

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-000476

### SITE DETAILS

Site: **BAT Pakistan Jhelum Multisite**  
Address: Kala Gujran, Main GT Road,, 49600, Jhelum, PAKISTAN  
Contact Person: Adeel Younas  
AWS Group Reference Number: AWS-G-000001  
Site Structure: Multi Site

### CERTIFICATION DETAILS

Certification status: Certified Core  
Date of certification decision: 2023-Aug-17  
Validity of certificate: 2026-Aug-17

### AUDIT DETAILS

Audited Service(s): AWS Standard v2.0 (2019)  
Audit Type(s): Initial Audit  
Audit Start Date: 2022-Dec-27  
Lead Auditor: Rizwan Masood

#### Site Participants:

Mr. Adeel Younas, Sustainability Manager  
Mr. Shadman Safdar Khattak, Area Sustainability Manager  
Ms. Tehreem Nasir, Sustainability Officer  
Mr. Malik Amin, Engineering Department  
Mr. Osama Khalid, Service Engineer  
Mr. Muhammad Irfan Mirza, Engineering Manager  
Mr. Shahid Imran, Sr. Sustainability Officer  
Mr. Hassan Khalid, Factory Manager

#### ASSIGNED SITE(S):

Name	Address	Contact name	AWS reference
BAT Pakistan - Jhelum - Modern Oral Products	Kala Gujran, Main GT Road, Jhelum, 49600, Jhelum, PAKISTAN	Adeel Younas	AWS-000502
BAT Pakistan Jhelum FMC	Kala Gujran, Main GT Road, Jhelum, 49600, Jhelum, PAKISTAN	Adeel Younas	AWS-000495

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### ADDITIONAL INFO

**Summary of Audit Findings:** A total of 35 findings were raised during the certification audit, 10 major non-conformities, 16 minor non-conformities and 9 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 by 6 June 2023.

The major non-conformities must be sufficiently addressed and evidence submitted to WSAS within 90 days of receipt of the report 6 July 2023.

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

The audit team recommends certification of Pakistan Tobacco Company Limited (Jhelum Multi Sites) 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 Pakistan Tobacco Company Limited (Jhelum Multi Sites) against the AWS International Water Stewardship Standard Version 2.

Pakistan Tobacco Company's Jhelum Factory is located at Grand Trunk Road in Jhelum district, Punjab province of Pakistan. It is located about 120 kilometers southeast of Islamabad and 190 kilometers north of Lahore. The Jhelum Factory spans over a total area of 58.28 acres, including Factory and residential areas. Factory Area is further divided in two administrative units Factory Made Cigarettes (FMC) Plant area and Modern Oral (MO) Products Plant area. Both plants are adjacent and located within 58.28 acres boundary. Also, water source, infrastructure and effluent treatment is the same for both plants.

The audit was conducted onsite on 27 to 30 December 2022.

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

### FINDINGS

#### NUMBER OF FINDINGS PER LEVEL

<b>Observation</b>	9
<b>Minor</b>	16
<b>Major</b>	10

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## Alliance for Water Stewardship (AWS)

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### FINDING DETAILS

Finding No: TNR-003771

Checklist Item No: 1.1.1

Status: Closed

Finding level: Major

Due date: 2023-Jul-04

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

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

Findings: The catchment identified by the site is not supported by any hydrological study of aquifer. Site has not collected adequate information on the source aquifer. The site is further required to provide more information on the catchment name, location and hydrogeological structure. Also, the storm network details provided through documents upload are contradictory to the onsite verification of storm water network. It was verified that storm water network that collects all the rainwater from the site and recharge it to the ground water through onsite recharge wells. However, document upload information explains that storm water is discharged to some off-site ponds. Site needs to elaborate on it.

Corrective action: 1- Hydro-logical Study to be conducted in liaison with a consultant  
2- Original Storm Water Layout to be shared

Evidence of implementation: Evidence of closure shared. Please find attached in "Files" tab.

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## Alliance for Water Stewardship (AWS)

Audit Number: AO-000476

Finding No:	TNR-003773
Checklist Item No:	1.2.1
Status:	Open
Finding level:	Observation
Checklist item:	<p>Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall:</p> <ul style="list-style-type: none"><li>- Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people;</li><li>- Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies;</li><li>- Provide evidence of stakeholder consultation on water-related interests and challenges;</li><li>- Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups;</li><li>- Identify the degree of stakeholder engagement based on their level of interest and influence.</li></ul>
Findings:	Site may include Public Health Engineering Department, Jhelum to better understand catchment water challenges.
Corrective action:	<p>1- PHED to be enlisted as a Stakeholder</p> <p>2- Engagement with PHED to be done and documented</p>
Evidence of implementation:	Evidence of implementation to be shared by observations closure deadline
Finding No:	TNR-003774
Checklist Item No:	1.3.2
Status:	Open
Finding level:	Observation
Checklist item:	Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped
Findings:	Site has many water storages, but these are not adequately documented/ mapped.
Corrective action:	All water storages to be identified and mapped on site layout
Evidence of implementation:	Evidence of implementation to be shared by observations closure deadline

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## Alliance for Water Stewardship (AWS)

Audit Number: AO-000476

Finding No:	TNR-003776
Checklist Item No:	1.3.3
Status:	In Progress - CA plan approved
Finding level:	Minor
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:	It has been noted almost that 40% of total site water extraction is consumed in manufacturing processes and reliable water measurements are available for this portion of water. Rest 60% of extraction used in Residential Area has no mapping, measurements and monitoring available. This portion of the Water Balance must be mapped, measured and monitored.
Corrective action:	1- Residential Area consumption to be made part of site water balance
Evidence of implementation:	Evidence of implementation to be shared by Minor Findings closure deadline
Finding No:	TNR-003777
Checklist Item No:	1.3.4
Status:	Closed
Finding level:	Major
Due date:	2023-Jul-04
Checklist item:	Water quality of the site's water source(s), provided waters, effluent and receiving water bodies shall be quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be quantified.
Findings:	Its visible that total colony count has considerable values in the raw and drinking water report but no further investigation on these values.
Corrective action:	1- Root Cause Analysis and end-to-end investigation for Total Colony Count to be initiated 2- Consultant to be engaged to evaluate solutions for Total Colony Count reduction 3- Total Colony Count Reduction Solution to be implemented
Evidence of implementation:	Evidence shared, please refer to "Files" Tab.

