

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000432

SITE DETAILS

Site: **BAT Sri Lanka - Green Leaf Threshing Plant, Kandy**
Address: Dutugamunu Mawatha, Mawilmada, 20000, Kandy, SRI LANKA
Contact Person: Dimuthu Tharanga
AWS Reference Number: AWS-000474
Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Core
Date of certification decision: 2023-May-03
Validity of certificate: 2026-May-03

AUDIT DETAILS

Audited Service(s): AWS Standard v2.0 (2019)
Audit Type(s): Initial Audit
Audit Start Date: 2022-Nov-15
Lead Auditor: Amit Singh
Audit team participants:
Mia Antoni-Naidoo, Observer

Site Participants:
Dimuthu Tharanga, Sustainability Manager
Yasantha Manukulasooriya, Other
Damith Baduraliyage, Other
Chithranga Edirisooriya, Area Sustainability Manager
Nadeesha Samaratunga, Other
Lasitha Dharmadasa, Other
Darshina Isanniaroahahi, Other
Thilanka Kumara, Other

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ADDITIONAL INFO

Summary of Audit Findings: A total of 50 findings were raised during the certification audit, 13 major non-conformities, 18 minor non-conformities, 17 observations. The major non-conformities were of sufficient concern to warrant the categorisation 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 10 April 2023.

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

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

The audit team recommends certification of BAT Sri Lanka Kandy at Core level pending approval of the corrective actions plan and closure of the major non-conformities.

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.

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Scope of Assessment: The scope of services covers the Initial certification audit for assessing conformity of BAT Sri Lanka - Green Leaf Threshing Plant, Kandy site against the AWS International Water Stewardship Standard Version 2.

The site is located besides to the Polgolla reservoir, Kandy, Sri Lanka. It manufactures re-dried tobacco using the green tobacco received from the depots located in various tobacco growing areas of the country. The site is comprised with other facilities other than the factory such as green leaf warehouse re-dried leaf warehouses, admin building, kitchen and canteen, car park and cigarette warehouse. The factory operation has been aligned to tobacco harvesting seasons, and it operates from Dec - Feb and Aug - Oct periods of the year. The factory is shut down during rest of the period. The total headcount is less than 100 during the season and less than 50 people work during the off-season.

The audit was conducted onsite on 15th November 2022 to 17th November 2022.

The onsite site visit included the assessment of site admin building, canteen, ETP, car park and visit to nearby residents within the catchment.

The following external stakeholders were interviewed during the audit:

1. Ms. Thakshila Damayanthi, Divisional Secretary - AGA Office
2. Ms. S.U. Elangasinghe, Manager - NWSDB
3. Mr. Wasala, Senior Environmental Officer - CEA
4. Mr. Dinuka Senevirathne, Engineer - Wastewater - KMC
5. Mr. Nimal Peter, Secretary - Mahaweli Ganthota Welfare Society (Local residents society)
6. Ms. Indrani Elkaduwa - Local resident / villager
7. Mr. Nihal - Local resident / villager
8. Mr. Sumedha Amarawansa - Local resident / villager

FINDINGS

NUMBER OF FINDINGS PER LEVEL

Observation	17
Minor	18
Major	13

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FINDING DETAILS

Finding No:	TNR-002913
Checklist Item No:	1.1.1
Status:	Closed
Finding level:	Minor
Due date:	2024-Jan-16
Checklist item:	The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including: <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.
Findings:	Site Discharge/removal points for sewage, treatment of sewage and discharge of treated water is not mapped. The ultimate receiving water body of storm water is not mapped in the layout / evidence.
Corrective action:	Updating the physical scope mapping documents to capture the above highlighted missing areas.

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Finding No: TNR-002944
Checklist Item No: 1.2.1
Status: In Progress - CA plan approved
Finding level: Major
Due date: 2023-Apr-16
Checklist item: Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall:

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

Findings: Vulnerable, women, minority, and Indigenous people have not been considered in the stakeholder identification and mapping process, nor identified. Upon discussion with key stakeholders, it was learnt that the government has identified vulnerable, minority and indigenous people. Stakeholder engagement on WASH related is missing.

Corrective action: Further consultation of government institutions to gather specific information related to above mentioned groups and their shared water challenges. A survey conducted to identify WASH related information in the catchment, shared wither challenges and risk. The stakeholders, challenges and risk related list will be updated accordingly.

Finding No: TNR-002942
Checklist Item No: 1.3.1
Status: Open
Finding level: Observation
Checklist item: Existing water-related incident response plans shall be identified.
Findings: The plan does not mention flooding, drought or potential stoppages due to No municipal water supply. However, the same are listed in site response actions but not in the plan.

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Finding No: TNR-002943
Checklist Item No: 1.3.2
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Jan-19
Checklist item: Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped
Findings: The losses and outflows are not mapped in the site water balance.
Corrective action: Site water balance process flow chart and quantification sheet will be updated specifying the water quantum identified as losses. The outflow data has been included in the calculation and need more clarity regarding to the specific issues.

Finding No: TNR-002950
Checklist Item No: 1.3.3
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Jan-20
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: Annual high and low variances (peak/low availability and peak /low demand), is not quantified and seasonal variance not measured.
Corrective action: Annual high and low variances (peak/low availability and peak /low demand) will be quantified and, seasonal variance will be measured & included in the document.

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Finding No:	TNR-002951
Checklist Item No:	1.3.4
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Jan-20
Checklist item:	Water quality of the site's water source(s), provided waters, effluent and receiving water bodies shall be quantified. Where there is a water-related challenge that would be a threat to good water quality status for people and environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be quantified.
Findings:	ETP treated water test report for year 2022 dt. 28.04.2022 shows dissolved phosphates result of 4.9 mg/l which is near to the maximum limit of 5 mg/l. This ETP treated water is discharged ultimately to the city main water body being used by people. The seasonal, high and low variances is not quantified. There is no indication of annual, and where appropriate, seasonal, high and low variances were not quantified.
Corrective action:	The ETP outflow water quality analysis will be increased to quarterly basis beyond the minimum requirements stipulated by the government. The water quality data mapping and variance analysis document will be provided.
Finding No:	TNR-002986
Checklist Item No:	1.3.6
Status:	Open
Finding level:	Observation
Checklist item:	On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values
Findings:	The site need to understand the definition of IWRA and identify the Important Water Related Areas.
Finding No:	TNR-003158
Checklist Item No:	1.4.2
Status:	Open
Finding level:	Observation
Checklist item:	The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.
Findings:	The site is recommended to review this annually and to expand the search for outsourced services beyond the initial exercise. For example final product delivery service provider.

