

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000438



SITE DETAILS

Site: **Philip Morris Pakistan Limited (PMPKL) - Sahiwal**

Address: Philip Morris Pakistan Limited, GT Road Qadirabad, 57000, Sahiwal, PAKISTAN

Contact Person: Naveed Raza

AWS Reference Number: AWS-000453

Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Core

Date of certification decision: 2023-May-05

Validity of certificate: 2026-May-05

AUDIT DETAILS

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

Audit Type(s): Initial Audit

Audit Start Date: 2022-Nov-01

Lead Auditor: Rizwan Masood

Site Participants:

Faisal Mushtaq, Director Manufacturing

Muhammad Umer, Manager Sustainability

Naveed Raza, Sustainability Specialist

Muhammad Shaban, Manager Project Engineering

Rana Azeem, Site Manager (3rd Party)

Junaid Arshad, Manager IFMS

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ADDITIONAL INFO

Summary of Audit Findings: A total of 45 findings were raised during the certification audit, 20 major non-conformities, 22 minor non-conformities and 3 observations. The major non-conformities were of sufficient concern to warrant the categorization of the non-conformity as major.

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 10/04/2023.

The major non-conformities must be sufficiently addressed, and evidence submitted to WSAS within 90 days of receipt of the report by 10/05/2023.

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-conformity and submitted the corrective action plan addressing all findings.

Proof of implementation has been requested for the Minors and this will be evaluated during the Surveillance Audit. The client is requested to upload evidence of implementation prior to the Surveillance Audit.

The audit team recommends certification of Philip Morris Pakistan Limited (PMPKL) - Sahiwal site 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 Phillip Morris Pakistan Limited (Sahiwal Plant) against the AWS International Water Stewardship Standard Version 2.

Phillip Morris Pakistan Limited (Sahiwal Plant) is located at around 165km Lahore-Multan road in Sahiwal district. It is a cigarette manufacturing plant which has mainly two processes. Primary processing of Tobacco and cigarette manufacturing (secondary processing). Site is extracting groundwater from onsite deep wells for its consumption. Site effluents are treated in onsite effluent treatment plant and recycled for landscaping and gardening at site. No effluent is discharged from the site. Site has a three-shift operation and around 380 employees work there.

The audit was conducted onsite on 01 to 03 Nov 2022.

The onsite site visit included the assessment of site water infrastructure, storage of potential sources of pollution and WASH facilities at site.

FINDINGS

NUMBER OF FINDINGS PER LEVEL

Observation	3
Minor	22
Major	20

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FINDING DETAILS

Finding No:	TNR-003173
Checklist Item No:	1.2.1
Status:	Open
Finding level:	Observation
Checklist item:	<p>Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall:</p> <ul style="list-style-type: none">- 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:	<p>Site has adequately identified the stakeholders but the engagement/consultation for shared water challenges is still not concluded. Consequently, the identified shared water challenges are not linked with stakeholder's feedback.</p>
Corrective action:	<p>1. Upload Shared water challenges selection criteria covering stakeholders consultation and water risk filter inputs.</p> <p>2. Upload evidences of shared water challenges consultation with stakeholders.</p>

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Finding No:	TNR-003176
Checklist Item No:	1.3.3
Status:	Closed
Finding level:	Major
Due date:	2023-May-10
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 time frame on which water balance has been prepared is not clear. Also, the effluent treatment plant outlet (recycling) amounts is also not mentioned in water balance.
Corrective action:	<div><div>1. Plan session with IFMS Engineer and Technician to update the water balance with recycling streams flow rates and include them in the sankey diagram.</div><div>2. Update Management of Change system checklist to include update water balance in case of any modification in water consumption or recycling at site.</div><div>3. Plan session with IFMS Engineer and Technician to validate the Water balance and mention the timeframe accordingly.</div><div>4. Update Sankey diagram with validated water balance and time frame.</div></div>
Evidence of implementation:	Evidences are attached.

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Finding No:	TNR-003254
Checklist Item No:	1.3.4
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Nov-01
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:	<p>Site has recently identified that the drinking water quality has issues of biological and heavy metal contamination.</p> <p>The drinking water test attachment shows the result for Arsenic as 25ppb, the local guideline value is 50ppb however the WHO limit is 10ppb. The public Health Monitoring report indicated Arsenic level measured in water was 100ppb, the local guideline level is 50ppb while the WHO limit is 10ppb.</p> <p>For biological contamination it has been indicated that it was a one-time incident, however, it was not investigated properly.</p> <p>For heavy metal (Arsenic) contamination site has not shown any significant efforts to address/ treat it.</p> <p>The following requirement: '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' has not been met.</p>
Corrective action:	<ol style="list-style-type: none">1. Upload Investigation of biological contamination in Deep well-2 results.2. Upload evidences of water 32 parameters results to show the compliance with the Local EPA and WHO requirements for arsenic.3. Upload annual seasonal variances high and low against water challenge which is threat to the people or environment.

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Finding No: TNR-003177
Checklist Item No: 1.3.5
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Nov-01
Checklist item: Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.
Findings: The potential sources of pollution have not been mapped/documentated adequately.
Corrective action:

1. Upload evidences of potential source of pollution map shared with Lead auditor in email.
2. Review of potential sources of pollution map and upload updated version on intact platform

Finding No: TNR-003178
Checklist Item No: 1.3.8
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Nov-01
Checklist item: Levels of access and adequacy of WASH at the site shall be identified.
Findings: It has been noted that in previous reports of site water quality indicate deviations in parameters like Total Coliforms, E-coli and Arsenic. These have not been adequately addressed.
Corrective action:

1. Upload Investigation of biological contamination in Deep well-2 results.
2. Installation of arsenic filters at site to comply with the WHO requirements.
3. Upload evidences of water 32 parameters results to show the compliance with the Local EPA and WHO requirements for arsenic.

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Finding No:	TNR-003179
Checklist Item No:	1.4.2
Status:	Closed
Finding level:	Major
Due date:	2023-May-10
Checklist item:	The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.
Findings:	Site has not provided any information about the outsourced services and indirect water consumption in these services.
Corrective action:	<ol style="list-style-type: none">1. Upload Outsourced Service providers list with details on Intact Platform2. Upload Outsourced Service providers water consumption and Quality Data in Intact Platform.
Evidence of implementation:	Evidences are attached.
Finding No:	TNR-003180
Checklist Item No:	1.5.1
Status:	Closed
Finding level:	Major
Due date:	2023-May-10
Checklist item:	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.
Findings:	No water governance initiatives have been identified/implemented for the catchment.
Corrective action:	<ol style="list-style-type: none">1. Upload evidence of engagements with Government bodies to discuss and identify the water governance actions / responsibilities.2. Upload evidence of Water governance initiatives taken / planned in collaboration with government bodies.
Evidence of implementation:	Evidence is attached.