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## Alliance for Water Stewardship (AWS)

Audit Number: AO-000476

Finding No: TNR-003780  
Checklist Item No: 1.3.6  
Status: In Progress - CA plan approved  
Finding level: Minor  
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 has not accurately identified the important water related areas, and instead explained important water related infrastructure.  
Corrective action: Site IWRAs to be revised as per AWS Guidance Standard  
Evidence of implementation: Evidence of implementation to be shared by Minor Findings closure deadline

Finding No: TNR-003781  
Checklist Item No: 1.3.8  
Status: Closed  
Finding level: Major  
Due date: 2023-Jul-04  
Checklist item: Levels of access and adequacy of WASH at the site shall be identified.  
Findings: Drinking water quality reports shows that total colony count has considerably high values, but no further investigation conducted on these values.  
Corrective action: 1- Root Cause Analysis and end-to-end investigation for Total Colony Count to be initiated  
2- Consultant to be engaged to evaluate solutions for Total Colony Count reduction  
3- Total Colony Count Reduction Solution to be implemented  
Evidence of implementation: Please refer to the "Files" Tab

Finding No: TNR-003782  
Checklist Item No: 1.4.2  
Status: In Progress - CA plan approved  
Finding level: Minor  
Checklist item: The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.  
Findings: Site has not identified outsourced service providers within the catchment. Consequently, the indirect water use not identified.  
Corrective action: Complete scope of site outsourced services to be identified and analysis to be done on service providers within the catchment followed by quantitative analysis for the same.  
Evidence of implementation: Evidence of implementation to be shared by Minor Findings closure deadline

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## Alliance for Water Stewardship (AWS)

Audit Number: AO-000476

Finding No:	TNR-003783
Checklist Item No:	1.5.3
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Apr-01
Checklist item:	The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.
Findings:	Site has not quantified water balance of the catchment adequately. Once the Site has more accurately defined the catchment the data for the Catchment Water Balance will be required to be improved upon
Corrective action:	Catchment Water Balance to be revised through Hydro-logical Study
Evidence of implementation:	Evidence of implementation to be shared by Minor Findings closure deadline
Finding No:	TNR-003865
Checklist Item No:	1.5.5
Status:	In Progress - CA plan approved
Finding level:	Minor
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:	The site has made a start in identifying the greater IWRAs, the site is also encouraged to identify smaller, possibly closer to site waterways, streams, wetlands, ponds, springs etc in the area with the potential for maintenance and rehabilitation. The site should focus on any areas where they might have impact.
Corrective action:	Catchment IWRAs to be revised through Hydrological Study
Evidence of implementation:	Evidence of implementation to be shared by Minor Findings closure deadline
Finding No:	TNR-003785
Checklist Item No:	1.5.7
Status:	Open
Finding level:	Observation
Checklist item:	The adequacy of available WASH services within the catchment shall be identified.
Findings:	Site has not assessed sanitation and hygiene facilities adequacy/status in the catchment.
Corrective action:	Conclusion of Catchment WASH services to be documented
Evidence of implementation:	Evidence of implementation to be shared by Observations closure deadline

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## Alliance for Water Stewardship (AWS)

Audit Number: AO-000476

Finding No: TNR-003786  
Checklist Item No: 1.7.1  
Status: In Progress - CA plan approved  
Finding level: Minor  
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: It has been noted that site is infiltrating storm water to ground through onsite water reservoir and infiltration wells. physical and regulatory risk related to this infiltration found has not been identified.  
Corrective action: Physical & Regulatory risks to be reviewed in light of infiltration  
Evidence of implementation: Evidence of implementation to be shared by Minor Findings closure deadline

Finding No: TNR-003787  
Checklist Item No: 1.8.2  
Status: Closed  
Finding level: Major  
Due date: 2023-Jul-04  
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 catchment best practices for water balance improvement.  
Corrective action: 1- Best Practices to explored with aid of Hydrological Study Team  
2- Trainings of efficient water management to be conducted in catchment to raise awareness  
3- Hydro-logical Study of the catchment to be shared with relevant stakeholders  
Evidence of implementation: Please refer to "Files" Tab for evidence

Finding No: TNR-003788  
Checklist Item No: 1.8.3  
Status: Open  
Finding level: Observation  
Checklist item: Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.  
Findings: Site also has collected and analyzed information on the catchment water quality. Site has considered both surface and ground water quality and performed 3rd party lab testing for different samples. However, the quality results/concerns haven't been shared with relevant stakeholders.  
Corrective action: Water Quality reports to be shared with relevant stakeholders  
Evidence of implementation: Evidence of implementation to be shared by Observations closure deadline



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Audit Number: AO-000476

Finding No: TNR-003789  
Checklist Item No: 1.8.4  
Status: Closed  
Finding level: Major  
Checklist item: Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.  
Findings: The site has not identified any best practice for site maintenance of catchment Important Water-Related Areas.  
Corrective action: Research to be done for identification of potential best practices in the catchment for IWRAs - Consultation with stakeholders & Benchmarking with other BAT End markets, competitors and industries in the catchment.  
List of potential future actions to be prepared.  
Evidence of implementation: Please refer to "Files" tab for evidence of implementation

Finding No: TNR-003790  
Checklist Item No: 2.1.1  
Status: In Progress - CA plan approved  
Finding level: Minor  
Checklist item: A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:  
- That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes  
- That the site implementation will be aligned to and in support of existing catchment sustainability plans  
- That the site's stakeholders will be engaged in an open and transparent way  
- That the site will allocate resources to implement the Standard.  
Findings: Site has displayed the Water Stewardship Commitment at different places in the factory however no appropriate platform used for public disclosure.  
Corrective action: Water stewardship commitment to be displayed on PTC's website for public disclosure.  
Evidence of implementation: Evidence of implementation to be shared by Minor Findings closure deadline

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## Alliance for Water Stewardship (AWS)

Audit Number: AO-000476

Finding No:	TNR-003794
Checklist Item No:	2.3.2
Status:	In Progress - CA plan approved
Finding level:	Minor
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:	Planned timeframes of action items and even stewardship plan is unclear. Site may compile the WSP on annual basis, which will help to evaluate progress and achievement as well.
Corrective action:	Water Stewardship Plan to be compiled and evaluated on an annual horizon
Evidence of implementation:	Evidence of implementation to be shared by Major Findings closure deadline
Finding No:	TNR-003795
Checklist Item No:	2.4.1
Status:	Open
Finding level:	Observation
Checklist item:	A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.
Findings:	Site has verbally communicated that it has coordination with local authorities to respond any abnormal situation caused by extensive rainfall, as site having low elevation from the road and receive large amount of storm water. However, the evidence of any such coordination/communication not provided during the audit.
Corrective action:	Communication with relevant stakeholders regarding aid during abnormal situations to be documented
Evidence of implementation:	Evidence of implementation to be shared by Observations closure deadline

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## Alliance for Water Stewardship (AWS)

