
Status:	Open
Finding level:	Observation
Checklist item:	Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.
Findings:	The site is aware of and involved in various best practices in the Nairobi and Kenyan context in catchment management, but this could be expanded to a greater understanding at an international level. The site has engaged in various roundtables hosted by the Kenyan Association of Manufacturers, Nature Conservancy and WWF to seek to learn about global best practice, but best practices that could be applied by BAT have not been documented.
Corrective action:	Identify the best practices that can be applied by BAT from various engagements

Finding No:	TNR-000925
Checklist Item No:	1.8.3
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Jun-19
Checklist item:	Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.
Findings:	The site has considered best practice regarding water quality within the Nairobi and Kenyan context, but this should be expanded to include international best practice.
Corrective action:	Train and develop implementation team on carrying out best practice identification. Carry out international best practice identification and benchmarking exercise.
Evidence of implementation:	Attached files indicating various best practices on site and in catchment

Finding No:	TNR-000984
Checklist Item No:	1.8.4
Status:	Closed
Finding level:	Major
Due date:	2022-Oct-28
Checklist item:	Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.
Findings:	This site has identified possible Best Practice for maintenance and enhancement of IWRAs within the boundaries of the site but have not identified these for the catchment.
Corrective action:	Provide a summary of best practices where BAT has been involved and those by other authorities
Evidence of implementation:	Attached evidence indicating various best practices on site and within the catchment

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Finding No:	TNR-000775
Checklist Item No:	2.3.2
Status:	Closed
Finding level:	Major
Due date:	2022-Sep-20
Checklist item:	A water stewardship plan shall be identified, including for each target: - How it will be measured and monitored - Actions to achieve and maintain (or exceed) it - Planned timeframes to achieve it - Financial budgets allocated for actions - Positions of persons responsible for actions and achieving targets - Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.
Findings:	The BAT Kenya (Nairobi) Water Strategy Plan 2021-2025 includes Focus Areas, Targets, Measurement and monitoring methods, Actions, Cost Allocation/Budget (KES), Timelines, Position (of staff responsible for actions), Status (of progress), Links to best practice, and the AWS Outcome that will be supported by the proposed actions. 1. Some of the targets are not quantified and only reflected as qualitative measures (e.g., high standards of hygiene). Consequently, they cannot be effectively measured in terms of progress/completion. Also, some of the measurements are quantified, but even if achieved are not appropriate measures of implementation success (e.g., ≥1 visit to key catchment infrastructure) that will lead to the achievement of the desired outcomes. 2. The current structure of the plan is covering 4 years, it is advisable to have a separate plan per year as this allows for better performance tracking, and it shows the evolution of the WS Plan as per the lessons learned which is a requirement of the standard. 3. The site has created goals against only two of the 5 Water Stewardship Outcomes, it is expected that the site has goals to achieving all 5 outcomes, as well as addressing risk and shared water challenge
Corrective action:	Update all measures of successes in the Water Stewardship to have quantified targets and aligned to the five Water Stewardship outcomes
Evidence of implementation:	Attached revised WSP

Finding No:	TNR-000981
Checklist Item No:	2.4.1
Status:	Open
Finding level:	Observation
Checklist item:	A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.
Findings:	The 20220219 Water Emergency situations document includes a comprehensive list of Emergency situations, the Likelihood of occurrence, Consequence, Mitigation measures, Responsible Parties, and References to related plans (e.g., BCP). Cognisance was taken of key considerations and constraints to implementation (e.g., lack of fire hydrants in the industrial area requiring the site to store all necessary water for an on-site fire on site; faulty water meters etc.), with associated correspondence confirming engagement with the related government stakeholders on some of these risks. Engagement also took place with key stakeholders through BAT Nairobi's March workshop, but follow-up engagement is required to comprehensive cover all the key risks.
Corrective action:	Carryout follow up emerging issues from stakeholders (Water supply risk/scarcity)

Finding No:	TNR-000929
Checklist Item No:	3.3.1
Status:	Open
Finding level:	Observation
Due date:	2023-Jun-19
Checklist item:	Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.
Findings:	"Progress towards water balance.presentation" reflects water abstraction reductions in relation to the WSP target of 35% by 2025 (baseline is 2017 abstraction value). Water Index data is monitored (Plots of water index vs target from 2018-2022.pptx) but not in a metric that enables easy assessment of status against the WSP targets.
Corrective action:	Use total

Finding No:	TNR-000865
Checklist Item No:	3.3.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Jun-19
Checklist item:	Where water scarcity is a shared water challenge, annual targets to improve the site's water use efficiency, or if practical and applicable, reduce volumetric total use shall be implemented.
Findings:	'20220218 Water Recovery Projects - Phases' reflects the targets set for reduced abstraction. Water withdrawal in terms of the site's water index has reduced year-on-year from 2018 to 2022 to date (Water withdrawn trend.png and Plots of water index vs target from 2018-2022.pptx). However, the total withdrawal has not decreased as per the targets set (Water withdrawn reduction trends.pptx and Water Management Water withdrawn trend and Glidepath.pptx).
Corrective action:	Establish a water use reduction plan Review target based on water use reduction plan
Evidence of implementation:	Attached files indicating measures to reduce total water usage

Finding No:	TNR-000877
Checklist Item No:	3.4.2
Status:	Closed
Finding level:	Major
Due date:	2023-Jan-30
Checklist item:	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.
Findings:	No actions have been identified and targets set for continual improvement at a good practice level beyond the proposed installation of enhanced filtration at the discharge point. This has been identified for actioning, but is still to be implemented (scheduled for July 2022). No actions were identified to address potential parameters of concern to the site and catchment (i.e., pH, COD, BOD, Nitrates, salinity).
Corrective action:	Develop and establish a water quality monitoring and improvement plan Include specific water quality parameters in the water stewardship plan
Evidence of implementation:	Attached documents, including revision of WSP to include water quality targets in areas of concern

Finding No:	TNR-000986
Checklist Item No:	3.5.1
Status:	Closed
Finding level:	Major
Due date:	2022-Oct-28
Checklist item:	Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.
Findings:	There are no IWRA target set in the WS Plan, this must be corrected and the site must consider opportunities both within the boundaries and within the greater catchment. Once these have been set then the site must take steps to implement. Evidence of implementation is required to close this finding.
Corrective action:	Incorporate the initiatives with quantified measures of success in the maintenance of catchment in the WSP

Finding No:	TNR-000869
Checklist Item No:	3.7.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Jun-19
Checklist item:	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.
Findings:	Been consultation with BAT Kenya GLTP, Thika (greatest indirect water use of suppliers) and laundry service company (Guildford and Lorris Ltd) to encourage their reduction in water use. Site visit was conducted to Guildford and Lorris Ltd to ensure their practices are sound, but not actions have been implemented by them to date. GLT Thika is directly involved in reforestation initiatives, to improve water availability and quality in the Tana catchment (from which some water is transferred to the Athi catchment). No consultation with or actions taken yet by Eastman Chemical International who provide tow to BAT Kenya - Nairobi, which constitutes BAT Kenya's secondary highest embedded water input.
Corrective action:	Engage indirect water users even beyond catchment based on the magnitude of proportion in indirect water use
Evidence of implementation:	Attached evidence on engagements with indirect water users

Finding No:	TNR-000987
Checklist Item No:	3.9.3
Status:	Open
Finding level:	Observation
Checklist item:	Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.
Findings:	The site has identified monitoring/metering as a key action in the WSP, but this is not a best practice action. A range of additional actions were identified by the site beyond those specified in the WSP, some of which have been implemented. However, these actions have not been integrated into the WSP with associated targets set for implementation and monitoring. Reconciliation between identification, implementation of Best Practice and targets set in the WS Plan.
Corrective action:	Incorporate the best practice activities in the WSP

Finding No:	TNR-000985
Checklist Item No:	3.9.4
Status:	Closed
Finding level:	Major
Due date:	2022-Oct-28
Checklist item:	Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.
Findings:	The site presented no evidence to suggest that any Best Practice actions towards maintenance of Important Water-Related Areas in the catchment had been implemented.
Corrective action:	Whereas the site has implemented various best practices on its catchment, the way in which the initiatives were captured was not clear on such best practices in catchment areas

Finding No:	TNR-000933
Checklist Item No:	4.1.1
Status:	Closed
Finding level:	Minor
Due date:	2023-Jun-19
Checklist item:	Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.
Findings:	20220320 Water Stewardship Plan Evaluation includes evaluation against all targets of the WSP. However, some of the targets in the WSP are not quantitative, which limits effective measurement of performance.
Corrective action:	Review WS targets for all expected measures of success for better evaluation of the plan Establish a goal setting framework for identification and setting of WS goals and targets.

