

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)



Audit Number: AO-000480

### SITE DETAILS

Site: **BAT PNG - Madang**

Address: P.O BOX 678 Modilon Road, Madang Papua New Guinea, 511, Madang, PAPUA NEW GUINEA

Contact Person: Joanne Bowoku

AWS Reference Number: AWS-000476

Site Structure: Single Site

### CERTIFICATION DETAILS

Certification status: Certified Core

Date of certification decision: 2023-Jun-30

Validity of certificate: 2026-Jun-30

### AUDIT DETAILS

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

Audit Type(s): Initial Audit

Audit Start Date: 2022-Dec-20

Lead Auditor: Amit Singh

Audit team participants:

Laisani Lewanavanua, Local Auditor

Site Participants:

Marion Gideon, Other

Allan David, Other

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### ADDITIONAL INFO

Summary of Audit Findings: A total of 52 findings were raised during the certification audit, 17 major non-conformities, 28 minor non-conformities, 7 observations. The major non-conformities were of sufficient concern to warrant the categorization of the non-conformity as major and related to good water quality status, good water governance, sustainable water balance & Important water related areas.

The Client is requested to perform a root cause analysis and define corrective actions for each of the non-conformities and to submit these to WSAS within 60 days of receipt of the audit report by 28/04/2023.

The major non-conformities must be sufficiently addressed, and evidence submitted to WSAS within 9 days of receipt of the report by 28/05/2023.

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

The audit team recommends certification of BAT PNG - Madang site 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.

Scope of Assessment: The scope of services covers the Initial certification audit for assessing conformity of BAT Papua New Guinea - Madang site against the AWS International Water Stewardship Standard Version 2.

The site manufactures various types of tobacco and related products and is located in Madang province of Papua New Guinea. The facility is located around 5 km from Madang Airport, 5km from Gum River and 17 kms from Gogol River. The site receives the raw material as Tobacco leaf from Indonesia and same is being processed at the Madang site. The major facilities at the site include Tobacco leaf, primary tobacco, cutrag tobacco, secondary tobacco, boiler, water storage / treatment and pumping systems and the effluent treatment plant.

The audit was conducted remotely from 20th December to 22nd December 2022. The remote site visit included the assessment of site admin building, canteen, parking, water storage / treatment & pumping systems and the effluent treatment plant, that were visited virtually as part of the audit.

### FINDINGS

#### NUMBER OF FINDINGS PER LEVEL

Observation	7
Minor	28
Major	17

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### FINDING DETAILS

Finding No:	TNR-003223
Checklist Item No:	1.1.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Dec-20
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"><li>- Site boundaries;</li><li>- Water-related infrastructure, including piping network, owned or managed by the site or its parent organization;</li><li>- Any water sources providing water to the site that are owned or managed by the site or its parent organization;</li><li>- Water service provider (if applicable) and its ultimate water source;</li><li>- Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies;</li><li>- Catchment(s) that the site affect(s) and is reliant upon for water.</li></ul>
Findings:	Water service provider and its ultimate water source, site Discharge/removal points for sewage, treatment of sewage and discharg of treated water is not mapped. The ultimate receiving water body of storm water is not mapped in the layout / evidence.
Corrective action:	1. Have a proper survey done of the factory water lines and map out on site map the following: <ul style="list-style-type: none"><li>A) inlet water coming in from town supply</li><li>B) water lines distribution into each building and tap on site</li><li>C) pipeline of treated water to discharge point for sewage</li><li>D) highlight discharge location(s) for effluent</li><li>E) Rainwater discharge</li></ul>

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## Alliance for Water Stewardship (AWS)

Audit Number: AO-000480

Finding No: TNR-003224  
Checklist Item No: 1.2.1  
Status: In Progress - CA plan approved  
Finding level: Minor  
Due date: 2023-Dec-20  
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: The site has not identified vulnerable / women / minority / Indigenous people as stakeholders.

Corrective action: Increase Stakeholder scoping to include vulnerable / women / minority / Indigenous people as stakeholders

Finding No: TNR-003280  
Checklist Item No: 1.3.1  
Status: In Progress - CA plan approved  
Finding level: Minor  
Due date: 2023-Dec-20  
Checklist item: Existing water-related incident response plans shall be identified.

Findings: The document needs to be revised with identification of more incidents / emergency and is to be updated whenever there is a major change such as change in details of key personnel.

Corrective action: Review existing document with identification of more incidents / emergency and is to be updated whenever there is a major change such as change in key personnel

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## Alliance for Water Stewardship (AWS)

Audit Number: AO-000480

Finding No: TNR-003226  
Checklist Item No: 1.3.2  
Status: In Progress - CA plan approved  
Finding level: Minor  
Due date: 2023-Dec-20  
Checklist item: Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped  
Findings: The site has not mapped rainwater and some of the water consuming sections. Also, the treated wastewater outflow is not mapped.  
Corrective action: Map out and quantify rainwater and all water inlet/outlet. And include waste water in the map (will be outlined in section 1.1.1)

Finding No: TNR-003227  
Checklist Item No: 1.3.3  
Status: In Progress - CA plan approved  
Finding level: Minor  
Due date: 2023-Dec-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: The site water balance is not correctly mapped. The input water and distribution is not matching, some major sections are missing. The treated wastewater outflow is not mapped. Annual high and low variances (peak/low availability and peak /low demand) is not quantified, and seasonal variance not measured.  
Corrective action: 1. Include all major sections in the water balance from the input water to the distribution sections.  
2. Include the treated wastewater outflow  
3. Quantify annual high and low variances (peak/low availability and peak /low demand) and seasonal variances

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## Alliance for Water Stewardship (AWS)

Audit Number: AO-000480

Finding No: TNR-003283  
Checklist Item No: 1.3.4  
Status: Closed  
Finding level: Major  
Due date: 2023-May-28  
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: The site effluent quality is measured inhouse for limited parameters. More quality parameters should be checked such as residual chlorine, etc. as the treated water is being discharged outside the premises. Testing by authorised external laboratories is not being done.

Corrective action: 

1. Increase effluent testing scope to include testing at the discharge point
2. Follow through External testing must be done monthly with available records
3. Complete set up of new vendor for external testing
4. Results are carefully analysed and non-conformances are flagged with proper mitigations

Evidence of implementation: Internal water and effluent tests only were conducted as per schedule. External tests were not done consistently due to poor response from the current lab (NAL). Expired accreditation also caused the site.

New vendor set up in the system is delayed due to technical issues, once verified, all samples will be sent to SGS for testing. for the interim, April and May samples are sent to SGS using credit card payments to get immediate results.

Finding No: TNR-003284  
Checklist Item No: 1.3.5  
Status: Open  
Finding level: Observation  
Checklist item: Potential sources of pollution shall be identified and if applicable, mapped including chemicals used or stored on site.

Findings: The spill kit procedure provided as evidence is for Bangladesh site and in local language.