Audit Number: AO-000476

Finding No: TNR-003797  
Checklist Item No: 3.1.1  
Status: In Progress - CA plan approved  
Finding level: Minor  
Checklist item: Evidence that the site has supported good catchment governance shall be identified.  
Findings: No evidence presented that site has participated or supported initiatives for good water governance in the catchment  
Corrective action: 1- Water use and quality data of site to be publicly disclosed  
2- Engagement with MNCs in catchment to share learnings / best practices regarding water governance  
3- Training on efficient water management for the catchment to be conducted  
4- Evidence of meetings with stakeholders to be consolidated and shared with WSAS  
Evidence of implementation: Evidence of implementation to be shared by Minor Findings closure deadline

Finding No: TNR-003799  
Checklist Item No: 3.2.1  
Status: Closed  
Finding level: Major  
Checklist item: A process to verify full legal and regulatory compliance shall be implemented.  
Findings: Site is extracting water from ground and according to a recent legislation "The Punjab Water Act 2019" (Already identified legal requirement 1.5.2) site need to have permission from relevant authorities for water extraction but that permission/ license has not been acquired by site yet. Also it has been identified during the audit that site has water critical/hazardous inventories (Nicotine and other chemicals) and generating hazardous wastes. However, the disposal of hazardous waste is being done through non approved (EPA) contractor.  
Corrective action: 1- Relevant Authority for Water Extraction Approval to be identified & pursued  
2- Waste disposal through EPA approved contractor to be ensured  
Evidence of implementation: Please refer to "files" tab for evidence

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## Alliance for Water Stewardship (AWS)

Audit Number: AO-000476

Finding No:	TNR-003800
Checklist Item No:	3.3.1
Status:	Open
Finding level:	Observation
Checklist item:	Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.
Findings:	It has been noted that site has not set water balance targets (till 2022) for residential area which is consuming major portion (around 60%) of total water extraction.
Corrective action:	Residential Area consumption to be made part of daily monitoring & water balance
Evidence of implementation:	Evidence of implementation to be shared by Observations closure deadline
Finding No:	TNR-003801
Checklist Item No:	3.4.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Checklist item:	Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.
Findings:	The site should expand their goals on water quality monitoring in the WS Plan beyond mere compliance, this will also contribute positively towards Best Practice in water quality.
Corrective action:	Quarterly and Monthly Water quality reports to be monitored beyond compliance; Trends to be formulated and analyzed for increasing, decreasing or disruptive indicators followed by action planning.
Evidence of implementation:	Evidence of implementation to be shared by Minor Findings closure deadline
Finding No:	TNR-003802
Checklist Item No:	3.5.1
Status:	In Progress - CA plan approved
Finding level:	Minor
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:	Practices to maintain and/or enhance the site's Important Water-Related Areas not found implemented.
Corrective action:	1- Maintenance regimes for IWRAs to be established 2- Evidence of Maintenance of IWRAs to be shared with WSAS
Evidence of implementation:	Please refer to "Files" Tab for Evidence

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-000476

Finding No:	TNR-003803
Checklist Item No:	3.6.1
Status:	Closed
Finding level:	Major
Checklist item:	Evidence of the site's provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers onsite shall be identified and where applicable, quantified.
Findings:	Drinking water quality reports shows that total colony count has considerably high values, but no further investigation conducted on these values
Corrective action:	1- Root Cause Analysis and end-to-end investigation for Total Colony Count to be initiated 2- Consultant to be engaged to evaluate solutions for Total Colony Count reduction 3- Total Colony Count Reduction Solution to be implemented
Evidence of implementation:	Please refer to "Files" tab for evidence
Finding No:	TNR-003804
Checklist Item No:	3.7.2
Status:	In Progress - CA plan approved
Finding level:	Minor
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 engagement on indirect water use with outsourced service providers not done.
Corrective action:	1- List of all service providers with contact details and locations to be shared with WSAS 2- Evidence of engagement with suppliers to be shared with WSAS
Evidence of implementation:	Evidence of implementation to be shared by Minor Findings closure deadline

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## Alliance for Water Stewardship (AWS)

Audit Number: AO-000476

Finding No: TNR-003805  
Checklist Item No: 3.9.1  
Status: Closed  
Finding level: Major  
Checklist item: Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.  
Findings: Site has not supported/participated in any catchment best practice for water governance. No evidence provided.  
Corrective action: 1- Water use and quality data of site to be publicly disclosed  
2- Engagement with MNCs in catchment to share learnings / best practices regarding water governance  
3- Training on efficient water management for the catchment to be conducted  
4- Evidence of meetings with stakeholders to be consolidated and shared with WSAS  
Evidence of implementation: Please refer to "Files" tab for evidence

Finding No: TNR-003806  
Checklist Item No: 3.9.2  
Status: Closed  
Finding level: Major  
Checklist item: Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.  
Findings: Site has not supported/participated in any catchment best practice for water balance improvement. No evidence provided.  
Corrective action: 1- Best Practices to be explored with aid of Hydro-logical Study Team  
2- Training on efficient water management to be conducted in catchment to raise awareness  
3- Hydro-logical Study of the catchment to be shared with relevant stakeholders  
4- Push Taps installation in neighbouring mosques to prevent water wastage  
Evidence of implementation: Please refer to "files" tab for evidence

Finding No: TNR-003807  
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: It has been observed that the quality testing has been conducted after filtration (community filtration plants), to ensure that the quality of water has met the drinking water quality standards.  
Corrective action: Testing of raw water for community filtration plants to be done  
Evidence of implementation: Evidence of implementation to be shared by Observations closure deadline

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Audit Number: AO-000476

Finding No: TNR-003808  
Checklist Item No: 3.9.4  
Status: Closed  
Finding level: Major  
Checklist item: Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.  
Findings: Site has not participated/ supported practices to improve catchment IWRAs. no evidence provided.  
Corrective action: 1- Clean up drive for Jhelum River to be conducted  
2- Awareness session to be conducted for relevant stakeholders to emphasize on IWRAs maintenance  
3- Water Monitoring of IWRAs to be conducted and shared with concerned bodies  
4- Share evidence on governance of filtration plants installed by PTC  
Evidence of implementation: Please refer to "Files" tab for evidence

Finding No: TNR-003809  
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: It has been observed that the quality testing has been conducted after filtration (community filtration plants), to ensure that the quality of water has met the drinking water quality standards.  
Corrective action: Testing of raw water for community filtration plants to be done  
Evidence of implementation: Evidence of implementation to be shared by Observations closure deadline

Finding No: TNR-003810  
Checklist Item No: 4.3.1  
Status: In Progress - CA plan approved  
Finding level: Minor  
Checklist item: Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.  
Findings: Site has not consulted stakeholders on its water stewardship performance.  
Corrective action: 1- Stakeholders to be consulted on site's stewardship performance  
2- Minutes of meetings and feedback to be formally documented and shared with WSAS  
Evidence of implementation: Evidence of implementation to be shared by Minor Findings closure deadline