Finding No:	TNR-000934
Checklist Item No:	4.1.2
Status:	Open
Finding level:	Observation
Checklist item:	Value creation resulting from the water stewardship plan shall be evaluated.
Findings:	The discrepancy between the stated volumetric reduction in 2022 of 34% in "Value Creation.pptx" and no volumetric reduction from 2017 to 2022 in "Water withdrawn reduction trends.pptx" should be addressed.
Corrective action:	Correct the discrepancy in the two sets of data

Finding No:	TNR-000873
Checklist Item No:	4.1.3
Status:	Open
Finding level:	Observation
Checklist item:	The shared value benefits in the catchment shall be identified and where applicable, quantified.
Findings:	The site could seek to quantify shared value benefits in the catchment going forward.
Corrective action:	Establish a tool for quantifying shared value benefits

Finding No:	TNR-000874
Checklist Item No:	4.3.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Jun-20
Checklist item:	Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.
Findings:	Consultation was undertaken with various stakeholders on the site's AWS journey, but the only performance data shared was on reduced water withdrawal by 31% and 24% in 2020 and 2021 (RE: BAT Kenya - Nairobi Factory [Alliance for Water Stewardship (AWS)] Journey.msg British American Tobacco Kenya Plc - Nairobi Factory (AWS Communication).pdf). Various correspondence provided confirming consultation with a broad suite of key stakeholders. The site is required to expand the content of the water stewardship performance that is shared with stakeholders. Guidance 4.3.1 The organization should report on its consultation efforts, the means of communication, and any feedback. The site should engage stakeholders at least once every year to review its water stewardship performance and provide written commentary from identified stakeholders on the site's performance. This consultation is a good opportunity to confirm shared water challenges and Important Water-Related Areas in the catchment. The form of the consultation should be appropriate for the local context and the stakeholders engaged but does not need to be conducted in person. Note that this may be a rather "informal" consultation. More elaborate and formal engagements are recognized as well. This is also a chance to further gather input for the renewed water stewardship plan.
Corrective action:	Review disclosure/consultation framework and define key data sharing points for effective stakeholder consultation.
Evidence of implementation:	Files indication communication of plan to stakeholder alongside the feedbacks received so far

Finding No:	TNR-000982
Checklist Item No:	4.4.1
Status:	Open
Finding level:	Observation
Checklist item:	The site's water stewardship plan shall be modified and adapted to incorporate any relevant information and lessons learned from the evaluations in this step and these changes shall be identified.
Findings:	If the site restructures the WS Plan to reflect annual (as opposed to multi-year) targets which evolve (from lessons learned), compliance to this indicator will be more easily reached.
Corrective action:	Split the targets to annual milestones and deliverable for better evaluation

Finding No:	TNR-000875
Checklist Item No:	5.2.1
Status:	Closed
Finding level:	Major
Due date:	2023-Jan-30
Checklist item:	The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.
Findings:	An overview of the site's AWS journey was shared with key stakeholders including key actions identified in the WSP, but not the actual WSP and related targets, timelines, how the water stewardship plan contributes to AWS Standard outcomes etc.
Corrective action:	Review disclosure/consultation framework and define key data sharing points for effective stakeholder consultation and communication. Share full WSP with stakeholders

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Finding No:	TNR-000935
Checklist Item No:	5.3.1
Status:	Closed
Finding level:	Major
Due date:	2022-Nov-06
Checklist item:	A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.
Findings:	Consultation was undertaken with various stakeholders on the site's AWS journey through which the performance data on reduced water withdrawal by 31% and 24% in 2020 and 2021 was shared (RE: BAT Kenya - Nairobi Factory [Alliance for Water Stewardship (AWS)] Journey.msg and British American Tobacco Kenya Plc - Nairobi Factory (AWS Communication).pdf). Various correspondence was provided confirming consultation with a broad suite of key stakeholders. The workshop at end March 2022 was also used as a platform to provide an opportunity for stakeholders to make input into BAT's journey and shared water challenges (as per the AWS Standard Guidance Document) (202202407_stakeholder_engagement_report.docx) with stakeholders at that time. Various summary data on performance was also shared via BAT Kenya's website and BAT Kenya - 2021 Annual Report & Financial Statements (https://www.batkenya.com/group/sites/BAT_B4ALXZ.nsf/vwPagesWebLive/DOB4AMEG). However, a summary of the site's water stewardship performance, including quantified performance against targets in the Water Stewardship Plan has not been disclosed annually at a minimum.
Corrective action:	Review disclosure/consultation framework and define key data sharing points for effective stakeholder consultation and communication. Share full and evaluated WSP with stakeholders

Signature WSAS

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Report Details

Report	Value
Report prepared by	Warrick Stewart
Report approved by	Mia Antoni-Naidoo
Report approved on (Date)	29 July 2022

Surveillance

Proposed date for next audit
2023-Jun-19

Comment This was an initial certification audit against the Core requirements of the Standard.

Stakeholder Announcements

Date of publication	Location
2022-May-25	WSAS Website
2022-May-25	AWS Website
2022-May-18	BAT Kenya Website
2022-May-18	Daily Nation Newspaper

Comment Interviews were held with key stakeholders that the site has the greatest likelihood of impacting or who may impact the site from a water stewardship perspective.

Catchment Information

Water Sources and Ultimate Waste Water Receiving Bodies MAP.jpg

Catchment Information

The BAT Kenya Factory in Likoni Road, Nairobi, is located in the Athi catchment of Kenya. The Athi catchment totals 58,639 sqkm, corresponding to 10.2% of the country's total land area. The main river in the catchment is the Athi River, which drains approximately 64% of the basin. The basin is mostly semi-arid, except the headwaters. High turbidity levels in the catchment are indicative of slight catchment degradation. A high Permanganate Value (PV) is indicative of organic pollution in the catchment. Available water in the catchment totals 3,104 MCM per annum, of which 2,555 MCM is from surface water and 549 MCM is from groundwater. Imported water to the catchment totals 181 MCM. The ecological reserve of the catchment totals 156 MCM. This brings the total available water in the catchment to 3,129 MCM/annum. Demand in 2018 totalled 1,553 MCM/annum, with a balance of 1,576 MCM/annum.

Client Description and Site Details

Client/Site Background

BAT Kenya Factory in Likoni Road in the Industrial Area of Nairobi, Kenya, manufactures cigarettes. The manufacturing process includes tobacco, cigarette paper, stamps, cork tipping, foil, labels/hinge lids, glue and plug wrap. The tobacco is sourced from BAT's green leaf threshing (GLT) plant in Thika, Kenya.

The facility is located in the Athi catchment of Kenya, which borders Tanzania to the south, the Indian Ocean coastline around Mombasa to the east, the Tana Basin to the north and the Rift Valley Basin to the west. The total population of the Athi Basin is 13.43 million, which is equivalent to a population density of 202 persons/sqkm. The Athi Basin has the highest ratio of urban to rural population in Kenya.

The plant includes the cigarette manufacturing production line and associated infrastructure, including the on-site potable water reticulation, waste-water reticulation, Effluent Treatment Plant, and a reverse osmosis plant.

Summary of Shared Water Challenges

Summary of Shared Water Challenges
Key shared water challenges include:

Water Scarcity: With increase an in population, water demand in the catchment area has increased.

Old/Inadequate Infrastructure: This has affected the water supply network leading to rationing, as the available infrastructure can not cater for the growing population.

Climate Change: Human activities are impacting negatively on the environment leading to a drastic change in the climate. The rain patterns have changed significantly.

Water quality: There is increased industrial and domestic pollution of water resources e.g., rivers affecting the water quality.

Enforcement of existing laws: existing laws and regulations related to water are not being adequately enforced due to conflicting regulations, inadequate staffing etc.

Lowering water table: there is concern that the water table is lowering, which is related to the abstraction of groundwater.

Low awareness on water related matters: low awareness on water related matters amongst the public affects how people manage water resources.

Encroachment: Due to increase in population the riparian areas are being encroached into leading to degradation of the catchment area.

Illegal abstraction/Over abstraction: There has been an increased abstraction of water in the catchment areas because of the illegal drilling of boreholes without permits.

Deforestation: Cutting down of trees to make room for the growing population and for economic reasons is a contributing factor to climate change thus affecting water levels.

Water cartels: There are water cartels that exist amongst WSPs (water service providers) who intentionally are not supplying water to the community for their personal gain (sell water in water bowsers).

0.1	**General Requirements for Single Sites, Multi-Sites and Groups**	
0.1.1	*Eligibility Criteria*	
0.1.1.1	*The site(s) occupy one catchment OR an exception has been granted.*	Yes
Comment	The site is located exclusively in the Athi catchment of Kenya.	
0.1.1.2	*The scope of the proposed certification shall be under the control of a single management system.*	Yes
Comment	BAT Kenya Factory is under the control of a single management system.	
0.1.1.3	*The scope of the proposed certification shall be homogeneous with respect to primary production system, water management, product or service range, and the main market structures.*	Yes
Comment	The scope of the proposed certification was homogeneous with respect to the primary production system, water management, product or service range, and the main market structures.	

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.

closed

Comment

Evidence:
SITE_BOUNDARY.jpg
20220218_BAT_Nairobi_site_map.pptx
BAT_Drainage_and_Water_Distri._Layout_2022.pdf
Athi_Catchment_Area_Overview.pptx
20220218_Athi_basin_catchment_map.docx
Athi-Basin-Plan-Final-Nov-2020.pdf
Nairobi_City_Water_sources_of_water.pptx
Ground_Water_Catchment.pptx
Discharge point of the site map.pptx
20220218 Nairobi Water supply and demand.pptx

Assessment:
The evidence provided included maps of the site boundaries, water-related infrastructure including the piping network owned or managed by the site, the catchment that the site affects and is reliant upon for water, and some of the ultimate water sources (Thika and Sasuma Dam) of the Nairobi Water and Sewage Company (Water service provider) to the Likoni Road plant. The distribution of the aquifer from which the plant obtains groundwater was mapped. However, the ultimate receiving water body/ies of storm water were not mapped in any of the uploaded evidence (e.g., streams nearest the site that receive storm water). The site was also under the impression that its storm water is discharged into the Municipal waste water system, which the Nairobi Water and Sewage Company confirmed is not the case.

Finding No: TNR-000938

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

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

No

Comment

Evidence:
20220331_Kenya_Nairobi_AWS_Stakeholders.xlsx
202202407_stakeholder_engagement_report.docx
20220217_BAT_Nairobi_stakeholders_mapping
Stakeholders engagement attendance list (see Appendix 1 of 202202407_stakeholder_engagement_report.docx)
BAT NAIROBI SITE IMPLEMENTATION PACK
Spatial Mapping of AWS Stakeholders.docx

Assessment
The '20220331_Kenya_Nairobi_AWS_Stakeholders' excel file lists the stakeholders but not their individual challenges.

'202202407_stakeholder_engagement_report' lists collective challenges from literature review and group discussions where all sectors discussed collective water challenges.

'20220331 Kenya Nairobi AWS Stakeholders.xlsx' lists also key stakeholders and their individual water challenges.

'202202407_stakeholder_engagement_report' and 'Stakeholders engagement attendance list' provided evidence of stakeholder consultation on water-related interests and challenges.

'20220331_Kenya_Nairobi_AWS_Stakeholders' identified the degree of stakeholder engagement based on their level of interest and influence.

