

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)



Audit Number: AO-000472

SITE DETAILS

Site: **BAT Vietnam - Vinataba, Bien Hoa**
Address: Long Binh Ward,, 810000, Bien Hoa, VIETNAM
Contact Person: Hoang Phuc Le
AWS Reference Number: AWS-000530
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: Rizwan Masood
Audit team participants:
Que Anh Vu

Site Participants:
Hoang Phuc Le, Head of Technical
Vinh Hung Nguyen, Facility Officer
Nam Son Duong, EHS Officer

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ADDITIONAL INFO

Summary of Audit Findings: A total of 47 findings were raised during the certification audit: 21 major non-conformities, 18 minor non-conformities, and 8 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 20 May 2023.

The major non-conformities must be sufficiently addressed and evidence submitted to WSAS within 90 days of receipt of the report by 20 June 2023. A follow-up remote assessment will be required to review and close out these 21 major non-conformities due to their volume and nature. The site will be required to contact WSAS within the 90 days to schedule a one-day remote assessment.

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

The audit team recommends certification of BAT- Vinataba (JV) factory, Bien Hoa at Core level pending approval of the corrective actions plan and closure of the major non-conformities at the follow-up assessment.

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- Vinataba (JV) factory, Bien Hoa against the AWS International Water Stewardship Standard Version 2.

BAT- Vinataba (JV) factory is located at Bien Hoa in Đồng Nai Province, Vietnam. It is a cigarette manufacturing plant which has mainly two processes: primary processing of tobacco, and cigarette manufacturing (secondary processing). The site has only one source of water - from the water supply company (i.e. Thien Tan water supply company). Site effluents are treated in onsite effluent treatment plant and major portion is recycled at site.

The audit was conducted onsite on 20 to 22 Dec 2022.

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

FINDINGS

NUMBER OF FINDINGS PER LEVEL

Observation	8
Minor	18
Major	21

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FINDING DETAILS

Finding No:	TNR-003492
Checklist Item No:	1.1.1
Status:	Closed
Finding level:	Major
Due date:	2023-Jun-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">- Site boundaries;- Water-related infrastructure, including piping network, owned or managed by the site or its parent organization;- Any water sources providing water to the site that are owned or managed by the site or its parent organization;- Water service provider (if applicable) and its ultimate water source;- Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies;- Catchment(s) that the site affect(s) and is reliant upon for water.
Findings:	Site has defined its catchment, based on Dong Nai River as it is source and ultimate receiving body. However, the documented catchment area is very small compared to the actual river catchment. Also, site has not documented the site water infrastructure. Site water piping network needs to be documented
Corrective action:	After get advice from Dong Nai environment department, We revised the catchment: the catchment is not only from water supply company to site then to discharge point on Dong Nai river -> the new catchment is Bien Hoa city catchment which is one of smaller catchment of Dong Nai catchment.
Evidence of implementation:	Site has presented revised catchment description and maps. Also documented water infrastructure for fresh water, waste water and rain water.

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Finding No:	TNR-003495
Checklist Item No:	1.2.1
Status:	Closed
Finding level:	Major
Due date:	2023-Jun-20
Checklist item:	<p>Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall:</p> <ul style="list-style-type: none">- Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people;- Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies;- Provide evidence of stakeholder consultation on water-related interests and challenges;- Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups;- Identify the degree of stakeholder engagement based on their level of interest and influence.
Findings:	<p>The site has not identified water governance bodies, owner of IWRAs in the catchment or regulatory bodies as stakeholders, or other stakeholders representative of the site's ultimate water source and ultimate receiving water body or bodies. The provider of water is also not identified as a stakeholder. The site has also not engaged with these categories of stakeholders. Water challenges of stakeholders are not identified. There is no evidence that stakeholders were consulted on water-related challenges.</p>
Corrective action:	<p>We have added in enough the evidence in the stake holder file. We submitted the evidence before but they are may not clear, so all the evidence file and picture are added in. Water supply stakeholder add in with evidence.</p> <p>Governance bodies as Dong Nai Environment department - Water resource was added in with evidence of approach.</p>
Evidence of implementation:	<p>Site has shared the engagement history of the with highlighted stakeholder.</p>

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Finding No:	TNR-003496
Checklist Item No:	1.2.2
Status:	Closed
Finding level:	Major
Due date:	2023-Jun-20
Checklist item:	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.
Findings:	The degree of influence between the site and stakeholders has not been identified.
Corrective action:	Add one column in stakeholder file 1.2.2 to clarify for the degree of influence stakeholder.
Evidence of implementation:	Site has presented revised stakeholder list with identified degree of influence
Finding No:	TNR-003497
Checklist Item No:	1.3.2
Status:	Closed
Finding level:	Major
Due date:	2023-Jun-20
Checklist item:	Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped
Findings:	The Water map is still not adequately reflecting the actual flows, and the map cannot be confirmed without the documentation on the water piping. Water use for some facilities like fire hydrants is not reflected in the map. The site has a biomass boiler, which has been recently outsourced: the site is not providing water to the boiler but is consuming steam, and that is not adequately reflected in the water balance.
Corrective action:	Make clear the water inflow, water outflow, storage and water loss.
Evidence of implementation:	Revised site water networks map and details of storages provided

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Finding No:	TNR-003498
Checklist Item No:	1.3.3
Status:	Closed
Finding level:	Major
Due date:	2023-Jun-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:	Site Water Balance has been revised a number of times during and after the audit but it is still not adequate and has many ambiguities. The site has documented water balance from Dec 2021 to Nov 2022 but the basis for the quantification is not clear because the site has only water inflow data (from supply company) till May 2022. Only section-wise water volume details are provided but there is no information how they match the monitored water inflows and outflows. The consumption, losses and discharge to a WWTP from each section/process is estimated using percentages, the basis of which are not clear. Documentation on piping is necessary for the evaluation of the site's water balance.
Corrective action:	Make clear the water inflow, water outflow, storage and water loss follow daily water using with data in 2022
Evidence of implementation:	Site has presented revised water balance
Finding No:	TNR-003508
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 has not accurately identified the important water related areas, and instead explained important water related infrastructure.
Corrective action:	Site IWRAs or relevant justification will be documented.