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## Alliance for Water Stewardship (AWS)

Audit Number: AO-000476

Finding No:	TNR-003811
Checklist Item No:	4.4.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Checklist item:	The site's water stewardship plan shall be modified and adapted to incorporate any relevant information and lessons learned from the evaluations in this step and these changes shall be identified.
Findings:	Site water stewardship plan set to be a live document and it is subject to frequent amendment. However no adoption on the basis of specific information observed. The site is required to demonstrate how they plan to evolve the plan through lessons learned. A set annual plan will allow this to be managed proficiently.
Corrective action:	Water Stewardship Plan to be compiled and evaluated on an annual horizon
Evidence of implementation:	Evidence of implementation to be shared by Minor Findings closure deadline
Finding No:	TNR-003812
Checklist Item No:	5.1.1
Status:	Open
Finding level:	Observation
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:	positions of those accountable for compliance with water-related laws and regulations
Corrective action:	Water Related Governance Structure to be disclosed on website
Evidence of implementation:	Evidence of implementation to be shared by Observations closure deadline
Finding No:	TNR-003813
Checklist Item No:	5.2.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Checklist item:	The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.
Findings:	No evidence provided that site water stewardship plan has been communicated with stakeholders. Stakeholder engagements are limited to identification of shared water challenges and opportunities to work together.
Corrective action:	WSP to be communicated to stakeholders via meetings
Evidence of implementation:	Evidence of implementation to be shared by Minor Findings closure deadline



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Audit Number: AO-000476

Finding No:	TNR-003814
Checklist Item No:	5.3.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Checklist item:	A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.
Findings:	Site has only published (on company website) the water intensity target and performance but water stewardship performance not disclosed.
Corrective action:	Site performance against all AWS Outcomes to be shared on website
Evidence of implementation:	Evidence of implementation to be shared by Minor Findings closure deadline

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-000476

### Report Details

Report	Value
Report prepared by	Rizwan Masood
Report approved by	Mia Antoni-Naidoo
Report approved on (Date)	6 April 2023

### Surveillance

**Proposed date for next audit**  
2023-Dec-18

Comment Annual surveillance is recommended

### Stakeholder Announcements

Date of publication	Location
06/12/2022	Local News Paper "Tameer e Jhelum"
06/12/2022	Local Newspaper "Jazba"
23/11/2022	WSAS and AWS Websites
Comment	Stakeholder announcement was published on AWS and WSAS websites 30 days before the audit. Site has also published translated version of the stakeholder announcement in local newspaper.

### Catchment Information

#### Catchment Information

Site's only source of water is ground water, which is extracted from ground through 3 onsite deep wells. Site is extensively treating and recycling its effluents and claims that no effluent is being discharged from the site. The catchment identified by the site is 25 km radius around the factory, which found to be a random estimation and not supported by any hydrological study of aquifer. Site has not collected adequate information on the source aquifer.



Catchment (PTC).jpg

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

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### Client Description and Site Details

#### Client/Site Background

Pakistan Tobacco Company's Jhelum Factory is located at Grand Trunk Road in Jhelum district, Punjab province of Pakistan. It is located about 120 kilometers southeast of Islamabad and 190 kilometers north of Lahore. The Jhelum Factory spans over a total area of 58.28 acres, including Factory and residential areas. Factory Area is further divided in two administrative units Factory Made Cigarettes (FMC) Plant area and Modern Oral (MO) Products Plant area. Both plants are adjacent and located in 58.28 acres boundary (site layout attached). This is why factory has been registered as multi-site for certification. However, water source, infrastructure and effluent treatment is same for both plants. FMC plant has mainly two processes. Primary processing of Tobacco and cigarette manufacturing (secondary processing). MO plant produces Oral Nicotine Pouches. Site has around 380 employees and these work in shifts. Site's only source of water is ground water, which is extracted from ground through 3 onsite deep wells. Site is extensively treating and recycling its effluents and claims that no effluent is being discharged from the site.



Jhelum site boundaries.jpg

### Summary of Shared Water Challenges

#### Summary of Shared Water Challenges

Site has identified the shared water challenges with consultation of stakeholders. The water related challenges in the catchment include;








- Pollution of Surface Water
- Pollution of Groundwater
- Depleting Water Table
- Inadequate Maintenance of Water Filtration Plants
- Piping and sanitation network Infrastructure Failure
- Poor Water Management

Site has prioritized the shared water challenges on the basis of significance and stakeholder feedbacks. Pollution of Groundwater and Piping & sanitation network Infrastructure Failure ranked as top priority challenges.

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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> 
Comment	Both sites are adjacent and located in 58.28 acers boundary. Also, water source, infrastructure, effluent treatment plant and catchment is same for both sites. Yes
0.1.1.2	<i>The scope of the proposed certification shall be under the control of a single management system.</i> 
Comment	Both sites are under single management system. The AWS representative is also same for the both sites. 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
0.2 Requirements for Multisite Operations	
0.2.1	<i>Multisite Management Requirements</i>
0.2.1.1	<i>The Multisite operation shall nominate an "AWS Group Representative".</i> 
Comment	Mr. Adeel Younas has been nominated as AWS representative for PTC Multi-Site. Yes
0.2.1.2	<i>The name and location of each site within the proposed scope for certification of the Multisite operation shall be clearly defined.</i> 
Comment	Pakistan Tobacco Company's Jhelum Factory is located at grand trunk road in Jhelum district, Punjab province of Pakistan. it is located about 120 kilometers southeast of Islamabad and 190 kilometers north of Lahore. The Jhelum Factory spans over a total area of 58.28 acres, including Factory and residential areas. Factory Area is further divided in two administrative units Factory Made Cigarettes (FMC) Plant area and Modern Oral (MO) Products Plant area. Both plants are adjacent and located in 58.28 acers boundary (site layout attached). This is why factory has been registered as multi-site for certification. However, water source, infrastructure and effluent treatment is same for both plants. FMC plant has mainly two processes. Primary processing of Tobacco and cigarette manufacturing (secondary processing). MO plant produces Oral Nicotine Pouches. Site has around 380 employees and these work in shifts. Yes
0.2.1.3	<i>Where a new site has been added to the multisite certificate, an onsite audit of the site was conducted prior to it being added to the certificate register.</i> 
Comment	This is onsite initial certification audit. Yes
0.2.1.4	<i>All AWS claims made by the client are managed through the "AWS Group Representative".</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** Site has documented site layout, source of water and basic site water infrastructure. Site's only source of water is ground water, which is extracted from ground through 3 onsite deep wells. Site is extensively treating and recycling its effluents and claims that no effluent is being discharged from the site.  
Site also has a storm water network that collects all the rainwater from the site and recharge it to the ground water through onsite recharge wells.  
The catchment identified by the site is 25 km radius around the factory, which found to be a random estimation and not supported by any hydrological study of aquifer. Site has not collected adequate information on the source aquifer.