'Spatial Mapping of AWS Stakeholders.docx' illustrates the spatial distribution of key stakeholders across the catchment.

The stakeholders have been identified according to their Influence/Power of stakeholder, Interest(High/Low), Engagement matrix, Communication Method, Role (Linkage to the Site), Contact Person Details and expectations. 'BAT NAIROBI SITE IMPLEMENTATION PACK' page 12 to 13 of 61 defines the process used for stakeholder identification.

Vulnerable, women, minority, and Indigenous people were not initially considered in the stakeholder identification and mapping process, nor identified, but have recently been included. However, such groups have not been identified at a detailed level via consultation, which still needs to take place.

'20220217_BAT_Nairobi_stakeholders_mapping' was provided to demonstrate the physical scope identified, as well as the stakeholders, but it does not clearly show the site's ultimate water source and ultimate receiving water body or bodies to inform the mapping of key stakeholders.

Finding No: TNR-000778

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

Evidence:
20220217 BAT Nairobi stakeholders mapping.docx
202202407_stakeholder_engagement_report.docx
20220331_Kenya_Nairobi_AWS_Stakeholders.xlsx
Stakeholders degree of influence.xlsx
Spatial Mapping of AWS Stakeholders.docx

Assessment
Potential degree of influence between site and stakeholders was identified in '20220331_Kenya_Nairobi_AWS_Stakeholders' and 'Stakeholders_degree_of_influence' document.

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.* Obs.

Comment

Evidence:
20211005_BCP- Recovery of Manufacturing Process approved
EHS Emergency Response Action Plans
Water Emergency Situations Response Plan (20220219 Water Emergency situations.docx)

Assessment:
Water Emergency Situations Response Plan (20220219 Water Emergency situations.docx) reflects all key water risks and responses (e.g., pollution and contamination, flooding, drought etc.). However, the BCP does not mention drought or potential water access/provision interruptions. The BCP specifies stoppages due to "No municipal water supply and borehole cannot supply water due to pump failure", but not due to drought and/or over-abstraction of the groundwater source.

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

Comment

Evidence:
20220217_BAT_Nairobi__2021_Water_Balance.pptx
20220517Water Balance2022.xlsx
WATER USAGE (BALANCE)2018-2022YTD.xlsx
20220218 Nairobi 2022 Water Balance.pptx
20220627 Water Balance Final.xlsx

Assessment:
The site water balance, including inflows, losses, storage, and outflows was identified and mapped. A revised version was provided shortly after the on-site audit (20220218 Nairobi 2022 Water Balance.pptx and 20220627 Water Balance Final.xlsx).

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.* closed

Comment

Evidence:
20220217_BAT_Nairobi__2021_Water_Balance.pptx
20220517Water Balance2022.xlsx
WATER USAGE (BALANCE)2018-2022YTD.xlsx

Assessment:
The Water Balance pptx reflects the water inflows, flows through the production process, production losses (e.g., boiler), storage and outflows. In December each year major maintenance is conducted, which results in the increase in Water Index each year. Also, a reduction was experienced in 2022 due to recycling.

However, the site water balance reflects unaccounted water losses of 17% of total water abstracted. This excludes anticipated losses from the boiler etc. An indication of annual variance in water usage rates was not quantified, nor an indication of annual high and low variances quantified.

Finding No: TNR-000923

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.* No

Comment

Evidence:
Nairobi_City_Water_sources_of_water.pptx
Various AgriQuest and Aquamist water quality results for drinking water (from supplier of only drinking water), boreholes and waste water etc.

Assessment:
The site samples municipal source water, borehole abstracted water, and the waste water it discharges. Exceedances are experienced periodically at Gate 2 (waste water discharge) for pH and colour. For the permit renewal process, the results have to be submitted to the Nairobi County. If any parameters are "off-spec", these need to be resolved. The site seeks to address "off-spec" results within 14 days.

Water for input to the boiler needs to be treated via the RO plant, particularly for Conductivity.

No indication of annual, and where appropriate, seasonal, high and low variances were quantified. The site stated that they are not seeing substantial variations in water quality between seasons, which are only likely to manifest during major drought.

Finding No: TNR-000763

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

Comment

Evidence:
20220217 Potential Pollution sources and Containment measures.pptx
20220218 Chemical Register.xlsx
20220218 Environmental Risk Assessment.xlsx
20220218BAT Nairobi site Water and drainage distribution.pdf
NEMA cert KZZ.pdf
Offloading and transfer procedure checklist.pdf

Assessment:
The evidence includes the identification of chemicals used or stored on site, a risk assessment, and management controls. Key areas where chemical are stored or present is also mapped.

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

Evidence:
BAT Drainage and Water Distribution.pdf
20220618 IWRA.xlsx
BAT Likoni site IWRA.pdf
ETP CIL Procedure checklist.pdf
ONSITE IWRAs.docx
Spatial mapping site IWRA.docx
Water systems checklist.pdf
Water systems maitenance.pptx

Assessment:
The following on-site IWRAs were identified and mapped: Borehole 1, Borehole 2, ETP (Effluent Treatment Plant), Overhead tank, and Modern oral RO plant. No natural IWRAs are applicable to the site.

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

Evidence:
20220220 Drinking Water points.xlsx
Bottled Drinking water cost 2021.xlsx
Water related costs and revenues.docx
Water related costs.xlsx

Assessment:
Annual water-related costs are quantified. Revenues are not specified, as sales are not directly linked to water, but economic value is quantified (e.g., taxes to government etc.). The social, cultural, environmental, and economic water-related values generated by the site have been described.

1.3.8 *Levels of access and adequacy of WASH at the site shall be identified.*

Yes

Comment

Evidence:
BAT Nairobi Site Implementation Plan.docx
20220217 WASH on Site.pptx
20220219 Washrooms Checklist.pdf
20220220 Drinking Water points.xlsx
Drinking water points and Washrooms.pdf
WASH services best practices(Washrooms).pptx

Assessment:
BAT seeks to comply with the Kenyan Public Health Act that specifies the level of sanitation that should be provided for personnel (1:25 for men and 1:24 for women). BAT submits a self-assessment annually, as per BAT Nairobi Site Implementation Plan.docx.

The BAT Nairobi Site Implementation Plan.docx includes a WASH Profile that specifies the number of WASH facilities on site, including the ratio of toilets for male and female workers.

BAT ensures provision of appropriate sanitation facilities for special needs and religious needs.

Best practice is applied in the ladies' washrooms by installing modern automatic sensor operating bins (for female hygiene).

The various evidence reflects full conformity in terms of the levels of access and adequacy of WASH at the site.

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

Evidence:
BAT NAIROBI SITE IMPLEMENTATION PACK.docx
1.4.1 1.4.2 indirect water use

Assessment:
The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment are all identified. This includes details for each Material, includingContribution % to product, Supplier, Origin, Use, Material/Service Water Foot Print, Annual Usage (Site), Embedded Water/Indirect Water, Water stress level, Water quality, and Water risks and Mitigations. Water quality of input water is monitored, as reflected in requirement 1.3.4.

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	Evidence: BAT NAIROBI SITE IMPLEMENTATION PACK.docx 1.4.1 1.4.2 indirect water use Assessment: The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment are all quantified. This includes details for each Material, including Contribution % to product, Supplier, Origin, Use, Material/Service Water Foot Print, Annual Usage (Site), Embedded Water/Indirect Water, Water stress level, Water quality, and Water risks and Mitigations.	
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	Evidence: Athi_Catchment_Area_Overview.pptx Athi-Basin-Plan-Final-Nov-2020.pdf 202202407_stakeholder_engagement_report BAT NAIROBI SITE IMPLEMENTATION PACK.docx Assessment: The Kenyan Constitution (2010) includes aspects that impact on the water sector - access to clean water is a basic human right, including in marginalised areas. National Water Act provides a clear line of responsibilities between national and country organs of state. The BAT NAIROBI SITE IMPLEMENTATION PACK.docx clearly specifies government arrangements (see page 34 of 80), initiatives, and goals (Potential Impact to the site, and Proposed Mitigations/Opportunities).	
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	Evidence: 20220218 Water regulations Review Nairobi City County Water related By Laws WRA Abstraction permit variation BAT NAIROBI SITE IMPLEMENTATION PACK Water Act 2016.pdf Water-Resources-Management-Rules-2007.pdf Application of variation of water permit.pdf Assessment '20220218 Water regulations Review' indicates applicable water-related legal and regulatory requirements and stakeholder-verified customary water rights. 'Nairobi City County Water related By Laws' addresses the waste water and solid waste bylaws. 'WRA Abstraction permit variation' is the permit for two boreholes on site (no additional regulatory requirements regarding boreholes was seen in the the evidence). BAT NAIROBI SITE IMPLEMENTATION PACK - page 41 of 61 specifies the relevant legal requirements that must be met. The evidence reflects identification of the applicable legal requirements.	
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

Evidence:
Catchment water balance.docx
20220218 Nairobi Water supply and demand.pptx
Athi_Catchment_Area_Overview.pptx
Athi-Basin-Plan-Final-Nov-2020.pdf
BAT NAIROBI SITE IMPLEMENTATION PACK.docx
20211008 National Water Master Plan sec 10.pdf

Assessment:
The catchment water-balance is quantified within various government documents and reflects a substantial positive net balance for the Athi catchment. This is contrary to all written contextual information from various government sources. Also, water demand is stated as being in excess of water supply, although this is likely due to infrastructure constraints as opposed to available water.

BAT Kenya stated that they are aware from media sources that up to 40% of water supply is lost due to losses due to illegal connections and leaks.

The extent of water losses is not quantified in any government documents, which likely means that the stated balance is less than currently determined by government.

BAT Kenya should consider engaging with the WRA and Nairobi City Water and Sewage Company to determine if the catchment water balance is in fact correct, particularly due to losses within the Nairobi City Council and Nairobi Water and Sewage Company infrastructure systems.