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Finding No: TNR-003085
Checklist Item No: 1.5.2
Status: Open
Finding level: Observation
Checklist item: Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.
Findings: The status of water related legal requirements is not shown. The customary water rights could be discussed and verified with stakeholders as the water rights identification is for the catchment.

Finding No: TNR-003086
Checklist Item No: 1.5.3
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Jan-21
Checklist item: The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.
Findings: The catchment water balance needs to cover water inflows, throughflows and outflows. The catchment water-balance, scarcity, indication of annual or seasonal, variance is not identified.
Corrective action: Site will initiate a work stream consists of an external expert (representing the site) and respective stakeholders to enable the mappin of required data to conduct the catchment water balance study including annual scarcity, peak off peak demand and seasonal variances will be mapped and provided. The final outcome will be ready at the time of surveillance audit considering the limited up to date information available related to the subject.

Finding No: TNR-003087
Checklist Item No: 1.5.4
Status: Open
Finding level: Observation
Checklist item: Water quality, including physical, chemical, and biological status, of the catchment shall be identified, and where possible, quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be identified.
Findings: The baseline could be set based on the values of 2016-17. The current status, indication of annual, seasonal, high and low variances shall be identified.

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Finding No: TNR-003090
Checklist Item No: 1.5.5
Status: In Progress - CA plan approved
Finding level: Major
Due date: 2023-Apr-21
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: More relevant IWRA needs to be identified using scientific information and through stakeholder engagement.
The status to be assessed as done for site IWRA's.
Corrective action: Improve and update the IWRA mapping following AWS standards. Site will initiate a work stream consists of an external expert (representing the site) and respective stakeholders to enable the an IWR status mapping exercise.
The final outcome will be ready at the time of surveillance audit considering the limited up to date scientific assessment available related to the subject.

Finding No: TNR-003091
Checklist Item No: 1.5.7
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Jan-21
Checklist item: The adequacy of available WASH services within the catchment shall be identified.
Findings: Details of adequate WASH services within the catchment is not available
The site is required to improve its understanding of the status of WASH services in the catchment.
Corrective action: Conduct a local assessment to understand the WSH related information of the catchment areas and provide specific information.

Finding No: TNR-003092
Checklist Item No: 1.7.2
Status: Open
Finding level: Observation
Checklist item: Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.
Findings: The site has not addressed potential savings associated with the opportunities.

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Finding No: TNR-003093
Checklist Item No: 1.8.2
Status: Open
Finding level: Observation
Checklist item: Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.
Findings: The identified best practices are for site. Site can work with other groups stakeholders to identify more opportunities for the catchment.

Finding No: TNR-003094
Checklist Item No: 1.8.3
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Jan-21
Checklist item: Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.
Findings: The site has mentioned about increasing the frequency of wastewater monitoring. However, it being tested annually. Latest report available was for April 2022. The site is requested to improve its identification of Best Practice for water quality.
Corrective action: The water quality tests of ETP and for legionella will be conducted quarterly basis.
There is no need to checking the drinking water supplied by the municipal council considering the assurance given by a government supplier. The annual test of supplied water by municipal council is conducted as an additional nice to have measure.

Finding No: TNR-003096
Checklist Item No: 1.8.5
Status: Open
Finding level: Observation
Checklist item: Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.
Findings: The best practice identified by site, i.e. provision of access to WASH facilities for vulnerable communities, was not in place at the time of audit as the vulnerable communities were not identified. The

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Finding No:	TNR-003114
Checklist Item No:	2.1.1
Status:	Open
Finding level:	Observation
Checklist item:	A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments: <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 Water Stewardship Policy shall include commitment towards catchment sustainability plans.

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Finding No:	TNR-003115
Checklist Item No:	2.3.2
Status:	In Progress - CA plan approved
Finding level:	Major
Due date:	2023-Apr-25
Checklist item:	A water stewardship plan shall be identified, including for each target: <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 plan needs to be revised as the plan does not include: <ul style="list-style-type: none">- methodology for identification, measurement and monitoring of actions to achieve the targets are not defined.- no baseline has been set for the specified targets.- the set timeframe seems difficult to track the continual improvement.- the plan lacks any financial budgets allocated for actions to achieve targets. It is recommended to have more specific targets which change each year. The Standard requires for the learning from achieving targets in the Water Stewardship Plan to demonstrate evolution of the plan each year.
Corrective action:	The plan will be modified to reflect the: <ul style="list-style-type: none">Methodology for identification, measurement and monitoring of actions to achieve the targetsBaseline of comparisonExtended timelines which enable to evaluate measure continual improvement andFinancial and budgetary allocations.

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Finding No: TNR-003116
Checklist Item No: 2.4.1
Status: In Progress - CA plan approved
Finding level: Major
Due date: 2023-Apr-25
Checklist item: A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.
Findings: The requirement of this indicator is to identify a plan (or site's responsiveness and resilience) to respond or mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies.
The water risks have been identified in 1.7 and could be combined to be component of the Water Risk Plan
Corrective action: The plan will be modified to reflect the risk assessment findings and the link to the risk assessment line items.
The responsibilities of plan implementation will be assigned to reflect relevant agencies and authorities in consideration.

Finding No: TNR-003118
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: More evidence and feedback forms / summary that the site has supported good catchment governance shall be provided.

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Finding No: TNR-003119
Checklist Item No: 3.1.2
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Jan-26
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: One of the focus activities mentioned by site is invitation to vulnerable groups for CTC sponsored events. However, the site has not identified vulnerable communities and indigenous people. Therefore, there are no measures identified to respect the water rights of others.
Corrective action: Further consultation of government institutions to gather specific information related to above mentioned groups and their shared water challenges related to water rights.
A survey conducted to identify water rights related information in the catchment as a part of shared water challenges and risks.
The stakeholders, challenges and risk related list will be updated accordingly, and plan will be developed and implemented to address the water rights related issues.