**Finding No: TNR-003771**

**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.



Obs.

**Comment** Site has documented the list stakeholders, which includes the almost all the relevant stakeholder categories as per standard. These stakeholders include water governance bodies, environmental regulatory bodies, internal parties, industries, community, contractors and service providers.  
The stakeholder list includes the status of engagement; like engaged, planned to be engaged, not engaged. The summary of engagements has been documented with the pictorial evidences and the feedback on shared water challenges.

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1.2.2	<i>Current and potential degree of influence between site and stakeholder shall be identified, within the catchment and considering the site's ultimate water source and ultimate receiving water body for wastewater.</i>	Yes
Comment	Site has prioritized the identified stakeholder on the basis of interest and power to influence. The prioritization for engagement is based on the level of interest and power to influence. The stakeholder list includes the status of engagement; like engaged, planned to be engaged.	
1.3	<i>Gather water-related data for the site, including: water balance; water quality, Important Water-Related Areas, water governance, WASH; water-related costs, revenues, and shared value creation.</i>	
1.3.1	<i>Existing water-related incident response plans shall be identified.</i>	Yes
Comment	Site has identified different water related incidents and prepared the plan to mitigate the incidents. Identified incidents are different types of spillages (including fuels and hazardous chemicals), floods and damage to water network. Response plan to each incident scenario found documented and employees found trained on response plan.	
1.3.2	<i>Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped</i>	Obs.
Comment	Site has 3 deep wells as water inputs, these are interconnected with piping network and supplying water to 2 overhead tanks. One overhead tank is for the residential area and other is for factory (both areas FMC and MO), but both are also interconnected to tackle with odd scenarios. Flowmeters are installed on outlet of both overhead tanks which is considered to be the water inflows. Water is treated and distributed in different sections for consumption and all the effluents are collected at effluent treatment plant, where it is treated and pass through ultra filtration and RO and sent back for recycling at site. Site claims that it does not discharge any effluent from site premises.	
1.3.3	<i>Site water balance, inflows, losses, storage, and outflows, including indication of annual variance in water usage rates, shall be quantified. Where there is a water-related challenge that would be a threat to good water balance for people or environment, an indication of annual high and low variances shall be quantified.</i>	in progress
Comment	In continuation to 1.3.2, site has reliable water measurements on water supplied to different sections of the factory. However, the water from the overhead tank supplying water to residential area has no further measurements. Site has quantified the water balance for year 2022 (Jan to Dec). It has been noted almost that 40% of total site water extraction is consumed in manufacturing processes and reliable water measurements are available for this portion of water. Rest 60% of extraction used in Residential Area has no mapping, measurements and monitoring available. <b>Finding No: TNR-003776</b>	
1.3.4	<i>Water quality of the site's water source(s), provided waters, effluent and receiving water bodies shall be quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be quantified.</i>	closed
Comment	Site has developed and implemented site water quality monitoring plan to evaluate the quality status of water quality. The plan includes with quality monitoring for raw water, drinking water, effluents and water reservoirs. Site has presented (attached) latest 3rd party quality monitoring reports of raw water, drinking water and treated effluents. Its visible that total colony count has considerable values in the raw and drinking water report but no further investigation on these values. <b>Finding No: TNR-003777</b>	
1.3.5	<i>Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.</i>	Yes

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Comment	Potential sources of pollution at site found adequately documented/identified and mapped. These includes fuels, lubes and other hazardous chemicals storages (including Nicotine). during the site visit it has been noted that the adequate mitigation measures have been implemented to prevent pollution. Chemical and fuel storages were provided with secondary containments and spillage control arrangements were readily available.	
1.3.6	<i>On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.</i>	 in progress
Comment	The site has not accurately identified the onsite important water related areas, and instead explained the important water related infrastructure.	
		<b>Finding No: TNR-003780</b>
1.3.7	<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>	 Yes
Comment	The site has summarized the water related costs for year 2022. This includes water extraction cost, maintenance of water related infrastructure, WASH provision cost and cost of quality monitoring. The site has not generated any water related revenue.	
1.3.8	<i>Levels of access and adequacy of WASH at the site shall be identified.</i>	 closed
Comment	The site has adequate arrangements to ensure access to drinking water, sanitation and hygiene (WASH) for all workers. Site has maintained separate toilets for males and females also evaluated the adequacy of number of toilets for each gender. Site is regularly monitoring the quality of drinking water through a 3rd party laboratory. Its visible that total colony count has considerably high values in the raw and drinking water reports, but no further investigation conducted on these values. Local drinking water quality standards doesn't define limit for the Total Colony Count, but international guidelines (including WHO) insist that this must not be above 500 CFU/ml or recommend further investigations.	
		<b>Finding No: TNR-003781</b>
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	Site has listed its main suppliers and concluded none of the supplier is located in defined catchment. Still site has established communication with suppliers on AWS agenda.	
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>	 in progress
Comment	Site has not identified outsourced service providers within the catchment. Consequently, the indirect water use not identified.	
		<b>Finding No: TNR-003782</b>
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>	



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1.5.1	Water governance initiatives shall be identified, including catchment plan(s), water-related public policies, major publicly-led initiatives under way, and relevant goals to help inform site of possible opportunities for water stewardship collective action.	 Yes
Comment	Site has adequately identified the water governance initiatives in the catchment. These includes water related infrastructure improvement, drinking water & sanitation and irrigation related projects from last 3 years.	
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 identified water related legal and regulatory requirements. These includes requirements from Environmental Protection Act, Factories Act and Punjab Water Act. Also, Site has defined responsibilities for compliance against the applicable legal requirements.	
1.5.3	The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.	 in progress
Comment	As mentioned in 1.1.1, site has not collected adequate information on its water source (aquifer) and defined the catchment on random basis. Similarly, water balance for the identified catchment has not been quantified. Site has shared water balance information of different catchments but not the identified catchment.	
Finding No: TNR-003783		
1.5.4	Water quality, including physical, chemical, and biological status, of the catchment shall be identified, and where possible, quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be identified.	 Yes
Comment	Site has collected and analyzed the catchment water quality. Site has considered both surface and ground water quality and performed 3rd party lab testing for different samples. Site also considered already published report and relevant stakeholders' input about the water quality. Following quality issues were identified in catchment; - Biological contamination in ground and surface water. - Heavy metals contamination in ground water	
1.5.5	Important Water-Related Areas shall be identified, and where appropriate, mapped, and their status assessed including any threats to people or the natural environment, using scientific information and through stakeholder engagement.	 Obs.
Comment	Important Water-Related Areas in the catchment found identified in the List of Catchment IWRAs. these include; - Mangla Dam & Reservoir - Public Water Deep wells and Filtration Plants - Jhelum River - Disposal Water Plant  The site detailed the importance and threats and condition of IWRAs.	
1.5.6	Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.	 Yes
Comment	Site has gathered adequate information on catchment water related infrastructure. This includes information on water supply and sanitation network.	
1.5.7	The adequacy of available WASH services within the catchment shall be identified.	 Obs.