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

Evidence:
Athi_Catchment_Area_Overview.pptx
Athi-Basin-Plan-Final-Nov-2020.pdf
Ruai Quality FEBRUARY 2022 MONTHLY REPORT.docx (WWTW quality results)
NAS Underground water quality.pptx and
https://www.un-igrac.org/sites/default/files/resources/files/GWMATE%20case%20profile%20-%20Kenya.pdf
202202323 Ruai treatment plant Visit.pptx
Catchment Water Quality Summary.pptx
Groundwater Quality in Nairobi.pdf
National-Water-Situation-Report-2018-19.pdf
National-Water-Situation-Report_2019-20.pdf

Assessment:
Catchment Water Quality Summary.pptx reflects surface water quality.

Ruai Quality FEBRUARY 2022 MONTHLY REPORT.docx reflects the Nairobi City Water and Sewage Company Ruai waste water treatment works water quality results for discharge to the Nairobi River after treatment.

NAS Underground water quality.pptx and
https://www.un-igrac.org/sites/default/files/resources/files/GWMATE%20case%20profile%20-%20Kenya.pdf reflects the water quality of groundwater in the catchment at a very summarised level.

Annual, but not seasonal, high and low variances are identified.

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.* Obs.

Comment

Evidence:
Athi_Catchment_Area_Overview.pptx
Athi-Basin-Plan-Final-Nov-2020.pdf
WRA conservation and protection of Ondiri& Manguo wetlands.pptx
Athi catchment important water related areas.docx
20220618 IWRA.xlsx
BAT NAIROBI SITE IMPLEMENTATION PACK.docx

Assessment:
Natural and built (e.g., dams) IWRAs are identified, categorised, and their status assessed. Key IWRAs are mapped (e.g., Nairobi River, Kikuyu Springs, major lakes, swamps and wetlands. However, forested hills (water towers) are not mapped in the evidence provided.

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

Comment

Evidence:
Water Related Infrastructure.docx
BAT NAIROBI SITE IMPLEMENTATION PACK.docx

Assessment:
Current and proposed future infrastructure is listed for dams, boreholes, waste water treatment plant, water distribution network, sewage system, Northern Collector Tunnel, and the Hydropower Development Plan (ACA). The Purpose, Condition, and Risks of each are stated, but the condition is not adequately descriptive for some (e.g., "quite old").

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

Comment

Evidence:
Athi WASH.docx

Assessment:
Athi WASH.docx specifies the level of potable water, sanitation, and sewage services in the catchment.

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

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

Comment

Evidence:
Catchment shared water challenges.docx
202202407_stakeholder_engagement_report.docx

Assessment:
"Catchment shared water challenges.docx" and "202202407_stakeholder_engagement_report.docx" specift=y the shared water challenges and prioritised them.

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

Comment

Evidence:
Water related challenges initiatives.docx

Assessment:
"Water related challenges initiatives" has addressed each shared water challenge with initiatives.

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	Evidence: Risk assessment Operational risks.pptx Basin risks.pptx Copy of 20211015 Water related Opportunities Register(NEW) (1) (002).xlsx BAT Kenya plc-Basin-Risk-Chart.pdf BAT Kenya plc-Likoni Road_Operational-Risk-Chart.pdf Various scenario analyses (e.g., Analysis_Single-Scenario_Current-Trend.pdf, Analysis_Single-Scenario_Optimistic-Pathway.pdf etc.) Assessment 'Risk assessment' has identified risks to the site, provided a rating, business impact, and potential costs for each. The "Water Risk Filter" was also used to undertake various risk analyses based on different scenarios.	
1.7.2	*Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.*	Obs.
Comment	Evidence: Water related Opportunities Register(NEW) (1) (002) Assessment: The 'Water related Opportunities Register(NEW) (1) (002)' document identified various key opportunities, including obtaining permits for over-abstraction to improve legal compliance. Costs were indicated for the opportunity, but no financial savings were shown (e.g. Potential Benefit to Water Stewardship Actions On-site rather than financial savings).	
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	Evidence: 20220218 Adopt A Forest Concept_BAT.pdf 20220219 Ministry of Forestry Appreciation.pdf 20220603 WorldEnvironmentDay_Tree Planting Activity.pdf 20220806 Good Governance.pptx BAT Kijani Afforestation Programme Ndakaini-World Environment Day 2022.pptx Celebrating World Environment Day!(2).msg County WED Support 2018.docx ESA Comms World Environment Day.pdf World Environment Day 2018-Kikuyu Springs Tree planting.pptx and various other related documents and correspondence. Assessment: The site has engaged in various roundtables hosted by the Kenyan Association of Manufacturers, Nature Conservancy and WWF to seek to learn about global best practice, however best practices that could be applied by BAT have not been documented. The site also undertakes benchmarking against other BAT sites globally (particularly from BAT's Pakistan site) in terms of WASH, recycling and water efficiency, which has led to the site seeking to implement a second RO plant to treat its backwash. The site has made contributions on Kenyan regulations for solid waste, which has an impact on water use. BAT Kenya is involved in "Adopt a Forest" with various partners and stakeholders to facilitate growing and restoring, not just tree planting as a once-off. The site engage in packaging recycling initiatives that reduce water use in production processes. In 2017 the Kenyan regulator banned plastic packaging. The site engaged with Diageo and other private sector stakeholders for the country to apply an Extended Producer Responsibility (EPR) route for plastic management. BAT Kenya participated in the stakeholder engagements with various government agencies for the adoption of the Sustainable Waste Bill, which was enacted earlier in June 2022.	
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.*	Obs.

Comment	Evidence: 20220218 Water Recovery Projects - Phases.pptx 2022Water Wirhdrawn Trend.pptx Steam leaks CIL & DH.pdf Water Recycling Rate Line.png Water systems checklist.pdf 20220218 Adopt A Forest Concept_BAT.pdf 20220219 Ministry of Forestry Appreciation.pdf 20220603 WorldEnvironmentDay_Tree Planting Activity.pdf 20220806 Good Governance.pptx BAT Kijani Afforestation Programme Ndakaini-World Environment Day 2022.pptx Celebrating World Environment Day!(2).msg County WED Support 2018.docx ESA Comms World Environment Day.pdf World Environment Day 2018-Kikuyu Springs Tree planting.pptx and various other related documents. Assessment: The site is aware of and involved in various best practices in the Nairobi and Kenyan context in catchment management, but this could be expanded to a greater understanding at an international level. The site has engaged in various roundtables hosted by the Kenyan Association of Manufacturers, Nature Conservancy and WWF to seek to learn about global best practice, but best practices that could be applied by BAT have not been documented. The site also undertakes benchmarking against other BAT sites globally (particularly from BAT's Pakistan site) in terms of WASH and recycling, which has led to the site seeking to install a second RO plant to treat its backwash. The site was implemented various actions to recovery water, based on lessons from other operations.	
1.8.3	*Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.*	No

Comment	Evidence: 202202323 Ruai treatment plant Visit.pptx ETP CIL Procedure checklist.pdf Harzadous waste collection ECCL.pdf Manholes mapping.pptx Oil spill kits Best practices.pptx Ruai Quality FEBRUARY 2022 MONTHLY REPORT.docx Ruai treatment plant permit to visit.pdf Desludging job cards-interceptors PDFs 20220218 Adopt A Forest Concept_BAT.pdf 20220219 Ministry of Forestry Appreciation.pdf 20220603 WorldEnvironmentDay_Tree Planting Activity.pdf 20220806 Good Governance.pptx BAT Kijani Afforestation Programme Ndakaini-World Environment Day 2022.pptx Celebrating World Environment Day!(2).msg County WED Support 2018.docx ESA Comms World Environment Day.pdf World Environment Day 2018-Kikuyu Springs Tree planting.pptx and various other related documents and correspondence. Assessment: The site visited the Ruai waste water treatment plant to understand the operation. BAT Kenya is involved in "Adopt a Forest" with various partners and stakeholders to facilitate growing trees and restoring the catchment as a long-term initiative, not just tree planting as a once-off. The site has made contributions on Kenyan regulations for solid waste, which has an impact on water use and quality. In 2017 the Kenyan regulator banned plastic packaging. The site engaged with Diageo and other private sector stakeholders for the country to apply an Extended Producer Responsibility (EPR) route for plastic management. BAT Kenya participated in the stakeholder engagements with various government agencies for the adoption of the Sustainable Waste Bill, which was enacted earlier in June 2022. However, additional best practice beyond the Nairobi and Kenyan context should be considered. ***Finding No: TNR-000925***

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

Comment	Evidence: 20220120 Kenya water recycling plant - Revised 3 (003).pptx Various evidence regarding the site's boreholes was provided as evidence (e.g., 20210216_Borehole 1 Report.pdf) but these documents are not directly related to this requirement. PTC's Water Stewardship Journey (002).pptx Assessment: The site undertakes benchmarking against other BAT sites globally (particularly from BAT's Pakistan site) in terms of recycling and water balance, which has led to the site seeking to implement a second RO plant to treat its backwash (Water Recycling Plan.pptx). ***Finding No: TNR-000984***

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

Comment	Evidence: GPTW-PROJECT IGNITE.pptx WASH services best practices(Washrooms).pptx 20220217 WASH on Site.pptx 20220220 Drinking Water points.xlsx COVID -19 Mitigation elements.pptx Assessment: BAT has implemented an initiative called "Ignite", to re-energise the work environment, which has included improvements to all workplace conditions and the application of automation, including upgrades to WASH facilities (sanitation, female hygiene receptacles etc.). These improvement have been based on international good and best practice for WASH. Various pro-active and re-active Covid-19 measures were identified and implemented, based on emerging international good and best practice.