Finding No: TNR-003121
Checklist Item No: 3.2.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Jan-26
Checklist item: A process to verify full legal and regulatory compliance shall be implemented.
Findings: The Environment Protection License has a validity from 9th August 2022 to 23rd January 2023. However, the compliance tracker mentions annual frequency.
Needs review and modification so as to mention the deadlines for each compliance.
Corrective action: The EPL license application process will be followed the annual frequency as per the requirements specified in local regulations, irrespective of lead time taken by Central Environment Authority in renewal process.
The support from internal regulatory affairs team will be obtained to align the future certification validity period for the whole year of operation.

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Finding No: TNR-003261
Checklist Item No: 3.2.2
Status: Open
Finding level: Observation
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: The site has not identified measures to respect the water rights. However, site has implemented water related rights available at site for the employees and could be included in the measures.

Finding No: TNR-003123
Checklist Item No: 3.3.1
Status: In Progress - CA plan approved
Finding level: Major
Due date: 2023-Apr-26
Checklist item: Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.
Findings: The annual performance against the site water balance targets are not specified. The status of water balance targets / baseline for catchment is not provided.
Corrective action: A quantitative assessment of water balance performance against the targets will be conducted and shared. Catchment water balance targets and performance related information will be acquired from relevant authorities based on the available information and a status evaluation will be conducted.

Finding No: TNR-003127
Checklist Item No: 3.3.2
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Jan-26
Checklist item: Where water scarcity is a shared water challenge, annual targets to improve the site's water use efficiency, or if practical and applicable, reduce volumetric total use shall be implemented.
Findings: The site has implemented water conservation initiatives within the plant by arresting the water leakages and utilisation of recycled water instead of fresh water. The above have resulted in increased water use efficiency. However, the same is not shown as evidence. The site should include water use efficiency targets in the WS Plan.
Corrective action: The evidences will be updated including the quantitative assessment to identify the improvements versus baseline. Water stewardship plan will be updated including quantifiable improvement efficiency targets.

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Finding No: TNR-003130
Checklist Item No: 3.4.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Jan-26
Checklist item: Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.

Findings: The data shows residual chlorine has exceeded the maximum prescribed limit of 1.0 mg/L for samples in 2020 and 2021. Therefore, it is necessary to regularly monitor the quality of treated wastewater. The response against these incidents have not been reported in the manual. The site is required to make this a priority in the plan and increase the monitoring frequency.

Corrective action: The ETP outflow water quality analysis will be increased to quarterly basis beyond the minimum requirements stipulated by the government. The risk of ETP water treatment process will be updated to reflect chemical dosing related issues and emergency response plans will be updated to reflect chemical dosing related emergencies. Evidence will be shared post conducting the testing of response plans.

Finding No: TNR-003131
Checklist Item No: 3.4.2
Status: In Progress - CA plan approved
Finding level: Major
Due date: 2023-Apr-26
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 maximum limit of residual chlorine is mentioned in the Environmental Protection License. The quality concerns of residual chlorine is not taken into account for regular monitoring.

Corrective action: The ETP outflow water quality analysis will be increased to quarterly basis beyond the minimum requirements stipulated by the government.

Finding No: TNR-003132
Checklist Item No: 3.7.1
Status: Open
Finding level: Observation
Checklist item: Evidence that indirect water use targets set in the water stewardship plan as applicable, have been met shall be quantified.
Findings: The evidences for actions are set for reduction of intensity in embedded water are not clear.

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Finding No: TNR-003265
Checklist Item No: 3.7.2
Status: Open
Finding level: Observation
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: Has the site taken into account the service provided which delivers the final tobacco product into account?

Finding No: TNR-003134
Checklist Item No: 3.8.1
Status: Open
Finding level: Observation
Checklist item: Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.
Findings: The evidence of shareholder meeting, details of common challenges and risks discussed during meeting is not shared.

Finding No: TNR-003135
Checklist Item No: 3.9.1
Status: In Progress - CA plan approved
Finding level: Major
Due date: 2023-Apr-26
Checklist item: Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.
Findings: The actions towards achieving best practice in water governance and the evidence are not provided.
Corrective action: The specific water governance related implemented actions will be listed and evidence will be shared linked to each initiative.

Finding No: TNR-003136
Checklist Item No: 3.9.2
Status: In Progress - CA plan approved
Finding level: Major
Due date: 2023-Apr-26
Checklist item: Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.
Findings: The actions towards achieving best practice for water balance and the evidence are not provided.
Corrective action: The specific water balance related implemented actions will be listed and evidence will be shared linked to each initiative.

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Finding No: TNR-003137
Checklist Item No: 3.9.3
Status: In Progress - CA plan approved
Finding level: Major
Due date: 2023-Apr-26
Checklist item: Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.
Findings: The actions towards achieving best practice for water quality and the evidence are not provided.
Corrective action: The specific water quality related implemented actions will be listed and evidence will be shared linked to each initiative.

Finding No: TNR-003138
Checklist Item No: 3.9.4
Status: In Progress - CA plan approved
Finding level: Major
Due date: 2023-Apr-26
Checklist item: Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.
Findings: The best practices identified in criteria 1.8 are listed with the status of corresponding best practice.
The actions towards achieving best practice towards IWRA's and the evidence are not provided.
Corrective action: The specific IWRA maintenance related implemented actions will be listed and evidence will be shared linked to each initiative.

Finding No: TNR-003157
Checklist Item No: 3.9.5
Status: In Progress - CA plan approved
Finding level: Major
Due date: 2023-Apr-27
Checklist item: Actions towards achieving best practice related to targets in terms of WASH shall be implemented.
Findings: The best practices identified in criteria 1.8 are listed with the status of corresponding best practice.
The actions towards achieving best practice for WASH and the evidence are not provided.
Corrective action: The specific WASH related implemented actions will be listed and evidence will be shared linked to each initiative.