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Finding No:	TNR-003182
Checklist Item No:	1.5.2
Status:	Closed
Finding level:	Major
Due date:	2023-May-10
Checklist item:	Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.
Findings:	Site has not documented consolidated list of applicable legal requirements.
Corrective action:	<ol style="list-style-type: none">1. Upload consolidated list of applicable water-related legal and regulatory requirements.2. Upload screenshots of red-on-line software on which we track and manage all the legal and regulatory requirements of site.
Evidence of implementation:	Evidences are attached.
Finding No:	TNR-003255
Checklist Item No:	1.5.2
Status:	Closed
Finding level:	Major
Due date:	2023-May-10
Checklist item:	Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.
Findings:	Site has not obtained approval for its operations from local environmental agency, the available approval is for construction phase only. Also site is extracting water from ground and according to a recent legislation "The Punjab Water Act 2019 " site need to have permission from relevant authorities for water extraction but that permission/ license has not been acquired by site yet.
Corrective action:	<ol style="list-style-type: none">1. Upload evidences of enagements with irrigation department to discuss and identify license / permits to extract water2. Upload evidence of unavailability of legal framework for the execution of Punjab water act-2019.3. Upload evidence of engagement and coordination with environment protection department to receive operation NOC of projects executed.
Evidence of implementation:	Evidences are attached.

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Finding No: TNR-003183
Checklist Item No: 1.5.5
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Nov-01
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: Site has not identified all catchment IWRAs. Consequently, the status and threats to the people and environment is also not identified.

Corrective action:

1. Conduct survey in collaboration with 3rd party consultant and local stakeholders to identify the Important water related areas in the catchment.
2. Map all the new identified important water related areas and assess their threats to the people and environment as per the feedback of 3rd party consultant and local stakeholders.
2. Upload all the important water related areas and their map on intact platform.

Finding No: TNR-003185
Checklist Item No: 1.5.6
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Nov-01
Checklist item: Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.

Findings: Site has identified/ assessed water related infrastructure in the catchment. However, the potential exposure to extreme events has not been assessed.

Corrective action:

1. Identify potential extreme events in the catchment by engaging water related bodies.
2. Assess potential extreme events and define collaborative mitigation action plan by engaging local water related bodies in the catchment.
2. Upload evidence of potential extreme events assessment along with mitigation plan.

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Finding No:	TNR-003186
Checklist Item No:	1.6.1
Status:	Closed
Finding level:	Major
Due date:	2023-May-10
Checklist item:	Shared water challenges shall be identified and prioritized from the information gathered.
Findings:	The identification process was not based on consultation with stakeholders or real-time research but based on a web tool. Site needs to update shared water challenges based on stakeholder consultation and credible research.
Corrective action:	<ol style="list-style-type: none">1. Upload Shared water challenges selection criteria covering stakeholders consultation and water risk filter inputs.2. Upload evidences of shared water challenges consultation with stakeholders.
Evidence of implementation:	Evidence is attached.
Finding No:	TNR-003187
Checklist Item No:	1.6.2
Status:	Closed
Finding level:	Major
Due date:	2023-May-10
Checklist item:	Initiatives to address shared water challenges shall be identified.
Findings:	Site has not adequately identified shared water challenges, even site is still in process to engage with stakeholders to identify shared water challenges. Consequently, no such initiatives identified.
Corrective action:	<ol style="list-style-type: none">1. Upload Shared water challenges selection criteria covering stakeholders consultation and water risk filter inputs.2. Upload evidences of shared water challenges consultation with stakeholders.3. Upload evidences of initiatives identified and implemented to contribute towards shared water challenges.
Evidence of implementation:	Evidences are attached.

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Finding No: TNR-003188
Checklist Item No: 1.7.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Nov-01
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: AWS update Presentation1 slides 53 & 54 lists site risks and opportunities however potential costs, and business impact was not analyzed.
Corrective action: 1. Analyze the cost and business impact of each identified water risk and opportunity.

2. Update water risk and opportunities file along with the potential cost and business impact on intact platform.

Finding No: TNR-003210
Checklist Item No: 1.7.2
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Nov-01
Checklist item: Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.
Findings: Site has not documented opportunities separately. In water stewardship plan the opportunities and potential savings are mentioned but the prioritization part is missing.
Corrective action: 1. Document identified opportunities in a separate file.

2. Prioritization of identified opportunities to be carried out.

3. Update water related opportunities and stewardship plan as per prioritization.

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Finding No: TNR-003211
Checklist Item No: 1.8.1
Status: Closed
Finding level: Major
Due date: 2023-May-10
Checklist item: Relevant catchment best practice for water governance shall be identified.
Findings: Site has not identified/documented catchment best practice for water governance.
Corrective action: 1. Upload catchment water governance best practices identified and implemented.
2. Upload evidences of best practices shared by stakeholders during engagement sessions.
3. Upload evidences of PMI global best practices tool utilized to identify the best practices.
Evidence of implementation: Evidences are attached.

Finding No: TNR-003212
Checklist Item No: 1.8.2
Status: Closed
Finding level: Major
Due date: 2023-May-10
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: Site has not identified/documented catchment best practice for water balance.
Corrective action: 1. Upload catchment water governance best practices identified and implemented.
2. Upload evidences of best practices shared by stakeholders during engagement sessions.
3. Upload evidences of PMI global best practices tool utilized to identify the best practices.
Evidence of implementation: Evidences are attached.

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Finding No: TNR-003213
Checklist Item No: 1.8.3
Status: Open
Finding level: Observation
Checklist item: Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.
Findings: Site has conducted the water quality testing for nearby Schools and shared the results with school administration. However, the issue of bad drinking water quality persists. No initiative identified for provision of safe drinking water at schools.
Corrective action: 1. Installation of arsenic filters at site to comply with the WHO requirements.
2. Upload evidences of water 32 parameters results to show the compliance with the Local EPA and WHO requirements for arsenic.

Finding No: TNR-003214
Checklist Item No: 1.8.4
Status: Closed
Finding level: Major
Due date: 2023-May-10
Checklist item: Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.
Findings: Site has not documented/identified catchment best practice for site maintenance of Important Water-Related Areas.
Corrective action: 1. Upload catchment best practices for site maintenance of important water-related areas identified and implemented.
2. Upload evidences of best practices shared by stakeholders during engagement sessions.
3. Upload evidences of PMI global best practices tool utilized to identify the best practices.
Evidence of implementation: Evidences are attached.