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.*
Comment	Evidence: Signed water stewardship policy.pdf (BAT_Kenya_Water_Stewardship_Policy.pdf) https://www.batkenya.com/group/sites/BAT_B4ALXZ.nsf/vwPagesWebLive/DOB45KFA/$file/BAT_Kenya_Water_Stewardship_Policy.pdf https://www.batkenya.com/group/sites/BAT_B4ALXZ.nsf/vwPagesWebLive/DO9T5K5L#:~:text=BAT%20Kenya%20is%20committed%20to,development%20and%20protection%20of%20biodiversity. https://www.batkenya.com/group/sites/bat_b4alxz.nsf/vwPagesWebLive/DOB4AMC3/$FILE/medMDCEWLNG.pdf?openelement Assessment: The organizational commitment that is signed and publicly disclosed includes the following commitments, amongst others: - Share and promote best water stewardship practices that support good water governance and quality, as well as Water, Sanitation and Hygiene Practices (WASH). - Support existing catchment sustainability plans. - Provision of resources to support sustainable water initiatives. - Commit to implement, disclose and report our water stewardship activities in an open and transparent way.
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

Yes

Comment

Evidence:
20220218 EHS Procedure Tracking of Legislation
License tracker
20220218 Water regulations Review AWS

Assessment:
20220218 EHS Procedure Tracking of Legislation informs compliance adherence and revisions to the procedure.

License tracker is used to monitor compliance, including responsible persons/positions.

20220218 Water regulations Review AWS is used to track compliance, including responsible persons/positions.

Through this system, compliance obligations for water and wastewater management are identified and maintained, including the identification of responsible persons/positions within facility organizational structure, and the process for submissions to regulatory agencies.

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

Evidence:
20220314 BAT Kenya Plc water strategy 2022.docx

Assessment:
The site's Water Stewardship Strategy includes an overarching mission, vision, and goals of the organization towards good water stewardship in line with this AWS Standard. The Strategy also includes Main Objectives; (Desired) Outcomes; Guiding Principles; a Water Stewardship Plan/Water Road Map; an overview of key Stakeholder Engagements processes required; and the necessary approaches to Water Related Emergency Incidents, Important Water Related area of the site and catchment, Communication of the Water Stewardship Plan, and documents needed for implementation and sustainability of the site's AWS journey.

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.

closed

Comment

Evidence:
20220320 Water Stewardship Plan.xlsx
Water RM Kenya Nairobi Q4 2021.xlsx

Assessment:
The BAT Kenya (Nairobi) Water Strategy Plan 2021-2025 includes Focus Areas, Targets, Measurement and monitoring methods, Actions, Cost Allocation/Budget (KES), Timelines, Position (of staff responsible for actions), Status (of progress), Links to best practice, and the AWS Outcome that will be supported by the proposed actions.

Water RM Kenya Nairobi Q4 2021 reflects the status of progress of site-related activities prior to the current version of the Water Stewardship Plan.

Many of the proposed actions have already been completed, despite the Plan being for the period 2021 - 2025, which was due to BAT corporate providing budget and encouraging more rapid implementation than was initially planned.

Some of the targets are not quantified and only reflected as qualitative measures (e.g., high standards of hygiene). Consequently, they cannot be effectively measured in terms of progress/completion. Also, some of the measurements are quantified, but even if achieved are not appropriate measures of implementation success (e.g., ≥1 visit to key catchment infrastructure) that will lead to the achievement of the desired outcomes.

The site has created goals against only two of the 5 Water Stewardship Outcomes, it is expected that the site has goals to achieving all 5 outcomes, as well as addressing risk and shared water challenge

Finding No: TNR-000775

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.*

Obs.

Comment

Evidence:
20211005_BCP- Recovery of Manufacturing Process approved.pdf
20211020___EAM_Denial_of_site Plan.pdf
20220117 Emergency Release Response Action Plan1.docx
20220219 Water Emergency situations.docx
Water Risk and opportunities Assessment.xlsx
20210524 Letter to NWSC on Faulty Meters.docx
Engagement with authorities in road construction project - Likoni Rd.msg
FW_ Likoni Road catchup.msg
NWCS Change of water meter work order.pdf

Assessment:
The 20220219 Water Emergency situations document includes a comprehensive list of Emergency situations, the Likelihood of occurrence, Consequence, Mitigation measures, Responsible Parties, and References to related plans (e.g., BCP).

Cognisance was taken of key considerations and constraints to implementation (e.g., lack of fire hydrants in the industrial area requiring the site to store all necessary water for an on-site fire on site; faulty water meters etc.), with associated correspondence confirming engagement with the related government stakeholders on some of these risks. Engagement also took place with key stakeholders through the March workshop, but follow-up engagement is required to fully cover all the key risks.

3	**STEP 3: IMPLEMENT - Implement the site's stewardship plan and improve impacts**
3.1	*Implement plan to participate positively in catchment governance.*
3.1.1	*Evidence that the site has supported good catchment governance shall be identified.* ✓ Yes
Comment	Evidence: BAT NAIROBI SITE IMPLEMENTATION PACK.docx Meeting with Nairobi Water Team.docx Various correspondence as per 1.8.1. Assessment: The interview with WRA confirmed the various engagements that BAT Likoni Road has undertaken to enable and practically support good catchment governance regarding improved catchment management and solid waste management regulations. This included involvement in various multi-stakeholder platforms, engaging public sector authorities on water related concerns, issues and infrastructure.
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	Evidence: Important Water Related Areas in the Catchment (Kirichwa Sub-Catchment).msg Kirichwa WRUA Feedback.msg RE_ Water Rights beyond what is provisioned for in Kenya Laws 3.3.1 Summary of STATUS OF PROGRESS TOWARDS MEETING WATER BALANCE TARGETS.docx Water balance (usage) 2018-2022 YTD.xlsx Water withdrawn reduction trends.pptx Assessment: The site consulted the Kirichwa WRUA and BAT's East Africa legal counsel to determine if any water rights are applicable over and above legal requirements. As the primary area of influence of the site is urban and peri-urban, there are no indigenous peoples present with customary or other rights over and above other citizens. There are also no water rights applicable over and above legal requirements. The site also identified and implemented various actions to reduce its water use, which has a positive impact on the catchment water balance and consequently on other water users and their water rights.
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	Evidence: Environmental Audit 2021 20220315 KEPRO Membership 2022 FW BAT Kenya Internal Legal Compliance audit & 20211214 - Internal Legal Compliance Audit plan NEMA Effluent Discharge License 2021 Water_quality_regulations 20220218 Water regulations Review.xlsb Licences tracker-Web based.docx Environmental Audit 2021.pdf FW BAT Kenya Internal Legal Compliance audit.msg Assessment: The site tracks its legal compliance and has a legal and compliance audit undertaken annually. The Cover page of the Environmental Audit 2021 and acknowledgement from NEMA of having received the Audit report, however a copy of the full Environmental Audit 2021 was not provided as evidence for uploading; a hard copy was provided for viewing during the on-site audit. '20220315 KEPRO Membership 2022' is a certificate of membership to KEPRO and its values and True North. 'FW BAT Kenya Internal Legal Compliance audit' Email was provided as well as '20211214 - Internal Legal Compliance Audit plan' indicating the internal annual audit having taken place in 2022.	
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	Evidence: Important Water Related Areas in the Catchment (Kirichwa Sub-Catchment) Email to Kirichwa WRUA WRA conservation and protection of Ondiri& Manguo wetlands. Kirichwa WRUA Feedback 20220624 Water Quality Summary 2020-2022.xlsx and the various effluent water quality results (e.g., Effluent quality test results.pdf, AQ615437-Gate 2 Exit After RCA.pdf) RCA for effluent tests Q1 2020.pdf Assessment: BAT Kenya has investigated water rights of the Kirichwa WRUA and received feedback, as well as provided a document indicating WRA conservation and protection of the Ondiri & Manguo wetlands No evidence was provided of an implementation strategy, commitment or implementation directly linked to this requirement, but earlier evidence does reflect implementation. The site has sought to avoid contamination of water through various on-site process (e.g., chemical, hydrocarbon pollution etc.). They also sought to help support provision of drinking water to all through catchment restoration. The site has also undertake testing for Legionella on-site to protect its workforce. The site has implemented various actions to reduce its water use, which has a positive impact on the catchment water balance and consequently on other water users and their water rights. Currently the tracker for this does not reflect current and past actions, but these are captured in the various evidence provided for earlier requirements (e.g., WRA conservation and protection of Ondiri & Manguo wetlands, 20220218 Adopt A Forest Concept_BAT.pdf, 20220219 Ministry of Forestry Appreciation.pdf etc.). Water quality results from 2022 - 2022 were provided. Whilst occasional minor exceedance have occurred, these have not been systematic and a root cause analysis and responses are implemented following such findings. The results confirm that the site's discharge of effluent is not having a negative impact on the rights of other water users.	
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.*	Obs.

Comment	Evidence 20220218 Water Recovery Projects - Phases Water withdrawn trend Water systems checklist British American Tobacco Kenya Plc - Nairobi Factory (AWS Communication).pdf Capital Expenditure Acquisition Form: Water Treatment Plant, approved 18/02/2022 FDDS Daily Water Performance Review - Site Leadership Team.docx Plots of water index vs target from 2018-2022.pptx Water withdrawn reduction trends.pptx Water withdrawn trend.png 3.3.1 summary.docx 20220120_Enercon DMS Summary 2022.xlsx Progress towards water balance.pptx Steam leaks CIL & DH.pdf Water balance (usage) 2018-2022 YTD.xlsx Water RM Kenya Nairobi Q4 2021.xlsx Assessment: Factory DDS (Leadership Team) evaluates the water KPI (and others) daily, which is reviewed daily and monthly (FDDS Daily Water Performance Review - Site Leadership Team.docx). A Water Systems Checklist is used to identify leaks and other impacts that could have an environmental impact. British American Tobacco Kenya Plc - Nairobi Factory (AWS Communication).pdf and 20220218 Water Recovery Projects - Phases.pptx reflects water recycling progress in relation to the 30% target set for 2025 (baseline is 2017 recycling value). CAPEX has been approved for a second RO plant (Capital Expenditure Acquisition Form: Water Treatment Plant, approved 18/02/2022). "Progress towards water balance.pptx" reflects water abstraction reductions in relation to the WSP target of 35% by 2025 (baseline is 2017 abstraction value). Water Index data is monitored (Plots of water index vs target from 2018-2022.pptx) but not in a metric that enables easy assessment of status against the WSP targets.	
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.*	No