Corrective action: Post correct Spill Kit Procedure

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## Alliance for Water Stewardship (AWS)

Audit Number: AO-000480

Finding No: TNR-003285  
Checklist Item No: 1.3.6  
Status: In Progress - CA plan approved  
Finding level: Minor  
Due date: 2023-Dec-20  
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 needs to identify Important Water-Related Areas at site including the rainwater being collected and utilized on site.  
Corrective action: Identify and map out on site Important Water Related Areas including the rainwater collection onsite

Finding No: TNR-003286  
Checklist Item No: 1.3.7  
Status: Closed  
Finding level: Major  
Due date: 2023-May-28  
Checklist item: 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.  
Findings: The site sources municipal water for its day to day operations. However, the site has not identified water related costs. As the water related costs are not identified, therefore the social, cultural and environmental value creation are not quantified.  
Corrective action: Identify water-related costs, revenues, and a description or quantification of the social, cultural, environmental, or economic water-related value generated by the site  
Evidence of implementation: Water related costs and identified water-related value updated

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## Alliance for Water Stewardship (AWS)

Audit Number: AO-000480

Finding No: TNR-003287  
Checklist Item No: 1.4.2  
Status: Closed  
Finding level: Major  
Due date: 2023-May-28  
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 identify embedded water use of outsourced services and review periodically.  
Corrective action: Identify embedded water use of outsourced services and review periodically.  
Evidence of implementation: Only one service provider was identified within the catchment (Guard Do Transport and Security). No response from supplier to complete embedded water use. See correspondences attached in evidence.  
  
No suppliers identified within the same catchment

Finding No: TNR-003288  
Checklist Item No: 1.5.1  
Status: Closed  
Finding level: Major  
Due date: 2023-May-28  
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: The site needs to clearly identify Government’s schemes & policy relatec to water governance so as to work together on the possible opportunities for water stewardship collective action.  
Corrective action: 1. Identify regulation related with water; waste water effluent, etc  
2. Identify government initiatives relate with water  
3. Identify water stewardship opportunities actions  
Evidence of implementation: PNG Government initiated National Sanitation and Hygiene (WASH) Policy to improve WASH facilities in PNG. Evidence Titled 'Water Governance Initiatives' attached shows initiatives done within the catchment in line with the Policy



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Audit Number: AO-000480

Finding No: TNR-003291  
Checklist Item No: 1.5.3  
Status: In Progress - CA plan approved  
Finding level: Minor  
Due date: 2023-Dec-20  
Checklist item: The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.  
Findings: The stakeholder discussion was held in detail during August 2022. The site needs to engage with relevant stakeholders to understand and quantify the catchment water balance.  
Corrective action: Identify and map out the catchment water-balance and targets and when applicable, quantify scarcity and seasonal variances  
Evidence of implementation: Find responses from Conservation Environment Protection Authority (CEPA) and Water PNG (WPNG) in evidences relating to catchment water balance

Site Water Balance Best Practice is provided in Evidence

Finding No: TNR-003292  
Checklist Item No: 1.5.4  
Status: In Progress - CA plan approved  
Finding level: Minor  
Due date: 2023-Dec-20  
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 current status, indication of annual, seasonal, high and low variance shall be identified.  
Corrective action: Provide detailed analysis water quality reports of the catchment including  
a) chemical, physical and biological parameters  
b) indication of seasonal variances  
c) provide supporting documents  
d) summary of the water quality status for the minimum of 2 years

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Audit Number: AO-000480

Finding No: TNR-003405  
Checklist Item No: 1.5.6  
Status: In Progress - CA plan approved  
Finding level: Minor  
Due date: 2023-Dec-20  
Checklist item: Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.  
Findings: The site has identified existing water-related infrastructure for site including the current condition of site infrastructure whereas the condition of catchment infrastructure was not identified.  
The site should gather more information about the catchment infrastructure, potential exposure to extreme events /associated risks and risk mitigation approach.  
Corrective action: 1. Gather more information about the catchment infrastructure, eg. maintenance plan or activities, good practices and 2. Identify the potential exposure to extreme events /associated risks and risk mitigation approach.

Finding No: TNR-003406  
Checklist Item No: 1.5.7  
Status: In Progress - CA plan approved  
Finding level: Minor  
Due date: 2023-Dec-20  
Checklist item: The adequacy of available WASH services within the catchment shall be identified.  
Findings: The site has captured pictures of WASH facilities at the catchment and Govt. / NGO initiatives across the country. The overall scenario of WASH facilities at the catchment is not known.  
Corrective action: Identify and map out WASH services within the catchment

Finding No: TNR-003295  
Checklist Item No: 1.6.1  
Status: Closed  
Finding level: Minor  
Due date: 2023-Dec-20  
Checklist item: Shared water challenges shall be identified and prioritized from the information gathered.  
Findings: The identified shared water challenges should be prioritized, and the site is required to describe the process by which prioritization was undertaken.  
Corrective action: Prioritize shared water challenges as well as process from which the information was gathered

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Audit Number: AO-000480

Finding No: TNR-003296  
Checklist Item No: 1.7.1  
Status: Closed  
Finding level: Minor  
Due date: 2023-Dec-20  
Checklist item: Water risks faced by the site shall be identified, and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.  
Findings: The site needs to re-prioritise the risks. The potential costs associated to mitigate the risks, impact on business and timeframe are not assessed.  
Corrective action: Identify and map out water risks faced by the site; prioritize it including likelihood and severity of impact within a given timeframe, potential costs and business impact.

Finding No: TNR-003298  
Checklist Item No: 1.7.2  
Status: In Progress - CA plan approved  
Finding level: Minor  
Due date: 2023-Dec-20  
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 aspects need to be addressed in more detail.  
The site has not addressed the potential savings and the business opportunities.  
Corrective action: 1. Identify water related opportunities and explain participation and assessment method.  
2. Clarify in document detail of potential saving and prioritization

Finding No: TNR-003299  
Checklist Item No: 1.8.1  
Status: In Progress - CA plan approved  
Finding level: Minor  
Due date: 2023-Dec-20  
Checklist item: Relevant catchment best practice for water governance shall be identified  
Findings: The evidence shared for the indicator does not include engagement with stakeholders / disclosure of best practices of site with other water users in the catchment.  
Corrective action: 1. Conduct training to all employees on Best practices of water governance so they can exercise in daily tasks  
2. Engage site with stakeholders to promote water stewardship and disclose site best practices

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## Alliance for Water Stewardship (AWS)

Audit Number: AO-000480

Finding No: TNR-003301  
Checklist Item No: 1.8.2  
Status: Closed  
Finding level: Major  
Due date: 2023-May-28  
Checklist item: Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.  
Findings: The site has not identified any best practice for Water Balance. The site has implemented various actions to reduce water use, recovery of water, rainwater harvesting. The site can work with stakeholder group to identify opportunities for the catchment.  
Corrective action: 1. Water consumption has to be monitored at catchment level  
2. Best practice for water balance of the catchment  
Evidence of implementation: Efforts of engagement are discussed with stakeholder are shown through stakeholder engagement details. Plans are captured in the water stewardship plan and mitigation  
  
Updated, refer to file Site Water Balance Best Practice, evidence from Stakeholder feedback on water balance best practices have been uploaded already

Finding No: TNR-003304  
Checklist Item No: 1.8.3  
Status: Closed  
Finding level: Major  
Due date: 2023-May-28  
Checklist item: Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.  
Findings: The water quality best practice for relevant sector or catchment is not identified. The site needs to work upon identification of Best Practice for water quality.  
Corrective action: 1. Water consumption has to be monitored at catchment level  
2. Best practice for water balance of the catchment  
Evidence of implementation: Efforts of engagement with stakeholder to get informations attached in evidences. Only site best practices, supporting documents and email correspondences provided.