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Finding No:	TNR-003215
Checklist Item No:	2.1.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Nov-01
Checklist item:	<p>A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:</p> <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.
Findings:	The Site AWS Commitment was not found publicly disclosed.
Corrective action:	<ol style="list-style-type: none">1. Publicly disclose signed AWS commitment with all the stakeholders.2. Upload evidences of publicly disclosure of AWS commitment.
Finding No:	TNR-003216
Checklist Item No:	2.3.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Nov-01
Checklist item:	<p>A water stewardship plan shall be identified, including for each target:</p> <ul style="list-style-type: none">- How it will be measured and monitored- Actions to achieve and maintain (or exceed) it- Planned timeframes to achieve it- Financial budgets allocated for actions- Positions of persons responsible for actions and achieving targets- Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.
Findings:	The Site Water Stewardship Plan has no links to Best Practice or Shared Water Challenges.
Corrective action:	<ol style="list-style-type: none">1. Update Water stewardship plan template to link actions with shared water challenges and best practices.2. upload updated Water stewardship plan on intact platform.

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Finding No:	TNR-003217
Checklist Item No:	2.4.1
Status:	Closed
Finding level:	Major
Due date:	2023-May-10
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:	Site has not provided any evidence of a plan to mitigate or adapt to identified water risks developed with the coordination of relevant public-sector and infrastructure agencies.
Corrective action:	<ol style="list-style-type: none">1. Upload evidences of actions identified along with relevant public sector to mitigate the water risks.2. upload evidences of actions implemented with relevant public sector to mitigate the water risks.
Evidence of implementation:	Evidences are attached.
Finding No:	TNR-003219
Checklist Item No:	3.1.1
Status:	Closed
Finding level:	Major
Due date:	2023-May-10
Checklist item:	Evidence that the site has supported good catchment governance shall be identified.
Findings:	Site has not been involved in any activity that support water governance in the catchment. No such evidence was provided.
Corrective action:	<ol style="list-style-type: none">1. Upload water governance actions / initiatives identified in collaboration with authorities and local community.2. Upload evidences of actions / initiatives have been taken to support good catchment governance.
Evidence of implementation:	Evidences are attached.

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Finding No:	TNR-003220
Checklist Item No:	3.1.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Nov-01
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:	Site has installed filtration plants in nearby schools to protect safe drinking water rights for the community, but these are not helpful to remove Arsenic contamination
Corrective action:	<ol style="list-style-type: none">1. Water filtration unit installation in collaboration with Public Health Engineering Department (PHED) and union council in 55/4.R chak.2. Investiagte the root cause of high arsenic in the ctachment in collaboration with local regulatory authorities.3. Upload evidences of water filtration unit installation on intact platform.
Finding No:	TNR-003221
Checklist Item No:	3.2.1
Status:	Closed
Finding level:	Major
Due date:	2023-May-10
Checklist item:	A process to verify full legal and regulatory compliance shall be implemented.
Findings:	Site has not documented consolidated list of applicable legal requirements. The site management indicated during the audit that some web tool is used for compliance evaluation, but no evidence was provided.
Corrective action:	<ol style="list-style-type: none">1. Upload consolidated list of applicable water-related legal and regulatory requirements.2. Upload screenshots of red-on-line software on which we track, review and manage all the legal and regulatory requirements of site.
Evidence of implementation:	Evidences are attached

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Finding No:	TNR-003231
Checklist Item No:	3.4.1
Status:	Closed
Finding level:	Major
Due date:	2023-May-10
Checklist item:	Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.
Findings:	Site has recently identified that the drinking water quality has issues of biological and heavy metal contamination. For biological contamination it was indicated that it was a one-time incident and not investigated properly and for heavy metal (Arsenic)contamination site has not shown any significant efforts to address/ treat it.
Corrective action:	<ol style="list-style-type: none">1. Upload Investigation of biological contamination in Deep well-2 results.2. Upload evidences of water 32 parameters results to show the compliance with the Local EPA and WHO requirements for arsenic.
Evidence of implementation:	Evidences are attached.
Finding No:	TNR-003232
Checklist Item No:	3.5.1
Status:	Closed
Finding level:	Major
Due date:	2023-May-10
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:	Site has identified deep wells and effluent treatment plant as onsite IWRAs. The status of deep wells with refence to static/dynamic levels and quality is not properly identified. Also, site has a water infiltration well that infiltrates rainwater into the ground, but the risks related to this infiltration not identified also the infiltration well was not identified as IWRA. About catchment IWRAs, site has not participated/ supported practices to maintain and/or enhance the Important Water-Related Areas
Corrective action:	<ol style="list-style-type: none">1. Upload MP&S Plans of Site Important water related areas and maintenance / inspections carried out.2. Upload Deep wells static and dynamic levels data on intact platform.3. Upload evidences of actions taken towards catchment / Site IWRAs maintenance / enhancement.4. Upload updated site IWRAs map covering rain water infiltration well.
Evidence of implementation:	Evidences are attached.

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Finding No: TNR-003234
Checklist Item No: 3.6.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Nov-01
Checklist item: 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.
Findings: It has been noted that in previous reports of site water quality indicate deviations in parameters like Total Coliforms, E-coli and Arsenic. These have not been adequately addressed.
Corrective action:
1. Upload Investigation of biological contamination in Deep well-2 results.
2. Upload evidences of water 32 parameters results to show the compliance with the Local EPA and WHO requirements for arsenic.

Finding No: TNR-003236
Checklist Item No: 3.6.2
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Nov-01
Checklist item: 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.
Findings: Site is extracting water from ground and according to a recent legislation "The Punjab Water Act 2019" site need to have permission from relevant authorities for water extraction but that permission/ license has not been acquired by site yet.
Corrective action:
1. Upload evidences of engagements with irrigation department to discuss and identify license / permits to extract water
2. Upload evidence of unavailability of legal framework for the execution of Punjab water act-2019.
3. Plan meeting with irrigation department to support in expedition of Punjab water act-2019

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Finding No:	TNR-003233
Checklist Item No:	3.7.2
Status:	Closed
Finding level:	Major
Due date:	2023-May-10
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:	Site has not provided any information about the outsourced services and indirect water consumption in these services.
Corrective action:	<ol style="list-style-type: none">1. Upload Outsourced Service providers / Suppliers list with details in Intact Platform.2. Upload evidences of engagement with outsource service providers and suppliers.3. Upload evidences of action taken by outsource service providers and suppliers.
Evidence of implementation:	Evidences are attached.
Finding No:	TNR-003237
Checklist Item No:	3.8.1
Status:	Closed
Finding level:	Major
Due date:	2023-May-10
Checklist item:	Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.
Findings:	No evidence of engagement was provided to fulfil the requirement of this indicator.
Corrective action:	<ol style="list-style-type: none">1. Upload evidences of engagement sessions carried out with all the stakeholders.2. upload evidences of water stewardship meeting carried out with all the stakeholders.
Evidence of implementation:	Evidences are attached.

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Finding No: TNR-003238
Checklist Item No: 3.9.1
Status: Closed
Finding level: Major
Due date: 2023-May-10
Checklist item: Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.
Findings: Site has not supported/participated in any catchment best practice for water governance. No evidence was provided.
Corrective action: 1. Upload catchment water governance best practices identified and implemented.
2. Upload evidences of best practices shared by stakeholders during engagement sessions.
3. Upload evidences of actions taken by site to support good water governance in catchment.
Evidence of implementation: Evidences are attached.