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Finding No: TNR-003143
Checklist Item No: 4.1.1
Status: Open
Finding level: Observation
Checklist item: Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated
Findings: There are no. of targeted projects which were to be completed in Q4 of 2022 but not initiated yet.
The yearwise recycling, water intensity and indirect water use targets are not mentioned.
The evidence of completed projects vs targeted projects are not provided

Finding No: TNR-003145
Checklist Item No: 4.1.2
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Jan-27
Checklist item: Value creation resulting from the water stewardship plan shall be evaluated.
Findings: The site need to prepare financial water cost-benefit analysis, which demonstrates value creation, in which the benefits achieved against the financial investment should be reflected.
Corrective action: The site will prepare and provide financial water cost-benefit analysis, which demonstrates value creation, in which the benefits achieved against the financial investments of all applicable initiatives.

Finding No: TNR-003146
Checklist Item No: 4.2.1
Status: In Progress - CA plan approved
Finding level: Major
Due date: 2023-Apr-27
Checklist item: A written annual review and (where appropriate) root-cause analysis of the year's emergency incident(s) shall be prepared and the site's response to the incident(s) shall be evaluated and proposed preventative and corrective actions and mitigations against future incidents shall be identified.
Findings: The emergency incident not reported. No root-cause analysis done. Proposed corrective actions and mitigations not identified for future incidents. This must be rectified to close the finding.
Corrective action: Site based survey will be conducted with the support of internal stakeholders to identify any past incidents. Investigations, root cause analysis will be conducted to identify completed actions and further actions required to avoid recurrence.

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Finding No: TNR-003147
Checklist Item No: 4.3.1
Status: In Progress - CA plan approved
Finding level: Major
Due date: 2023-Apr-27
Checklist item: Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.
Findings: The site has not presented evidence relating to consultation efforts on the water stewardship performance. The site is required to provided evidence that the water stewardship performance has been shared with stakeholders and they have been consulted on the performance.
The consultation efforts with stakeholders specifically related to WASH are not identified.
Corrective action: The stakeholder consultation of WS performances will be obtained on the activities implemented as a part of WS plan and be shared as evidences. The consultation focused to WASH related implementation will be obtained too.

Finding No: TNR-003148
Checklist Item No: 4.4.1
Status: Open
Finding level: Observation
Checklist item: The site's water stewardship plan shall be modified and adapted to incorporate any relevant information and lessons learned from the evaluations in this step and these changes shall be identified.
Findings: The site is required to redesign the water stewardship plan in order to reflect the modifications, adaptations and lessons learned (including WASH component).
The same can be achieved by presenting the yearly plan.

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Audit Number: AO-000432

Finding No: TNR-003149
Checklist Item No: 5.1.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Jan-27
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: The disclosure is not publicly accessible. The site should focus on disclosure of this information to a wider audience outside the steering committee.
The disclosure does not include:
- details of how water-related issues are governed at site level
- positions of staff accountable for compliance with water-related laws and regulations
Corrective action: The disclosure will be completed including the:
- details of how water-related issues are governed at site level
- positions of staff accountable for compliance with water-related laws and regulations

Finding No: TNR-003150
Checklist Item No: 5.2.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Jan-27
Checklist item: The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.
Findings: The Site is required to disclose the water stewardship plan as it has been documented, including how they contribute to the AWS Outcomes to relevant stakeholders.
Corrective action: The plan sharing will be made as a part of closing the NC related to WS plan performance cascade.
The sharing of new plans will be done aligned to the requirements specified in the standards.

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Audit Number: AO-000432

Finding No: TNR-003151
Checklist Item No: 5.3.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Jan-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: The site must provide evidence or demonstrate compliance to the indicator by subsequent disclosure of water stewardship performance, including quantified performance against targets as per the indicator requirements.
Corrective action: The WSP performance communication will be completed as a part of 2022 sustainability reporting.

Finding No: TNR-003152
Checklist Item No: 5.4.2
Status: Open
Finding level: Observation
Checklist item: Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.
Findings: The site need to prepare a format with shared water challenges, efforts made to engage with stakeholders and responses available.

Finding No: TNR-003156
Checklist Item No: 5.5.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Jan-27
Checklist item: Any site water-related compliance violations and associated corrections shall be disclosed.
Findings: The site is required to disclose compliance violations to achieve compliance. Evidence of the disclosure is required. The site should closely monitor the compliance requirements.
Corrective action: The water quality test reports will be analysed to identify the deviations and, any nonconformities identified will be disclosed accordingly along with corrective actions be taken to avoid the recurrence.

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Audit Number: AO-000432

Finding No: TNR-003269
Checklist Item No: 5.5.2
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Feb-08
Checklist item: Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.
Findings: The site is required to document the corrective actions for compliance violations.
Corrective action: Site has not met with any significant compliance violations in the past to conduct any disclosures. Any future compliance violations may occur will be documented, investigated and corrective action plans be implemented to avoid the recurrence.

Finding No: TNR-003277
Checklist Item No: 5.5.3
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Feb-09
Checklist item: 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.
Findings: No water related compliance violations that may pose a significant risk and threat to human, or ecosystem health were recorded. However residual chlorine levels of the waste water exceeded prescribed limits and no evidence was provided to show that this was communicated to public sector agencies. The site is required to present its procedures for reporting compliance violations.
Corrective action: Site has not caused any significant compliance violations in the past which may pose a significant risk and threat to human, or health of ecosystem. The obtaining of EPL (the license granted after assuring the environmental compliance of the site by the environment authority of Sri Lanka), is an evident to ensure that such violations are not caused by the operation.
The discharge water quality assessment reports are submitted to the Central Environment Authority as supportive document in the EPL application process. The respective evidences will be shared.
The compliance violation reporting procedure will be updated and shared as evidences.

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Report Details

Report	Value
Report prepared by	Amit Singh
Report approved by	Mia Antoni-Naidoo
Report approved on (Date)	9 February 2023

Surveillance

Proposed date for next audit
2023-Nov-17

Stakeholder Announcements

Date of publication	Location
13/10/2022	WSAS and AWS Website
Comment	The site has shared an image of the stakeholder announcement as evidence for advertisement at local newspaper, however no date of publication is presented and no image of the ad in the newspaper was provided.

