

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000345



SITE DETAILS

Site: **PMI Jordan - Amman**

Address: Jordan - Amman - Na'ur - Umm ALBasateen road - Madaba Triangle, P.O.Box 1875 Amman 11941, Jordan, 11941, Amman, JORDAN

Contact Person: Isaam AbuFreiha

AWS Reference Number: AWS-000448

Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Core

Date of certification decision: 2022-Dec-23

Validity of certificate: 2025-Dec-23

AUDIT DETAILS

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

Audit Type(s): Initial Audit

Audit Start Date: 2022-Oct-18

Lead Auditor: Nathalie Karam

Audit team participants:

Mia Antoni-Naidoo

Site Participants:

Isaam AbuFreiha, Sustainability Manager

Ozgur Sevim, Director

Mai Al Jundi, Other

Zaid Qaqish, Other

Wael Anis, Other

Bashar Khalief, Other

Mohammad El Nadi, Other

Razan Hakna, Other

Hakem Alhasabeen, Other

Abdullah Al-Sawar, Other

Saif Attawalbeh,

Ayat Manadha, Consultant

Ibrahim Hammoudeh, Process Manager

Mohamed Adamat, Other

Sameh Al AQil, Sr. Director, EHS, Security and Facilities

abdelaziz Rahhal, Production manager

Radwan Al Bariri, Other

Salah El Sweir, Public Affairs

WSAS

2 Quality StreetNorth Berwick, EH39 4HW, UNITED KINGDOM

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ADDITIONAL INFO

Summary of Audit Findings: A total of 32 findings were raised during the certification audit, 5 major non-conformities, 18 minor non-conformities, 9 observations. The major non-conformities were of sufficient concern to warrant the categorisation of the non-conformity as major and related to good water governance, sustainable water balance and good water quality status.

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 January 2023.

The major non-conformities must be sufficiently addressed and evidence submitted to WSAS within 90 days of receipt of the report 28 February 2023.

Minor non-conformities must be closed out by the time of the next annual audit, however, if the site is able to submit a corrective action plan and evidence of implementation then these can be closed with the Majors.

The audit team recommends certification of PMI Jordan - Amman at Core level pending approval of the corrective actions plan and closure of the major non-conformities.

Scope of Assessment: The scope of services covers the Initial certification audit for assessing conformity of Philip Morris Jordan (PMJO) against the AWS International Water Stewardship Standard Version 2.

PMJO is a tobacco company located in Na'ur, Umm Albasateen road - Madaba triangle, Amman 11941, Jordan, Coordinates: 31.857285484377645, 35.83183550276354. The assessment of the PMJO tackled all the facilities and processes on site i.e. primary unit, secondary unit, water well, water treatment, canteen, warehouses, utilities, and administrative building.

The facility is located in the catchment area of the aquifer body named Amman-Wadi Es Sir (A7/B2) which is one of the main 3 aquifer in the Amman-Zarqa basin.

The audit was conducted onsite on 18-20 October 2022.

The site visit included the physical assessment of production line (primary and secondary), on site water well, water treatment unit, wastewater septic tanks, canteen, warehouses (liquid and solid material).

The following external stakeholders were interviewed during the audit: Ministry of Agriculture, Municipality of Naour, EFS and Dar El Dawaa

FINDINGS

NUMBER OF FINDINGS PER LEVEL

Observation	9
Minor	18
Major	5

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FINDING DETAILS

Finding No: TNR-002065

Checklist Item No: 1.2.1

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2023-Oct-17

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: Stakeholders water related challenges were identified during the open day and PMJO assumed that these challenges are common to all stakeholders. A questionnaire was distributed to the stakeholders. Analysis of the received filled questionnaires from the different stakeholders and use these questionnaires to inform the stakeholders water challenges. Upload summary of the questionnaires and sample as evidence.

Corrective action:

- "1. Update current stakeholder list Groups & indigenous people inside the catchment.
2. Add in WS plan the actions that will be done during January to engage them
3. Prepare a separate questionnaire to them
4. Share questionnaire with them and collect them back for analysis
4. Complete the analysis for these groups and summarize them
5. Perform analysis from the current questionnaire with summary on them. and we will upload one evidence from the questionnaire"
- "Create Summary of all current questionnaires with the analysis of explaining the main outcomes of the questionnaires and the shared challenges from the involved stakeholders.
- '-To upload questionnaires sample as an evidence "
- Engage all the stakeholder during the 2023 gathering session

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Audit Number: AO-000345

Finding No:	TNR-001712
Checklist Item No:	1.3.3
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Oct-17
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:	A trend was not performed for the last 5 years however the team was able to provide the incoming water records. The site is requested to provide data on the trend and annual variance.
Corrective action:	-To calibrate & fix the static and dynamic level sensor. Use current dataset we have for creating a full covered trend -Since water balance is a new practice, we will update the trend with the new available data, ensuring to cover all water consumption in the trend.
Finding No:	TNR-002273
Checklist Item No:	1.3.3
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Oct-17
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 site did not map the groundwater level trends in the catchment.
Corrective action:	"To map groundwater level trends inside the catchment using Google Earth and checking local data "

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Finding No:	TNR-002274
Checklist Item No:	1.3.4
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Oct-17
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 did not present data for the catchment.
Corrective action:	"1. Contact WWTP to have an evidence that PMJo didnt have any impact observed during the last 5 years. 2. Upload all evidences of current wastewater results that were shared with our WWTP "
Finding No:	TNR-001685
Checklist Item No:	1.3.4
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Oct-17
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:	Water is being tested internally, nevertheless the trend is available only for 2021 and was not externally analyzed nor was proof of compliance provided. Analysis of the seasonal trends of water quality and assessment of compliance is required. Additional improvement can be achieved by taking duplicate samples of in house analysis and compare with the third party.
Corrective action:	"1. Graph process water internal results of current available data for the last 3-4 years showing the trend. 2. Add all quality external test results into an excel sheet and graph it, and have a specific analysis to compare between internal and external results. "

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Finding No: TNR-002117
Checklist Item No: 1.3.5
Status: Open
Finding level: Observation
Checklist item: Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.
Findings: The site can expand the pollutants listed to includes any liquid fuels stored on site and and hazardous waste storage areas.