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**Comment** Site has assessed the drinking water, sewerage water network and availability in the catchment. The data presented shows the concerns in drinking water quality and sewerage network. However, site has not assessed toilets and hygiene adequacy/status in the catchment.

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

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

  
Yes

**Comment** Site has identified the shared water challenges with consultation of stakeholders. The water related challenges in the catchment include;  
- Pollution of Surface Water  
- Pollution of Groundwater  
- Depleting Water Table  
- Inadequate Maintenance of Water Filtration Plants  
- Piping and sanitation network Infrastructure Failure  
- Poor Water Management

Site has prioritized the shared water challenges on the basis of significance and stakeholder feedbacks. Pollution of Groundwater and Piping & sanitation network Infrastructure Failure ranked as top priority challenges.


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

  
Yes

**Comment** Site has documented the initiatives to address the identified (in 1.6.1) shared water related challenges.

**1.7** *Understand the site's water risks and opportunities: Assess and prioritize the water risks and opportunities affecting the site based upon the status of the site, existing risk management plans and/or the issues and future risk trends identified in 1.6.*

**1.7.1** *Water risks faced by the site shall be identified, and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.*

  
in progress

**Comment** Water related risks faced by the site have been identified. These risks cover physical, regulatory, and reputational risks. Also, the site has prioritized the risk on the basis of likelihood and consequences. Prominent risk identified by the site are;  
- Contamination in Drinking Water  
- Flood  
- Damaged Infrastructure  
- Failure of Water Treatment System  
- Contamination of Groundwater due to Spillage of HFO, Diesel, Gum etc.,  
- Pollution of Water Bodies

However, it has been noted that site is infiltrating storm water to ground through onsite water reservoir and infiltration wells. physical and regulatory risk related to this infiltration found not identified.

**Finding No: TNR-003786**

**1.7.2** *Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.*

  
Yes

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Comment	Site has identified the water related opportunities at site. Some of these are being exploited and some are planned. Also, the site has prioritized the risk on the basis of significance. Prominent opportunities identified by the site are; - Water Re-use/ Recycling - Decreasing Water Use - Improving Water Quality	
<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>	 Yes
Comment	Site has been engaged with water governance bodies in the catchment and identified best practices related to water governance. These include:  - TMA Jhelum Collaborating with World Bank for Wastewater & Sewerage Network Repair - Rural Drainage Scheme Pinanwal, Tehsil Pind Dadan Khan. - Extension of water Supply scheme - Khewra, Tehsil Pind Dadan Khan, District Jhelum - Key Stake Holder & Engagement Sessions (TMA Jhelum, MCJ, MCD, PCRWR)	
<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>	 closed
Comment	The site has not identified catchment best practices for water balance improvement. <b>Finding No: TNR-003787</b>	
<b>1.8.3</b>	<i>Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.</i>	 Obs.
Comment	Site has identified the drinking water quality problems in the catchment has installed filtration plants in the catchment for provision of clean drinking water. Site also has collected and analyzed information on the catchment water quality. Site has considered both surface and ground water quality and performed 3rd party lab testing for different samples. However, the quality results/concerns haven't been shared with relevant stakeholders.	
<b>1.8.4</b>	<i>Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.</i>	 closed
Comment	The site has not identified any best practice for site maintenance of catchment Important Water-Related Areas. <b>Finding No: TNR-003789</b>	
<b>1.8.5</b>	<i>Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.</i>	 Yes
Comment	Site has been engaged with local community in the catchment and identified best practices related to water governance. These include: - TMA Jhelum Collaborating with World Bank for Waste Water & Sewerage Network Repair - Installation of Clean Drinking Water Facilities in Jhelum & Dina District	

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2	STEP 2: COMMIT & PLAN - Commit to be a responsible water steward and develop a Water Stewardship Plan	
2.1	<i>Commit to water stewardship by having the senior-most manager in charge of water at the site, or if necessary, a suitable individual within the organization head office, sign and publicly disclose a commitment to water stewardship, the implementation of the AWS Standard and achieving its five outcomes, and the allocation of required resources.</i>	
2.1.1	<i>A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:</i> <ul style="list-style-type: none"> <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>Site has documented Commitment on Water Stewardship, PK JF FMC an MO signed by Factory Manager. This contains site's public commitment to sustainable water management and water stewardship. Based on the review of its contents, it adequately addresses the requirements of AWS standards.</p> <p>Site has displayed the Water Stewardship Commitment at different places in the factory however no appropriate platform used for public disclosure.</p>	<p><b>Finding No: TNR-003790</b></p>
2.2	<i>Develop and document a process to achieve and maintain legal and regulatory compliance.</i>	
2.2.1	<i>The system to maintain compliance obligations for water and wastewater management shall be identified, including:</i> <ul style="list-style-type: none"> <li>- Identification of responsible persons/positions within facility organizational structure</li> <li>- Process for submissions to regulatory agencies.</li> </ul>	 Yes
Comment	<p>Site has developed and implemented system maintain compliance with applicable legal requirements. The system includes the responsible persons for maintaining and submission of compliance obligation to regulatory bodies. Mr. Adeel Younas, Sustainability Manager of JF (FMC and MO Plants) is responsible /focal person for maintain compliance and submission of effluent quality records to relevant authority.</p>	
2.3	<i>Create a water stewardship strategy and plan including addressing risks (to and from the site), shared catchment water challenges, and opportunities.</i>	
2.3.1	<i>A water stewardship strategy shall be identified that defines the overarching mission, vision, and goals of the organization towards good water stewardship in line with this AWS Standard.</i>	 Yes
Comment	<p>Site has documented water stewardship strategy which includes vision, mission and goals of site in line with AWS outcomes.</p>	

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- 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** Site has documented a water stewardship plan which includes actions, targets, budget, responsibilities and linkage shared water challenges and water risks. The presented plan is first ever water stewardship plan of site and includes actions those already completed couple of years ago and those are planned till 2025. There is no information of time span of action items only year of completion or expected completion is mentioned.