Comment	Evidence: 20220218 Water Recovery Projects - Phases Water withdrawn trend Water systems checklist British American Tobacco Kenya Plc - Nairobi Factory (AWS Communication).pdf Capital Expenditure Acquisition Form: Water Treatment Plant, approved 18/02/2022 FDDS Daily Water Performance Review - Site Leadership Team.docx Plots of water index vs target from 2018-2022.pptx Water withdrawn reduction trends.pptx Water withdrawn trend.png 20220120_Enercon DMS Summary 2022.xlsx Progress towards water balance.pptx Steam leaks CIL & DH.pdf Water balance (usage) 2018-2022 YTD.xlsx Water RM Kenya Nairobi Q4 2021.xlsx 3.3.2 Summary of STATUS OF PROGRESS TOWARDS MEETING WATE R BALANCE TARGETS.docx Water Management Water withdrawn trend and Glidepath.pptx 20220218 Water Recovery Projects - Phases.pptx Assessment '20220218 Water Recovery Projects - Phases' reflects the targets set for reduced abstraction. Water withdrawal in terms of the site's water index has reduced year-on-year from 2018 to 2022 to date (Water withdrawn trend.png and Plots of water index vs target from 2018-2022.pptx). However, the total withdrawal has not decreased as per the targets set (Water withdrawn reduction trends.pptx and Water Management Water withdrawn trend and Glidepath.pptx). ***Finding No: TNR-000865***
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	No re-allocation of water is being implemented by BATS Likoni Road to social, cultural or environmental needs.
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

Evidence:
agriQ Quest Lab Test Report (12/03/2021)
Aquamist Limited-Aquamist Limited-Water Analysis-19 May 2022-0049 to 0049.pdf
Q1 Water quality Results (e.g., AQ615437-Gate 2 Exit.pdf, AQ615437-Gate 2 Exit After RCA.pdf, Gate 2 Exit RCA.pdf, AQ615810- Effluent- Gate 2 Exit.pdf etc.)
Cropnuts lab report of drinking water to the site (bottled)
Various Legionella lab results (e.g., AQ615703.pdf to AQ615714.pdf)

Assessment:
The site set the following water quality targets within the WS Plan:
- 100% compliance to the quarterly monitoring as per the schedule
- 100% compliance to the set quality specifications
- 0 illnesses related to water quality
- 100% compliance with set waste water discharge parameters
- Zero cases of water contamination

agriQ Quest Lab Test Report (12/03/2021) reflects exceedances for pH, Colour, and Cu for input water from the municipal system, but these are outside of the site's control (area of direct influence).

Cropnuts lab report of drinking water to the site (bottled) reflects no exceedances.

1 April 2022 lab results report did not include measurement of Cu and Zn.

AQ615437-Gate 2 Exit.pdf, AQ615437-Gate 2 Exit After RCA.pdf, Gate 2 Exit RCA.pdf (lab reports of 1 April 2022) reflect waste water quality upon leaving the site. Only the colour parameter exceeded the legal specification, a root cause analysis (RCA) was conducted, and corrective actions were then implemented. The lab report of Q2 did not reflect any exceedances.

Other lab results reflect periodic minor exceedances, but none were systematic and corrective actions were implemented.

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.*

closed

Comment

Evidence:
20220320 Water Stewardship Plan.xlsx

Assessment:
The WSP specifies the installation of enhanced filtration at the discharge point. No other actions have been identified and targets set for continual improvement at a good practice level. The enhanced filtration at the discharge point has been identified for actioning, but is still to be implemented (scheduled for July 2022). No actions were identified to address potential parameters of concern to the site and catchment (i.e., pH, COD, BOD, Nitrates, salinity).

Finding No: TNR-000877

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.*

closed

Comment

Evidence:
20220320 Water Stewardship Plan.xlsx
20220218 Water Recovery Projects - Phases.pptx reflects actions taken and proposed.

Assessment:
The following on-site IWRAs were identified and mapped: Borehole 1, Borehole 2, ETP (Effluent Treatment Plant), Overhead tank, and Modern oral RO plant. No natural IWRAs are applicable to the site.

However, the site is planning to installed a new RO plant, for which CAPEX has been approved. Also enhanced filtration at the discharge point planned for July 2022. Flash steam recovery is proposed for implementation in Q3 2022; bids have been received and are being evaluated. Routing of canteen and gym waste water to the ETP is planned and the contractor has been appointed and the project will commence in July 2022. Metering and sub-metering has been implemented, to improve monitoring, reduced use, and leak maintenance. RO reject water is now being re-used in washrooms.

Finding No: TNR-000986

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

Evidence:
BAT NAIROBI SITE IMPLEMENTATION PACK.docx (section 1.3.8 re facilities and ratios) and site photographs
20220217 WASH on Site.pptx
20220219 Washrooms Checklist.pdf
20220220 Drinking Water points.xlsx
Drinking water points and Washrooms.pdf
WASH services best practices(Washrooms).pptx

Assessment:
WASH facilities are identified, quantified and evidence of the number and excellent condition and access to all staff and contractors on site are verified.

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

Evidence:
Environmental audit report
Various waste water quality lab results
COVID -19 Mitigation elements.pptx
20220218 Water Recovery Projects - Phases.pptx
20220220 Drinking Water points.xlsx
WASH services best practices(Washrooms).pptx

Assessment:
Various Covid-19 hygiene measures were implemented on site, including mask use, disinfection of workplace and access to personal sanitation points, sanitizer provided to staff for on-site and at home. The site has also implemented actions to reduce water abstraction and increase water re-use. No systemic exceedances of water quality parameters for effluent discharge have taken place.

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

Evidence:
3.7.1 Summary IMPLEMENTATION OF ACTIONS TO IMPROVE INDIRECT WATER USE.docx
BAT NAIROBI SITE IMPLEMENTATION PACK.docx (1.4 reflects products with direct and indirect water use)
1.4.1 1.4.2 indirect water use.xlsx
VIVO ESG_RFx_3671002 HFO Contract questionnaire (Water management).xlsx

Assessment
The WSP identified the following actions:
Understand water footprint of indirect water users by:
1. Engage at least 5 indirect water users by Dec. 2022
2. Reduce indirect water consumed by 5% by Dec. 2023

Key indirect water use is from the tobacco received from GLT Thika, Tow plasticiser for filters, packaging from PrintPak. BAT's supply chain procurement process now includes ESG criteria, including water stewardship.

Efforts are underway to engage with key suppliers to jointly identify opportunities for improvement, with 5 key stakeholder consulted to date. BLT Thika has achieved a reduction in water intensity of 19% in 2022 compared to 2021. However, this is directly related to its own water stewardship journey and AWS objectives, and likely not directly related to the interaction with BAT Nairobi.

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.*	No

Comment

Evidence:
3.7.1 Summary IMPLEMENTATION OF ACTIONS TO IMPROVE INDIRECT WATER USE.docx
BAT NAIROBI SITE IMPLEMENTATION PACK.docx (1.4 reflects products with direct and indirect water use)
1.4.1 1.4.2 indirect water use.xlsx
VIVO ESG_RFx_3671002 HFO Contract questionnaire (Water management).xlsx
See all evidence from 3.7.1

Assessment:
Been consultation with GLT Thika (greatest indirect water use of suppliers) and laundry service company (Guildford and Lorris Ltd) to encourage their reduction in water use. Site visit was conducted to Guildford and Lorris Ltd to ensure their practices are sound, but not actions have been implemented by them to date.

GLT Thika is directly involved in reforestation initiatives, to improve water availability and quality in the Tana catchment (from which some water is transferred to the Athi catchment).

No consultation with or actions taken yet by Eastman Chemical International who provide tow to BAT Likoni Road, which constitutes BAT's secondary highest embedded water input.

Finding No: TNR-000869

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

Evidence:
20210524 Letter to NWSC on Faulty Meters.docx
202202323 Ruai treatment plant Visit.pptx
EDUCATIONAL VISIT- BAT KENYA.msg
FW_ Likoni Road progress review and way forward.msg
Envirosafe Limited Visit- Hazardous waste handlers.pptx
Harzadous waste collection ECCL.pdf
FW_ Likoni Road catchup.msg
FW_ Likoni Road progress review and way forward.msg
Re_ Water quality results report.msg
Stakeholder list and engagement.docx

Assessment:
Engagement with Kenya Urban Roads Authority on potable and waste water pipelines linked to upgrading of Likoni Road.

WWTW (Ruai): Site visit undertaken on 15 March 2022.

Hazardous Waste Management Site: Site visit undertaken on 7 December 2021.

BAT Kenya workshop on Water Stewardship held with key stakeholders on 30 March 2022 included consultation on shared water-related infrastructure of concern.

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

Evidence:
20220218 Adopt A Forest Concept_BAT.pdf
20220219 Ministry of Forestry Appreciation.pdf
20220603 WorldEnvironmentDay_Tree Planting Activity.pdf
20220806 Good Governance.pptx
BAT Kijani Afforestation Programme Ndakaini-World Environment Day 2022.pptx
Celebrating World Environment Day!(2).msg
County WED Support 2018.docx
ESA Comms World Environment Day.pdf
World Environment Day 2018-Kikuyu Springs Tree planting.pptx and various other related documents and correspondence.
RE_ Benchmarking Visit to KBL

Assessment:
The site has made contributions on Kenyan regulations for solid waste, which has an impact on water use.

BAT Kenya is involved in "Adopt a Forest" with various partners and stakeholders to facilitate growing and restoring, not just tree planting as a once-off.

BAT Kenya has engaged in packaging recycling initiatives, which reduce water use in production processes.

In 2017 the Kenyan regulator banned plastic packaging. The site engaged with Diageo and other private sector stakeholders for the application of an Extended Producer Responsibility (EPR) route for plastic management. BBAT Kenya participated in the stakeholder engagements with various government agencies for the adoption of the Sustainable Waste Bill, which was approved earlier in June 2022.