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Audit Number: AO-000480

Finding No: TNR-003305  
Checklist Item No: 1.8.4  
Status: Closed  
Finding level: Major  
Due date: 2023-May-28  
Checklist item: Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.  
Findings: The best practice for site maintenance of Important Water-Related Areas for the catchment was not identified.  
Corrective action: 1. Water consumption has to be monitored at catchment level  
2. Best practice for water balance of the catchment  
Evidence of implementation: No information shared by other stakeholders.  
  
Evidence shows BAT's effort to maintain and improve IWRA, in planning phase for World Environment Day 2023

Finding No: TNR-003306  
Checklist Item No: 1.8.5  
Status: In Progress - CA plan approved  
Finding level: Minor  
Due date: 2023-Dec-20  
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 for site provision of equitable and adequate WASH services for relevant sector or catchment is not identified.  
The site has implemented best practice for adequate WASH services at site.  
Corrective action: 1. Continue doing monthly water tests, internal and external tests are required  
2. Water Filtration system - capture its checks in monthly compliance checks and follow up on order of the filters  
3. Identify catchment/sector best practices for water governance

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## Alliance for Water Stewardship (AWS)

Audit Number: AO-000480

Finding No:	TNR-003307
Checklist Item No:	2.1.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Dec-20
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"><li>- That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes</li><li>- That the site implementation will be aligned to and in support of existing catchment sustainability plans</li><li>- That the site's stakeholders will be engaged in an open and transparent way</li><li>- That the site will allocate resources to implement the Standard.</li></ul>
Findings:	The site will need to update the commitment so as to include the following commitments which are not covered in the policy: <ul style="list-style-type: none"><li>- the site will disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes</li><li>- the site implementation will be aligned to and in support of existing catchment sustainability plans</li></ul>
Corrective action:	<ol style="list-style-type: none"><li>1. Update Policy to include;<ul style="list-style-type: none"><li>- the site will disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes</li><li>- the site implementation will be aligned to and in support of existing catchment sustainability plans</li></ul></li><li>2. Have country General Manager (GM) to sign the updated Policy</li><li>3. Communicate to team the approved Policy</li></ol>

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## Alliance for Water Stewardship (AWS)

Audit Number: AO-000480

Finding No:	TNR-003309
Checklist Item No:	2.3.2
Status:	Closed
Finding level:	Major
Due date:	2023-May-28
Checklist item:	A water stewardship plan shall be identified, including for each target: <ul style="list-style-type: none"><li>- How it will be measured and monitored</li><li>- Actions to achieve and maintain (or exceed) it</li><li>- Planned timeframes to achieve it</li><li>- Financial budgets allocated for actions</li><li>- Positions of persons responsible for actions and achieving targets</li><li>- Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.</li></ul>
Findings:	The plan needs to be revised as the plan does not include: <ul style="list-style-type: none"><li>- methodology for identification, measurement and monitoring of actions to achieve the targets</li><li>- the timeframe are not set (only start date and end date / status are mentioned). It seems difficult to track the continual improvement.</li><li>- the plan lacks any financial budgets allocated for actions to achieve targets.</li></ul> It is recommended to have more specific targets which change each year. The Standard requires for the learning from achieving targets in the WaterStewardship Plan to demonstrate evolution of the plan each year.
Corrective action:	1. Create a water stewardship plan that addresses risks, shared challenges and opportunities; Plan should have the following target: <ul style="list-style-type: none"><li>- How it will be measured and monitored</li><li>- Actions to achieve and maintain (or exceed) it</li><li>- Planned timeframes to achieve it</li><li>- Financial budgets allocated for actions</li><li>- Positions of persons responsible for actions and achieving targets</li><li>- Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.</li></ul>
Evidence of implementation:	AWS mission statement and plan provided in evidence

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## Alliance for Water Stewardship (AWS)

Audit Number: AO-000480

Finding No: TNR-003310  
Checklist Item No: 2.4.1  
Status: Closed  
Finding level: Major  
Due date: 2023-May-28  
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. This was not achieved.  
Corrective action: Invite stakeholders from both public and private sectors to identify water risks and plan the mitigation  
Evidence of implementation: Stakeholder meetings and responses from CEPA and WPNG attached related to water risks and mitigations.  
Also discussed in workshop with stakeholders, however, it was agreed mostly that due to AWS being a new agenda to most industries in PNG, all stakeholders including BAT have agreed to start with awareness and training first. BAT will continue to engage with CEPA (water regulatory body) to conduct awareness and training across other industries and the community first on water governance.

Evidence provided as 'Water Risk Assessment Madang'

Finding No: TNR-003323  
Checklist Item No: 3.1.2  
Status: Closed  
Finding level: Major  
Due date: 2023-May-28  
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: The site has held meeting with BAT staff representing indigenous people and discussed about the issues of the community. The same groups could be consulted to initiate the process of identifying the water rights of others including Indigenous peoples.  
The site has not worked upon this indicator nor provided any evidence for the indicator.  
Corrective action: Identify measures to respect water rights of others including Indigenous peoples that are not part of 3.2  
Evidence of implementation: Water rights identified that are not in 3.2



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## Alliance for Water Stewardship (AWS)

Audit Number: AO-000480

Finding No: TNR-003335  
Checklist Item No: 3.3.1  
Status: In Progress - CA plan approved  
Finding level: Minor  
Due date: 2023-Dec-20  
Checklist item: Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.  
Findings: The water balance targets need to be reworked with proper mentioning of yearwise targets to show the percentage% reduction in water use.  
Corrective action: 1. Review Water balance gauges targets  
2. Water metering gauges should be installed at building level

Finding No: TNR-003351  
Checklist Item No: 3.4.1  
Status: Closed  
Finding level: Major  
Due date: 2023-May-28  
Checklist item: Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.  
Findings: The data shows certain parameters such as Cadmium, Fluoride and Mercury has exceeded the maximum prescribed limit for samples in 2022. Therefore, it is necessary to regularly monitor the quality of water to provide good quality water.  
The incidents have not been reported.  
The site is required to make this a priority in the plan and increase the monitoring frequency.  
Corrective action: 1. Water incident report of the Cd, F, Hg which exceed the limit  
2. Define action plan  
3. Monitor the progress of Action plan  
4. Put into plan

Evidence of implementation: - Team finally contacted NAL . Jan result done and given. Feb test missing sample not received and missed. March sample on hold in Quality office and not issued.  
- New vendor, SGS set up ongoing with procurement, to conduct water tests, 85% completed  
- NAL Lae credentials expired and feedback is to renew still ongoing, no tests will be done with NAL until then  
- Internal water tests only are done at this point until SGS is set up in the system  
  
Internal water and effluent tests are completed as per schedule

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## Alliance for Water Stewardship (AWS)

Audit Number: AO-000480

Finding No: TNR-003359  
Checklist Item No: 3.4.2  
Status: Open  
Finding level: Observation  
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 when applicable, quantified.  
Findings: The site effluent quality is measured inhouse for limited parameters. More quality parameters should be checked such as residual chlorine, etc. as the treated water is being discharged to the sea.