Finding No: TNR-003239
Checklist Item No: 3.9.2
Status: Closed
Finding level: Major
Due date: 2023-May-10
Checklist item: Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.
Findings: Site has not supported/participated in any catchment best practice for water balance improvement. No evidence was provided.
Corrective action: 1. Upload evidences of enagements with irrigation department to discuss and identify license / permits to extract water
2. Upload evidence of unavailability of legal framework for the execution of Punjab water act-2019.
3. Upload evidences of in-applicability of operation NOC on Philip Morris International.
4. Upload evidence of engagement and coordination with environment protection department to receive operation NOC of projects executed.
Evidence of implementation: Evidences are attached.

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Finding No:	TNR-003241
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:	Site has conducted the water quality testing for nearby Schools and shared the results with school administration. However, the issue of bad drinking water quality persists. No initiative identified for provision of safe drinking water at schools.
Corrective action:	<ol style="list-style-type: none">1. Installation of arsenic filters at site to comply with the WHO requirements.2. Upload evidences of water 32 parameters results to show the compliance with the Local EPA and WHO requirements for arsenic.
Finding No:	TNR-003242
Checklist Item No:	3.9.4
Status:	Closed
Finding level:	Major
Due date:	2023-May-10
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:	Site has not supported/participated in site's maintenance of Important Water-Related Areas. No evidence was provided.
Corrective action:	<ol style="list-style-type: none">1. Upload Site Important water related areas maintenance best practices identified and implemented.2. Upload evidences of best practices shared by stakeholders during engagement sessions.3. Upload evidences of actions taken to support Site IWRAs maintenance in the catchment.
Evidence of implementation:	Evidences are attached.

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Finding No: TNR-003243
Checklist Item No: 4.1.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Nov-01
Checklist item: Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.
Findings: Site has recently adopted AWS standard and prepared its 1st AWS plan in 2022. Site's AWS commitment is also documented in May, 2022. However, site has mentioned actions those were completed in previous years in their recent water stewardship plan which doesn't represent their performance against water stewardship plan. No action for 2022 found evaluated.
Corrective action: 1. Evaluate water performance against the targets identified / planned in the water stewardship plan.
2. Update water performance against the targets in Water stewardship plan.
2. Upload evidences of Water performance targets on intact platform.

Finding No: TNR-003244
Checklist Item No: 4.1.2
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Nov-01
Checklist item: Value creation resulting from the water stewardship plan shall be evaluated.
Findings: Site has recently adopted AWS standard and prepared its 1st AWS plan in 2022. Site's AWS commitment is also documented in May, 2022. However, site has mentioned actions those were completed in previous years in their recent water stewardship plan which doesn't represent their performance against water stewardship plan.
Value creation resulting from the water stewardship plan was not evaluated.
Corrective action: 1. Evaluate value creation against the targets identified / planned in the water stewardship plan.
2. Update value creation against the targets in Water stewardship plan.
2. Upload evidences of value creation against targets on intact platform.

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Finding No: TNR-003245
Checklist Item No: 4.1.3
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Nov-01
Checklist item: The shared value benefits in the catchment shall be identified and where applicable, quantified.
Findings: Site has not participated/ supported significant projects to mitigate shared water challenges in the catchment so far. Consequently, the shared value benefits also were not identified.
Corrective action: 1. Identify value benefits against the actions identified / participated in the water stewardship plan to mitigate shared water challenges.

2. Update value benefits against the actions in Water stewardship plan.

2. Upload evidences of value benefits against actions on intact platform.

Finding No: TNR-003246
Checklist Item No: 4.3.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Nov-01
Checklist item: Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.
Findings: Site has recently adopted the AWS standard and prepared its first AWS plan. Performance evaluation against the AWS plan has not been conducted yet. Consequently, no such consultation was evident.

Corrective action: 1. Conduct water stewardship meeting with all the identified internal / external stakeholders to consult water stewardship performance.
2. Upload evidences of Water stewardship performance consultation with all the internal / external stakeholders.

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Finding No:	TNR-003248
Checklist Item No:	4.4.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Nov-01
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:	Site has recently adopted the AWS standard and prepared its first AWS plan. Performance evaluation against the AWS plan has not been conducted yet. Consequently, no such modification was evident.
Corrective action:	<ol style="list-style-type: none">1. Performance evaluation of water stewardship plan to be carried out in water stewardship meeting.2. Update Water stewardship plan against the performance evaluation.3. Upload evidences of Water stewardship plan modifications against the performance evaluation.
Finding No:	TNR-003249
Checklist Item No:	5.1.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Nov-01
Checklist item:	The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.
Findings:	Site has not disclosed its water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations.
Corrective action:	<ol style="list-style-type: none">1. Publicly disclose personnel accountable for water related internal governance and water related law and regulations compliance.2. Upload evidences of publicly disclosure of water related internal governance and laws/ regulation compliance.

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Finding No: TNR-003250
Checklist Item No: 5.2.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Nov-01
Checklist item: The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.
Findings: Site water stewardship plan has not been communicated with stakeholders.
Corrective action: 1. Conduct Quarterly water stewardship meeting to communicate water stewardship plan with all the identified stakeholders.
2. Upload evidences of engagements with all the stakeholders in water stewardship meeting to communicate water stewardship plan

Finding No: TNR-003251
Checklist Item No: 5.3.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Nov-01
Checklist item: A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.
Findings: Site has not documented and disclosed its annual water stewardship performance summary.
Corrective action: 1. Develop summary of site's annual water stewardship performance to communicate / disclose with all the stakeholders.
2. Upload evidences of site's annual summary of water stewardship performance disclosure

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Finding No: TNR-003252
Checklist Item No: 5.4.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Nov-01
Checklist item: The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.
Findings: Shared water related challenges have not been adequately identified. Also, the identified challenges have not been disclosed.
Corrective action: 1. Upload Shared water challenges selection criteria covering stakeholders consultation and water risk filter inputs.

2. Upload evidences of shared water challenges consultation with stakeholders.

3. Upload evidences of shared water challenges disclosure in the water stewardship meeting.

Finding No: TNR-003253
Checklist Item No: 5.4.2
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Nov-01
Checklist item: Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.
Findings: The engagement with stakeholders and public sector agencies is focused on identification of shared water related challenges. Mitigation strategy is not agenda of engagement.

No evidence was provided to show efforts made by the site to engage stakeholders and coordinate and support public-sector agencies.

Corrective action: 1. Upload evidences of engagements with stakeholders to identify shared water challenges and build mitigation strategies.
2. Upload evidences of mitigation actions taken / planned in collaboration with government bodies / public sector.