**Finding No: TNR-003794**

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






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

**Comment** The site has a system to address water risks to the site, this has been documented in EHS (Environment Health & Safety) Roadmap (Workgroups C11 and C13), and compliance is ensured through external audits. There are also two water-related emergency response plans for the site. one for flood and one for general water related issues. Site has verbally communicated that it has coordination with local authorities to respond any abnormal situation caused by extensive rainfall, as site having low elevation from the road and receive large amount of storm water. However, the evidence of any such coordination/ communication not provided during the audit.

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3	STEP 3: IMPLEMENT - Implement the site's stewardship plan and improve impacts	
3.1	Implement plan to participate positively in catchment governance.	
3.1.1	Evidence that the site has supported good catchment governance shall be identified.	 in progress
Comment	As mentioned in 1.5.3, site has identified the catchment water governance initiatives also site has engaged water governance bodies. However, it has been noted that site has engaged with governance bodies for identification of shared water challenges. No evidence presented that site has participated or supported initiatives for good water governance in the catchment <b>Finding No: TNR-003797</b>	
3.1.2	Measures identified to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be implemented.	 Yes
Comment	The catchment is facing bad quality of drinking water. Site has installed and operating 5 water filtration (drinking water) plants in different areas of Jhelum to provide safe drinking water to the communities.	
3.2	Implement system to comply with water-related legal and regulatory requirements and respect water rights.	
3.2.1	A process to verify full legal and regulatory compliance shall be implemented.	 closed
Comment	Site has developed and implemented system maintain compliance with applicable legal requirements. The system includes the responsible persons for maintaining and submission of compliance obligation to regulatory bodies. Mr. Adeel Younas, Sustainability Manager of JF (FMC and MO Plants) is responsible /focal person for maintain compliance and submission of effluent quality records to relevant authority. All the reports (attached) found in compliance with the local environmental standards. However, Site is extracting water from ground and according to a recent legislation "The Punjab Water Act 2019" (Already identified legal requirement 1.5.2) site need to have permission from relevant authorities for water extraction but that permission/ license has not been acquired by site yet. Also it has been identified during the audit that site has water critical/hazardous inventories (Nicotine and other chemicals) and generating hazardous wastes. However, the disposal of hazardous waste is being done through non approved (EPA) contractor. <b>Finding No: TNR-003799</b>	
3.2.2	Where water rights are part of legal and regulatory requirements, measures identified to respect the water rights of others including Indigenous peoples, shall be implemented.	 Yes
Comment	No such legal binding applicable	
3.3	Implement plan to achieve site water balance targets.	
3.3.1	Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.	 Obs.
Comment	Site has set targets for water balance improvement and reduction in water consumption. Site is monitoring its water balance targets as water intensity per unit product produced. Site has two product categories; FMC and MO. water intensity targets found set for both sections. However, it has been noted that site has not set water balance targets (till 2022) for residential area which is consuming major portion (around 60%) of total water extraction.	

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3.3.2	Where water scarcity is a shared water challenge, annual targets to improve the site's water use efficiency, or if practical and applicable, reduce volumetric total use shall be implemented.	 Yes
Comment	Though site is not in water scarce area but site has still plans and target to improve its water efficiency and reduce the consumption. Section wise target set for FMC and MO plants and these are continuously tracked. It has been noted that site has achieved its water efficiency target over last couple of years and for year 2022 the performance till Nov 2022 is on track.	
3.3.3	Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.	 Yes
Comment	No such legal binding applicable	
3.4	Implement plan to achieve site water quality targets	
3.4.1	Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.	 in progress
Comment	Site has not set specific water quality target but to comply with local water quality standards. Its visible that total colony count has considerably high values in the raw and drinking water reports, but no further investigation conducted on these values. Local drinking water quality standards doesn't define limit for the Total Colony Count, but international guidelines (including WHO) insist that this must not be above 500 CFU/ml or recommend further investigations.	
	Finding No: TNR-003801	
3.4.2	Where water quality is a shared water challenge, continual improvement to achieve best practice for the site's effluent shall be identified and where applicable, quantified.	 Yes
Comment	Site is consuming/ recycling all its treated effluent. Site claims that no effluent is sent out of factory premises. Also, site is monitoring the quality of treated effluents through a 3rd party laboratory and the results found in compliance with effluent quality standards (ref. 3.2.1).	
3.5	Implement plan to maintain or improve the site's and/or catchment's Important Water-Related Areas.	
3.5.1	Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.	 No
Comment	As mentioned in 1.3.6, and 1.5.5. site has not accurately identified the important water related areas, and instead explained important water related infrastructure. Consequently, Practices to maintain and/or enhance the site's Important Water-Related Areas not found implemented.	
	Finding No: TNR-003802	
3.6	Implement plan to provide access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers at all premises under the site's control.	
3.6.1	Evidence of the site's provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers onsite shall be identified and where applicable, quantified.	 closed

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Comment	The site has adequate arrangements to ensure access to drinking water, sanitation and hygiene (WASH) for all workers. Site has maintained separate toilets for males and females also evaluated the adequacy of number of toilets for each gender. Site is regularly monitoring the quality of drinking water through a 3rd party laboratory. Its visible that total colony count has considerably high values in the raw and drinking water reports, but no further investigation conducted on these values. Local drinking water quality standards doesn't define limit for the Total Colony Count, but international guidelines (including WHO) insist that this must not be above 500 CFU/ml or recommend further investigations.	
		<b>Finding No: TNR-003803</b>
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	No incident or evidence of impingement of human rights on water & sanitation observed during audit and stakeholder interviews. The catchment is facing bad quality of drinking water. Site has installed and operating 5 water filtration (drinking water) plants in different areas of Jhelum to provide safe drinking water to the communities (Ref. 3.1.2).	
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>	Yes
Comment	As mentioned in 1.4.1, none of the supplier is located in defined catchment. Still site has established communication with suppliers on AWS agenda.	
3.7.2	<i>Evidence of engagement with suppliers and service providers, as well as, when applicable, actions they have taken in the catchment as a result of the site's engagement related to indirect water use, shall be identified.</i>	in progress
Comment	Site has not identified outsourced service providers within the catchment. Consequently, the engagement on indirect water use with outsourced service providers not done.	
		<b>Finding No: TNR-003804</b>
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>	Yes
Comment	Site is not dependent for sourcing or disposal of water on external infrastructure as it is extracting water from onsite deep wells and recycling all its effluents at site. However, site has engaged water governance bodies and owners of any shared water-related infrastructure on AWS agenda (Ref 1.2.1).	
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>	closed
Comment	Site has not supported/participated in any catchment best practice for water governance. No evidence provided.	
		<b>Finding No: TNR-003805</b>



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<b>3.9.2</b>	<i>Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.</i>	 closed
Comment	Site has not supported/participated in any catchment best practice for water balance improvement. No evidence provided. <b>Finding No: TNR-003806</b>	
<b>3.9.3</b>	<i>Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.</i>	 Obs.
Comment	The catchment is facing bad quality of drinking water. Site has installed and operating 5 water filtration (drinking water) plants in different areas of Jhelum to provide safe drinking water to the communities. However, it has been observed that the quality testing has been conducted after filtration, to ensure that the quality of water has met the drinking water quality standards.	
<b>3.9.4</b>	<i>Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.</i>	 closed
Comment	Ref. to 1.5.5, site has not participated/ supported practices to improve catchment IWRA's. no evidence provided. <b>Finding No: TNR-003808</b>	
<b>3.9.5</b>	<i>Actions towards achieving best practice related to targets in terms of WASH shall be implemented.</i>	 Obs.
Comment	The catchment is facing bad quality of drinking water. Site has installed and operating 5 water filtration (drinking water) plants in different areas of Jhelum to provide safe drinking water to the communities. However, it has been observed that the quality testing has been conducted after filtration, to ensure that the quality of water has met the drinking water quality standards.	