Finding No: TNR-003360  
Checklist Item No: 3.5.1  
Status: Closed  
Finding level: Major  
Due date: 2023-May-28  
Checklist item: Practices set in the water stewardship plan to maintain and/or enhance the site’s Important Water-Related Areas shall be implemented.  
Findings: The site needs to show the engagement with stakeholders and the activities carried out to enhance the site’s Important Water-Related Areas.  
Corrective action: Illustrate engagement with stakeholders and activities carried out to enhance site's IWRA  
Evidence of implementation: Plans are in place, once all approvals are obtained, activities will commence.

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## Alliance for Water Stewardship (AWS)

Audit Number: AO-000480

Finding No: TNR-003363  
Checklist Item No: 3.6.2  
Status: Closed  
Finding level: Major  
Due date: 2023-May-28  
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: The incidents of water quality have not been reported. It is necessary to regularly monitor the quality of water to provide good quality water. More quality parameters should be checked for treated waster water (being discharged to the sea) such as residual chlorine, etc.  
Corrective action: 1. Report and document water related incidents  
2. Ensure External testing is completed monthly  
Evidence of implementation: Internal tests are completed as oer schedule, issues with supplier were unable to complete consistent external tests.

Recent development from previous Engineering Manager in BAT is that effluent is no longer discharged to the lagoon, however, is sent to the soaking pit underground within BAT premises. See corresponding email attached. Contractors are engaged to map out new water site plan.

Finding No: TNR-003364  
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 site should consider adding this to the water stewardship plan going forward.  
Corrective action: Include and quantify indirect water use in the water stewardship plan

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-000480

Finding No: TNR-003365  
Checklist Item No: 3.7.2  
Status: Closed  
Finding level: Major  
Due date: 2023-May-28  
Checklist item: Evidence of engagement with suppliers and service providers, as well as when applicable, actions they have taken in the catchment as a result of the site's engagement related to indirect water use, shall be identified.  
Findings: The site should engage with the suppliers and services providers, set targets for indirect water use and list the probable actions in the water stewardship plan.  
Corrective action: Identify direct and indirect suppliers and service providers and where necessary, document actions taken in the catchment as a result.  
  
The only service provider from the same catchment is Guard Dog Security Services. No other service provider nor any supplier identified within the same catchment.  
Evidence of implementation: No response from service provider. However no response from GDSS through email or phone calls after initial phone call of introductory only.  
  
Despite phone calls, emails and letter written to Guard Dog Services to engage with them to do water saving/efficiency at their site, they have not responded to any communication except the stakeholder workshop where they sent their commander on the last minute and had no clue what we were discussing. After the workshop again, no response from them. Evidence of phone calls, email correspondences and invitation letter attached  
  
Way forward, BAT will visit Guard Dog unannounced to schedule a meeting with the General Manager to discuss further on AWS related agenda.

Finding No: TNR-003366  
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: No action plans for the aging infrastructure have been recorded. The minutes of each stakeholder discussion / meeting should be documented with the action points.  
Corrective action: Have engagements with stakeholders regarding shared water related infrastructure with documented minutes. Maintain records of action plans for aging infrastructure

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-000480

Finding No: TNR-003367  
Checklist Item No: 3.9.1  
Status: Closed  
Finding level: Major  
Due date: 2023-May-28  
Checklist item: Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.  
Findings: The site should identify actions towards achieving best practice in water governance.  
Corrective action: Identify actions towards achieving best practice in water governance in catchment  
Evidence of implementation: Site Best practice provided in AWS Plan and for World Environment Day See responses from CEPA and WPNG relating to best practices.

Finding No: TNR-003370  
Checklist Item No: 3.9.2  
Status: Closed  
Finding level: Major  
Due date: 2023-May-28  
Checklist item: Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.  
Findings: The site needs to identify actions towards achieving best practice for water balance and involve with stakeholders to share the best practices and plan actions for catchment water balance.  
Corrective action: Identify actions towards achieving best practice for water balance and involve with stakeholders to share the best practices and plan actions for catchment water balance  
Evidence of implementation: Best Practices from the catchment level are explained in feedback from CEPA and WPNG

Finding No: TNR-003371  
Checklist Item No: 3.9.3  
Status: Open  
Finding level: Observation  
Checklist item: Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.  
Findings: The drinking water and treated wastewater needs to be tested frequently for adequate no. of parameters by external laboratory.  
Corrective action: 1. Clearly set out targets for drinking water quality and state Standards used.  
2. Do same as above for waste water as well; set targets and state Standards used.  
3. External water tests must be done religiously for all areas

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-000480

Finding No: TNR-003372  
Checklist Item No: 3.9.4  
Status: Closed  
Finding level: Major  
Due date: 2023-May-28  
Checklist item: Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.  
Findings: The actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas are not provided.  
Corrective action: 1. Identify and list down important water related areas  
2. Identify best practice relating to targets in the water stewardship plan and implement  
Evidence of implementation: Site IWRA identified with best practices included in evidences

Finding No: TNR-003373  
Checklist Item No: 3.9.5  
Status: Open  
Finding level: Observation  
Checklist item: Actions towards achieving best practice related to targets in terms of WASH shall be implemented.  
Findings: The site need to identify shared Goals and specific actions as mentioned in the WSP.