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Report Details

Report	Value
Report prepared by	Rizwan Masood
Report approved by	Ruth Wandera
Report approved on (Date)	9 February 2023

Surveillance

Proposed date for next audit
2023-Nov-01

Stakeholder Announcements

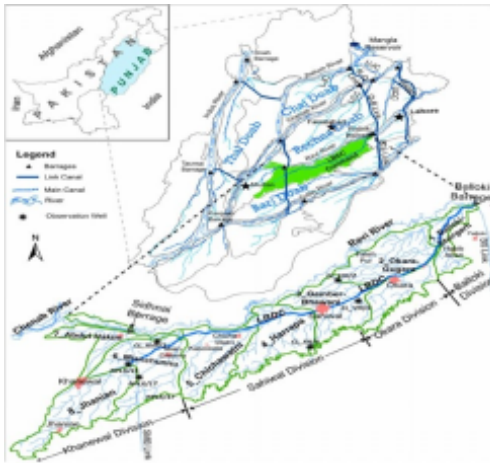
Date of publication	Location
30/09/2022	Daily Express, Page 3
30/09/2022	Business Recorder. Page 2
28/09/2022	AWS/WSAS Website
Comment	Stakeholder announcement was published on AWS and WSAS websites before the audit. Site has also published the stakeholder announcement in two local newspapers.

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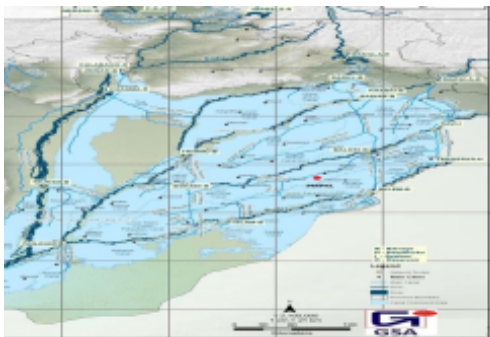
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Catchment Information



Catchment Map 1.jpg



Catchment Map.jpg

Catchment Information

The Philip Morris Pakistan Limited (PMPKL) Sahiwal catchment area is a part of the Indus Basin, which was formed by Indus River and its tributaries i.e., Jhelum, Chenab, Ravi and Sutlej. The catchment area falls in the Lower Bari Doab, which is bounded by Ravi River on the north and Sutlej River on the south. Ravi River is located towards north of the project area at about 18 km and flows in south-western direction. Sahiwal and its neighboring areas rely on Lower Bari Doab Canal and Groundwater to meet its daily demand of raw water.

Philip Morris Pakistan Limited (PMPKL) Sahiwal is selected 10Km radius as a physical scope area. Lower Bari Doab Canal is passing less than a 1 Km nearby the factory.

Client Description and Site Details

Client/Site Background

Phillip Morris Pakistan Limited (Sahiwal Plant) is located at around 165km Lahore-Multan road in Sahiwal district. It is a cigarette manufacturing plant which has mainly two processes. Primary processing of Tobacco and cigarette manufacturing (secondary processing). Site is extracting groundwater from onsite deep wells for its consumption. Site effluents are treated in onsite effluent treatment plant and recycled for landscaping and gardening at site. No effluent is discharged from the site.

Site has a three-shift operation and around 350 employees work there.

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Summary of Shared Water Challenges




Summary of Shared Water Challenges
Site has identified shared water challenges based on the "water risk filter" and same is used to prioritize them. Site failed to present any linkage between stakeholders’ feedback and shared water challenges. The identified shared challenges are Baseline water stress, water quality, Water Level depletion, WASH provision, Projected impact on freshwater biodiversity, Flood occurrence and Drought Occurrence. However, the identification process was not based on consultation with stakeholders or real-time research but based on a web tool. Site needs to update shared water challenges based on stakeholder consultation and credible research. Also, site must keep the evidence of identification process to ensure that the identification is in line AWS requirements.

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.	<div><div></div><div>Yes</div></div>
0.1.1.2	The scope of the proposed certification shall be under the control of a single management system.	<div><div></div><div>Yes</div></div>
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.	<div><div></div><div>Yes</div></div>

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1 STEP 1: GATHER AND UNDERSTAND	
1.1	<i>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.</i>
1.1.1	<p><i>The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including:</i></p> <ul style="list-style-type: none"> - 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. <p>Comment The site has documented site boundaries and water mapping for water intake and effluents. Site water source is only ground water which is extracted through 2 deep wells and its effluent is treated at site and used for landscaping and gardening purposes. Site also has a rainwater network which collect all the rainwater from site and infiltrate it in the ground through infiltration pits water.</p> <p>Site is located in Lower Bari Doab catchment and site has defined 10 km radius as physical scope for the site.</p> <p>Yes </p>
1.2	<i>Understand relevant stakeholders, their water related challenges, and the site's ability to influence beyond its boundaries.</i>
1.2.1	<p><i>Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall:</i></p> <ul style="list-style-type: none"> - 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. <p>Comment Site has documented the stakeholders, which includes almost all the relevant stakeholder categories as per standard. These stakeholders are divided in segments like; internal. external industrial, external institutional, regulator, community, NGOs, suppliers and service providers.</p> <p>Site also has prioritized the stakeholders on the basis of level of interest and ability to influence. The evidence provided shows that the site has reached out to stakeholders through letters (attached) but this process is in early stages and still ongoing.</p> <p>Obs. </p>
1.2.2	<p><i>Current and potential degree of influence between site and stakeholder shall be identified, within the catchment and considering the site's ultimate water source and ultimate receiving water body for wastewater.</i></p> <p>Comment Site has prioritized the stakeholders on the basis of level of interest and ability to influence.</p> <p>Yes </p>