Finding No: TNR-002067
Checklist Item No: 1.3.6
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Oct-17
Checklist item: On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.
Findings: IWRA mapping is missing. On-site Important Water-Related Areas shall be mapped, including a description of their status including Indigenous cultural values.
Corrective action: "1. To map IWRA on site including a description of their status including Indigenous cultural values and possible related risks in a specific file.
1.1 For the status description, we will refer back to expert or stakeholders consultation to have better assessment.
2. Add photograph to our onsite IRWAs.
"

Finding No: TNR-002110
Checklist Item No: 1.4.1
Status: Open
Finding level: Observation
Checklist item: The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be identified.
Findings: More efforts can be invested in the assessment of quantified embedded and indirect water consumption and quality.

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Finding No: TNR-002111
Checklist Item No: 1.5.3
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Oct-17
Checklist item: The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.
Findings: There is lack of data, not allowing the variance to be assessed properly. invest more efforts in data collection from different stakeholders and in establishing a better trend.
Corrective action: "to collect more data related to catchment water balance from different stakeholders,
Establish a specific questionnaire for this indicator with questions that support to cover this indicator
Analysis after receiving the filled questionnaire and create a clear trend with variance based on the answers that are available. "

Finding No: TNR-002112
Checklist Item No: 1.5.4
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Oct-17
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: There is lack of data, not allowing the variance to be assessed properly. Invest more efforts in data collection from different stakeholders and in establishing a better trend.
Corrective action: "to collect more data related to catchment water quality; physical and biological status from different stakeholders,
Establish a specific questionnaire for this indicator with questions that support to cover this indicator.
Questions will need to have a quantified answers in order to have clarity in the analysis and trend that will be created accordingly.
Analysis after receiving the filled questionnaire and create a clear trend with variance based on the answers that are available. "

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Finding No:	TNR-002050
Checklist Item No:	1.5.6
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Oct-17
Checklist item:	Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.
Findings:	The uploaded document did not includes the condition of IWRA and potential exposure to extreme events.
Corrective action:	<p>"1. Update our current file related to existing and planned water related infrastructure within the catchment area with their condition/status and potential exposure to extreme events; specially to the existing infrastructure in order to acknowledge this limitation.</p> <p>2. Include the important measures such As % of the catchment population with access to safe drinking water along with the % connected to wastewater collection.</p> <p>3. Water related infrastructure with their condition & potential exposure to extreme events Refer back to alarm presentation for infrastructure and rephrase based on what is requested in the guidance.</p> <p>4. Share this document and discuss it with our stakeholders to raise awareness."</p>
Finding No:	TNR-002051
Checklist Item No:	1.7.1
Status:	Closed
Finding level:	Major
Due date:	2023-Feb-27
Checklist item:	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.
Findings:	The water risks indicator has not been adequately addressed to achieve compliance. All the addressed risks are more about the national risk but not the site risks. The PMJO identified risks are same as the identified water challenges and PMJO used the same criteria for prioritization the related potential costs and business impact were not presented. The site is required to identify risks to the site and to differentiate between risks and shared water challenges. Once this has bee completed the site must assess also the potential costs and business impact.
Corrective action:	corrective actions were uploaded on preventive actions box, site uploading issue.

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Finding No:	TNR-002113
Checklist Item No:	1.7.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Oct-17
Checklist item:	Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.
Findings:	Potential savings were not tackled or not quantified. Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.
Corrective action:	To identify Water-related opportunities, with how assessment and prioritization of potential savings, and business opportunities were done by having a summary slide from 1.7.1.
Finding No:	TNR-002275
Checklist Item No:	3.1.1
Status:	Open
Finding level:	Observation
Checklist item:	Evidence that the site has supported good catchment governance shall be identified.
Findings:	Evidence were not uploaded under this indicator.
Finding No:	TNR-002118
Checklist Item No:	3.1.2
Status:	Open
Finding level:	Observation
Checklist item:	Measures identified to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be implemented.
Findings:	Additional efforts can be invested in the identification of measures to protect the water rights of others.

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Finding No: TNR-002052
Checklist Item No: 3.2.2
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Oct-17
Checklist item: 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.
Findings: Regulatory framework for human rights related to water were not properly reported. The site identification and compliance to the regulatory texts and convention related to water rights needs to be reviewed and re-represented for assessment.
Corrective action: "1.Add an action in our WS plan to have quarterly meetings with Stakeholders and indigenous groups focusing on water rights to bulid up trust between communities and ensure long term commitments.

2. Share the outcomes from quarterly meetings and activities share with all stakeholder to increase their knowledge related to water rights."

Finding No: TNR-002053
Checklist Item No: 3.3.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Oct-17
Checklist item: Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.
Findings: The listed targets are more site related and they are all completed progress. The site should review its WS Plan and, include catchment targets, then conduct a better assessment of targets and their progress taking into consideration all the targets i.e. planned, in progress, completed.
Corrective action: "1. Update WS plan on monthly basis with the current actions with the correct status.
2. Add more actions that is agreed with stakeholders that will have effective effect on the catchment ensuring to cover all AWS outcomes.
3. Ensure to add a meaningful targets to each action so we can be able to quantify it and have an analysis and trends to them to monitor our performance and enhancements when possible.
4. After evaluation of each action based on its due date, if target not achieved, we can add a new row for the new action with new targets, and give justification on the reason on not achieving the target. "

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Finding No:	TNR-002054
Checklist Item No:	3.4.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Oct-17
Checklist item:	Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.
Findings:	The site has inadequate water quality monitoring targets in the WS Plan, none are in the catchment. Improvement is required on the setting of targets and the status of progress towards meeting those targets. Additional proof of compliance to this indicator are required
Corrective action:	"1. Create a specific presentation related to all types of water (Raw, process and wastewater) and their tests (internal and external tests). 2. Update our Q protocol with the new testings that will be included in our WS plan. 3. Include targets and tolerances of each testing parameters with the references used for testing (PMI requirements and ISO standards). 4. Add more actions for water quality testing inside the catchment from different sources and share results with related parties such as stakeholders and WWTP."
Finding No:	TNR-002114
Checklist Item No:	3.4.2
Status:	In Progress - CA plan approved
Finding level:	Major
Due date:	2023-Feb-27
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:	The site stopped waste water on site treatment and thus stopped the testing of the water effluent. This does not constitute neither continual improvement, nor Best Practice. The site has provided no information on where the effluent goes nor the issues involved with further treatment at this point. Additional efforts to be invested in ensuring that the water effluents are within the norms and informing the wastewater treatment plan of the testing results in order to lessen the load to the receiving environment.
Corrective action:	Corrective actions were uploaded on the preventive actions box, site uploading issue.