Catchment Information

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Catchment Area Image 2.png

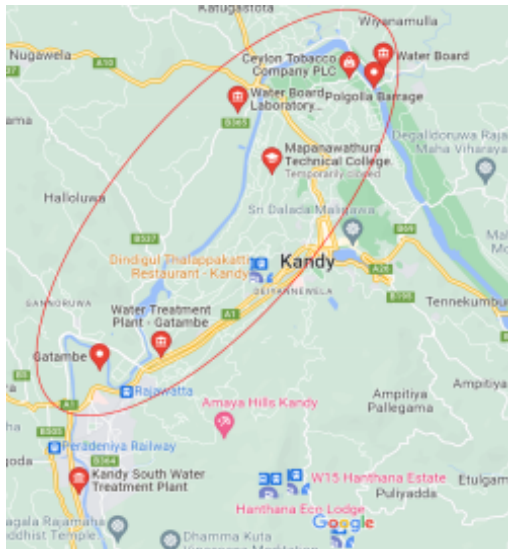


Catchment Area Image 4.png

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Catchment Area Image 1.png



Catchment Area Image 3.png

Catchment Information

The site is in a strategic location neighboring the Polgolla dam, which is constructed across the Mahaweli River, the longest river of Sri Lanka. The Polgolla reservoir and upstream segment of the river is a very important catchment for various water related activities conducted by numerous stakeholders.

The catchment area of the location has been spread a bit towards the southwest direction of Polgolla Barrage and where CTC is located, but less towards the south direction about 1.5 km away.

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Client Description and Site Details

Client/Site Background




Green Leaf Threshing Plant (GLTP) in Kandy is part of Ceylon Tobacco Company (CTC) PLC and the Global BAT Group, which operates in more than 200 countries worldwide. GLTP is located in the central province of the country about 120 km away from the capital city of Colombo. The GLTP Site in Kandy is located towards North of the Kandy City Centre and bordering the Mahaweli River which is the longest river in Sri Lanka. The site has provided maps showing the spatial locations of area as well as the BAT GLT site.

Summary of Shared Water Challenges

Summary of Shared Water Challenges

- The key shared water challenges identified by site:
1. Surface water pollution / Contamination due to lack of infrastructure and human activities related to sewage discharge
 2. Industrial pollution by discharge of poorly treated water and other pollutants
 3. Poor human behavior such as garbage dumping due to lack of knowledge and awareness about adverse impacts of pollution
 4. Unlawful encroachment of riverbank, deterioration due to deforestation and soil erosion
 5. Accidental Spills including hazardous material from the industries in the catchment
 6. Pollutants entering groundwater
 7. Increasing the water demand for industrial purpose which will further lead to decrease in water availability for livelihood
 8. High cost of water
 9. Lack of water supply
 10. Poor quality of supply water

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

0.1.1	<i>Eligibility Criteria</i>	
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.



closed

Comment

The site water network consists of two main parts as:

1. Green Leaf Threshing Plant & Parangantota Warehouse and
2. Morawetiya Warehouse, due to the physical separation of two sites.

Both locations are depended on municipal supply water. The Morawetiya site is connected to one water intake point and a tank, whilst the other site is connected to four water intakes, one overhead-tank and sump tank each.

The evidence includes the mapping of the physical scope of the site, covering the following:

- Site boundaries
- Water-related infrastructure at site
- Any water sources providing water to the site that are owned or managed by the site or its parent organization
- Water service provider and its ultimate water source
- Catchment that the site affects

The Site Discharge points for sewage, treatment of sewage and discharge of treated water is not mapped.

Site has mentioned about discharge of treated Effluent and storm water to surface water. However, the ultimate receiving water body of storm water are not mapped in the layout / evidence.

Finding No: TNR-002913

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

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- 1.2.1** *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.

 in progress

Comment The stakeholders have been identified considering the influence and interest levels of stakeholders.
The site has established engagement with key stakeholders such as NWSDB, Mahaweli Authority, Wattegama Divisional Secretariat, Open University of Sri Lanka, Central Environment Authority, Kandy Municipal Council, neighbouring water users and societies.

Vulnerable, women, minority, and Indigenous people have not been considered in the stakeholder identification and mapping process, nor identified.

Finding No: TNR-002944

- 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 Potential degree of influence between site and stakeholders was identified.

Evidence is same as 1.2.1

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

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

 Obs.

Comment The site has an onsite Emergency Response Plan which specifies the steps to followed and by whom in case of emergency.
The plan does not mention flooding, drought or potential stoppages due to "No municipal water supply. However, the same are listed in site response actions but not in the plan.


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

 in progress

Comment The site has mapped all the inflows and storage in the water balance. However, the losses and outflows are not mapped in the site water balance.

Finding No: TNR-002943

- 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.*

 in progress

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Comment The Water Balance excel sheet reflects the water inflows, drinking water and ETP treated water.
The site has shown annual water intensity.
The water intensity trend and water withdrawal trend is shown in manual at section 1.3.3.1 and 1.3.3.2.

Finding No: TNR-002950

1.3.4 *Water quality of the site's water source(s), provided waters, effluent and receiving water bodies shall be quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be quantified.* 🚩
in progress

Comment The testing of municipal water, storage water and ETP treated water is done on annual basis by external agency. The frequency of testing of ETP treated water is low.
ETP treated water test report for year 2022 dt. 28.04.2022 shows dissolved phosphates result of 4.9 mg/l which is near to the maximum limit of 5 mg/l.
The ETP treated water is discharged ultimately to the city main water body. Water from the river is used by people.
The seasonal, high and low variances is not quantified.

Finding No: TNR-002951

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

Comment The site has mapped the areas on site which have the potential for polluting water.
For evidence, refer pg. 35 of Manual.

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

Comment The following on-site Important Water Related Areas have been identified by GLTP site and mapped:
1. Drinking water storage and facilities
2. Boiler
3. Effluent treatment plant
4. Garden
5. Kitchen and canteen
6. Laboratory
7. Washroom facilities
8. Water storage tanks
9. Water circulation pipes
10. Fire hydrant pipes
Refer pg. 35 of Manual for details.

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 The site has quantified annual water related costs.
No water related revenues were generated. The site has also developed a description of the social, cultural and environmental value generated.
Refer pg. 36-40 of Manual for details.