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1.3	<i>Gather water-related data for the site, including: water balance; water quality, Important Water-Related Areas, water governance, WASH; water-related costs, revenues, and shared value creation.</i>	
1.3.1	<i>Existing water-related incident response plans shall be identified.</i>	 Yes
Comment	The Site has identified water-related incidents and has documented plan to respond them. An existing emergency-response plan is developed and implemented, which addresses spillage of hazardous chemicals and floods. Site also has documented deviation incidents related to water and effluent compliance in Water & Wastewater Non-Conformity Procedure.	
1.3.2	<i>Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped</i>	 Yes
Comment	Site has mapped the water inflows and out flows and also the site important water related areas. Site is extracting water from two deep wells. after extraction it goes into a overhead storage tank and distributed for process and domestic use at site. Almost every fresh/processed water line is metered. All the effluents are collected and treated at Wastewater treatment plant and recycled at site for landscaping and gardening.	
1.3.3	<i>Site water balance, inflows, losses, storage, and outflows, including indication of annual variance in water usage rates, shall be quantified. Where there is a water-related challenge that would be a threat to good water balance for people or environment, an indication of annual high and low variances shall be quantified.</i>	 closed
Comment	Site has installed extensive metering on its water network. Almost every fresh/processed water line is metered. Site has documented its water balance on these metered values. However, the time frame on which water balance has been prepared is not clear. Verbally, it was told that this is annual but the numbers are matching with Jan to Dec 2021 or July 2021 to Jun 2022. Site is not discharging its effluents from site and recycling it at site for landscaping and gardening. The effluent treatment plant outlet (recycling) amounts is also not mentioned in water balance. Finding No: TNR-003176	
1.3.4	<i>Water quality of the site's water source(s), provided waters, effluent and receiving water bodies shall be quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be quantified.</i>	 in progress
Comment	Raw water quality (physical, chemical and biological) parameters of source water are being monitored on a regular basis (Deep Well 1 & 2 Reports - Attached). Site has also conducted its drinking water testing from public health engineering department. The quality of effluents at ETP discharge is also being regularly monitored. Last 3rd party report found compliant with local wastewater quality parameters. Finding No: TNR-003254	
1.3.5	<i>Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.</i>	 in progress
Comment	Site has identified the potential sources of pollution at site. These includes fuels and chemicals storages. during the site visit it has been noted that the adequate mitigation measures have been implemented to prevent pollution. However, the potential sources of pollution have not been mapped/documentated adequately. Finding No: TNR-003177	
1.3.6	<i>On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.</i>	 Yes
Comment	Site has identified the onsite Important water related areas. these includes deep wells and wastewater treatment plant. The description of IWRAs and threats are documented..	

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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	Site has identified the costs for water extraction, processing, quality monitoring and effluent processing. No cost has been imposed by the government for extraction. Also, site is recycling all its effluents, so disposal cost is mentioned.	
1.3.8	Levels of access and adequacy of WASH at the site shall be identified.	 in progress
Comment	The site has adequate arrangements to ensure access to drinking water, sanitation and hygiene (WASH) for all workers. Site is also using a self-assessment tool for evaluating access to water sanitation and hygiene (WASH) at workplace. It covers the workplace facilities related to water supply, sanitation and hygiene. Site has maintained separate toilets for males and females also evaluated the adequacy of number of toilets for each gender.	
Finding No: TNR-003178		
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	Site has indicated that there is no supplier of its raw or packing materials in the catchment. Site explained that they will engage their suppliers (out of catchment) on AWS in the future.	
1.4.2	The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.	 in progress
Comment	Site has not provided any information about the outsourced services and indirect water consumption in these services.	
Finding No: TNR-003179		
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.	 closed
Comment	Site is still in process to engage governance bodies and understand shared water related challenges. No water governance initiatives have been identified/implemented for the catchment yet.	
Finding No: TNR-003180		
1.5.2	Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.	 closed
Comment	Site has defined a process to identify the applicable legal requirements and responsibilities defined for compliance against the applicable legal requirements. However, site has not documented consolidated list of applicable legal requirements. Site has not obtained approval for its operations from local environmental agency, the available approval is for construction phase only. Also site is extracting water from ground and according to a recent legislation "The Punjab Water Act 2019 " site need to have permission from relevant authorities for water extraction but that permission/ license has not been acquired by site yet.	
Finding No: TNR-003182		
Finding No: TNR-003255		

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1.5.3	The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.	 Yes
Comment	Site has formulated water balance for the catchment, based on the data and available literature. The catchment comprises of fertile agricultural land and is irrigated through lower bari doab canal. but with increasing agriculture and population more and more ground water is extracted to meet the needs. The water balance of the catchment is under stress and water table is falling continually over the decades.	
1.5.4	Water quality, including physical, chemical, and biological status, of the catchment shall be identified, and where possible, quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be identified.	 Yes
Comment	Site is located in an area where there are many water quality related issues have been identified. These issues include but not limited to; biological contamination of ground water and high Arsenic level. Site is still further exploring the issues related to quality of water in the catchment with the help of public health engineering department. Reports of water quality testing for nearby schools are attached.	
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.	 in progress
Comment	Site has identified only Lower Bari Doab Canal and some neighboring fish forms as IWRAs in the catchment. However, Site has a huge catchment including many more IWRAs which are not identified/documented.	
Finding No: TNR-003183		
1.5.6	Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.	 in progress
Comment	Site is not relying on catchment infrastructure for sourcing or disposal of water. It has its own deep wells and effluents are also consumed/ recycled at site. Site has identified/ assessed water related infrastructure in the catchment. However, the potential exposure to extreme events has not been assessed.	
Finding No: TNR-003185		
1.5.7	The adequacy of available WASH services within the catchment shall be identified.	 Yes
Comment	Site has gathered reasonable data on availability of WASH facilities in the catchment. Site also has identified through stakeholder engagements that the drinking water quality is a major concern in the catchment especially, the issue of heavy metal and biological contamination.	
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.	 closed
Comment	Site has identified shared water challenges based on the "water risk filter" and same is used to prioritize them. Site also has started to engage with stakeholders for identification of shared water challenges. The identified shared challenges are Baseline water stress, water quality, Water Level depletion, WASH provision, Projected impact on freshwater biodiversity, Flood occurrence and Drought Occurrence. However, the identification process was not based on consultation with stakeholders or real-time research but based on a web tool. Site needs to update shared water challenges based on stakeholder consultation and credible research. Also, site must keep the evidence of identification process to ensure that the identification is in line AWS requirements.	

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1.6.2	<i>Initiatives to address shared water challenges shall be identified.</i>	
		closed
Comment	As mentioned in 1.6.1 site has not adequately identified shared water challenges, even site is still in process to engage with stakeholders to identify shared water challenges. Consequently, no such initiatives identified.	
	Finding No: TNR-003187	
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>	
		in progress
Comment	AWS update Presentation1 slides 53 & 54 lists site risks and opportunities however potential costs, and business impact was not analyzed.	
	Finding No: TNR-003188	
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>	
		in progress
Comment	Site has not documented opportunities separately. In water stewardship plan the opportunities and potential savings are mentioned but the prioritization part is missing.	
	Finding No: TNR-003210	
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>	
		closed
Comment	Site has not identified/documented catchment best practice for water governance.	
	Finding No: TNR-003211	
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>	
		closed
Comment	Site has not identified/documented catchment best practice for water balance.	
	Finding No: TNR-003212	
1.8.3	<i>Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.</i>	
		Obs.
Comment	Site is located in an area where there are many water quality related issues have been identified. These issues include but not limited to; biological contamination of ground water and high Arsenic level. Site is still further exploring the issues related to quality of water in the catchment with the help of public health engineering department. Site has conducted the water quality testing for nearby Schools and shared the results with school administration. However, the issue of bad drinking water quality persists. no initiative identified for provision of safe drinking water at schools.	
1.8.4	<i>Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.</i>	
		closed
Comment	Site has not documented/identified catchment best practice for site maintenance of Important Water-Related Areas.	
	Finding No: TNR-003214	