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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> <span>✓ Yes</span>
Comment	Site has evaluated the achievement of each action item in water stewardship plan. The evaluation results are quantified and where quantification not possible qualitative evaluation has been performed.
4.1.2	<i>Value creation resulting from the water stewardship plan shall be evaluated.</i> <span>✓ Yes</span>
Comment	Economic values creation is not possible for each action in site water stewardship plan. However, it has evaluated value creation where possible.
4.1.3	<i>The shared value benefits in the catchment shall be identified and where applicable, quantified.</i> <span>✓ Yes</span>
Comment	Site has identified shared value benefits for the actions in water stewardship plan. Shared value benefits includes social, cultural and economic benefits.
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> <span>✓ Yes</span>
Comment	Site representative explained that no real time water related emergency incident or extreme event occurred, hence no such evaluation available
4.3	<i>Evaluate stakeholders' consultation feedback regarding the site's water stewardship performance, including the effectiveness of the site's engagement process.</i>
4.3.1	<i>Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.</i> <span>➤ in progress</span>
Comment	Site has not consulted stakeholders on its water stewardship performance. The consultation efforts verified during the audit were focused on understanding the water related challenges and collecting information.
<b>Finding No: TNR-003810</b>	
4.4	<i>Evaluate and update the site's water stewardship plan, incorporating the information obtained from the evaluation process in the context of continual improvement.</i>
4.4.1	<i>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.</i> <span>➤ in progress</span>

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**Comment** Site has recently adopted the AWS standard and prepared its first ever Water stewardship plan. The plan includes actions those already completed couple of years ago and those are planned till 2025. No specific timeframe set for the stewardship plan. Being live document and it is subject to frequent updation. However no adoption on the basis of specific information observed.

**Finding No: TNR-003811**

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5	STEP 5: COMMUNICATE & DISCLOSE - Communicate about water stewardship and disclose the site's stewardship efforts	
5.1	Disclose water-related internal governance of the site's management, including the positions of those accountable for legal compliance with water-related local laws and regulations.	
5.1.1	The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.	 Obs.
Comment	Site's water related internal governance has been disclosed on company website ( <a href="https://www.ptc.com.pk/group/sites/pak_ampc26.nsf/vwPagesWebLive/DOAMQFGG/\$FILE/medMDCMCLTT.pdf?openelement">https://www.ptc.com.pk/group/sites/pak_ampc26.nsf/vwPagesWebLive/DOAMQFGG/\$FILE/medMDCMCLTT.pdf?openelement</a> ). However, site has not explicitly disclosed positions of those accountable for compliance with water-related laws and regulations.	
5.2	Communicate the water stewardship plan with relevant stakeholders.	
5.2.1	The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.	 in progress
Comment	No evidence provided that site water stewardship plan has been communicated with stakeholders. Stakeholder engagements are limited to identification of shared water challenges and opportunities to work together. Though Site has published it water stewardship plan on the website but the communication is not ensured.	
Finding No: TNR-003813		
5.3	Disclose annual site water stewardship summary, including: the relevant information about the site's annual water stewardship performance and results against the site's targets.	
5.3.1	A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.	 in progress
Comment	Site has only published (on company website) the water intensity target and performance but water stewardship performance not disclosed.	
Finding No: TNR-003814		
5.4	Disclose efforts to collectively address shared water challenges, including: associated efforts to address the challenges; engagement with stakeholders; and co-ordination with public-sector agencies.	
5.4.1	The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.	 Yes
Comment	Site has disclosed shared water related challenges and efforts to address these challenges by publishing these on company website.	
5.4.2	Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.	 Yes
Comment	Site has disclosed the summary of engagement effort on AWS agenda on company website ( <a href="https://www.ptc.com.pk/group/sites/pak_ampc26.nsf/vwPagesWebLive/DOAMQFGG/\$FILE/medMDCMCE3K.pdf?openelement">https://www.ptc.com.pk/group/sites/pak_ampc26.nsf/vwPagesWebLive/DOAMQFGG/\$FILE/medMDCMCE3K.pdf?openelement</a> )	
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.	

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<b>5.5.1</b>	<i>Any site water-related compliance violations and associated corrections shall be disclosed.</i>	 Yes
Comment	Site has mentioned that no water related violation has been reported/occurred in recent past.	
<b>5.5.2</b>	<i>Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.</i>	 Yes
Comment	Site has mentioned that no water related violation has been reported/occurred in recent past.	
<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	Site has mentioned that no water related violation has been reported/occurred in recent past.	

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Photographic Evidence from Audit

✔

Yes



PMD Steam Network.jpg



Haz. Waste Storage.jpg

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Stakeholder Interview (MC Dina).jpeg



Stakeholder Interview (MM3).jpeg



Strom Water Network.jpg



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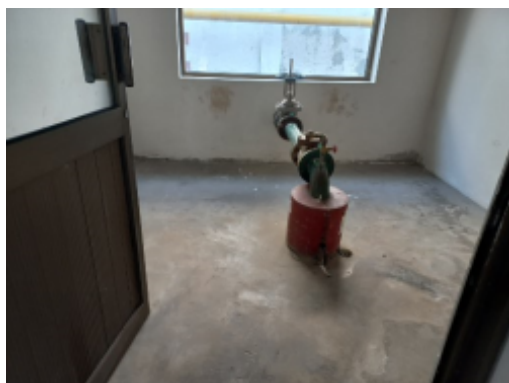
Effluent Treatment plant at site.jpg



Washrooms.jpg



Stakeholder Interview (EPA).jpeg



Deep well at site.jpg



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Chemical Storage.jpg



Overhead water tank 2.jpg



Oil Storage.jpg



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Community Water Filtration Plant MM3.jpg



Over Head Water Tank 1.jpg



Storm Water Wanks and Infiltration wells.jpg



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Chemical Storage at MO.jpg