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Finding No: TNR-003509
Checklist Item No: 1.4.1
Status: Closed
Finding level: Major
Due date: 2023-Jun-20
Checklist item: The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be identified.
Findings: The site has not compiled any information/ data about embedded water use when it is clearly applicable to the site (a key supplier is a neighbour). Instead, the site has split its water consumption into production and non-production water.
Corrective action: Identified the embedded water usage of the site.
Evidence of implementation: Details of primary inputs and embedded water

Finding No: TNR-003510
Checklist Item No: 1.4.2
Status: Closed
Finding level: Major
Due date: 2023-Jun-20
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 compiled any information/ data about embedded water use. Instead, site has split its water consumption in production and not production water.
Corrective action: Identify the embed water of the site
Evidence of implementation: Site has shared water consumption details for outsourced biomass boiler

Finding No: TNR-002641
Checklist Item No: 1.5.1
Status: Closed
Finding level: Major
Due date: 2023-Jun-20
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 has not engaged with any regulatory or catchment-related stakeholders and has not collected information on catchment water governance initiatives.
Corrective action: Site have engaged Dong Nai water resource department and peoples committees to identified the governance initiatives.
Evidence of implementation: List of governance initiatives including 3 projects

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Finding No:	TNR-002640
Checklist Item No:	1.5.3
Status:	Closed
Finding level:	Major
Due date:	2023-Jun-20
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 compiled a catchment water balance. Also as mentioned in 1.1.1 the defined catchment area needs to be reviewed.
Corrective action:	The documents for water balance were attached but they was not identif clearly. So We make separately file for Catchment water balance with clear number.
Evidence of implementation:	Site has presented revised water balance
Finding No:	TNR-003675
Checklist Item No:	1.5.4
Status:	Open
Finding level:	Observation
Checklist item:	Water quality, including physical, chemical, and biological status, of the catchment shall be identified, and where possible, quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be identified.
Findings:	The report presented as evidence indicates there are water-related challenges in the river, therefore the site will need to understand annual, and where appropriate, seasonal, high and low variances. Interviewed stakeholders mentioned groundwater quality issues, indicating groundwater quality also needs to be identified.
Finding No:	TNR-003523
Checklist Item No:	1.5.5
Status:	Open
Finding level:	Observation
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 identified only the Don Nai river as important water related area in the catchment. The site needs to explore further important water related areas in the catchment with economic, cultural, social and ecological importance.

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Finding No: TNR-002639
Checklist Item No: 1.5.7
Status: Closed
Finding level: Major
Due date: 2023-Jun-20
Checklist item: The adequacy of available WASH services within the catchment shall be identified.
Findings: The site has not identified the status/ adequacy of WASH services in the catchment.
Corrective action: Checking with Dong Nai clinic to have information about WASH service in catchment
Evidence of implementation: WASH status report for Bien Hoa City

Finding No: TNR-003524
Checklist Item No: 1.6.1
Status: Closed
Finding level: Major
Due date: 2023-Jun-20
Checklist item: Shared water challenges shall be identified and prioritized from the information gathered.
Findings: The site has not identified the shared water challenges adequately. Only water quality and water quantity are defined as shared water challenges with almost no further elaboration. Also, there is no evidence that stakeholders were consulted for identification of shared water challenges
Corrective action: We have summary all shared water challenge regarding to water quality, water quantity, IWRA & WASH in the file 1.6.1. All the evidence that challenge feed back from stakeholder are clearly mention in file 1.2.1. The feed back from all stakeholder are they have shortage of supply in Peak hour due to the supply system is lower the demand in the peak hour when have so many people use water at the same time
Evidence of implementation: List of revised shared water challenges and evidence of stakeholder engagement has been provided

Finding No: TNR-003525
Checklist Item No: 1.6.2
Status: Closed
Finding level: Major
Due date: 2023-Jun-20
Checklist item: Initiatives to address shared water challenges shall be identified.
Findings: The site has not identified initiatives to address shared water challenges.
Corrective action: The initiative to mitigate shared water challenge are enlisted now.
Evidence of implementation: List of initiatives

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Finding No:	TNR-003671
Checklist Item No:	1.7.1
Status:	Open
Finding level:	Observation
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 given timeframe for which likelihood and severity were assessed, should be indicated.
Finding No:	TNR-003526
Checklist Item No:	1.7.2
Status:	Open
Finding level:	Observation
Checklist item:	Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.
Findings:	The site has identified the water related opportunities and actions to address these opportunities. However, the prioritization and potential benefits are not identified.
Finding No:	TNR-003527
Checklist Item No:	1.8.1
Status:	Closed
Finding level:	Major
Due date:	2023-Jun-20
Checklist item:	Relevant catchment best practice for water governance shall be identified
Findings:	The site has not identified any best practice for better water governance.
Corrective action:	We have given the Enercon project - that the evidence for best practice for water governance. The file have been submit in previous audit but the evidence has been upload to wrong category 1.8.2 - best practice for water balance
Evidence of implementation:	Site shared plans to participate catchment best practices in 2023.

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Finding No: TNR-003528
Checklist Item No: 1.8.2
Status: Closed
Finding level: Major
Due date: 2023-Jun-20
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 improvement.
Corrective action: We have give two best practice regarding to water saving: Rain water collecting and recycle water for air scrubber machine. The file have been submit in previous audit but the evidence has been upload to wrong category 1.8.1 - best practice for water governance
Evidence of implementation: Site shared afforestation and rain water harvesting project details.