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Audit Number: AO-000345

Finding No:	TNR-002276
Checklist Item No:	3.5.1
Status:	Open
Finding level:	Observation
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:	Additional efforts can be invested in the different IWRA.
Finding No:	TNR-001705
Checklist Item No:	3.7.1
Status:	Closed
Finding level:	Major
Due date:	2023-Feb-27
Checklist item:	Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.
Findings:	There are no indirect water use targets in the WS Plan. Identification of indirect water use targets is required.
Corrective action:	"1. Rephrase our targets that were mentioned in a better manner inside WS plan and separate them to serperate sheet for the sake of evidence under this indicator. 2. Collect more data from supplier to get more information on how to have better targets as awareness session actions are considered as soft actions and we need to have more concrete actions to have better indiction on the targets or the way of measuring and improving water management at their site. " "1. Rephrase our actions that were mentioned in WS plan and separate them to separate sheet for the sake of evidence under this indicator." "
Finding No:	TNR-002120
Checklist Item No:	3.7.2
Status:	In Progress - CA plan approved
Finding level:	Major
Due date:	2023-Feb-27
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:	The site is required to provide evidence in order to assess conformity.
Corrective action:	Corrective actions were uploaded on the preventive actions box, site uploading issue.

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Finding No:	TNR-001715
Checklist Item No:	3.8.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Oct-17
Checklist item:	Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.
Findings:	The stakeholders engagement were in generally not properly documented. Confirmation of key message delivered and their receipts to be documented.
Corrective action:	"1. Document the evidences related to this indicator in a proper & specific file ensuring to cover the confirmation of key message delivered and their receipts. 2. Upload the current evidences we have and that was presented during the audit under this indicator to the same file in point #1. "
Finding No:	TNR-002121
Checklist Item No:	3.9.2
Status:	Open
Finding level:	Observation
Checklist item:	Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.
Findings:	The site has performed many projects towards Best Practice towards water balance. Preparation and presentation on information for this indicator can be improved upon.
Finding No:	TNR-002122
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:	Best Practice efforts can be improved upon.
Finding No:	TNR-002123
Checklist Item No:	3.9.4
Status:	Open
Finding level:	Observation
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:	Best Practice efforts can be improved upon.

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Finding No:	TNR-002124
Checklist Item No:	4.1.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Oct-17
Checklist item:	Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.
Findings:	Further evaluation will provided more meaningful evolution of the Plan. Further suggestions on how this can be done is provided in the AWS Guidance Document.
Corrective action:	" 1. Show a better evolution to our WS plan in a separate sheet and not only a screenshot of old WS plans. 2. Evaluate our WS plan by listing the targets for action and improvement. 3. Report on to what extent they are being, or have met including how it has contributed to achieving each of the five AWS Outcomes. 4. Include rate at which our targets are achieved and compare it with the timelines that were mentioned in our water stewardship plan."
Finding No:	TNR-002057
Checklist Item No:	4.1.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Oct-17
Checklist item:	Value creation resulting from the water stewardship plan shall be evaluated.
Findings:	The value creation from the WS plan has not been properly assessed and evaluated. The economic, environmental and social/cultural value created in their WS activities must be captured.
Corrective action:	"1. Revise the current value creation and report it in a better way for understanding ensuring to capture economic, environmental, and social/cultural values in our WS activities. 2. Check if PMJO could provide a financial water cost-benefit component and report on its financial investment in water stewardship and the services and benefits achieved."

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Finding No: TNR-002058
Checklist Item No: 4.1.3
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Oct-17
Checklist item: The shared value benefits in the catchment shall be identified and where applicable, quantified.
Findings: The shared value benefit to the catchment from the WS plan has not been properly assessed and evaluated.
Corrective action: "1. The shared value benefit to the catchment to be evaluated in a better way and standardized in the evaluation form.
2. Create a specific sheet for this indicator and cover all requirements including the shared value from point #1."

Finding No: TNR-002115
Checklist Item No: 4.2.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Oct-17
Checklist item: A written annual review and (where appropriate) root-cause analysis of the year's emergency incident(s) shall be prepared and the site's response to the incident(s) shall be evaluated and proposed preventative and corrective actions and mitigations against future incidents shall be identified.
Findings: PMJO did not upload neither the incident register nor a review of the year stating that there is no incident.
Corrective action: "1. To include all emergency incidents in annual review (for small and big incidents)
2. Share the current updated incident register sheet for Q4,2022.
3. Share the annual review of the year's emergency incident(s) with PMJO team and for big spills if available with Ministry of Environment (MOE)."

Finding No: TNR-002116
Checklist Item No: 4.3.1
Status: Open
Finding level: Observation
Checklist item: Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.
Findings: Additional efforts in collecting responses for the questionnaires and their analysis is still needed. The site must retain evidence to support conformity to this indicator.

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Finding No:	TNR-002125
Checklist Item No:	5.3.1
Status:	In Progress - CA plan approved
Finding level:	Major
Due date:	2023-Feb-27
Checklist item:	A summary of the site’s water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.
Findings:	Insufficiency evidence was provided to ascertain conformity to this indicator. In the disclosure report the performance was shared for the water efficiency only and not against the plan.
Corrective action:	corrective actions were uploaded on the preventive actions box, site uploading issue



Signature WSAS

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Report Details

Report	Value
Report prepared by	Nathalie Karam
Report approved by	Lurdes Guerra
Report approved on (Date)	27/11/2022

Surveillance

Proposed date for next audit
2023-Oct-17

Stakeholder Announcements

Date of publication	Location
2022-Aug-30	WSAS and AWS Website
2022-Sep-18	PMJO Emailed Stakeholders
2022-Sep-19	PMJO LinkedIn Post

Catchment Information



tree plantation.jpg

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WhatsApp Image 2022-11-17 at 13.58.58.jpg



WhatsApp Image 2022-10-19 at 14.19.20.jpg

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WhatsApp Image 2022-11-17 at 13.58.58 tree.jpg

Catchment Information

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The Amman-Zarqa basin lies in the northern part of Jordan, with a total area of 4,586 km² (4,074 km² of which are in Jordan and 512 km² in Syria). Within the basin there are located Jordan's two main cities: Amman and Al Zarqa that is home to 52% of Jordan's industries, as well as parts of Jerash, Mafraq, and Balqa. The major water resources within the basin are surface water, groundwater, and treated wastewater. Zarqa River is the main surface water source with a catchment area of 3,900 km². There are also seven sub-catchments within the Amman-Zarqa basin that are unique in their land use and land cover.