Finding No: TNR-003375  
Checklist Item No: 4.1.1  
Status: In Progress - CA plan approved  
Finding level: Minor  
Due date: 2023-Dec-20  
Checklist item: Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated  
Findings: The details on the status of the targets and the contribution to achieving water stewardship outcomes are not evaluated.  
Corrective action: 1. Evaluate water usage against targets and ensure evaluation is capture with actions and meeting minutes.  
2. Evaluation to be done against Water Stewardship plan as well

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-000480

Finding No: TNR-003378  
Checklist Item No: 4.1.2  
Status: Open  
Finding level: Observation  
Checklist item: Value creation resulting from the water stewardship plan shall be evaluated.  
Findings: The evidence / supporting documents against the details tabulated in the sheet enlisting the value creation are not included in the evidence.  
Corrective action: 1. Ensure there is "Value creation" in the water stewardship plan and include in the evidence

Finding No: TNR-003379  
Checklist Item No: 4.2.1  
Status: In Progress - CA plan approved  
Finding level: Minor  
Due date: 2023-Dec-20  
Checklist item: A written annual review and (where appropriate) root-cause analysis of the year's emergency incident(s) shall be prepared and the site's response to the incident(s) shall be evaluated and proposed preventative and correct actions and mitigations against future incidents shall be identified.  
Findings: The incidents were not reported. No root-cause analysis done. Corrective actions and mitigations not identified for future incidents. The same must be rectified to close the finding.  
The site is required to make this a priority and increase the monitoring frequency.  
Corrective action: 1. Document incident reports with RCA  
2. Mitigate actions for future incidents  
3. Track records of water-related incidents

Finding No: TNR-003380  
Checklist Item No: 4.3.1  
Status: In Progress - CA plan approved  
Finding level: Minor  
Due date: 2023-Dec-20  
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 consultation efforts with stakeholders specifically related to WASH are not identified.  
Corrective action: 1. Have a list of related water stakeholders  
2. Set up stakeholder consultation meetings  
3. Evaluate consultation feedback

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-000480

Finding No: TNR-003382  
Checklist Item No: 4.4.1  
Status: In Progress - CA plan approved  
Finding level: Minor  
Due date: 2023-Dec-20  
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).  
Corrective action: Redesign the water stewardship plan in order to reflect the modifications adaptations and lessons learned (including WASH component)

Finding No: TNR-003383  
Checklist Item No: 5.1.1  
Status: In Progress - CA plan approved  
Finding level: Minor  
Due date: 2023-Dec-20  
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 of the site’s water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations is not publicly accessible. The site should focus on disclosure of this information to a wider audience, other than the persons involved.  
The disclosure shall 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: 1. Form and disclose team assigned and responsible for AWS implementation for the site



# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-000480

Finding No:	TNR-003384
Checklist Item No:	5.2.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Dec-20
Checklist item:	The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.
Findings:	There is no evidence that the site has published the water stewardship plan in the newspaper or shared with the relevant stakeholders. 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:	<ol style="list-style-type: none"><li>1. Draw up water stewardship plan for the site</li><li>2. Share waterstewardship plan with LT and later with stakeholders</li><li>3. In the plan, highlight plan to achieve goals towards addressing the challenges, risks and opportunities.</li></ol>
Finding No:	TNR-003386
Checklist Item No:	5.3.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Dec-20
Checklist item:	A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.
Findings:	Summary of the site's water stewardship performance, including quantified performance against targets in the Water Stewardship Plan has not been disclosed till now.
Corrective action:	Show quantified AWS Performance against targets, this will include; <ol style="list-style-type: none"><li>a) Internal and external disclosure</li><li>b) Stakeholder engagement, feedback and evaluation</li><li>c) AWS outcome summary</li><li>d) Share AWS performance in OLT (Operations Leadership Team) and Steering Committee meeting (BATPNG Executive team)</li><li>e) Disclose all above in forums such as Tribal Tok, company websites, yammer, local newspaper, etc.</li></ol>

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-000480

Finding No: TNR-003387  
Checklist Item No: 5.4.1  
Status: In Progress - CA plan approved  
Finding level: Minor  
Due date: 2023-Dec-20  
Checklist item: The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.  
Findings: No evidence has been shared for the disclosure of efforts made to address the shared water challenges.  
Corrective action: 1. Disclose actions/efforts undertaken to address these shared water challenges described in 1.6.1 and stakeholder engagement efforts, with an emphasis on engagement directed toward shared water challenges.  
2. Communicate through various forums the efforts taken to collectively address shared water challenges, including associated efforts to address the challenges; engagement with other organizations and community groups in the area; and coordination with public-sector agencies

Finding No: TNR-003388  
Checklist Item No: 5.4.2  
Status: In Progress - CA plan approved  
Finding level: Minor  
Due date: 2023-Dec-20  
Checklist item: Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.  
Findings: The site needs to engage with stakeholders and coordinate and support public-sector agencies. There was no evidence to show that the efforts made by the site to engage stakeholders and coordinate and support public-sector agencies were identified.  
Corrective action: Provide the efforts made by the site to engage stakeholders, coordinate and support public-sector agencies to address shared water challenges.

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-000480

Finding No: TNR-003390  
Checklist Item No: 5.5.1  
Status: In Progress - CA plan approved  
Finding level: Minor  
Due date: 2023-Dec-20  
Checklist item: Any site water-related compliance violations and associated corrections shall be disclosed.  
Findings: The incidents have not been reported or disclosed. The site should closely monitor the parameters being monitored and the compliance requirements.  
The site is required to present its procedures for reporting compliance violations.  
Corrective action: 1. Provide tracker of water violation, if there is any. Even if there is no violation, as long as the tracker is available including the corrective action plan  
2. Disclose water related violations with stakeholder, if requested

Finding No: TNR-003392  
Checklist Item No: 5.5.2  
Status: In Progress - CA plan approved  
Finding level: Minor  
Due date: 2023-Dec-20  
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 the water quality violations.  
Corrective action: 1. Include water-related incidents into aspects and impacts register to mitigate any future violations  
2. Disclose information, if applicable

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-000480

### Report Details

Report	Value
Report prepared by	Amit Singh
Report approved by	Ruth Wandera
Report approved on (Date)	27 February 2022

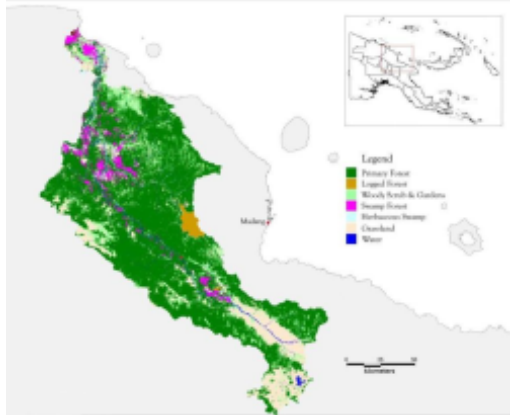
### Surveillance

**Proposed date for next audit**  
2023-Dec-20

### Stakeholder Announcements

Date of publication	Location
08/12/2022	Newspaper - The National
08/12/2022	Newspaper - Post Courier
01/12/2022	WSAS website

### Catchment Information



Catchment Map.png

#### Catchment Information

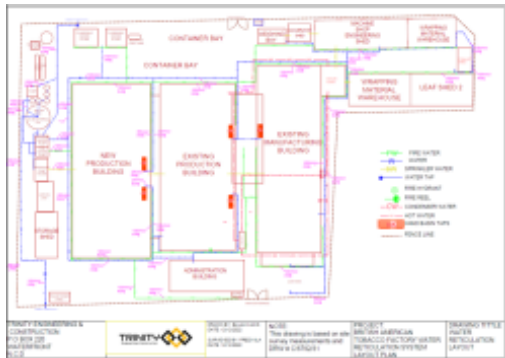
- The site has identified two catchment areas for Madang province.
1. Gum catchment which is about 5 kilometers out of Madang town and flows from the mountains of Madang into the sea in Madang town.
  2. Gogol River which is located about 17km in the outskirts of Madang town.