Finding No: TNR-003529
Checklist Item No: 1.8.3
Status: Closed
Finding level: Major
Due date: 2023-Jun-20
Checklist item: Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.
Findings: The site has not identified any best practice for water quality in the catchment.
Corrective action: Summary of sector and catchment best practise related to water quality enlisted.
Evidence of implementation: Summary of best practise related to water quality

Finding No: TNR-003530
Checklist Item No: 1.8.4
Status: Closed
Finding level: Major
Due date: 2023-Jun-20
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 Important Water-Related Areas.
Corrective action: Site has identified waste collection and afforestation activities as best practices
Evidence of implementation: Site has identified waste collection and afforestation activities as best practices

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Finding No:	TNR-003672
Checklist Item No:	1.8.5
Status:	Open
Finding level:	Observation
Checklist item:	Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.
Findings:	Identification of best practices on WASH may be needed once the adequacy of WASH at the catchment is identified.
Finding No:	TNR-003531
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">- That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes- That the site implementation will be aligned to and in support of existing catchment sustainability plans- That the site's stakeholders will be engaged in an open and transparent way- That the site will allocate resources to implement the Standard.
Findings:	The site water stewardship commitment statement has not been disclosed publicly.
Corrective action:	"Public the statement on the company website. Design the communication board on Company gate"
Finding No:	TNR-002588
Checklist Item No:	2.3.1
Status:	Closed
Finding level:	Minor
Due date:	2023-Dec-22
Checklist item:	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.
Findings:	The site has not identified/documented its water stewardship strategy.
Corrective action:	Site water stewardship strategy will be documented.

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Finding No:	TNR-002589
Checklist Item No:	2.3.2
Status:	Closed
Finding level:	Major
Due date:	2023-Jun-20
Checklist item:	A water stewardship plan shall be identified, including for each target: <ul style="list-style-type: none">- How it will be measured and monitored- Actions to achieve and maintain (or exceed) it- Planned timeframes to achieve it- Financial budgets allocated for actions- Positions of persons responsible for actions and achieving targets- Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.
Findings:	Water stewardship plan includes mostly completed projects and some are old, i.e. from 2015-16. Also, only action items have been documented in the identified WSP, with no target. Also, the WSP has no connection with shared water challenges.
Corrective action:	Make clear AWS plan with link to water challenge with target and status
Evidence of implementation:	Site has presented revised water stewardship plan
Finding No:	TNR-003532
Checklist Item No:	2.4.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Dec-20
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 site has not presented any plans or initiatives on risk mitigation or adaptation developed in co-ordination with relevant public-sector and infrastructure agencies, despite having shared infrastructure.
Corrective action:	Build separate contingency plan for water supply and water discharge. Risk of flooding on the site if heavy rain

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Finding No:	TNR-002590
Checklist Item No:	3.1.1
Status:	Closed
Finding level:	Major
Due date:	2023-Jun-20
Checklist item:	Evidence that the site has supported good catchment governance shall be identified.
Findings:	The site has not participated in any catchment water governance initiatives.
Corrective action:	We have 3 activities to support catchment and also in plan for 2023 and further year. I will summary for all in excel file and attached the evidence for every activities
Evidence of implementation:	Site has engaged water governance bodies in the catchment and planne activities to be performed in 2023.
Finding No:	TNR-003533
Checklist Item No:	3.1.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Dec-20
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:	During the stakeholder's interviews it has been noted that catchment has a shortage of water supply and in peak hours water supply is not sufficient. This is because of rapid increase in demand due to industrialization. However, the site has not investigated if its operations impinge on the water rights of indigenous people.
Corrective action:	Together with Legal, build a program to support community about water infrastructure
Finding No:	TNR-003535
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 site's water stewardship plan does not include any targets for improvement of water balance.
Corrective action:	Add clear target for AWS plan

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Finding No:	TNR-003536
Checklist Item No:	3.5.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Dec-20
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 has not accurately identified the important water related areas, and instead explained important water related infrastructure. Consequently, the maintenance of IWRAs was not considered.
Corrective action:	We will check and revised IWRA
Finding No:	TNR-003548
Checklist Item No:	3.6.2
Status:	Open
Finding level:	Observation
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:	During the stakeholder interviews it has been noted that the catchment has a shortage of water supply and in peak hours water supply is not sufficient. This is because of rapid increase in demand due to industrialization. However, site has not investigated if its operations are impinging on the water rights of indigenous people.
Finding No:	TNR-003549
Checklist Item No:	3.7.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Dec-20
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 has not compiled any information/ data about embedded water use and no targets were set for indirect water use in water stewardship plan although indirect water use is clearly applicable to the site.
Corrective action:	Indirect water use targets will be set in water stewardship plan

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Finding No: TNR-003550
Checklist Item No: 3.7.2
Status: Closed
Finding level: Major
Due date: 2023-Jun-20
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 has not provided evidence of engagement with suppliers and services providers related to indirect water use.
Corrective action: We have engage to Hoa viet, Farmer and contractor for AWS plan and strategic.
Evidence of implementation: Evidence of engagement with stakeholders

Finding No: TNR-003551
Checklist Item No: 3.8.1
Status: Open
Finding level: Observation
Checklist item: Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.
Findings: The site has organized only one seminar to engage stakeholders, including owners of shared water infrastructure. The seminar was held ju weeks before the audit and focused on making stakeholders aware about the site's water management initiatives and site's intention to obtain AWS certification. Any other evidence of engagement was not shared.

Finding No: TNR-003552
Checklist Item No: 3.9.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Dec-20
Checklist item: Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.
Findings: The site has not participated in any governance initiative.
Corrective action: The site will give action on participated in governance initiative.

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Finding No: TNR-003553
Checklist Item No: 3.9.3
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Dec-20
Checklist item: Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.
Findings: Site has not participated/presented in any catchment water quality relate initiative or best practice for better water quality.
Corrective action: Site will set action in catchment water quality related initiative or best practice for better water quality.