There are three main aquifers within the basin, the most relevant to PMJO is the Amman—Wadi As Sir (B2/A7) aquifer, which extends over a large part of the national territory, including the Wadi Al Mujib basin, and that is the main source of fresh water for domestic and irrigated agricultural uses.

The Amman-Zarqa basin has been suffering from acute water shortage for decades as a consequence of population growth, economic development, and exacerbated in the past decade by the Syrian refugee crises. This increasing growing gap between supply and demand resulted in overexploitation of the groundwater aquifers and deterioration of water quality. There are Six dams within the Amman-Zarqa Basin: King Talal, Khaldiyyeh, Wadi Rajil, Al Lahfi, Abu Sowwaneh and Wadi Al Esh. The largest is the KTD situated at the western part of Amman-Zarqa Basin, while the others are situated in the north-eastern part of the basin.

The groundwater abstraction rates for the inlet catchment at Al Mujib basin and for the outlet at Amman-Zarqa basin far exceed the rates groundwater replenishment, exceeding the safe yields by more than 150% therefore the basin is suffering from overexploitation.

The quality of basin water is influenced significantly by human activities which, in turn affects its uses. Water quality in the Amman-Zarqa basin (outlet catchment for PMJO) is affected by many factors: mainly, effluent and agricultural discharges, poor quality groundwater, return flow, runoff from urban areas and industrial waste discharge.

PMJO abstracts from the Amman—Wadi As Sir (B2/A7) aquifer, which is the most important aquifer in the catchment, with large volume and high hydraulic conductivity, and is the main source of fresh water for domestic, as well as irrigated agricultural, uses. The number of established wells has increased significantly during the past decades specially with the influx of refugees. As indicated, the aquifer is overexploited.

PMJO is situated within the Side Valleys groundwater basin which exhibits one of the highest rates of groundwater level decline at -1.9 meter per year, forecast to reach a 38-meter decline by 2030. Pumping from wells occurs primarily along the western edge of the basin, near the Jordan Valley, in the highlands on the eastern edge of the basin, and along wadis. Groundwater salinity trends in the Side Valleys and Dead Sea basins are variable. Low groundwater salinities were reported in the north of Madaba and in the southwest of Al Mujib basin. The high variability in salinity in the center and southeast of Amman is mainly due to anthropogenic activities, over exploitation of the aquifers, and mining processes that lead to salt concentrations in drainage waters.

During the catchment tour a nearby pharmaceutical company having an onsite waste water treatment plan was visited as well as the location of tree planting campaign in the Sil Husban park located inside the catchment area. this project was executed in collaboration with the municipality and aims for the restoration of forest cover, prevention of deforestation, increase in local biodiversity, mitigation of evapotranspiration rates of bare soil cover

Client Description and Site Details

Client/Site Background

Philip Morris Investments B. V. Jordan (PMJO) is a cigarette manufacturing facility established in 2011 in Na'ur as a result of Philip Morris International's (PMI) acquisition of the operations of the International Tobacco Cigarettes Company (ITCC).

PMJO is located in Na'ur, Umm Albasateen road - Madaba triangle, Amman 11941, Jordan (Coordinates: 31.857285484377645, 35.83183550276354).

PMJO receives its potable water from 1 deep well located on-site which relies upon a deep aquifer body named Amman-Wadi Es Sir (A7/B2), pumped water undergo several step before being used in the process (sedimentation, sand filter, and water treatment such as RO...).

PMJO is divided in several facilities such as: administrative area, primary processing facility, secondary processing facility, water treatment, warehouses, chemical storage area, waste storage area, parking, and canteen).

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Summary of Shared Water Challenges




Summary of Shared Water Challenges

In cooperation with their stakeholders PMJO identified their shared water challenges noting that all these challenges range from moderate to very high risks:

- Droughts and baseline water stress;
- Surface water quality: water quality in the basin is highly impacted by human activities, industries, agriculture and other factors;
- Water depletion: caused by continuous overexploitation over decades where the abstraction reached levels higher than 150%;
- Water depletion: with overexploitation reaching very high levels the groundwater is at very high risk of depletion;
- Projected impact on freshwater biodiversity: the freshwater biodiversity is at high risk due to overexploitation, drought, flooding, pollution;
- Flood occurrence: flood events induced by rain are becoming very common in the catchment area;
- Wash provisions: access to sanitation and WASH services is a challenge in the catchment area as it is not available to all the community members including minorities and poor people.

0.1 General Requirements for Single Sites, Multi-Sites and Groups

0.1.1 Eligibility Criteria

0.1.1.1	<i>The site(s) occupy one catchment OR an exception has been granted.</i>	 Yes
0.1.1.2	<i>The scope of the proposed certification shall be under the control of a single management system.</i>	 Yes
0.1.1.3	<i>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.</i>	 Yes

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1 STEP 1: GATHER AND UNDERSTAND

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

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

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



Yes

Comment Site boundaries: a presentation was uploaded showing the location of PMJO, the boundaries of PMI on google photo, the site boundaries and plan layout, and contraction plan (asset layout map).
Water-related infrastructure: a presentation was uploaded showing the water related infrastructure available on site: Piping network, water related infrastructure (well location, different water tanks location, water treatment plant, septic tanks) as well as additional infrastructure such as firefighting pumps room, diesel tank, boiler, HW area, liquid storage locations, spill kits locations... the presentation shows as well the stormwater drainage system and waster water journey for treatment.
Source of water: the uploaded presentation shows that the solo source of water for PMJO is the on site underground water well; the presentation also shows the original water source for the well, and the water well documentation (the permits (license valid until 2023 and renewed on yearly basis) and the rehabilitation technical report (2013) water meters...).

Discharge points and wastewater service providers: the presentation shows the location of the septic tanks and the, the inspection documentation done by service provider in regards to septic tanks volume, disposal invoices at ain ghazal, transporter permits, in addition to information about the final WWPT.

Catchment: the presentation shows information on the catchment including maps for aquifer, physical scope, groundwater basin, and surface water.

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


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Comment PMJO uploaded 4 documents under this section presenting their process for stakeholders selection, up to date list of stakeholders including level of engagements, influences, general information, physical location. Nevertheless, it was noted that minor groups or indigenous people are not within the list. The excel sheet shows the identified shared water challenges. During the audit it was revealed that these challenges were identified during the open day and it was assumed that the stakeholders share the same challenges because they share the same catchment. The distribution of questionnaire were presented during the audit but neither summary of questionnaires nor samples were uploaded under this section.