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-000480

### Client Description and Site Details



Water Layout.png

### Physical Scope of Madang Factory site



Physical scope of site.png

### Client/Site Background

British American Tobacco, Madang site manufactures various types of tobacco and related products and is located in Madang province of Papua New Guinea. The site is part of the Global BAT Group, which operates in more than 200 countries worldwide.

The facility is located around 5 km from Madang Airport, 5km from Gum River and 17 kms from Gogol River. The site receives raw material as Tobacco leaf from Indonesia and the same is being processed at the Madang site. The major facilities at the site include Tobacco leaf, primary tobacco, cutrag tobacco, secondary tobacco, boiler, water storage / treatment and pumping systems and the effluent treatment plant.

Audit Number: AO-000480

**Summary of Shared Water Challenges**

**Summary of Shared Water Challenges**

- The site has identified key shared water challenges with respect to stakeholders:
1. PNG Maritime College - Water consumption for college operations and Wastewater disposal
  2. Globe Meat Cannery - Water consumption for food manufacturing and Wastewater disposal
  3. Avis Hire Car - Water consumption for car wash
  4. Modilon General Hospital - Water consumption for hospital management and Wastewater disposal
  5. Madang Country Club - Water consumption for club management and Wastewater disposal
  6. Madang Fire Services - Water consumption for fire fighting services
  7. Water PNG, Madang - Provision of manucipal water to Madang Province
  8. Residential Neighbours (community) - Depletion of water level by using unplanned and ground water directly without considering rainwater harvesting plans
  9. Ward Project Office - Demography/population productivity
  10. WWF - Relocation of plant and cosatal demographics.
  11. World Vision - Depletion of water level by using unplanned and ground water directly without considering rainwater harvesting plans

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

<b>0.1.1</b>	<i>Eligibility Criteria</i>	
<b>0.1.1.1</b>	<i>The site(s) occupy one catchment OR an exception has been granted.</i>	 Yes
Comment	The site has identified two catchment areas: Gum River and Gogol River	
<b>0.1.1.2</b>	<i>The scope of the proposed certification shall be under the control of a single management system.</i>	 Yes
<b>0.1.1.3</b>	<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

Audit Number: AO-000480

**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.

in progress

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

- Site boundaries
- Water-related infrastructure at site
- 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 outside premises and storm water into the sea.

However, the ultimate receiving water body are not mapped in the layout / evidence.

**Finding No: TNR-003223**

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

**1.2.1** *Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall:*

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

in progress

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-000480

**Comment** The stakeholders have been identified considering the influence of stakeholders on site and influence of site on stakeholders.  
 The site has established engagement with key stakeholders such as Water PNG, Ward Project Office, WWF, World Vision, BAT staff representing Indigenous / community groups. The site has identified following stakeholder selection criteria:  
 - Organisations in catchment area  
 - Those who impact on organization (e.g., regulators, other water users, polluters, special interest groups)  
 - Those on whom organization has (or is perceived to have) an impact (e.g., other water users, neighbours, conservation management organizations)  
 - Those who have a common interest (e.g., similar business sectors)  
 - Those with no specific link but with whom it is beneficial to maintain a positive reputation & relationship (neutral)  
 Some of the stakeholders have been part of meetings.

**Finding No: TNR-003224**

**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 is identified.

**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.* ➤  
in progress

**Comment** The site has prepared water related incident / emergency response plan. The responsibilities in case of incidents / emergency controller have been defined. The responsibilities against each incident are given to Site Services Manager/ Engineering Manager/ Factory EHS Manager/ EHS Officer. However, there is no EHS manager at site for quite sometime and name of Site Services Manager & EHS Officer are not listed in the key personnel.

**Finding No: TNR-003280**

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

**Comment** The site has mapped the inflows, storage and usage areas in the water balance.

**Finding No: TNR-003226**

**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

**Comment** The site has quantified & mapped the inflows, storage and usage areas in the water balance. The site has shown trend for annual Water reduction targets with baseline year as 2017.








**Finding No: TNR-003227**



# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-000480

<b>1.3.4</b>	<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>	 No
Comment	The testing of municipal water, storage water and ETP treated water is not done by external agency. The frequency of internal testing of ETP treated water is twice in a week and 8 per month. Limited parameters are measured, i.e. Settle Sludge Volume (SSV); Dissolved Oxygen (DO) and pH. The effluent. The seasonal, high and low variances are not quantified. <b>Finding No: TNR-003283</b>	
<b>1.3.5</b>	<i>Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.</i>	 Obs.
Comment	The site has mapped the areas on site which have the potential for polluting water. The preventive measures identified by site are categorised under ETP, STP and Spill retention kit procedure.	
<b>1.3.6</b>	<i>On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.</i>	 in progress
Comment	The site has mentioned, there are no IWRA's at site and have not identified any Important Water-Related at site. <b>Finding No: TNR-003285</b>	
<b>1.3.7</b>	<i>Annual water-related costs, revenues, and a description or quantification of the social, cultural, environmental, or economic water-related value generated by the site shall be identified and used to inform the evaluation of the plan in 4.1.2.</i>	 No
Comment	The site has prepared annual costs related to effluent treatment plant. No water related revenues were generated by the site. <b>Finding No: TNR-003286</b>	
<b>1.3.8</b>	<i>Levels of access and adequacy of WASH at the site shall be identified.</i>	 Yes
Comment	The site has mapped WASH facilities such as male / female washrooms, handwashing, cafeteria and kitchen available at site. The site has quantified WASH facilities and represented in a table with photographs which provide details of the above facilities at site.	
<b>1.4</b>	<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>	
<b>1.4.1</b>	<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.	
<b>1.4.2</b>	<i>The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.</i>	 No
Comment	The embedded water use of outsourced services was not identified.	

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-000480

**Finding No: TNR-003287**

**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.*

 No

Comment Water governance initiatives are not clearly identified and documented. After the audit, site has gathered information and shared following documents: 1. PNG Govt. WASH initiatives 2. Published Paper on Urban Water Supply in PNG 3. PNG Wash Policy 2015-2030


**Finding No: TNR-003288**

**1.5.2** *Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.*

 Yes

Comment The site has clearly identified water-related legal and regulatory requirements and documented in the legal regulatory tracker.

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

 in progress

Comment The catchment water-balance, scarcity, indication of annual or seasonal, variance is not identified.

**Finding No: TNR-003291**

**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.*

 in progress

Comment The site has gathered the data for catchment water quality based on Water Quality of Water PNG.

**Finding No: TNR-003292**

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

 Yes

Comment The site has identified Gum River and Gogol River as catchment IWRA. The importance and status of the IWRA is assessed and documented alongwith with the risk and mitigation approach.

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

 in progress

Comment The site has identified existing water-related infrastructure for site and catchment including the current condition of site infrastructure whereas the condition of catchment infrastructure is not identified.








The site should gather more information about the catchment infrastructure, potential exposure to extreme events /associated risks and risk mitigation approach.