Finding No: TNR-003554
Checklist Item No: 3.9.4
Status: Closed
Finding level: Major
Due date: 2023-Jun-20
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 site has not participated/presented in any catchment IWRA related initiative or best practice for improvement of IWRAs.
Corrective action: BAT have one project of afforestation to protect water source for Dong N catchment
Evidence of implementation: afforestation project details

Finding No: TNR-003555
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: Only actions have been documented in the identified WSP, with no targets set, against which achievement might be evaluated. The evaluation sheet only includes action items and their completion status.
Corrective action: Build again the AWS plan with clear target, action and evaluation measurement.

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Finding No:	TNR-003556
Checklist Item No:	4.1.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Dec-20
Checklist item:	Value creation resulting from the water stewardship plan shall be evaluated.
Findings:	The site has presented a document showing some evaluation of the value creation from part of the water stewardship plan, but that has no time frame over which these value creations have been calculated nor elaboration on calculations of value creation.
Corrective action:	Build again the AWS plan with clear target, action and evaluation measurement.
Finding No:	TNR-003557
Checklist Item No:	4.1.3
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Dec-20
Checklist item:	The shared value benefits in the catchment shall be identified and where applicable, quantified.
Findings:	As mentioned in 2.3.2, the site's water stewardship plan has no connection with shared water challenges. No initiative related to catchment water related challenges is part of the site's water stewardship plan. Therefore, shared value benefits are not identified/quantified.
Corrective action:	Build again the AWS plan with clear target, action and evaluation measurement link to share water challenge
Finding No:	TNR-003558
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:	No evidence of consultation with stakeholders on the water stewardship performance was provided during the audit.
Corrective action:	Consultation with stakeholders on the water stewardship performance in new year approach

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Finding No:	TNR-003559
Checklist Item No:	4.4.1
Status:	Open
Finding level:	Observation
Checklist item:	The site's water stewardship plan shall be modified and adapted to incorporate any relevant information and lessons learned from the evaluations in this step and these changes shall be identified.
Findings:	The site has produced the first iteration of its water stewardship plan, and there are issues with its evaluation, as explained in earlier indicators. No modification was done yet.
Finding No:	TNR-003560
Checklist Item No:	5.1.1
Status:	Closed
Finding level:	Major
Due date:	2023-Jun-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 site has not disclosed water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations.
Corrective action:	Site has published its internal water governance on company website at https://www.batvietnam.com/group/sites/BAT_9VJH58.nsf/vwPagesWebve/DO9VJEEM?opendocument
Evidence of implementation:	evidence file has been added
Finding No:	TNR-003561
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:	No evidence of communication of water stewardship plan to stakeholder: was provided during the audit.
Corrective action:	Communicate AWS plan to stakeholder clearer in next Seminar

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Alliance for Water Stewardship (AWS)

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Finding No:	TNR-003562
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:	Site has not disclosed summary of water stewardship performance.
Corrective action:	We performance of AWS have been shared in our ESG report. That is the way to communicate to stakeholder and external
Finding No:	TNR-003563
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:	As mentioned in 1.6.1, shared water related challenges have not been adequately identified. Also the identified shared water related challenges have not been disclosed.
Corrective action:	Share water challenge have been make clear on file 1.6.1
Finding No:	TNR-003564
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 engagement with stakeholders was focused on information sharing of site water management initiatives and intention to get AWS certification. No evidence of collaborative efforts with stakeholders to address shared water challenges was provided by the site.
Corrective action:	Organize new seminar in 2022 to have better approach to stakeholder

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Audit Number: AO-000472

Report Details

Report	Value
Report prepared by	Rizwan Masood
Report approved by	Neringa Pumputyte
Report approved on (Date)	31 March 2023

Surveillance

Proposed date for next audit
2023-Dec-19

Comment Annual surveillance audit recommended.

Stakeholder Announcements

Date of publication	Location
21/11/2022	Company Website (https://www.batvietnam.com/group/sites/BAT_9VJH58.nsf/vwPagesWebLi ve/DO9VJEEM)
07/12/2022	Seminar on AWS (stakeholders and public invited)
Comment	Stakeholder announcement was published on AWS and WSAS websites 30 days before the audit. Site has also published the stakeholder announcement on its website.

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Alliance for Water Stewardship (AWS)

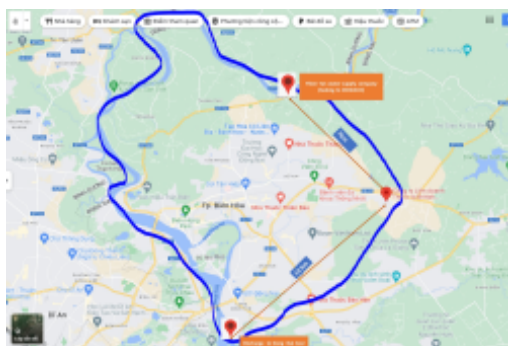
Audit Number: AO-000472

Catchment Information

Catchment Information

The site sources its water from Thien Tan water supply company, which take water from Dong Nai river and supply it after treatment. The site has an onsite wastewater treatment plant, and a portion of its treated water is recycled at the site. The treated effluent is discharged to Ba Lua stream that links to Chua stream and eventually reaches to the same Dong Nai river (downstream).

The site has defined Dong Nai River catchment as the relevant catchment as it is both the source and the ultimate receiving body. Total area of Dong Nai catchment is 38,600 km². The river go through many provinces (9 provinces) and Dong Nai province belong to middle stream and end stream of Dong Nai river. Dong Nai catchment are divided to 7 smaller sub-catchments, Bien Hoa City is one of sub-catchment of Dong Nai catchment. So the factory is located in Bien Hoa City, it belong to Bien Hoa city catchment.