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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 Covered in the same document as above. The degree of stakeholders influence was tackled within the same excel sheet as the list of stakeholders defining the influence of the site on each identified stakeholders and the influence of the stakeholders on the site.

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


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

Comment Emergency response plan was uploaded under this section, tackling description of responses in case of a spillage of hazardous materials and chemicals, leakage of a water tank or its contamination, water source depletion at the well.
During the audit it was noticed that the site is prepared for several type of incidents for example:
- spill kits are available in all areas,
- firefighting system is there,
- precautionary measures are being taken to avoid incidents related to overflow of the septic tanks (regular frequent inspection of the level of wastewater, and condition of septic tanks by a third party as well as regular emptying of the tanks),
- Fuel tank is stored in a secondary spill containment area.

It was informed that no major incident happened, nevertheless, the site keeps records of the minor defects related to water leakages, the excel sheet attached to the uploaded internal email shows that the type of defects and that they were fixed within 1 week period.

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





Comment PMJO uploaded a sankey diagram showing the water flows, water meters and volumes. they uploaded as well an excel sheet calculating the water balance for the year 2021. The site has mapped basically the site water balance with inflows, storage and losses.

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.*  **No**

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Comment	<p>PMJO uploaded 2 documents showing the below:</p> <ul style="list-style-type: none">- water inflow trend (2019-2020),- monthly water consumption trend for the years 2019, 2020, 2021 and 2021,- a monthly comparative graph of the water consumption of 2022 vs previous years showing a decrease in the consumption,- quotation received for the water well static and dynamic level sensor maintenance by a third party,- water pumping inspection checklist. <p>During the audit:</p> <ul style="list-style-type: none">- the water invoices were presented and it was noted that the water inflow numbers are taken from the invoices.- it was noted that the water balance is a new practice and cannot be back calculated to perform a trend even though some data is available such as water inflow, variance of water consumption in the process on monthly and annually basis but not covering all the water consumption.- the water well static and dynamic level are not currently being monitored. <p>Finding No: TNR-001712 Finding No: TNR-002273</p>	
1.3.4	<p><i>Water quality of the site's water source(s), provided waters, effluent and receiving water bodies shall be quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be quantified.</i></p>	 No
Comment	<p>PMJO uploaded their sampling procedures and plan, the results of drinking water quality tests done by a third party.</p> <p>Water inflow are being tested before and after treatment on a biweekly basis for chemicals and occasionally for biological parameters (last test this year).</p> <p>The process water is being tested internally.</p> <p>The trend of water quality for the year 2021 were presented in form of tables but not analyzed and compliance was not presented.</p> <p>Since the stop of the wastewater treatment on site the testing stopped and PMJO mentioned that they restarted it in late 2022 and plan to continue on quarterly basis.</p> <p>Finding No: TNR-002274 Finding No: TNR-001685</p>	
1.3.5	<p><i>Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.</i></p>	 Obs.
Comment	<p>PMJO uploaded a document showing the on site potential source of pollution including liquid substance storage locations, spill kits locations and list of chemicals stored.</p>	
1.3.6	<p><i>On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.</i></p>	 Obs.
Comment	<p>PMJO uploaded 2 documents, areal photo of the catchment showing the location of PMJO and mentioning the water well and excel sheet for the on-site IWRA risk assessment listing 3 on site IWRA, their status and identifying potential actions in cooperation with other stakeholders. Noting that a map of the on site IWRA was not added to this section but on site IWRA was presented as water related infrastructure under 1.1.1.</p>	
1.3.7	<p><i>Annual water-related costs, revenues, and a description or quantification of the social, cultural, environmental, or economic water-related value generated by the site shall be identified and used to inform the evaluation of the plan in 4.1.2.</i></p>	 Yes
Comment	<p>PMJO uploaded a document including the water related cost including water meters reading and related costs, testing, water management, water efficiency costs. The revenues from water saving in PMJO briefly mentioned water initiatives cost and examples of their water related value creation (social, cultural and economic).</p>	

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1.3.8	<i>Levels of access and adequacy of WASH at the site shall be identified.</i>	 Yes
Comment	PMJO uploaded a document showing the WASH related facilities as well as their compliance with the International Building Code in relation to WASH facility numbers.	
1.4	<i>Gather data on the site's indirect water use, including: its primary inputs; the water use embedded in the production of those primary inputs the status of the waters at the origin of the inputs (where they can be identified); and water used in out-sourced water-related services.</i>	
1.4.1	<i>The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be identified.</i>	 Obs.
Comment	Excel sheets for leaf suppliers and DIM suppliers were uploaded for the year 2021. The sheets shows the suppliers location (inside or outside the catchment area), identifies whether the inputs originate from within or outside the site's catchment, the water demands, the water quality impacts. During the audit it was noted that the providers do not monitor water consumption but rather when given it is estimated figures, in addition there is no monitoring of the water quality. PMJO provided as well communication with DIM suppliers in regards to indirect water use. More efforts can be invested in the assessment of embedded and indirect water consumption and quality.	
1.4.2	<i>The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.</i>	 Yes
Comment	PMJO provided an excel sheet of within the catchment are service providers specifying which one is on site and off site. the water consumption for 2 on site service providers were provided. PMJO provided as well communication with Tazweed and EFS onsite service providers. Additional efforts can be invested in the quantification of embedded water from all the service providers	
1.5	<i>Gather water-related data for the catchment, including water governance, water balance, water quality, Important Water-Related Areas, infrastructure, and WASH</i>	
1.5.1	<i>Water governance initiatives shall be identified, including catchment plan(s), water-related public policies, major publicly-led initiatives under way, and relevant goals to help inform site of possible opportunities for water stewardship collective action.</i>	 Yes
Comment	PMJO uploaded a presentation showing the main national and local authorities responsible for water related initiatives such as the Ministry of Water, Ministry of Environment, Ministry of agriculture... and their main role as well as water governance initiatives and programmes.	
1.5.2	<i>Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.</i>	 Yes
Comment	PMJO identified the key legislation related national legislation related to water and wastewater such as the law 6/2017, 202/2007 (industrial effluents limits), 13/2015 and amendment 50/2015, MoA G/7 of 2016 (wastewater treated usage for irrigation), Jordanian standards for drinking water, national water strategy 2016-2025, law of groundwater (government is the only owner of groundwater), law on water auth. prohibiting sale of water without approval's, water agreements with Syria, Israel and Saudi Arabia. The attached presentation also tackled the right of the marginalized and indigenous people. PMJO also uploaded a document showing the responsibilities of the different departments including the legal department role in updating the list on quarterly. Another document was uploaded showing the process of legal compliance as well as an excel sheet showing the identified legislation and standards, their applicability to PMJO and the required actions.	
1.5.3	<i>The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.</i>	 Obs.