3.9.2	*Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.*	Yes

Comment

Evidence:
RE_ Benchmarking Visit to KBL.msg
Smart water taps(Automatic motion sensors)
Water systems checklist
PTC's Water Stewardship Journey (02).pptx
AWS overview training attendance from SMD meeting room..pdf
Facilities team AWS awareness training.pdf
meetingAttendanceReport(AWS Awareness Training) (2).csv
Water Recycling Rate Line.png
Water systems checklist.pdf

Assessment:
The site undertakes benchmarking against other BAT sites globally (particularly from BAT's Pakistan site) in terms of WASH, recycling and water efficiency, which has led to the site seeking to implement a second RO plant to treat its backwash (PTC's Water Stewardship Journey (02).pptx).

BAT Kenya also undertook a site visit and benchmarking exercise of Diageo's site in Kenya, which also informed BAT Likoni Road's decision to install a second RO plant (RE_ Benchmarking Visit to KBL).

Smart water taps were installed at the canteen (with automatic motion sensors) to reduce use.

The site achieved a reduction in its water recycling rate of 30% in May compared to January 2022.

3.9.3	*Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.*	Obs.

Comment	Evidence: BAT NAIROBI SITE IMPLEMENTATION PACK.docx (section 3.9) Summary of Best Practice on Actions Towards Meeting Water Quality.docx UNDERGROUND SETTLEMENT TANK FOR WASTEWATER.docx Benchmark on Effluent Specs Africa and Asia.docx Kenya water recycling plant Master Plan - use of RO Reject in Washrooms.xls PO for Spenomatic Running ETP -Capability Building.pdf Ruai Quality FEBRUARY 2022 MONTHLY REPORT.docx Ruai treatment plant permit to visit.pdf Sample Legionella SP Tests.pdf 20211220 ETP After Treatment.pdf and 20211220 ETP Before Treatment.pdf 202202323 Ruai Treatment Plant Visit.pptx BAT Drainage and Water Distribution.pdf ETP CIL checklist.pdf Lyft RO Water recovery.png Oil spill kits Best practices.pptx Spenomatic ETP re-commissioning report.pdf Water treatment facility at boiler(Dosing).pptx Assessment: The site has identified monitoring/metering as a key action in the WSP, but this is not a best practice action. A range of additional actions were identified by the site beyond those specified in the WSP, some of which have been implemented. The proposed actions include: - Despite not being a legal requirement, the site carries out Legionella test on water storage facilities to prevent potential risk of illness at least once annually - Installation of a settling pit for process water to capture sediments and preventing the addition of silt to the site wastewater facility. Settlement is also achieved through intermittent pumping to the treatment plant. - Explore an early warning system for underground water quality monitoring through consultation with upstream and downstream water stakeholders - The site has engaged with Ruai Wastewater Treatment facility to benchmark and understand the effectiveness of the treatment process at the plant and any opportunities to improve on their processes and ensure effective treatment - Capability building through involvement of OEM (Spenomatic) to run the effluent treatment plant for 3 months, thereby passing skills to in-house operators - Use of recovered water (from RO process) for washroom in ignite 1&2 (1st and 2nd floor). This water is of better quality than raw borehole water that was previously used. Use of this water has led to reduction in withdrawal of municipal water making it (municipal water) available to other users who potentially are using lower quality water(borehole) -The site has done benchmark on the quality parameters for effluent discharge against other jurisdictions in Africa and Asia and established that the guidelines are comparable across various countries and if the organisation was located in these countries, it would meet their specifications. (NB: Many of these jurisdictions are not considered to be examples of good and/or best practice). However, these actions have not been integrated into the WSP with associated targets set for implementation and monitoring.	
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.*	closed

Comment

Evidence:
20220320 Water Stewardship Plan.xlsx
ONSITE IWRAs.docx
BAT Likoni site IWRA.pdf
Spatial mapping site IWRA.docx
Water systems maitenance.pptx
Sample Water Systems Checklist.pdf
Modern Oral System Preventive Maintenance.pdf
ETP CIL Procedure checklist.pdf

Assessment:
A range of best practice actions have been completed or are in progress for various site IWRAs, including the following (amongst others):
- A Water Systems Checklist is used to identify leaks and other impacts that could have an environmental impact, with daily and weekly meetings to ensure early detection, actioning and rectification.
- British American Tobacco Kenya - Nairobi Factory (AWS Communication).pdf and 20220218 Water Recovery Projects - Phases.pptx reflects water recycling progress in relation to the 30% target set for 2025 (baseline is 2017 recycling value).
- CAPEX has been approved for a second RO plant (Capital Expenditure Acquisition Form: Water Treatment Plant, approved 18/02/2022).
- Flash steam recovery project (Pressurized tank, blow down unit) in progress
- Steam condensate metering
- Optimisation of Effluent Treatment Plant operations
- Recovery of MO plant reverse osmosis reject (Pump, tank and piping).

Finding No: TNR-000985

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

Yes

Comment

Evidence:
BAT NAIROBI SITE IMPLEMENTATION PACK.docx
GPTW-PROJECT IGNITE.pptx

Assessment:
Various WASH actions were identified (Install additional hand wash stations, Issue staff with hand sanitizers and surgical masks, and Disinfect high touch points on hourly frequency), GPTW-PROJECT IGNITE.pptx reflects the plant and office upgrade approach and actions.

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.* Obs.

Comment

Evidence:
20220320 Water Stewardship Plan Evaluation
Various other documents provided verifying implementation/achievement of the targets are reflected in the Water Stewardship Plan Evaluation.

Assessment:
20220320 Water Stewardship Plan Evaluation includes evaluation against all targets of the WSP. However, some of the targets in the WSP are not quantitative, which limits effective measurement of performance.

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

Comment

Evidence:
Value Creation.pptx

Assessment:
Value Creation document reflects substantial water intensity reduction. A step change of water recycled from 2% to 26% annualised to KEs 1,152,586.40 has been achieved.

A total saving of GBP 8,000 annually from reduction of water abstracted has been achieved, which will be increased though implementation of second RO plant and flash steam recovery project. Also the proposed flash steam loss project will result in both water use and energy reductions.

A volumetric reduction in 2022 of 34% is also reflected in "Value Creation.pptx", but this does not correlate with "Water withdrawn reduction trends.pptx" that does not reflect a volumetric reduction from 2017 to 2022.

The site's Afforestation programs in the catchment area are contributing to land conservation and restoration, but the value creation has not been evaluated yet.

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

Comment

Evidence:
4.1.3 Shared value benefits in the catchment.docx

Assessment:
4.1.3 Shared value benefits in the catchment reflects shared catchment benefits across the areas of Water Quantity/Scarcity, Water Quality/Water Balance, Water Governance, and Low levels of awareness.

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

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

Comment

Evidence:
2021119 Annual Review-Water related incidences.docx
BAT Nairobi's Emergency Response team helping put out at neighbouring company.pptx

Assessment:
3 occurrences took place: disruption of water meters, water supply from Nairobi City Water and Sewage Company, and Covid-19 pandemic. The Significance Level, Root Cause, and Mitigation Measures were determined for each of the three occurrences (2021119 Annual Review-Water related incidences.docx).

During a recent fire incident elsewhere in the industrial area of Nairobi, BAT provided water to assist the Nairobi City Council in fighting the fire (BAT Nairobi's Emergency Response team helping put out at neighbouring company.pptx). Root cause and mitigation measures were provvided.

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.*

No

Comment

Evidence:
RE: BAT Kenya Plc- Nairobi Factory [Alliance for Water Stewardship (AWS)] Journey.msg
British American Tobacco Kenya Plc - Nairobi Factory (AWS Communication).pdf
RE_ Benchmarking Visit to KBL
Various correspondence confirming consultation with a broad suite of key stakeholders.
202202407_stakeholder_engagement_report.docx
BAT Engagement with Top Suppliers on ESG Commitments.pdf
BAT_Kenya-Annual_Report_2021.pdf
Environmental sustainability at BAT Kenya - Feature Sunday Nation_5th June 2022.pdf

Assessment:
Consultation was undertaken with various stakeholders on the site's AWS journey, but the only performance data shared was on reduced water withdrawal by 31% and 24% in 2020 and 2021 (RE: BAT Kenya Plc- Nairobi Factory [Alliance for Water Stewardship (AWS)] Journey.msg and British American Tobacco Kenya Plc - Nairobi Factory (AWS Communication).pdf)

The workshop at end March 2022 was also used as a platform to provide an opportunity for stakeholders to make input into BAT's journey and shared water challenges (as per the AWS Standard Guidance Document), but no performance information was shared (202202407_stakeholder_engagement_report.docx) with stakeholders at that time.

BAT Engagement with Top Suppliers on ESG Commitments.pdf reflects engagement with key material suppliers by BGAT at a group-level to disclose their water use, but it is not clear if this included any of BAT Nairobi's suppliers.

Various information on BAT's AWS journey and actions was conveyed to stakeholders via the BAT_Kenya-Annual_Report_2021.pdf but much of this related to actions undertaken by BAT GLT Thika as opposed to BAT Nairobi.

Information was conveyed to the general public via "Environmental sustainability at BAT Kenya - Feature Sunday Nation_5th June 2022.pdf", but from a water stewardship perspective this was limited to the water withdrawal target by 2035, as well as trees planted to date and water recycled to date across all of BAT Kenya's operations.

Finding No: TNR-000874

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.* Obs.

Comment

Evidence:
Water Roadmap (Water RM Kenya Nairobi Q4 2021.xlsx) was updated to the the first (current) WSP 2021 - 2025 (20220320 Water Stewardship Plan.xlsx)
20220320 Water Stewardship Plan Evaluation.xlsx

Assessment:
The current WSP (20220320 Water Stewardship Plan.xlsx)) is the site's first version, but it was developing based on improvements to the site's initial Water Roadmap (Water RM Kenya Nairobi Q4 2021.xlsx). No major changes have been identified to the current Water Stewardship Plan, as it is the first version, but 20220320 Water Stewardship Plan Evaluation.xlsx reflects minor changes to proposed actions to improve effectiveness.