Catchment Map (Vintaba).jpg



Dong_Nai_catchment_boundary.png

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Client Description and Site Details

Client/Site Background

BAT- Vinataba (JV) factory is located at Bien Hoa in Đồng Nai Province, Vietnam. It is a cigarette manufacturing plant which has mainly two processes: primary processing of tobacco, and cigarette manufacturing (secondary processing). The site has only one source of water - from water supply company (i.e. Thien Tan water supply company). Site effluent is treated in an onsite effluent treatment plant and major portion of the treated effluent is recycled at the site.

The site has a total area around 60,000 m2 and 175 employees work here in shifts.

Summary of Shared Water Challenges

Summary of Shared Water Challenges

The site has identified the shared water challenges after consultation with stakeholders.

The identified challenges includes;

- Low water pressure/ water shortage of local supply in peak hours
- Surface and ground water pollutions
- Illegal extraction of ground water
- Deforestation in the catchment

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

0.1.1 Eligibility Criteria

0.1.1.1 The site(s) occupy one catchment OR an exception has been granted.



Yes

0.1.1.2 The scope of the proposed certification shall be under the control of a single management system.



Yes

0.1.1.3 The scope of the proposed certification shall be homogeneous with respect to primary production system, water management, product or service range, and the main market structures.



Yes

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1 STEP 1: GATHER AND UNDERSTAND

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

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

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



closed

Comment The site has documented the factory layout, source of water, and effluent discharge. The site sources its water from Thien Tan water supply company, which takes water from Dong Nai river and supplies it after treatment. The site has an onsite wastewater treatment plant and a portion of its treated water is recycled at the site. The treated effluent is discharged to Ba Lua stream that links to Chua stream and eventually reaches to the same Dong Nai river (downstream). The site has defined its catchment based on Dong Nai River as it is source and ultimate receiving body. However, the documented catchment area is very small compared to the actual river basin. The site has not documented the site water infrastructure. Site water piping network needs to be documented.

Finding No: TNR-003492

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.



closed

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Comment The site has identified most stakeholders based on the principle of being located in close vicinity. Identified stakeholders include local community, army barracks and neighboring industries. However, the site has not identified water governance bodies, owner of IWRAs in the catchment or regulatory bodies as stakeholders, or other stakeholders representative of the site's ultimate water source and ultimate receiving water body or bodies. The provider of water is also not identified as a stakeholder. The site has also not engaged with these categories of stakeholders. Water challenges of stakeholders are not identified. There is no evidence that stakeholders were consulted on water-related challenges.

Finding No: TNR-003495

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.* ✓
closed

Comment As mentioned in 1.2.1, the site has not identified stakeholders adequately. The most influential stakeholders like water related governance bodies, regulatory bodies, water related service providers etc were not included in stakeholders list. Also, the degree of influence between the site and currently identified stakeholders has not been identified.

Finding No: TNR-003496

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

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

Comment The site has identified water related incidents (potential scenarios), these include fuels/ chemical spillages, site water supply cutoff, and failure of wastewater treatment plant. Response to these incidents/ scenarios is documented in Emergency Response Plan and Manufacturing Recovery Plan (attached).

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

Comment Site Water Mapping and Water Balance were revised a number of times during and after the audit but it is still not adequately reflecting the actual flows and there are many ambiguities. As the site has not provided documentation on the water piping, the mapping cannot be properly evaluated. Water use for some facilities like fire hydrants is not reflected in the map. The site has a biomass boiler, which has been recently outsourced: the site is not providing water to the boiler but is consuming steam, and that is not adequately reflected in the water balance.

Finding No: TNR-003497

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.* ✓
closed

Comment Site Water Balance has been revised a number of times during and after the audit but it is still not adequate and has many ambiguities. The site has documented water balance from Dec 2021 to Nov 2022 but the basis for the quantification is not clear because the site has only water inflow data (from supply company) till May 2022. Only section-wise water volume details are provided but there is no information how they match the monitored water inflows and outflows, and the consumption, losses and discharge to a WWTP from each section/process is estimated using percentages, the basis of which are not clear. Documentation on piping is necessary for the evaluation of the site's water balance.

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Finding No: TNR-003498

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

Comment The site is monitoring quality of its water source (i.e. local water supply), effluent, and drinking water. Raw water and effluent quality is monitored quarterly through authorized bodies. Drinking water is sourced through a supplier, who also submits drinking water quality report on a monthly basis. The site also tests its drinking water quality on a quarterly basis. Last reports are attached.
The site has also presented the Surface water monitoring report of Dong Nai province published in 2019. This report covers the physical, chemical and biological characteristics of surface water in the catchment.

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

Comment Site has identified the potential sources of pollution at the site as follow:

1. Oil cooker from canteen
2. Import oil areas
3. IC collect WW From production
4. Sewage from Lab room

These are mapped on the site layout (attached). The arrangement to prevent contamination/ pollution includes secondary containments, spillage kits and training of employees.

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

Comment The site has not accurately identified the onsite important water related areas, and instead explained important water related infrastructure.

Finding No: TNR-003508

1.3.7 *Annual water-related costs, revenues, and a description or quantification of the social, cultural, environmental, or economic water-related value generated by the site shall be identified and used to inform the evaluation of the plan in 4.1.2.* ✔
Yes

Comment The site has summarized the water related costs for year 2021-22. This includes water supply bills, maintenance of water related infrastructure, and cost of quality monitoring. The site has not generated any water related revenue.