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

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Comment	The site has mapped the drinking water, bathrooms, handwashing, toilet and canteen facilities available at site. The site has added a table which provide details of the above facilities at site. The site has also listed the opportunities for improvement of WASH facilities at site.	
1.4	<i>Gather data on the site's indirect water use, including: its primary inputs; the water use embedded in the production of those primary inputs the status of the waters at the origin of the inputs (where they can be identified); and water used in out-sourced water-related services.</i>	
1.4.1	<i>The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be identified.</i>	 Yes
Comment	The site has identified their primary inputs for the suppliers located outside the site's catchment. There are no suppliers within the site's catchment.	
1.4.2	<i>The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.</i>	 Obs.
Comment	The site has listed the outsourced services. They have reviewed to identify which are located within and outside the site's catchment. None of the service providers are located within the site's catchment.	
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	The site has summarised in a table where the initiatives of Government / County / Municipalities have been identified related with various schemes and policy. A schematic is created relating to an existing administrative coordinating mechanism of the water resource management at the national, district, divisional, and field levels in Sri Lanka (left) and preparation of SOP at Water Management Secretariat. As per the document, it is confirmed that the site is aware and familiar with the initiatives led by government. Refer pg. 43 to 46 for details.	
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>	 Obs.
Comment	The site has listed water related legal and regulatory requirements. They have made a procedure to track status of legal requirements. However, the status of water related legal requirements is not shown.	
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>	 in progress

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Comment The details for average annual volume of inflow to the Polgolla weir are quite old i.e. 1995 to 2006.
The river inflow data from 2012 to 2017 is also shown.
The catchment water-balance, scarcity, indication of annual or seasonal, variance is not identified.

Finding No: TNR-003086

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

Comment The site has gathered the data for catchment water quality for surface water and groundwater based on the research paper / article (source link provided in manual). The data considered for this research was for year Dec 2015 to May 2017.
The document shows details of various locations where water quality is of concern.

Refer pg. 53 to 58 for details.

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 The site has identified several generic areas within the catchment which are considered IWRAs. More relevant IWRAs needs to be identified using scientific information and through stakeholder engagement. The status to be assessed as done for site IWRAs.

Finding No: TNR-003090

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

Comment The site has identified existing water related infrastructures. The Purpose, Condition, and Risks of each are stated, but for some of the infrastructures the condition is not adequately described (e.g. quite old).

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

Comment The site has identified following WASH facility:
1. Pipe borne water is available for 75% in Kandy district. The quality of water is not mentioned.
2. Data mentioning 0.1% in Kandy district was not having toilet facility in 2012. However, there are certain areas identified in section 1.5.4 which are leading to pollution of surface water and ground water
3. Wastewater services data for Kandy South Water Treatment Plant which is not providing water to the catchment
4. WASH data as per JMP for the country
Refer







Finding No: TNR-003091

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.*

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1.6.1	<i>Shared water challenges shall be identified and prioritized from the information gathered.</i>	 Yes
Comment	The site has identified and prioritized shared water challenges. The site has described process of prioritization which is based on likelihood and severity of impact.	
1.6.2	<i>Initiatives to address shared water challenges shall be identified.</i>	 Yes
Comment	The site has prepared a table which maps the challenges, the corresponding actions and intervention / projects undertaken by the site. Details have been provided showing the status of the challenges. The details confirm site's understanding of the issue. Refer pg. 64 to 66 for details.	
1.7	<i>Understand the site's water risks and opportunities: Assess and prioritize the water risks and opportunities affecting the site based upon the status of the site, existing risk management plans and/or the issues and future risk trends identified in 1.6.</i>	
1.7.1	<i>Water risks faced by the site shall be identified, and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.</i>	 Yes
Comment	The site has identified and prioritised the water risks, with likelihood and severity of impact with a defined timeframe, potential cost and business impact.	
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>	 Obs.
Comment	The site has identified several opportunities from the identified risks, linked with actions, benefit to site and catchment with the priority and status. The site has not addressed potential savings associated with the opportunities.	
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 identified the following catchment best practice for Water Governance: - Create a common forum across key stakeholder bodies to drive a shared agenda to promote AWS - Run joint efforts together with stakeholders to enhance community awareness - Enhance emergency readiness and establish robust management systems to improve the readiness - Stakeholder management system compliance to international standards - Developing and driving water safety plans across the catchment - Conduct site water management process and compliance review The site has participated in the stakeholder engagements with various government agencies and local residents / villagers.	
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>	 Obs.

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- Comment The site has identified the following best practice for Water Balance:
- Water waste reduction through leak prevention
 - Establishment of a leak detection and corrective action program
 - Enhance water metering points to identify losses and top losses
 - Water/community engagement to promote efficient water use practices
 - Installation of water efficient equipment
 - Daily monitoring of water consumption patterns and performance against KPIs
 - Increase water recycling and reuse and reduce water withdrawal from suppliers

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

- Comment The site has identified the following best practice for Water Quality:
- Increase the frequency of water quality monitoring of discharge water
 - Installation of water pollution prevention mechanisms of discharge water
 - Sedimentation clearance and capacity enhancement
 - Identification of water related risks and readiness of emergency response actions
 - Water pollution prevention awareness of employees and communities
 - Following highest international standards/management systems for water quality testing & management
 - Testing of water quality for contamination of water storages

Finding No: TNR-003094

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

- Comment The site has identified the following best practice for maintenance of On-site Important Water-Related Areas:
- Implementation of robust inspection and maintenance plans of onsite IWRA
 - Introduction of water contamination prevention initiatives related to sources of contamination
 - Capex investment allocated to improve the status of onsite IWRA
 - Reallocation of treated water to sustain the condition of IWRAs on site
- The site has identified the following best practice for maintenance of Catchment Important Water-Related Areas:
- Protection of vulnerable reservation areas of the catchment through afforestation
 - Installation of awareness boards along the riverbank to prevent pollution
 - Introduce waste collectors at importance areas of the riverbank
 - Strict enforcement of regulations to protect IWRA

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

- Comment The site has identified the following best practice for site provision of equitable and adequate WASH services:
- Enhance the WASH related awareness among women, children and minorities
 - Provision adequate WASH (toilets, washrooms, rest rooms, handwashing stations) facilities over and above the minimum requirement
 - Provision of quality drinking water for all workers in CTC GLTP
 - Provision of effective COVID-19 prevention related infrastructure arrangements
 - Provision of women specific hygiene arrangements across the site
 - Distribution of safe drinking water related equipment among workers and communities
 - Provision of access to WASH facilities for vulnerable communities

The site has implemented adequate WASH services within site.