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1.8.5	Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.	 Yes
Comment	<p>Site has engaged with stakeholder for implementation of WASH related best practices in the catchment. These includes:</p> <ul style="list-style-type: none">- Awareness sessions in schools about AWS and WASH- Awareness banners installation on WASH- Installation of 10 Hand Wash Systems in Local Community Schools and Universities- Drainage System Rehabilitation in Local Community Public Schools- Provision and Distribution of Hand Soaps to Community People	

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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	<p>A signed and publicly disclosed site statement OR organizational document shall be identified. in progress</p> <p>The statement or document shall include the following commitments:</p> <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.
Comment	<p>Site has documented AWS commitment signed by the Director Manufacturing (May 2022). However, the Site AWS Commitment was not found publicly disclosed.</p> <p style="text-align: right;">Finding No: TNR-003215</p>
2.2	Develop and document a process to achieve and maintain legal and regulatory compliance.
2.2.1	<p>The system to maintain compliance obligations for water and wastewater management shall be identified, including: Yes</p> <ul style="list-style-type: none"> - Identification of responsible persons/positions within facility organizational structure - Process for submissions to regulatory agencies.
Comment	<p>Site has documented the process for identification and implementation of compliance obligations in "Legal and Other Requirements Identification & Non-compliance management Flow Chart". Site also has documented responsibilities and accountabilities against compliance obligations in "RACI Matrix for Legal & Other Requirements"</p>
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	<p>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</p>
Comment	<p>Site has incorporated water stewardship strategy into the Water Stewardship Plan. This includes goals, strategy and actions which are in line with AWS Standard.</p>
2.3.2	<p>A water stewardship plan shall be identified, including for each target: in progress</p> <ul style="list-style-type: none"> - How it will be measured and monitored - Actions to achieve and maintain (or exceed) it - Planned timeframes to achieve it - Financial budgets allocated for actions - Positions of persons responsible for actions and achieving targets - Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.
Comment	<p>Site has documented its water stewardship plan which includes Actions, time frames, budget, and responsibilities. However, The WSP has no links to Best Practice or Shared Water Challenges.</p> <p style="text-align: right;">Finding No: TNR-003216</p>
2.4	Demonstrate the site's responsiveness and resilience to respond to water risks

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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>	
		closed
Comment	Site has not provided any evidence of a plan to mitigate or adapt to identified water risks developed with the coordination of relevant public-sector and infrastructure agencies. Finding No: TNR-003217	

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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. 
	closed
Comment	Site has not been involved in any activity that support water governance in the catchment. No such evidence provided.
	Finding No: TNR-003219
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. 
	in progress
Comment	Site has identified that drinking water quality is not good in neighboring community. The issues include but not limited to; biological contamination of ground water and high Arsenic level. Site is still further exploring the issues related to quality of water in the catchment with the help of public health engineering department. Reports of water quality testing for nearby schools are attached.
	Site has installed filtration plants in nearby schools to protect safe drinking water rights for the community, but these are not helpful to remove Arsenic contamination
	Finding No: TNR-003220
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. 
	closed
Comment	Site has defined a process to identify the applicable legal requirements and responsibilities defined for compliance against the applicable legal requirements. However, site has not documented consolidated list of applicable legal requirements. The site management indicated during the audit that some web tool is used for compliance evaluation, but no evidence was provided.
	Finding No: TNR-003221
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	No such legal binding applicable
3.3	Implement plan to achieve site water balance targets.
3.3.1	Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified. 
	Yes

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Comment	<p>Site has set targets for water balance improvement and reduction in water consumption. Site is monitoring its water balance targets as m3 of water per million cigarette (Water (m3/Mio)). Over the last 6 years site has improved water efficiency from 4.4 to 2.4 Water (m3/Mio). Site has achieved 2.49 Water (m3/Mio) in 2021 and on track for 2022 to achieve 2.4.</p> <p>To achieve water efficiency targets site has initiated many onsite projects and these are part of Water Stewardship Plan. some of projects are as follows</p> <ul style="list-style-type: none"> - Optimized boiler steam pressure to reduce water consumption; also saving energy cost - Re-use/recycle water to reduce water consumption. - Adiabatic Humidification brings benefit for reduction of water consumption required for cooling. - Utilization of treated water to conserve fresh water, increase awareness on water conservation - reduced water consumption by optimization of cleaning frequency - Reduced water consumption by optimization of machines efficiency to optimize production days. 	
3.3.2	<i>Where water scarcity is a shared water challenge, annual targets to improve the site's water use efficiency, or if practical and applicable, reduce volumetric total use shall be implemented.</i>	 Yes
Comment	<p>The catchment comprises of fertile agricultural land and is irrigated through lower bari doab canal. but with increasing agriculture and population more and more ground water is extracted to meet the needs. The water balance of the catchment is under stress and water table is falling continually over the decades. However, site is not in water scarce region.</p> <p>Site has set targets for water efficiency. Site is monitoring its water efficiency targets as m3 of water per million cigarette (Water (m3/Mio)). Over the last 6 years site has improved water efficiency from 4.4 to 2.4 Water (m3/Mio). Site has achieved 2.49 Water (m3/Mio) in 2021 and on track for 2022 to achieve 2.4.</p>	
3.3.3	<i>Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.</i>	 Yes
Comment	No such legal binding applicable	
3.4	<i>Implement plan to achieve site water quality targets</i>	
3.4.1	<i>Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.</i>	 closed
Comment	<p>Site has recently identified that the drinking water quality has issues of biological and heavy metal contamination. For biological contamination it has been told for biological contamination that its one-time incident and not investigated properly and for heavy metal (Arsenic)contamination site has not shown any significant efforts to address/ treat it. site is still investigating quality issues in the catchment and site. Site water sample Arsenic value is still in local limits but exceeding WHO limits.</p> <p>It is known that the ground water in the catchment having Arsenic contamination but the site has not shown any significant efforts to address/ treat it.</p>	
	Finding No: TNR-003231	
3.4.2	<i>Where water quality is a shared water challenge, continual improvement to achieve best practice for the site's effluent shall be identified and where applicable, quantified.</i>	 Yes
Comment	Site is consuming/ recycling all its treated effluent at site for landscaping and gardening. no effluent is sent out of factory Premises. Also, site is monitoring the quality of treated effluents through a 3rd party laboratory and the results found in compliance with effluent quality standards.	
3.5	<i>Implement plan to maintain or improve the site's and/or catchment's Important Water-Related Areas.</i>	
3.5.1	<i>Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.</i>	 closed

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Comment Site has not provided any evidence of implementation of best practices to maintain or enhance site and catchment important water related areas. Site has identified deep wells and effluent treatment plant as onsite IWRAs. The status of deep wells with reference to static/dynamic levels and quality is not properly identified. Also, site has a water infiltration well that infiltrates rainwater into the ground, but the risks related to this infiltration not identified at also the infiltration well was not identified as IWRA. About catchment IWRAs, site has not participated/ supported practices to maintain and/or enhance the Important Water-Related Areas


Finding No: TNR-003232

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.*  in progress

Comment The site has adequate arrangements to ensure access to drinking water, sanitation and hygiene (WASH) for all workers. Site is also using a self-assessment tool for evaluating access to water sanitation and hygiene (WASH) at workplace. It covers the workplace facilities related to water supply, sanitation and hygiene. Site has maintained separate toilets for males and females also evaluated the adequacy of number of toilets for each gender.