**Finding No: TNR-003405**

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-000480


<b>1.5.7</b>	<i>The adequacy of available WASH services within the catchment shall be identified.</i>	 in progress
Comment	The site has captured pictures of WASH facilities at the catchment and Govt. / NGO initiatives across the country. The overall scenario of WASH facilities at the catchment is not known. <b>Finding No: TNR-003406</b>	
<b>1.6</b>	<i>Understand current and future shared water challenges in the catchment, by linking the water challenges identified by stakeholders with the site's water challenges.</i>	
<b>1.6.1</b>	<i>Shared water challenges shall be identified and prioritized from the information gathered.</i>	 closed
Comment	The site has identified and listed shared water challenges. Each shared water challenge has been categorised into likelihood, severity and impact. <b>Finding No: TNR-003295</b>	
<b>1.6.2</b>	<i>Initiatives to address shared water challenges shall be identified.</i>	 Yes
Comment	The site has listed the initiatives to address the shared water challenges.	
<b>1.7</b>	<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>	
<b>1.7.1</b>	<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>	 closed
Comment	The site has identified internal and external water risks. Against each risk, the site has included the likelihood & severity of impact and prepared actions to mitigate the risks. An attempt has been made to prioritize the risks. <b>Finding No: TNR-003296</b>	
<b>1.7.2</b>	<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	The site has identified some opportunities which are basic and a generic attempt is made to address this indicator. <b>Finding No: TNR-003298</b>	
<b>1.8</b>	<i>Understand best practice towards achieving AWS outcomes: Determining sectoral best practices having a local/catchment, regional, or national relevance.</i>	
<b>1.8.1</b>	<i>Relevant catchment best practice for water governance shall be identified.</i>	 in progress
Comment	The site has not identified catchment best practice for Water Governance. <b>Finding No: TNR-003299</b>	
<b>1.8.2</b>	<i>Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.</i>	 No
Comment	The site has not identified any best practice for Water Balance.	

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**Finding No: TNR-003301**

**1.8.3** *Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.*  No


Comment The evidence shows water quality test result of Water PNG and GUM catchment monthly average test results.

**Finding No: TNR-003304**

**1.8.4** *Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.*  No

Comment The best practice for site maintenance of Important Water-Related Areas for the catchment is not identified.




**Finding No: TNR-003305**

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

Comment The evidence shows pictures of WASH facilities of catchment (same evidence as for 1.5.7).

**Finding No: TNR-003306**

Audit Number: AO-000480

<b>2</b>	<b>STEP 2: COMMIT &amp; PLAN - Commit to be a responsible water steward and develop a Water Stewardship Plan</b>	
<b>2.1</b>	<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>	
<b>2.1.1</b>	<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"> <li>- That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes</li> <li>- That the site implementation will be aligned to and in support of existing catchment sustainability plans</li> <li>- That the site's stakeholders will be engaged in an open and transparent way</li> <li>- That the site will allocate resources to implement the Standard.</li> </ul>	 in progress
Comment	<p>The site has publicly disclosed (via social platform) BAT PNG Commitment towards Water stewardship and AWS certification.</p> <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"> <li>- Engage stakeholders in an open and transparent manner to identify shared water challenges, define mitigation plan and share best practices</li> <li>- Maintain the organizational capacity necessary to successfully implement the AWS Standard, including ensuring that staff have the time and resources necessary to undertake the implementation</li> <li>- Implement good water governance to ensure better catchment water quality</li> </ul> <p style="text-align: right;"><b>Finding No: TNR-003307</b></p>	
<b>2.2</b>	<i>Develop and document a process to achieve and maintain legal and regulatory compliance.</i>	
<b>2.2.1</b>	<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"> <li>- Identification of responsible persons/positions within facility organizational structure</li> <li>- Process for submissions to regulatory agencies.</li> </ul>	 Yes
Comment	<p>The procedure to track, identify and implement Legal and other requirements pertaining to EHS is documented and attached. The EHS Manager and EHS Officer has the responsibility to maintain the compliance obligations.</p>	
<b>2.3</b>	<i>Create a water stewardship strategy and plan including addressing risks (to and from the site), shared catchment water challenges, and opportunities.</i>	
<b>2.3.1</b>	<i>A water stewardship strategy shall be identified that defines the overarching mission, vision, and goals of the organization towards good water stewardship in line with this AWS Standard.</i>	 Yes


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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: To conduct its business in full compliance with Alliance for Water Stewardship requirement  
 Mission: To minimize the impact of our activities to conserve water resources and prevent pollution  
 Goals: Water Efficiency Management Plan is established to:  
 1. Determine breakdown of water usage & develop Water Balance Chart  
 2. Identify areas to reduce water consumption & raise water efficiency  
 3. Establish measures in water savings & implementation timelines  
 4. Engage important stakeholders to identify shared water challenges and share ideas to mitigate the challenges


**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.*

  
No

Comment The site has prepared a water stewardship plan and tabulated the Actions to achieve target, benefits, linkage of catchment/site risks/opportunities and the person responsible.  
**Finding No: TNR-003309**

**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.*

  
No

Comment The site has provided similar plan as identified for site emergency response procedures for Step 1.3.1. The site should understand that all the risks may not be associated with emergencies.  
**Finding No: TNR-003310**

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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> <span style="float: right;">✔ Yes</span>
Comment	The site has engaged with identified stakeholders during August, November and December 2022. The minutes of meeting for August are reported.
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> <span style="float: right;">✘ No</span>
Comment	The site has not worked upon this indicator nor provided any evidence for the indicator. <b>Finding No: TNR-003323</b>
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> <span style="float: right;">✔ Yes</span>
Comment	The site has prepared procedure for tracking, identifying and implementation of Legal and other requirements pertaining to EHS for legal compliance. A legal regulatory tracker sheet is prepared by site which mentions about requirement of the act, responsible person and compliance status.
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> <span style="float: right;">✔ Yes</span>
Comment	As per site's legal requirement, the site is maintaining following water quality and health related requirements being linked with water rights: - In accordance with Public Health Act 1973, Standards for raw water comes under Schedule 1, and standards for drinking water falls under Schedule 2 of the Public Health (Drinking Water) Regulation 1984 Sec 5: Good quality water (90% of the sample shall not contain any coliform organisms in any sample of 100 ml and there shall be no E. Coli in any sample) and - As per Industrial Safety Health and Welfare Regulations 1965: adequate WASH facilities should be provided.
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> <span style="float: right;">➔ in progress</span>
Comment	Site water stewardship plan was documented in August 2022. The plan mentions about reducing 35% of town water consumption and 30% increase to recycle of wastewater. In the evidence document - Water balance performance (slide 4) mentions about 35% water reduction with 2017 as baseline. <b>Finding No: TNR-003335</b>