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Comment PMJO uploaded a very recent study (Oct 2022) conducted by a third party (environmental consultancy firm). The study assessed the water balance and quality, using the available data in the catchment area. the study showed that the catchment is suffering from several factors including over-exploitation of the basin exceeding 150% of water replenishment. Additional efforts can be invested in data collection from different stakeholders and in the assessment of variance which was not tackled properly within the study due to lack of data.

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

Comment The same study for water balance tackled water quality. Groundwater is highly impacted by wastewater, agricultural and industrial activities and salinity. Additional efforts can be invested in data collection from different stakeholders and in the assessment of variance which was not tackled properly within the study due to lack of data.


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

Comment PMJO uploaded a presentation mapping the important IWRA and presenting the main risks. In addition to an excel sheet presenting an assessment of the risks for each identified IWRA and potential actions.

1.5.6 *Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.*  No


Comment PMJO uploaded a list of the identified existing and planned water related infrastructure within the catchment area. however the uploaded document did not include their condition and potential exposure to extreme events

Finding No: TNR-002050


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

Comment PMJO uploaded a document showing analysis done by different parties in regards to WASH within the catchment area. the document shows poor WASH services and PMJO noted that they are planning to study the WASH status and establish an action plan to improve the WASH inside the catchment and included this in their water stewardship plan

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 PMJO uploaded an excel of shared water challenges, risk level, prioritization, opportunities and potential actions. Prioritization criteria were listed within the same file and PMJO noted in a separate file that the prioritization criteria were based on:
- The results of the 1.7. Catchment and site water risk assessment, uploaded in indicator 1.7.1.
- Gathered Stakeholder feedback from various questionnaires in 3.1.1 and an example of Open Day for Water in indicator 2.4.1. not there (it can be prepared based on the risk assessment and the questionnaires).








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

Comment PMJO uploaded a file listing the existing and planned initiatives to address shared water challenges. Initiatives were addressed for each challenge identified in 1.6.1.

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1.7	<i>Understand the site's water risks and opportunities: Assess and prioritize the water risks and opportunities affecting the site based upon the status of the site, existing risk management plans and/or the issues and future risk trends identified in 1.6.</i>	
1.7.1	<i>Water risks faced by the site shall be identified, and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.</i>	 No
Comment	Physical regulatory reputational different type of risk on the basin were identified (water stress and depletion and droughts), flash flood risks, surface water quality risk (contamination, increase in salinity) high risk on fresh water biodiversity, wash access to sanitation. All the addressed risks are more about the national risk but not the site risks. the PMJO identified risks are same as the identified water challenges and PMJO used the same criteria for prioritization the related potential costs and business impact were not presented. Finding No: TNR-002051	
1.7.2	<i>Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.</i>	 No
Comment	PMJO uploaded an excel file tackling the some opportunities and assessing their impacts on the site and their prioritization as well as general impact on the business. Potential savings were not tackled or not quantified. Finding No: TNR-002113	
1.8	<i>Understand best practice towards achieving AWS outcomes: Determining sectoral best practices having a local/catchment, regional, or national relevance.</i>	
1.8.1	<i>Relevant catchment best practice for water governance shall be identified.</i>	 Yes
Comment	The site has presented a list of actions which they consider to be Best Practice. Some of the identified best practices are more of internal standards practices and not catchment related best practices and some can be considered as best practices in a wider perspective.	
1.8.2	<i>Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.</i>	 Yes
Comment	Most of the identified best practices are more of internal standards practices and not catchment related best practices and some can be considered as best practices.	
1.8.3	<i>Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.</i>	 Yes
Comment	Most of the identified best practices are more of internal standards practices and not catchment related best practices and some can be considered as best practices.	
1.8.4	<i>Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.</i>	 Yes
Comment	Most of the identified best practices are more of internal standards practices and not catchment related best practices and some can be considered as best practices.	
1.8.5	<i>Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.</i>	 Yes
Comment	Some of the identified best practices can be considered good practices and some can be considered as best practices.	

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2	STEP 2: COMMIT & PLAN - Commit to be a responsible water steward and develop a Water Stewardship Plan	
2.1	<i>Commit to water stewardship by having the senior-most manager in charge of water at the site, or if necessary, a suitable individual within the organization head office, sign and publicly disclose a commitment to water stewardship, the implementation of the AWS Standard and achieving its five outcomes, and the allocation of required resources.</i>	
2.1.1	<i>A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:</i> <ul style="list-style-type: none"> - That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes - That the site implementation will be aligned to and in support of existing catchment sustainability plans - That the site's stakeholders will be engaged in an open and transparent way - That the site will allocate resources to implement the Standard. 	 Yes
Comment	A signed Alliance for Water Stewardship Commitment was uploaded as evidence. The commitments signed by the Director of Manufacturing for Levant and West Africa and it meets the requirements of the Standard. The commitment was reported to be shared with employees and stakeholders during the Open Day and the Annual Report. During the audit the commitment was witnessed displayed on the entrance of the factory.	
2.2	<i>Develop and document a process to achieve and maintain legal and regulatory compliance.</i>	
2.2.1	<i>The system to maintain compliance obligations for water and wastewater management shall be identified, including:</i> <ul style="list-style-type: none"> - Identification of responsible persons/positions within facility organizational structure - Process for submissions to regulatory agencies. 	 Yes
Comment	PMJO uploaded several documents: <ul style="list-style-type: none"> - Certification Report by a 3rd party for ISO 14001. - Their annual legal monitoring plan presenting the frequency of reviews and submissions. - Their water legal register assessing the existing legislation, the thresholds by the different applicable regulation, the compliance status and legal requirements of PMJO and the required actions. - Water related roles and responsibilities, showing that it is the key responsibilities of each department regarding the regulatory compliance. - Template for EHS procedure at PMI. - Recent and previous communication evidence for the update of the legal framework. - SOP for legal requirements, the legal department collect the data, the system is there with the legal department we requested a screenshot with a description. 	
2.3	<i>Create a water stewardship strategy and plan including addressing risks (to and from the site), shared catchment water challenges, and opportunities.</i>	
2.3.1	<i>A water stewardship strategy shall be identified that defines the overarching mission, vision, and goals of the organization towards good water stewardship in line with this AWS Standard.</i>	 Yes
Comment	PMJO uploaded their water stewardship strategy, representing their vision to preserve water resources and respect the natural cycle of water in cooperation with their stakeholders. PMJO presented broadly their commitments in regards to water and sustainability (2 documents).	