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

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

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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>	 closed
Comment	The site has not compiled any information/ data about embedded water use when it is clearly applicable to the site (a key supplier is a neighbour). Instead, the site has split its water consumption into production and non-production water.	
		Finding No: TNR-003509
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>	 closed
Comment	The site has not compiled any information/ data about embedded water use. Instead, the site has split its water consumption into production and non-production water.	
		Finding No: TNR-003510
1.5	<i>Gather water-related data for the catchment, including water governance, water balance, water quality, Important Water-Related Areas, infrastructure, and WASH</i>	
1.5.1	<i>Water governance initiatives shall be identified, including catchment plan(s), water-related public policies, major publicly-led initiatives under way, and relevant goals to help inform site of possible opportunities for water stewardship collective action.</i>	 closed
Comment	The site has not provided any relevant information for this indicator. As part of documentation for the indicator 1.5.6, the site uploaded 'Approved water supply plan in Dong Nai Province to 20202 and vision to 2050', which would be relevant for this indicator. However, overall the site has not engaged with any regulatory or catchment-related stakeholders and has not collected information on catchment water governance initiatives. The water stewardship plan also does not include any initiative related to water governance.	
		Finding No: TNR-002641
1.5.2	<i>Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.</i>	 Yes
Comment	The site has identified water related legal and regulatory requirements in "Regulation for water management" and "Compliance matrix for Environment". The site has obtained all necessary licenses related to water sourcing and disposal.	
1.5.3	<i>The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.</i>	 closed
Comment	Site has not compiled a catchment water balance. Some random reports were shared during the audit, but catchment water balance has not been documented. Also as mentioned in 1.1.1 the defined catchment area needs to be reviewed.	
		Finding No: TNR-002640

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1.5.4	<i>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.</i>	 Obs.
Comment	The site has presented the Surface water monitoring report of Dong Nai province published in 2019. This report covers the physical, chemical and biological characteristics of surface water in the catchment.	
1.5.5	<i>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.</i>	 Obs.
Comment	The site has identified only the Don Nai river as important water related area in the catchment. The site needs to explore further important water related areas in the catchment with economic, cultural, social and ecological importance.	
1.5.6	<i>Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.</i>	 Yes
Comment	Site has identified the catchment water supply infrastructure. This includes the supply plan for the catchment, facility details, and capacities in Dong Nai province.	
1.5.7	<i>The adequacy of available WASH services within the catchment shall be identified.</i>	 closed
Comment	The site has not identified the status/ adequacy of WASH services in the catchment Finding No: TNR-002639	
1.6	<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>	
1.6.1	<i>Shared water challenges shall be identified and prioritized from the information gathered.</i>	 closed
Comment	The site has only identified the water related risks and challenges faced by the site itself (as required in 1.7.1). The identification of catchment shared water challenges with consultation of stakeholders is not done yet. Only water quality and water quantity are defined as shared water challenges with almost no further elaboration. Finding No: TNR-003524	
1.6.2	<i>Initiatives to address shared water challenges shall be identified.</i>	 closed
Comment	As mentioned in 1.6.1, the site has not identified the shared water challenges adequately. Consequently, the initiatives to address shared water challenges are not identified. Finding No: TNR-003525	
1.7	<i>Understand the site's water risks and opportunities: Assess and prioritize the water risks and opportunities affecting the site based upon the status of the site, existing risk management plans and/or the issues and future risk trends identified in 1.6.</i>	

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1.7.1	<i>Water risks faced by the site shall be identified, and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.</i>	 Obs.
Comment	The site has identified the water related risks and challenges faced by the site. These risk cover operational, environmental and compliance related risks. Also, the site has prioritized the risk on the basis of likelihood and severity.	
1.7.2	<i>Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.</i>	 Obs.
Comment	The site has identified the water related opportunities and actions to address these opportunities. However, the prioritization and potential benefits are not identified.	
1.8	<i>Understand best practice towards achieving AWS outcomes: Determining sectoral best practices having a local/catchment, regional, or national relevance.</i>	
1.8.1	<i>Relevant catchment best practice for water governance shall be identified.</i>	 closed
Comment	The site has not identified any best practice for better water governance. Finding No: TNR-003527	
1.8.2	<i>Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.</i>	 closed
Comment	The site has not identified any best practice for water balance improvement. Finding No: TNR-003528	
1.8.3	<i>Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.</i>	 closed
Comment	The site has not identified any best practice for water quality in the catchment. Finding No: TNR-003529	
1.8.4	<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 Important Water-Related Areas. Finding No: TNR-003530	
1.8.5	<i>Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.</i>	 Obs.
Comment	The site has adequate arrangements to ensure access to safe drinking water, sanitation and hygiene (WASH) for all workers, and therefore identification of further best practice for WASH at the site is not necessary at the moment. However, identification of best practices on WASH may be needed once the adequacy of WASH at the catchment is identified (indicator 1.5.7).	

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2	STEP 2: COMMIT & PLAN - Commit to be a responsible water steward and develop a Water Stewardship Plan	
2.1	<i>Commit to water stewardship by having the senior-most manager in charge of water at the site, or if necessary, a suitable individual within the organization head office, sign and publicly disclose a commitment to water stewardship, the implementation of the AWS Standard and achieving its five outcomes, and the allocation of required resources.</i>	
2.1.1	<i>A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:</i> <ul style="list-style-type: none"> - That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes - That the site implementation will be aligned to and in support of existing catchment sustainability plans - That the site's stakeholders will be engaged in an open and transparent way - That the site will allocate resources to implement the Standard. 	 in progress
Comment	The site has recently (15 Nov, 2022) developed water stewardship commitment statement, which is signed by general director. However, the commitment statement was not found to be publicly disclosed.	
Finding No: TNR-003531		
2.2	<i>Develop and document a process to achieve and maintain legal and regulatory compliance.</i>	
2.2.1	<i>The system to maintain compliance obligations for water and wastewater management shall be identified, including:</i> <ul style="list-style-type: none"> - Identification of responsible persons/positions within facility organizational structure - Process for submissions to regulatory agencies. 	 Yes
Comment	The site has identified water related legal and regulatory requirements in "Regulation for water management" and "Compliance matrix for Environment". The site has obtained all necessary licenses related to water sourcing and disposal.	
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>	 closed
Comment	The site has not identified/documented water stewardship strategy.	Finding No: TNR-002588

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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.*



closed

Comment The site has recently started working on AWS and established its first ever water stewardship plan. But water stewardship plan includes mostly completed projects and some are old, i.e. from 2015-16. Also, only action items have been documented in the identified WSP, with no target. Also, the WSP has no connection with shared water challenges.