Finding No: TNR-003234

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.*  in progress


Comment There is no evidence that site is impinging on the human right to safe water and sanitation of communities through their operations. However, site is extracting water from ground and according to a recent legislation "The Punjab Water Act 2019" site need to have permission from relevant authorities for water extraction but that permission/ license has not been acquired by site yet.

Finding No: TNR-003236

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 Site has indicated that there is no supplier of its raw or packing materials in the catchment. Site explained that they will engage their suppliers (out of catchment) on AWS in the future.

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.*  closed

Comment Site has not provided any information about the outsourced services and indirect water consumption in these services.

Finding No: TNR-003233

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.*  closed

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Comment Site is not dependent for sourcing or disposal of water on external infrastructure as it is extracting water from onsite deep wells and recycling all its effluents at site. However, site need to coordinate with relevant authorities for mitigation of threat of floods, identified as shared challenge.

Finding No: TNR-003237

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.*



closed

Comment Site has not supported/participated in any catchment best practice for water governance. No evidence was provided.

Finding No: TNR-003238

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



closed

Comment Site has not supported/participated in any catchment best practice for water balance improvement. No evidence was provided.

Finding No: TNR-003239

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



Obs.

Comment Site is located in an area where there are many water quality related issues have been identified. These issues include but not limited to; biological contamination of ground water and high Arsenic level. Site is still further exploring the issues related to quality of water in the catchment with the help of public health engineering department.
Site has conducted the water quality testing for nearby Schools and shared the results with school administration. However, the issue of bad drinking water quality persists. no initiative identified for provision of safe drinking water at schools

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 Site has not supported/participated in site's maintenance of Important Water-Related Areas. No evidence provided.

Finding No: TNR-003242

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



Yes

Comment Site has engaged with stakeholder for implementation of WASH related best practices in the catchment. These includes:
- Awareness sessions in schools about AWS and WASH
- Awareness banners installation on WASH
- Installation of 10 Hand Wash Systems in Local Community Schools and Universities
- Drainage System Rehabilitation in Local Community Public Schools
- Provision and Distribution of Hand Soaps to Community People


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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.  in progress


Comment Site has recently adopted AWS standard and prepared its 1st AWS plan in 2022. Site's AWS commitment is also documented in May, 2022. However, site has mentioned actions those were completed in previous years in their recent water stewardship plan which doesn't represent their performance against recent water stewardship plan.

Finding No: TNR-003243

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

Comment Site has recently adopted AWS standard and prepared its 1st AWS plan in 2022. Site's AWS commitment is also documented in May, 2022. However, site has mentioned actions those were completed in previous years in their recent water stewardship plan which doesn't represent their performance against recent water stewardship plan.
Value creation resulting from the water stewardship plan was not evaluated.


Finding No: TNR-003244

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

Comment Site has not participated/ supported significant projects to mitigate shared water challenges in the catchment so far. Consequently, the shared value benefits also not identified.


Finding No: TNR-003245

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 No real time water related emergency incident or extreme event occurred, hence no such evaluation available

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.  in progress

Comment Site has recently adopted the AWS standard and prepared its first AWS plan. Performance evaluation against the AWS plan has not been conducted yet. Consequently, no such consultation was evident. However, site has started stakeholder engagements for identification of shared water challenges.

Finding No: TNR-003246

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.

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4.4.1	<p>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.</p> <p>in progress</p>
Comment	<p>Site has recently adopted the AWS standard and prepared its first AWS plan. Performance evaluation against the AWS plan has not been conducted yet. Consequently, no such modification was evident.</p> <p>Finding No: TNR-003248</p>

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5	STEP 5: COMMUNICATE & DISCLOSE - Communicate about water stewardship and disclose the site's stewardship efforts	
5.1	<i>Disclose water-related internal governance of the site's management, including the positions of those accountable for legal compliance with water-related local laws and regulations.</i>	
5.1.1	<i>The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.</i>	in progress 
Comment	Site has documented its water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations. However, this has not been disclosed at any appropriate forum.	
	Finding No: TNR-003249	
5.2	<i>Communicate the water stewardship plan with relevant stakeholders.</i>	
5.2.1	<i>The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.</i>	in progress 
Comment	No evidence provided that site water stewardship plan has been communicated with stakeholders. Stakeholder engagements are limited to identification of shared water challenges and opportunities to work together.	
	Finding No: TNR-003250	
5.3	<i>Disclose annual site water stewardship summary, including: the relevant information about the site's annual water stewardship performance and results against the site's targets.</i>	
5.3.1	<i>A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.</i>	in progress 
Comment	Site has not documented and disclosed its annual water stewardship performance summary.	
	Finding No: TNR-003251	
5.4	<i>Disclose efforts to collectively address shared water challenges, including: associated efforts to address the challenges; engagement with stakeholders; and co-ordination with public-sector agencies.</i>	
5.4.1	<i>The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.</i>	in progress 
Comment	As mentioned in 1.6.1, shared water related challenges have not been adequately identified. Also, the identified challenges have not been disclosed.	
	Finding No: TNR-003252	
5.4.2	<i>Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.</i>	in progress 
Comment	The engagement with stakeholders and public sector agencies is focused on identification of shared water related challenges. Mitigation strategy is not agenda of engagement, no such evidence provided.	
	Finding No: TNR-003253	
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>	

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5.5.1	<i>Any site water-related compliance violations and associated corrections shall be disclosed.</i>	 Yes
Comment	Site has mentioned that no water related violation has been reported/occurred in recent past.	
5.5.2	<i>Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.</i>	 Yes
Comment	Site has mentioned that no water related violation has been reported/occurred in recent past.	
5.5.3	<i>Any site water-related violation that may pose significant risk and threat to human or ecosystem health shall be immediately communicated to relevant public agencies and disclosed.</i>	 Yes
Comment	Site has mentioned that no water related violation has been reported/occurred in recent past.	

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Photographic Evidence from Audit



Yes



Female washrooms.jpg



Deep Well.jpg

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Washrooms 1.jpg



Drinking water Station 2.jpg

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Flow Meter.jpg



Fuel Storage 1.jpg

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Drinking Water Station.jpg



Spillage Kit.jpg