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2.3.2	<i>A water stewardship plan shall be identified, including for each target:</i> <ul style="list-style-type: none">- How it will be measured and monitored- Actions to achieve and maintain (or exceed) it- Planned timeframes to achieve it- Financial budgets allocated for actions- Positions of persons responsible for actions and achieving targets- Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.	 Yes
Comment	PMJO uploaded their water stewardship plan differentiating between the social & community actions and the technological actions. The plan is linked to the identified water challenges, the identified best practices and the goals & strategy. The plan provided information on the: <ul style="list-style-type: none">- the planned activities and (status of completion)- the related costs and timeline- the responsible person- target- improved additional improvements can be done on the IWRA- link from best practices identification and the plan is existent and presented	
2.4	<i>Demonstrate the site's responsiveness and resilience to respond to water risks</i>	
2.4.1	<i>A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.</i>	 Yes
Comment	For this indicator PMJO uploaded 5 documents: <ul style="list-style-type: none">- Business Impact Analysis: analysis of the impact on the business from national disaster and social unrest including probability, possibility of recovery and recovery costs.- Stakeholder shared water related challenges.- Utilities BCP Procedure.- Business Impact Analysis-Water related: screenshot from the Utilities BCP Procedure including short term mitigation for failure or contamination of water well, water tank or water network on site.- Utilities BCP Procedure_ Page 3- Water related: screenshot from the Utilities BCP Procedure which is a brief illustration of their water procedure. Evidence of coordination with national authorities (presentation of Al Samra WWTP, risk presentation, Evidence on discussing the WS plan) were discussed under another indicator (3.9).	

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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.  Obs.
Comment	<p>PMJO uploaded a presentation showing coordination with stakeholders (local municipalities and stakeholders), distribution of questionnaires and disclosure of questionnaires. some of the listed example are not related to governance such as awareness raising through the aid of a social media influencer.</p> <p>During the audit a cooperation between the PMJO and the Ministry of Agriculture was noted, as well as the organization of the open day with the participation of public authorities, nevertheless the evidence were not uploaded under this indicator.</p>
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.  Obs.
Comment	<p>PMJO uploaded 1 planned activity for the 2023, which is testing the water used by poor people. During the audit it was noted that PMJO did some efforts in donating aerators to the local community council building and shared WASH related awareness signs on the walls.</p>
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	<p>PMJO uploaded several documents:</p> <ul style="list-style-type: none"> - their annual legal monitoring plan presenting the frequency of reviews and submissions - their water legal register assessing the existing legislation, the thresholds by the different applicable regulation, the compliance status and legal requirements of PMJO and the required actions. - Identification of legal and other requirements and evaluation of compliance including roles and responsibilities, showing that it is the key responsibilities of each department regarding the regulatory compliance.
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.  No
Comment	<p>The uploaded document present the current status of access to sanitation and safe drinking water without tackling the identification of legal texts that guarantee human rights including indigenous people related to water.</p> <p>During the audit it was noted that human rights for water are not tackled within the national legal framework (an information to be validated) and that one international convention mentioned signed by government mentioned the human rights regarding water but it was not presented under this section.</p> <p>Finding No: TNR-002052</p>
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.  No


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Comment PMJO uploaded a document presenting the water balance target from the water stewardship, it shows the progress in meeting targets taking 2019 as a baseline year. Noting that in the presented document only S7 completed targets were listed and none were listed as in progress.
It is worth noting the listed targets are not catchment related but only site related.
During the audit a document presenting the targets including the different progress status (S1-S7) was presented.

Finding No: TNR-002053


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

Comment PMJO listed the current and planned projects related to water use, water efficiency on site and their implementation status including costs, savings.

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 PMJO uploaded their water permit from the Ministry of Water and irrigation clearly stating that re-allocation of water is prohibited

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.*  **No**

Comment Nothing was uploaded under this indicator, however from the revision of other indicators one water quality target was listed under the indicator 3.1.1 and some tests that were done in the past noting that there is a plan to test water quality on site (raw and wastewater for 2022 onward)
the uploaded tests results under 1.3.4 are more related to drinking water quality.


Finding No: TNR-002054

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.*  **in progress**

Comment Septic tank water were tested recently and testing results were uploaded, tightness testing for septic tanks is planned. Wastewater treatment on site was stopped and wastewater is being transported to a WWTP within the catchment for treatment. Additional efforts to be invested in ensuring that the water effluents are within the norms and informing the wastewater treatment plan of the testing results.


Finding No: TNR-002114

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.*  **Obs.**

Comment The site provided evidence of the implementation of 2 projects (Tree plantation project and cleaning activities) in an IWRA was presented.







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**

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Comment	Evidence was uploaded & or witnessed by the audit team during the audit (photos evidence, SGS tests for water drinking bottles). In addition to the uploaded documents the certification for the canteen was presented during the audit.	
3.6.2	<i>Evidence that the site is not impinging on the human right to safe water and sanitation of communities through their operations, and that traditional access rights for indigenous and local communities are being respected, and that remedial actions are in place where this is not the case, and that these are effective.</i>	 Yes
Comment	PMJO stated that during the activity day and after sharing questionnaires with 14 stakeholders, 2 responses received indicating that PMJO was not impacting negatively the human rights to safe water and sanitation. Additional evidence such as effluent water tests were shared. Nevertheless, showing more positive examples for their contributions toward human rights access to safe water and sanitation can be added.	
3.7	<i>Implement plan to maintain or improve indirect water use within the catchment:</i>	
3.7.1	<i>Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.</i>	 in progress
Comment	There are no indirect water use targets in the WS Plan.	
	Finding No: TNR-001705	
3.7.2	<i>Evidence of engagement with suppliers and service providers, as well as, when applicable, actions they have taken in the catchment as a result of the site's engagement related to indirect water use, shall be identified.</i>	 in progress
Comment	PMJO did not upload any evidence under this indicator, nevertheless from the stakeholders interview evidence of engagement were concluded.	
	Finding No: TNR-002120	
3.8	<i>Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have.</i>	
3.8.1	<i>Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.</i>	 No
Comment	Meeting with Al Samra WWTP was presented in the uploaded document, Additional evidence of the engagements with the owners of shared water related infrastructure were presented during the audit including the open day, meetings, cooperation with Seel Hosban. However, were not uploaded under this indicator, confirmation of key message delivered and their receipt were not presented as well.	
	Finding No: TNR-001715	
3.9	<i>Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.</i>	
3.9.1	<i>Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.</i>	 Yes
Comment	Example of actions towards achieving targets related to water governance were presented. Document attached in 3.9.	
3.9.2	<i>Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.</i>	 Obs.