Finding No: TNR-002589

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

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



in progress

Comment The site has analysed possible control measures at the site for the risks identified at the site level. The site has not presented any plans or initiatives on risk mitigation or adaptation developed in co-ordination with relevant public-sector and infrastructure agencies, despite having shared infrastructure.

Finding No: TNR-003532

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3 STEP 3: IMPLEMENT - Implement the site's stewardship plan and improve impacts	
3.1	Implement plan to participate positively in catchment governance.
3.1.1	Evidence that the site has supported good catchment governance shall be identified. ✔ closed
Comment	The site has not participated in any catchment water governance initiatives. Finding No: TNR-002590
3.1.2	Measures identified to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be implemented. ➤ in progress
Comment	During the stakeholder's interviews it has been noted that catchment has a shortage of water supply and in peak hours water supply is not sufficient. This is because of rapid increase in demand due to industrialization. However, the site has not investigated if its operations impinge on the water rights of indigenous people. Finding No: TNR-003533
3.2	Implement system to comply with water-related legal and regulatory requirements and respect water rights.
3.2.1	A process to verify full legal and regulatory compliance shall be implemented. ✔ Yes
Comment	The site has identified water related legal and regulatory requirements in "Regulation for water management" and "Compliance matrix for Environment". The site has obtained all necessary licenses related to water sourcing and disposal. Effluent quality and water reports show compliance with applicable legal requirements.
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 legally binding requirement is 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. ➤ in progress
Comment	The site's water stewardship plan does not include any targets for improvement of water balance. However, it has been noted that site has improved its water consumption over the years. Finding No: TNR-003535
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	The site's water stewardship plan does not include any targets for improvement of water balance. However, it has been noted that site has improved its water consumption over the years.

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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 legally binding requirement is 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.	 Yes
Comment	The site has not set any specific water quality related targets in its water stewardship plan. The only target is to comply with legal quality limits. The site's water quality monitoring shows legal requirements are met.	
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	See 3.4.1. As the shared water challenges were not adequately identified, there is no information whether there is a shared water challenge on water quality.	
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.	 in progress
Comment	As mentioned in 1.3.6, the site has not accurately identified the important water related areas, and instead explained important water related infrastructure. Consequently, the maintenance of IWRAs is not considered. The site's water related infrastructure was found to be maintained.	
Finding No: TNR-003536		
3.6	Implement plan to provide access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers at all premises under the site's control.	
3.6.1	Evidence of the site's provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers onsite shall be identified and where applicable, quantified.	 Yes
Comment	The site has adequate arrangements to ensure access to safe drinking water, sanitation and hygiene (WASH) for all workers. The site is also using a self-assessment tool for evaluating access to water sanitation and hygiene (WASH) at workplace. It covers the workplace facilities related to water supply, sanitation and hygiene. The site has maintained separate toilets for males and females, and also evaluated the adequacy of number of toilets for each gender. Everyone at site has access to bottled drinking water.	
3.6.2	Evidence that the site is not impinging on the human right to safe water and sanitation of communities through their operations, and that traditional access rights for indigenous and local communities are being respected, and that remedial actions are in place where this is not the case, and that these are effective.	 Obs.

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Comment	There was no evidence observed that would indicate the site operations are impinging on the human right to safe water and sanitation of communities. But during the stakeholder interviews it has been noted that catchment has a shortage of water supply and in peak hours water supply is not sufficient. This is because of rapid increase in demand due to industrialization. However, site has not investigated if its operations are impinging on the water rights of indigenous people.	
3.7	<i>Implement plan to maintain or improve indirect water use within the catchment:</i>	
3.7.1	<i>Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.</i>	 in progress
Comment	The site has not compiled any information/ data about embedded water use and no targets were set for indirect water use in water stewardship plan although indirect water use is clearly applicable to the site.	
		Finding No: TNR-003549
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>	 closed
Comment	The site has not provided evidence of engagement with suppliers and services providers related to indirect water use.	
		Finding No: TNR-003550
3.8	<i>Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have.</i>	
3.8.1	<i>Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.</i>	 Obs.
Comment	The site has organized only one seminar to engage stakeholders, including owners of shared water infrastructure. The seminar was held just weeks before the audit and focused on making stakeholders aware about the site's water management initiatives and site's intention to obtain AWS certification. Any other evidence of engagement was not shared.	
3.9	<i>Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.</i>	
3.9.1	<i>Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.</i>	 in progress
Comment	The site has not participated in any governance initiative.	
		Finding No: TNR-003552
3.9.2	<i>Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.</i>	 Yes
Comment	The site has implemented some best practices on site to reduce water consumption. These include: - Treated effluent recycling for gardening and in Air Scrubber - Rainwater harvesting for the use in Air Scrubber	
3.9.3	<i>Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.</i>	 in progress

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Comment	The site has not participated/presented in any catchment water quality related initiative or best practice for better water quality.	
		Finding No: TNR-003553
3.9.4	<i>Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.</i>	<div><div>✔</div><div>closed</div></div>
Comment	The site has not participated/presented in any catchment IWRA related initiative or best practice for improvement of IWRAs.	
		Finding No: TNR-003554
3.9.5	<i>Actions towards achieving best practice related to targets in terms of WASH shall be implemented.</i>	<div><div>✔</div><div>Yes</div></div>
Comment	As indicated earlier in the report, the site has adequate arrangements to ensure access to safe drinking water, sanitation and hygiene (WASH) for all workers.	