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<b>3.3.2</b>	<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	Water scarcity is not identified as a shared water challenge.	
<b>3.3.3</b>	<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.	
<b>3.4</b>	<i>Implement plan to achieve site water quality targets</i>	
<b>3.4.1</b>	<i>Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.</i>	 No
Comment	The site has tabulated water quality parameters from 2018 to 2022. No test report external agency is submitted as evidence. As per test data for 2022, certain parameters such as Cadmium, Fluoride and Mercury has exceeded the maximum prescribed limit. <b>Finding No: TNR-003351</b>	
<b>3.4.2</b>	<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>	 Obs.
Comment	The site has shared the timelines for major ETP maintenance to maintain desired quality of treated wastewater.	
<b>3.5</b>	<i>Implement plan to maintain or improve the site's and/or catchment's Important Water-Related Areas.</i>	
<b>3.5.1</b>	<i>Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.</i>	 No
Comment	The site has not shared any evidence which shows the implementation to maintain and/or enhance the site's Important Water-Related Areas, <b>Finding No: TNR-003360</b>	
<b>3.6</b>	<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>	
<b>3.6.1</b>	<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 shown evidence of provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for workers onsite.	
<b>3.6.2</b>	<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>	 No



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Comment As per water quality test data for 2022, certain parameters such as Cadmium, Fluoride and Mercury has exceeded the maximum prescribed limit.  
No systemic exceedances of quality parameters for effluent discharge have taken place.  
However, only limited parameters are being monitored.

**Finding No: TNR-003363**

**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.*

Q  
Obs.

Comment In the water stewardship plan, site has mentioned there are no indirect water use impacts have been noted within the catchment.

**3.7.2** *Evidence of engagement with suppliers and service providers, as well as, when applicable, actions they have taken in the catchment as a result of the site's engagement related to indirect water use, shall be identified.*

✘  
No

Comment There is no evidence to confirm the criteria for engagement with suppliers and service providers,

**Finding No: TNR-003365**

**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.*

Q  
Obs.

Comment The site had stakeholder discussions with Water PNG during August, November and December 2022. The meeting minutes were recorded for August which mentions about the water supply aging infrastructure.

**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.*

✘  
No

Comment The best practices are not identified in criteria 1.8. In the evidence provided, site has mentioned that wastewater is treated at ETP before discharging outside plant.

**Finding No: TNR-003367**

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

✘  
No

Comment The site has shown reduction in water withdrawal in year 2022 and mentioned the below reasons for reduction in water withdrawal:

- Social water usage decrease due to PMD Factory shut down in mid 2021
- Fixing of leaking taps on site
- Additional catchment tanks

**Finding No: TNR-003370**

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


Q  
Obs.

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Comment The site has installed UV for usage of water in the industry and filtration system is installed for drinking purpose.  
The wastewater is treated at ETP and discharged to lagoon.  
The testing of water and wastewater quality is done for limited parameters.

**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.*   
No

Comment The actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas are not provided.  
**Finding No: TNR-003372**

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

Comment At site level, actions are being taken to achieve WASH related targets such as regular housekeeping of the WASH facilities. Toilet facilities are cleaned periodically through defined checklists and records are maintained.

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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 Most of the targets set in site's water stewardship plan were to be initiated in December 2022 (i.e. during the month of audit). The status of targets are not known.  
**Finding No: TNR-003375**
- 4.1.2** *Value creation resulting from the water stewardship plan shall be evaluated.* 🔍 Obs.
- Comment The site has listed the value creation aligning with the water stewardship plan. The financial investment, water savings, monetary savings against each project alongwith the status of project have been tabulated in the sheet prepared as evidence.
- 4.1.3** *The shared value benefits in the catchment shall be identified and where applicable, quantified.* ✅ Yes
- Comment The shared value benefits in the catchment have been identified in the water stewardship plan. However, the shared value benefits shall also be quantified.
- 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.* 🚩 in progress
- Comment The site has tabulated water quality parameters from 2018 to 2022. As per test data for 2022, certain parameters such as Cadmium, Fluoride and Mercury has exceeded the maximum prescribed limit.  
**Finding No: TNR-003379**
- 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 The site has shared consultation feedback for stakeholder discussions held in August 2022. The details of consultation feedback for stakeholder discussions held in November and December 2022 are not reported.  
**Finding No: TNR-003380**
- 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**      *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.* ↗  
in progress

Comment      The site's water stewardship plan states that the Water Stewardship plan shall be elevated at least annually, and goals and targets to be updated at that time to reflect continual improvement.  
However, the site needs to highlight the lessons learned from the evaluations.  
**Finding No: TNR-003382**




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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 presented an organogram for the factory with regards to AWS Organizational Structure and Responsibilities. But the disclosure is not publicly accessible.	
		<b>Finding No: TNR-003383</b>
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	In water stewardship plan, it is mentioned that the plan is published in newspaper and will be published after evaluation of plan every year. There is no evidence that the site has communicated the water stewardship plan with the relevant stakeholders.	
		<b>Finding No: TNR-003384</b>
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	In the site water stewardship plan, it is mentioned that the plan will be evaluated and disclosed every year. However, the site's progress against the targets have not been evaluated.	
		<b>Finding No: TNR-003386</b>
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	The site has mentioned certain initiatives to be taken to address the shared water challenges. Details of meeting Minutes of Initial engagements with some stakeholders have been shared as evidence. However, no evidence has been shared for the disclosure of efforts made to address the challenges.	
		<b>Finding No: TNR-003387</b>
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 

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Comment	The site has mentioned that no initiatives have been made till now.	<b>Finding No: TNR-003388</b>
<b>5.5</b>	<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>	
<b>5.5.1</b>	<i>Any site water-related compliance violations and associated corrections shall be disclosed.</i>	 in progress
Comment	The evidence shared talks about the effluent maintenance activity during 2022. In the response against the indicator, site has mentioned that the AWS activities are not yet disclosed publicly. The water quality data shows certain parameters such as Cadmium, Fluoride and Mercury has exceeded the maximum prescribed limit for samples in 2022.	<b>Finding No: TNR-003390</b>
<b>5.5.2</b>	<i>Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.</i>	 in progress
Comment	In the response against the indicator, site has mentioned that the maintenance schedule/activities are yet to come. The site did not report any water related compliance violation and hence no corrective actions were undertaken during the period.	<b>Finding No: TNR-003392</b>
<b>5.5.3</b>	<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	The site has not worked upon this indicator nor provided any response / evidence for the indicator. No water related compliance violations that may pose a significant risk and threat to human, or ecosystem health were recorded.	

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### Photographic Evidence from Audit



Yes

Comment      The photographic evidence from audit of below mentioned locations are attached as evidence:

- Main gate / entrance
- AWS Policy placed at different locations
- ETP Treated Water discharge point
- Storm drain channel within premises
- Sludge removal tank and valve
- Stormwater discharge point
- Chemical storage area
- Diesel storage area
- Two pits - domestic and effluent
- Catchment tanks
- Aeration tanks
- Handwashing Taps (both conventional and sensor based)
- WASH facilities
- Water meter (municipal supply)
- Lawn area / Garden
- Parking area of transport vehicles
- Process Area (Tobacco & Cigarette)
- Laboratory
- Water Treatment System (UV and Filtration System)