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Comment	1 example of actions towards achieving targets related to water withdrawal (more of awareness raising activity tackling water balance) was presented. Document attached in 3.9.	
3.9.3	<i>Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.</i>	 Obs.
Comment	1 example of actions towards achieving targets related to the water quality was presented. Document attached in 3.9.	
3.9.4	<i>Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.</i>	 Obs.
Comment	1 example of actions towards achieving targets related to the maintenance of IWRA was presented.	
3.9.5	<i>Actions towards achieving best practice related to targets in terms of WASH shall be implemented.</i>	 Yes
Comment	2 examples of actions towards achieving Wash were presented.	

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4 STEP 4: EVALUATE - Evaluate the site's performance.	
4.1	<i>Evaluate the site's performance in light of its actions and targets from its water stewardship plan and demonstrate its contribution to achieving water stewardship outcomes.</i>
4.1.1	<i>Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.</i>
Comment	PMJO evaluated their performance and by how far the broad target categories were achieved. The site reported on the completed progress and their contribution to achieving the AWS Outcomes tackling only water balance and water quality.
4.1.2	<i>Value creation resulting from the water stewardship plan shall be evaluated.</i>
Comment	The same document was uploaded as 4.1.1 this does not reflect the value of the activities which have been created for the site.
Finding No: TNR-002057	
4.1.3	<i>The shared value benefits in the catchment shall be identified and where applicable, quantified.</i>
Comment	The same document was uploaded as 4.1.1 this does not reflect the shared benefit to the catchment of the activities which have been created for the site.
Finding No: TNR-002058	
4.2	<i>Evaluate the impacts of water-related emergency incidents (including extreme events), if any occurred, and determine the effectiveness of corrective and preventative measures.</i>
4.2.1	<i>A written annual review and (where appropriate) root-cause analysis of the year's emergency incident(s) shall be prepared and the site's response to the incident(s) shall be evaluated and proposed preventative and corrective actions and mitigations against future incidents shall be identified.</i>
Comment	PMJO uploaded 2 documents: - preventive and corrective flow chart for water exceedance that illustrates the procedure to implement in case of threshold exceedances in process water. - a service provider report assessing the problems in the water related systems and suggesting solutions and recommendations. During the audit, and under the indicator 1.3.1 the emergency response plan was presented, No incident that passed the threshold were reported, a clear differentiation between small and big spill for example was noted missing. it was also noted that the small incident are tracking withing defect that is being corrected in a very short term.
Finding No: TNR-002115	
4.3	<i>Evaluate stakeholders' consultation feedback regarding the site's water stewardship performance, including the effectiveness of the site's engagement process.</i>
4.3.1	<i>Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.</i>

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Comment PMJO informed that they did face-to-face meetings and on-site workshops with Stakeholder in order to disclose:

- AWS Commitment
- water stewardship strategy plan
- water-related risks identified in the local catchment territory
- target achievement

In addition, they sent questionnaires to stakeholders for their consultation feedback regarding their water stewardship performance. and that they will tackle this point as an action to evaluate the performance with the stakeholders during the regular PDCA DRUMBEAT.
Evidence was not uploaded under this indicator, however when reviewing other indicators 2 questionnaires copies were uploaded confirming a good performance of PMJO.

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

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



Yes

Comment PMJO uploaded a document showing that the water stewardship plan was updated and showed that some changes were made to the plan based on stakeholders reply on questionnaires.

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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.	<div><div></div><div>Yes</div></div>
Comment	PMJO uploaded a document showing the roles and responsibilities of their teams in relation to water related internal governance and emergency responses.	
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.	<div><div></div><div>Yes</div></div>
Comment	PMJO uploaded documents showing that they disclosed their Water Stewardship Strategy with stakeholders via email dated 18/9/2022 requesting also stakeholders to fill a questionnaires (the questionnaire, the report, and a filled questionnaire were presented as evidence). The site informed that they disclose their water stewardship plan within face to face meetings done with the stakeholders. During the audit, all the interviewed stakeholders confirmed receiving a copy of the water stewardship plan of PMJO.	
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.	<div><div></div><div>in progress</div></div>
Comment	PMJO uploaded the same document of 4.1.1 which is not related to the disclosure. PMJO noted that performance was disclosed through the annual disclosure report page " 7" In the disclosure report the performance was shared for the water efficiency only and not against the plan.	
Finding No: TNR-002125		
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.	<div><div></div><div>Yes</div></div>
Comment	PMJO uploaded 2 filled questionnaires under this indicator as evidence. Both replies confirmed that PMJO did share their water related challenges. During the audit water related challenges were presented as part of the annual disclosure report.	
5.4.2	Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.	<div><div></div><div>Yes</div></div>
Comment	PMJO added a disclosure email of the water stewardship plan and an internal communication suggesting including additional activity to support a nearby stakeholder in preventing chemical spill and infiltration in the ground water. Both evidence are not public sector related, however during the audit the efforts of PMJO to coordinate with the public authorities and mainly ministry of agriculture and local municipality were noted.	

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5.5	<i>Communicate transparency in water-related compliance: make any site water-related compliance violations available upon request as well as any corrective actions the site has taken to prevent future occurrences.</i>	
5.5.1	<i>Any site water-related compliance violations and associated corrections shall be disclosed.</i>	<div><div>✔</div><div>Yes</div></div>
Comment	PMJO submitted an internal email from the MEA sustainability manager indicating that there was no violations, nevertheless a document signed by the factory manager declaring that there was no violation can be considered as a better evidence.	
5.5.2	<i>Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.</i>	<div><div>✔</div><div>Yes</div></div>
Comment	PMJO submitted an internal email from the MEA sustainability manager indicating that there was no violations, nevertheless a document signed by the factory manager declaring that there was no violation can be considered as a better evidence.	
5.5.3	<i>Any site water-related violation that may pose significant risk and threat to human or ecosystem health shall be immediately communicated to relevant public agencies and disclosed.</i>	<div><div>✔</div><div>Yes</div></div>
Comment	PMJO submitted an internal email from the MEA sustainability manager indicating that there was no violations, nevertheless a document signed by the factory manager declaring that there was no violation can be considered as a better evidence.	

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Photographic Evidence from Audit



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Yes