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2 STEP 2: COMMIT & PLAN - Commit to be a responsible water steward and develop a Water Stewardship Plan	
2.1	<p><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></p>
2.1.1	<p><i>A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:</i></p> <ul style="list-style-type: none"> - 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>The organizational commitment that is signed and publicly disclosed (also attached as evidence) includes the following commitments amongst others:</p> <ul style="list-style-type: none"> - Implement water stewardship programs to achieve improvements as per the water stewardship plan and outcomes - Disclose and report the activities and progress comprehensively and transparently - Assess the future availability of water in relevant catchment areas and eliminate or mitigate environmental and social risks linked to our use of water - Engage with communities and relevant stakeholders in an open and transparent way to increase awareness on water protection measures and foster relevant initiatives - Commit resources to implement the AWS Standard across our manufacturing / processing sites
2.2	<p><i>Develop and document a process to achieve and maintain legal and regulatory compliance.</i></p>
2.2.1	<p><i>The system to maintain compliance obligations for water and wastewater management shall be identified, including:</i></p> <ul style="list-style-type: none"> - Identification of responsible persons/positions within facility organizational structure - Process for submissions to regulatory agencies.
Comment	<p>The procedure to maintain the legal compliances is documented and attached. The EHS Manager and Legal Counsel have overall responsibilities for operation of the procedure. The responsibility for Water and Wastewater Discharge Management is as below: Procedure implementation - EHS Manager as the custodian Implementation at Specific sites - Site Owners Auditing and monitoring - EHS Representatives</p>
2.3	<p><i>Create a water stewardship strategy and plan including addressing risks (to and from the site), shared catchment water challenges, and opportunities.</i></p>
2.3.1	<p><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></p>

Q
Obs.

✔
Yes

✔
Yes


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Comment The site has developed a water specific strategy which has a vision and mission. They have identified separate goals for the catchment and the site.
 Vision: Delivering on Water Commitments for a Better Tomorrow
 Mission: Utilize the AWS framework and collaboration of stakeholders to promote good water governance, sustainable water balance, good water quality status, healthy status of Important Water-Related Areas and Water and Sanitation and Hygiene (WASH) by proactively addressing site and catchment related shared water challenges and risks.
 Goals: 100% Comply with Water related Legal/ regulatory requirements & Water Rights. Drive continuous improvements in water balance targets. Strive towards improved water quality status of the site and catchment. Driving actions with stakeholder cooperation to secure Important Water Related Areas. Support workers and communities to gain adequate access to WASH.

2.3.2 *A water stewardship plan shall be identified, including for each target:*
 - How it will be measured and monitored
 - Actions to achieve and maintain (or exceed) it
 - Planned timeframes to achieve it
 - Financial budgets allocated for actions
 - Positions of persons responsible for actions and achieving targets
 - Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.


in progress 

Comment The site has listed AWS masterplan for site and catchment with the objectives, Measure of success and set timeframes which is very generic.

Finding No: TNR-003115

2.4 *Demonstrate the site’s responsiveness and resilience to respond to water risks*

2.4.1 *A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.*

in progress 

Comment The site has provided similar plan as identified for site emergency response procedures for Step 1.3.
 The site should understand that all the risks may not be associated with emergencies.

Finding No: TNR-003116






Audit Number: AO-000432

3 STEP 3: IMPLEMENT - Implement the site's stewardship plan and improve impacts	
3.1	<i>Implement plan to participate positively in catchment governance.</i>
3.1.1	<i>Evidence that the site has supported good catchment governance shall be identified.</i> 🔍 Obs.
Comment	The site has involved with multiple stakeholders during a workshop held on July 2022. The interview with AGA confirmed the various engagements that BAT Kandy site has undertaken to enable and practically support good catchment governance.
3.1.2	<i>Measures identified to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be implemented.</i> 🚩 in progress
Comment	The site has facilitated awareness sessions with Women groups. Photos are provided as evidence (for evidence, pl. refer Step 3.1.2 at pg. 75). The feedback forms / MoM are not included in the evidence.
Finding No: TNR-003119	
3.2	<i>Implement system to comply with water-related legal and regulatory requirements and respect water rights.</i>
3.2.1	<i>A process to verify full legal and regulatory compliance shall be implemented.</i> 🚩 in progress
Comment	The site has defined procedure for legal compliance process tracking. A compliance tracker sheet is prepared by site which mentions about requirement of the act, compliance actions, frequency, responsible persons and status.
Finding No: TNR-003121	
3.2.2	<i>Where water rights are part of legal and regulatory requirements, measures identified to respect the water rights of others including Indigenous peoples, shall be implemented.</i> 🔍 Obs.
Comment	The site has mentioned the following response against the indicator: Although the water has been identified as a basic human right, specific regulations have not been implemented focusing the rights of specific groups such as indigenous people.
3.3	<i>Implement plan to achieve site water balance targets.</i>
3.3.1	<i>Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.</i> 🚩 in progress
Comment	In the site WSP, site has not set the baseline and the yearly targets are not specified for reduction in water withdrawal and increase in water recycle. However, the water withdrawal reduction value and water recycle values are mentioned. Against the catchment WSP, the current status is not provided.
Finding No: TNR-003123	
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> 🚩 in progress

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Comment	Water scarcity is identified as a shared water challenge. But, the annual targets to improve the site's water use efficiency are not set.	Finding No: TNR-003127
3.3.3	<i>Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.</i>	 Yes
Comment	There are no legal requirements identified for the re-allocation of water to social, cultural or environmental needs. The site has mentioned of re-allocating excess treated water for maintenance of gardening and landscape. During the catchment tour, it was observed that the site has re-allocated the ETP treated water to a nearby green area at Bus-stop outside the plant premises.	
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>	 in progress
Comment	The site has submitted sheet showing treated wastewater quality parameters from 2020 to 2022 as per test reports. The data shows residual chlorine has exceeded the maximum prescribed limit of 1.0 mg/L for samples in 2020 and 2021.	Finding No: TNR-003130
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>	 in progress
Comment	Water quality is identified as a shared water challenge. Quality concerns for excess of residual chlorine in treated wastewater is not identified.	Finding No: TNR-003131
3.5	<i>Implement plan to maintain or improve the site's and/or catchment's Important Water-Related Areas.</i>	
3.5.1	<i>Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.</i>	 Yes
Comment	The site has provided following documents as evidence: - Mapping of IWRA - Monitoring & Maintenance of IWRA - Awareness Boards - Tree Plantation	
3.6	<i>Implement plan to provide access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers at all premises under the site's control.</i>	
3.6.1	<i>Evidence of the site's provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers onsite shall be identified and where applicable, quantified.</i>	 Yes
Comment	The site has provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers onsite.	