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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> in progress 
Comment	As mentioned in 2.3.2, the site has recently started working on AWS and established its first ever water stewardship plan. But water stewardship evaluation includes mostly completed projects and some are old, i.e. from 2015-16. Also, only actions have been documented in the identified WSP, with no targets set, against which achievement might be evaluated. The evaluation sheet only includes action items and their completion status. Finding No: TNR-003555
4.1.2	<i>Value creation resulting from the water stewardship plan shall be evaluated.</i> in progress 
Comment	The site has presented a document showing some evaluation of the value creation from part of the water stewardship plan, but that has no time frame over which these value creations have been calculated nor elaboration on calculations of value creation. Finding No: TNR-003556
4.1.3	<i>The shared value benefits in the catchment shall be identified and where applicable, quantified.</i> in progress 
Comment	As mentioned in 2.3.2, the site's water stewardship plan has no connection with shared water challenges. No initiative related to catchment water related challenges is part of the site's water stewardship plan. Therefore, shared value benefits are not identified/quantified. Finding No: TNR-003557
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> Yes 
Comment	The site representative explained that no real time water related emergency incident or extreme event occurred, hence no such evaluation was needed.
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> in progress 

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Comment The site has not engaged/ consulted stakeholders on water stewardship performance. The site has organized only one seminar to engage stakeholders. The seminar was held just weeks before the audit and focused on making stakeholders aware about the site's water management initiatives and site's intention to obtain AWS certification. No evidence of consultation with stakeholders on the water stewardship performance was provided during the audit. Finding No: TNR-003558

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

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

Comment The site has produced the first iteration of its water stewardship plan, and there are issues with its evaluation, as explained in earlier indicators. No modification was done yet.

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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. ✔ closed
Comment	The site has not disclosed water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations. Finding No: TNR-003560
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	Site has only organized only a seminar to make stakeholders aware about site's water management initiatives and its intention to get AWS certification. No evidence of communication of water stewardship plan to stakeholders was provided during the audit. Finding No: TNR-003561
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	The site has not disclosed a summary of water stewardship performance. Finding No: TNR-003562
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. ➤ in progress
Comment	As mentioned in 1.6.1, shared water related challenges have not been adequately identified. Also the identified shared water related challenges have not been disclosed. Finding No: TNR-003563
5.4.2	Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified. ➤ in progress
Comment	The engagement with stakeholders was focused on information sharing on site water management initiatives and intention to get AWS certification. No evidence of collaborative efforts with stakeholders to address shared water challenges was provided by the site. Finding No: TNR-003564

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5.5	<i>Communicate transparency in water-related compliance: make any site water-related compliance violations available upon request as well as any corrective actions the site has taken to prevent future occurrences.</i>	
5.5.1	<i>Any site water-related compliance violations and associated corrections shall be disclosed.</i>	 Yes
Comment	The site has confirmed that no water related violation has occurred in the recent past.	
5.5.2	<i>Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.</i>	 Yes
Comment	The site has confirmed that no water related violation has occurred in the recent past.	
5.5.3	<i>Any site water-related violation that may pose significant risk and threat to human or ecosystem health shall be immediately communicated to relevant public agencies and disclosed.</i>	 Yes
Comment	The site has confirmed that no water related violation has occurred in the recent past.	

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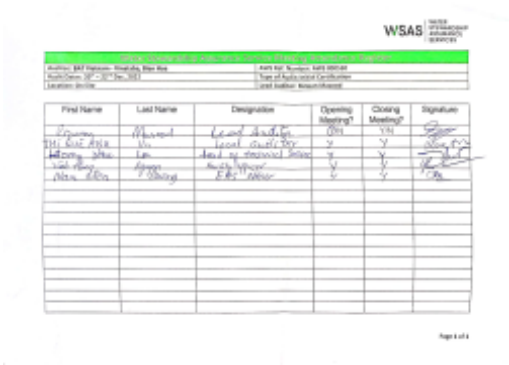
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Photographic Evidence from Audit

☒

Yes



Attendance.jpg



Fire Hydrant Water Storage.jpg

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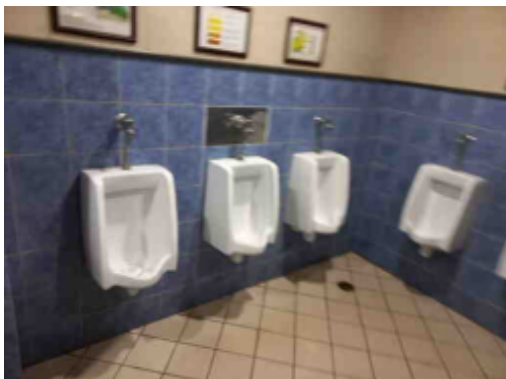
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WWTP 1.jpg



WASH 1.jpg



WASH 2.jpg

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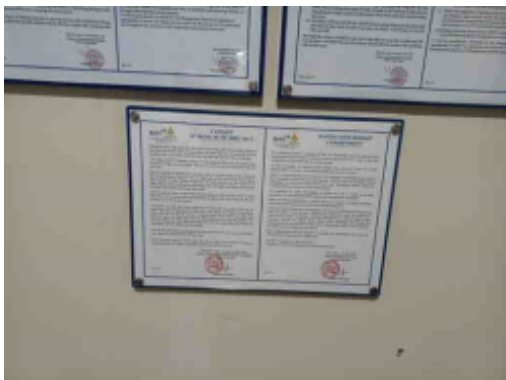
Rain Water Harvesting Tank.jpg



WWTP.jpg



Biomass Boiler (out sourced).jpg



WSAS

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AWS Commitment Displayed.jpg



Spillage kit 1.jpg



Spillage kit 2.jpg



Air Scrubber.jpg

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Fuel storage.jpg



WASH.jpg



Water Supply Meter.jpg



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Chemical storage.jpg