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

Evidence:
British American Tobacco Kenya Plc - Nairobi Factory (AWS Communication).pdf
BAT Kenya Plc- Nairobi Factory Alliance for Water Stewardship (AWS) Journey.msg
Likoni road Stewardship Communication.docx
20220218 Water regulations Review.xlsb
BAT Kenya website stakeholder communication.docx
British American Tobacco Kenya Plc - Nairobi Factory (AWS Communication) (003).pdf
Website Link-British American Tobacco Kenya Plc - Nairobi Factory (AWS Communication).docx
World Water Day 2021- Kenya (Nairobi Factory).mp4

Assessment:
The site's site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations were disclosed through email (BAT Kenya Plc- Nairobi Factory Alliance for Water Stewardship (AWS) Journey.msg) and the related presentation that was shared (British American Tobacco Kenya Plc - Nairobi Factory (AWS Communication).pdf).

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.* ✓ closed

Comment

Evidence:
BAT Kenya Plc- Nairobi Factory _Alliance for Water Stewardship (AWS)_ Journey.msg
Regional and site water KPI tracking.pptx

Assessment:
An overview of the site's AWS journey was shared with key stakeholders including key actions identified in the WSP, but not the actual WSP and related targets, timelines. how the water stewardship plan contributes to AWS Standard outcomes etc.

Finding No: TNR-000875

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.* ✓ closed

Comment

Evidence:
RE: BAT Kenya Plc- Nairobi Factory [Alliance for Water Stewardship (AWS)] Journey.msg
British American Tobacco Kenya Plc - Nairobi Factory (AWS Communication).pdf
RE_ Benchmarking Visit to KBL
Various correspondence confirming consultation with a broad suite of key stakeholders.
202202407_stakeholder_engagement_report.docx
British American Tobacco Kenya - Environmental sustainability (https://www.batkenya.com/group/sites/BAT_B4ALXZ.nsf/vwPagesWebLive/DOB4AMC3)
BAT Kenya - 2021 Annual Report & Financial Statements (https://www.batkenya.com/group/sites/BAT_B4ALXZ.nsf/vwPagesWebLive/DOB4AMEG)

Assessment:
Consultation was undertaken with various stakeholders on the site's AWS journey through which the performance data on reduced water withdrawal by 31% and 24% in 2020 and 2021 was shared (RE: BAT Kenya Plc- Nairobi Factory [Alliance for Water Stewardship (AWS)] Journey.msg and British American Tobacco Kenya Plc - Nairobi Factory (AWS Communication).pdf). Various correspondence was provided confirming consultation with a broad suite of key stakeholders.

The workshop at end March 2022 was also used as a platform to provide an opportunity for stakeholders to make input into BAT's journey and shared water challenges (as per the AWS Standard Guidance Document) (202202407_stakeholder_engagement_report.docx) with stakeholders at that time.

Various summary data on performance was also shared via BAT Kenya's website and BAT Kenya - 2021 Annual Report & Financial Statements (https://www.batkenya.com/group/sites/BAT_B4ALXZ.nsf/vwPagesWebLive/DOB4AMEG).

However, a summary of the site's water stewardship performance, including quantified performance against targets has not been disclosed annually at a minimum.

Finding No: TNR-000935

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

Evidence:
https://www.batkenya.com/group/sites/BAT_B4ALXZ.nsf/vwPagesWebLive/DOB4AMEG
RE: BAT Kenya Plc- Nairobi Factory [Alliance for Water Stewardship (AWS)] Journey.msg
British American Tobacco Kenya Plc - Nairobi Factory (AWS Communication).pdf
202202407 stakeholder engagement report.docx
BAT Kenya website stakeholder communication.docx
catchment shared water challenges.docx
Water related challenges initiatives.docx
Website Link-British American Tobacco Kenya Plc - Nairobi Factory (AWS Communication).docx

Assessment:
The site's shared water-related challenges and efforts made to address these challenges were disclosed via the workshop at end March 2022, and various one-on-one and group dialogues and communication.

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

Yes

Comment	Evidence: https://www.batkenya.com/group/sites/BAT_B4ALXZ.nsf/vwPagesWebLive/DOB4AMEG RE: BAT Kenya Plc- Nairobi Factory [Alliance for Water Stewardship (AWS)] Journey.msg British American Tobacco Kenya Plc - Nairobi Factory (AWS Communication).pdf BAT Kenya website stakeholder communication.docx Assessment: The workshop at end March 2022 and various one-on-one and group dialogues and communication were used to engage stakeholders and coordinate and support public-sector agencies.	
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	Evidence: 5.5.1 5.5.2 5.5.3.docx Environmental Audit 2021.pdf document 20220624 Water Quality Summary 2020-2022.xlsx Effluent quality test results.pdf Effluent Quality Tests Results.pdf RCA for effluent tests Q1 2020.pdf Water Quality Monitoring-Submission to Authorities.docx Assessment: Exceedances for effluent discharge related to pH, Nitrates, and salinity were identified in the Environmental Audit 2021.pdf document, but the extent of such exceedances were verified against the lab results provided and no systemic or major exceedances of concern were identified. The site did not disclose any compliance violations and associated corrections. We have assumed that this was due to such periodic minor exceedances not being of a material and/or systemic nature, and were therefore not viewed as compliance violations.	
5.5.2	*Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.*	Yes
Comment	Evidence: 5.5.1 5.5.2 5.5.3.docx Environmental Audit 2021.pdf document 20220624 Water Quality Summary 2020-2022.xlsx Effluent quality test results.pdf Effluent Quality Tests Results.pdf RCA for effluent tests Q1 2020.pdf Water Quality Monitoring-Submission to Authorities.docx Assessment: Minor corrective actions were implemented, but none of the exceedances were of a major or systemic nature that would constitute a "Significant water-related violation". We have assumed that these exceedances were therefore not deemed to be compliance violations requiring disclosure of corrective actions.	
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	Evidence: 5.5.1 5.5.2 5.5.3.docx Environmental Audit 2021.pdf document 20220624 Water Quality Summary 2020-2022.xlsx Effluent quality test results.pdf Effluent Quality Tests Results.pdf RCA for effluent tests Q1 2020.pdf Water Quality Monitoring-Submission to Authorities.docx Assessment: None of the exceedances were of a major or systemic nature that would constitute a "Significant water-related violation" that may pose significant risk and threat to human or ecosystem health.

Photographic Evidence from Audit

The meter for borehole 2.

20220620_143753.jpg

WASH facilities for staff uniforms.

20220620_155127.jpg

Display of the site's Water Stewardship Policy on site.

20220620_145646.jpg

Chemical Spill control measures instruction sheet.

20220620_162239.jpg

Colour and alphanumeric coding of the storm waste water drainage system.

20220620_143007.jpg

Waste sorting and storage area.

20220620_144820.jpg

Ablution facilities.

20220620_155215.jpg

Borehole 1 abstraction point.

20220620_160454.jpg

Waste receptacles for general waste.

20220620_145842.jpg

WASH facilities in the men's ablutions.

20220620_155217.jpg

Health, Safety and Environment procedures on a noticeboard within the factory.

20220620_154346.jpg

Dual metering at borehole abstraction point.

20220620_160649.jpg

A drinking water dispenser within the offices on site.

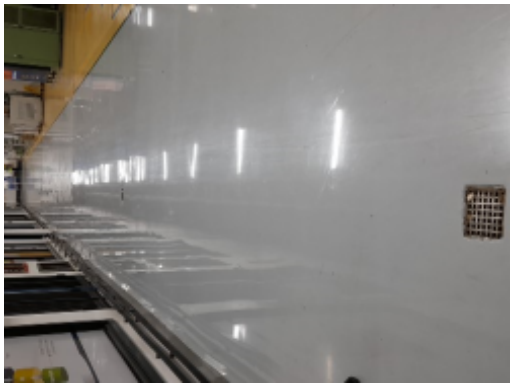
20220620_152647.jpg

Hazardous waste awaiting collection by the approved waste disposal company. Documentary evidence was provided confirming that this waste was collected the same day and disposed of appropriately.

20220620_145129.jpg

Ablution facilities within the factory.

20220620_152842.jpg



Internal drainage system for waste water (e.g., floor cleaning, minor spills etc.) within the factory.

20220620_155045.jpg

Yes

Comment The following photographic evidence of the site's operations was captured by BAT Nairobi during the on-site walkover undertaken by the audit team.

Drinking water provision that is available at key locations across the plant for staff and contractors.

20220620_154920.jpg

20220620_164343.jpg

Spill tray at fuel input valve to a storage tank.

20220620_143322.jpg

Borehole 1 abstraction location.

20220620_160450.jpg

Communication within the factory of the site's environmental goals and associated progress to date.

20220620_150812.jpg

Colour and alphanumeric coding of the storm and waste water drainage system.

20220620_142956.jpg

The site's Effluent Treatment Plant.

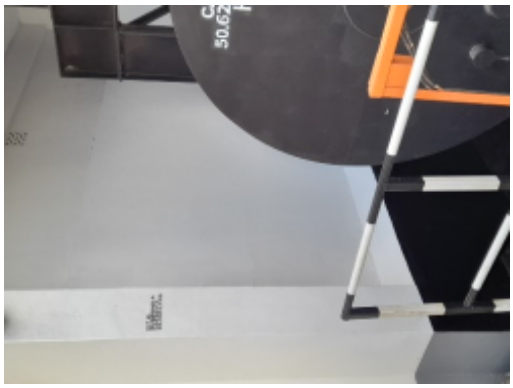
20220620_143633.jpg

Water loss on site through the expelling of steam.

20220620_163158.jpg

Skill trays for the glue used on site.

20220620_155424.jpg



Adequate bunding for the site's hydrocarbon storage tanks.

20220620_162758.jpg

Chemical Spill kit on-site containing the necessary equipment.

20220620_161817.jpg

Signage of bunding capacity of diesel fuel storage tank 1.

20220620_143203.jpg

Spill trays for Fembor used by the factory.

20220620_151053.jpg

The drainage system for process water leaks in the factory.

20220620_152429.jpg

Containment trays for smaller volume hydrocarbon drums.
20220620_161554.jpg