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3.6.2	<i>Evidence that the site is not impinging on the human right to safe water and sanitation of communities through their operations, and that traditional access rights for indigenous and local communities are being respected, and that remedial actions are in place where this is not the case, and that these are effective.</i>	 Yes
Comment	The site has plan to add shower facility for the seasonal female staff. The site has recently constructed washroom for disabled persons (access through laboratory area). The site has distributed water filters to the nearby residents / villagers for improved water quality of drinking water.	
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>	 Obs.
Comment	In the WSP, actions are set for reduction of intensity in embedded water. The evidences are not clear.	
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>	 Obs.
Comment	The site has mentioned there are no suppliers and service providers within the catchment.	
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>	 Obs.
Comment	The level of risks and actions to be taken against these is mentioned in the document. No new risks were highlighted during the stakeholder meeting.	
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>	 in progress
Comment	The best practices identified in criteria 1.8 are listed with the status of corresponding best practice. The actions towards achieving best practice and the evidence are not provided. Finding No: TNR-003135	
3.9.2	<i>Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.</i>	 Obs.
Comment	The best practices identified in criteria 1.8 are listed with the status of corresponding best practice. The actions towards achieving best practice and the evidence are not provided.	
3.9.3	<i>Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.</i>	 Obs.

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Comment The best practices identified in criteria 1.8 are listed with the status of corresponding best practice.
The actions towards achieving best practice and the evidence are not provided.

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.* 🔍
Obs.

Comment The best practices identified in criteria 1.8 are listed with the status of corresponding best practice.
The actions towards achieving best practice and the evidence are not provided.

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

Comment The best practices identified in criteria 1.8 are listed with the status of corresponding best practice.
The actions towards achieving best practice and the evidence are not provided.

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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	The site has submitted site evaluation sheet in which the status against the targets are listed. The actions are categorised under different AWS outcomes. The qualitative and quantitative evaluation of the changes due to actions specifically related to WASH are not reported.
4.1.2	<i>Value creation resulting from the water stewardship plan shall be evaluated.</i>
Comment	The site has listed the value creation against the targets set in water stewardship plan. There is no indication of the cost involved. The qualitative and quantitative evaluation of the changes due to actions specifically related to WASH are not reported.
	Finding No: TNR-003145
4.1.3	<i>The shared value benefits in the catchment shall be identified and where applicable, quantified.</i>
Comment	The shared value benefits (social, economic or environmental) against the various implemented projects have been listed with the financial investment
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	The site has mentioned that for year 2021 & 2022 the site did not experience any water related emergencies. However, in section 3.9, it was observed that treated waste water quality (residual chlorine) has deteriorated and exceeded the prescribed limit in 2020 and 2021.
	Finding No: TNR-003146
4.3	<i>Evaluate stakeholders' consultation feedback regarding the site's water stewardship performance, including the effectiveness of the site's engagement process.</i>
	Finding No: TNR-003147
4.3.1	<i>Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.</i>

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Comment The site has reached out to the following govt. stakeholders for feedback on its water stewardship performance:
- National Water Supply & Drainage Board
- Mahaweli Authority of Sri Lanka
- Assistant Government Agents Office Pathadumbara
- Kandy Municipal Council

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.*

Q
Obs.

Comment The site has identified a no. of issues in implementation of WSP to achieve the AWS outcomes. Site actions to be taken to address the issues have been listed against the issues.
Details provided in pg. 95-96 of the manual.

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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	The site has displayed the commitment to AWS and Water Stewardship Policy at company's website and at plant gate. The roles and the responsibilities of the internal key stakeholders have been identified and documented. But the disclosure is not publicly accessible. Finding No: TNR-003149
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	The site has mentioned that the water stewardship plan is shared with the site leadership. There is no evidence that the site has communicated the water stewardship plan with the relevant stakeholders. Finding No: TNR-003150
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	The site's aspire to achieve AWS certification is included in the ESG report published along with the annual report for 2021. The site has mentioned that the summary of the results of the AWS actions for 2022 will be published in the ESG report for 2022. The site conducts stakeholder meetings at regular intervals but there is no evidence of disclosure of water stewardship performance to the stakeholders. Finding No: TNR-003151
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> ✅ Yes
Comment	The site's shared challenges and the actions taken to address them is published in the internal website and communicated to the relevant stakeholders through email. The information in the BAT SharePoint is visible to all BAT employees worldwide. Refer Pg. 98 to 101 of Manual for details.
5.4.2	<i>Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.</i> 🔍 Obs.

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Comment The site has made efforts to engage with stakeholders, coordinate and support public-sector agencies. But the same are not identified and listed.

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


5.5.1 *Any site water-related compliance violations and associated corrections shall be disclosed.*

 in progress

Comment The site has mentioned that the site did not record any water related compliance violation that hence no corrective actions were undertaken during the review period. In section 3.9, it was observed that treated waste water quality (residual chlorine) has deteriorated and exceeded the prescribed limit in 2020 and 2021. The same is not disclosed. However, it has been captured in 3.9.

Finding No: TNR-003156


5.5.2 *Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.*

 in progress

Comment The site did not record any water related compliance violation that hence no corrective actions were undertaken during the review period.

Finding No: TNR-003269

5.5.3 *Any site water-related violation that may pose significant risk and threat to human or ecosystem health shall be immediately communicated to relevant public agencies and disclosed.*

 in progress

Comment No water related compliance violations that may pose a significant risk and threat to human, or ecosystem health were recorded. However residual chlorine levels of the waste water exceeded prescribed limits and no evidence was provided to show that this was communicated to public sector agencies.

Finding No: TNR-003277

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Photographic Evidence from Audit

✔
Yes

Comment The photographic evidence of interaction with local residents / villagers is uploaded.



IMG-9811.JPG



IMG-9815.JPG