

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)



Audit Number: AO-000606

SITE DETAILS

Site: **BAT Bangladesh Savar Factory - Dhaka**
Address: Mozarmill, Sripur, Ashulia,, 1349, Dhaka, BANGLADESH
Contact Person: Md Mahmudul Alam
AWS Reference Number: AWS-000517
Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Core
Date of certification decision: 2023-Nov-14
Validity of certificate: 2026-Nov-14

AUDIT DETAILS

Audited Service(s): AWS Standard v2.0 (2019)
Audit Type(s): Initial Audit
Audit Start Date: 2023-Jul-10
Lead Auditor: Amit Singh
Audit team participants:
AMIT KUMAR SINGH, Lead Auditor
Site Participants:
FAHIM AHMED, Sustainability Manager
ZUBAIR MAHMUD, Engineering & Site Services Manager
NABIDUL ALAM, Utilities Process Lead
RAWHA MIKDAD, Sustainability Officer
RUMANA SHARMIN, Commercial Sustainability Manager
JASARAT AL ATUN, Area Sustainability Manager
Md. MAHMUDUL ALAM, Facilities Manager

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000606

ADDITIONAL INFO

Summary of Audit Findings: A total of 35 findings were raised during the certification audit, 2 major non-conformities, 19 minor non-conformities and 14 observations. The major non-conformities were of sufficient concern to warrant the categorisation of the non-conformity as major and related to incorrect catchment identification.

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 12/11/2023.

The major non-conformities must be sufficiently addressed and evidence submitted to WSAS within 90 days of receipt of the report 12/12/2023.

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

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

CLOSURE OF FINDINGS AND CORRECTIVE ACTION PLAN:

The Client has successfully resolved the major non-conformity and submitted the corrective action plan addressing all findings.

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

Scope of Assessment: The scope of services covers the Initial certification audit for assessing conformity of BAT Bangladesh SAVAR Factory against the AWS International Water Stewardship Standard Version 2.

BAT Bangladesh/ BATB Savar Factory is a major cigarette manufacturer in Bangladesh. The activities include tobacco cigarettes manufacturing and distribution via a third party, throughout Bangladesh. The plant is located at Dhamsona Union of Savar Upazila of Dhaka District, Bangladesh, which lies around the coordinates 23.75°N 90.25°E. Savar and its surrounding area are located in the Bengal Basin, a large sedimentary basin formed by the convergence of the Indian Plate and the Eurasian Plate. It is situated in the Gangetic-Brahmaputra alluvial plain near the Ganges-Brahmaputra Delta, where the rivers meet the Bay of Bengal.

The audit was conducted onsite on 10th July to 12th July 2023. The onsite site visit included the assessment of Water Treatment facility, Boilers, Effluent treatment Plant, Primary and Secondary Production Division that were visited onsite as part of the audit.

FINDINGS

NUMBER OF FINDINGS PER LEVEL

Observation	14
Minor	19
Major	2

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000606

FINDING DETAILS

Finding No:	TNR-005311
Checklist Item No:	1.1.1
Status:	Closed
Finding level:	Major
Due date:	2023-Dec-10
Checklist item:	<p>The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including:</p> <ul style="list-style-type: none">- Site boundaries;- Water-related infrastructure, including piping network, owned or managed by the site or its parent organization;- Any water sources providing water to the site that are owned or managed by the site or its parent organization;- Water service provider (if applicable) and its ultimate water source;- Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies;- Catchment(s) that the site affect(s) and is reliant upon for water.
Findings:	<p>The ultimate receiving water body of storm water is not mapped in the layout / evidence.</p> <p>Also, site has shown 3 images of storm water discharge points. The location of all these points are not clear.</p> <p>The Catchment(s) that the site affect(s) and is reliant upon for water is not correctly defined because the site does not name the catchment or account for the ultimate source and ultimate discharge or upstream and downstream users in a river basin. It also does not consider the receiving body of storm water from site.</p>
Corrective action:	The Overall response has been shared in the attached documents.
Evidence of implementation:	The Overall response has been shared in the attached documents.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000606

Finding No:	TNR-005312
Checklist Item No:	1.2.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Jul-10
Checklist item:	Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall: <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:	<ul style="list-style-type: none">- The site has not identified vulnerable / women / minority / Indigenous people as stakeholders. The site has not identified relevant government authorities such as Water Development Board and P.H.E. as stakeholders. Engaging with these stakeholders could result in addressing the common issues.
Corrective action:	The site will engage the legal & external affairs team (LEX) to check way forward on identifying vulnerable community groups as stakeholders. The site will explore opportunities to communicate to regional departmental offices of BWDB, LGED etc.
Finding No:	TNR-005532
Checklist Item No:	1.2.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Jul-10
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:	It is not clear whether the site considered the correct site's ultimate water source and ultimate receiving water body for wastewater in stakeholder identification because the catchment definition for the site was incorrect to begin with.
Corrective action:	Necessary explanation on catchment details, ultimate water source, ultimate water receiving body has been provided against TNR-005311

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000606

Finding No:	TNR-005313
Checklist Item No:	1.3.1
Status:	Open
Finding level:	Observation
Checklist item:	Existing water-related incident response plans shall be identified.
Findings:	<p>In the response plan for 3 incidents, it has been identified that the switch room operator will inform the Facilities manager and for 1 incident switch room operator is to be informed.</p> <p>Who and where is the switch room operator and contact details of witch room operator is not defined in the response plan.</p>
Finding No:	TNR-005314
Checklist Item No:	1.3.2
Status:	Closed
Finding level:	Major
Due date:	2023-Dec-10
Checklist item:	Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped
Findings:	<p>The difference in bore well intake and usage has been categorized as line loss. This difference shall also constitute the back washing of filters in Water treatment plant. The water balance is also for 3 months and could be better represented with one year's data. Water through and out of RO is not represented in the map. The line loss is determined through calculation without an understanding of where specific losses are being experienced. The water balance has to be reworked.</p>
Corrective action:	The Overall response has been shared in the attached documents.
Evidence of implementation:	The Overall response has been shared in the attached documents.
Finding No:	TNR-005315
Checklist Item No:	1.3.3
Status:	Open
Finding level:	Observation
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:	<p>The water withdrawal baseline for Savar factory is 19425 m3 for year 2022. However, the target water withdrawal for 2025 is 60550 m3. The same is due to variation in production values. There is no indication of improving processes to reduce withdrawal. It is not clear what the site is doing to address water scarcity which is a shared water challenge.</p>

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000606

Finding No: TNR-005317
Checklist Item No: 1.3.5
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Jul-10
Checklist item: Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.
Findings: The site has not identified the chemicals used or stored at site (such as chemicals used in WTP, WWTP, etc.) as the potential sources of pollution.
Corrective action: These locations potential pollution sources are secured with bunding and spillage retention kit. The site will update the list mentioning existing risk and control measures.

Finding No: TNR-005320
Checklist Item No: 1.4.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Jul-10
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 average water quantity per day for MAST Packaging comes in the tune of 2 to 3 kL/day which seems to be on lower side considering site operations and domestic consumption. The site need to review the water consumption data shared by suppliers to have proper understanding of the embedded water use.
There are no data water quality.
Corrective action: Suppliers water data to be analyzed and actions to be generated for better understanding of their water consumption and improvement areas.

Finding No: TNR-005502
Checklist Item No: 1.4.2
Status: Open
Finding level: Observation
Checklist item: The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.
Findings: The site has identified one of the outsourced service providers, M/s Kashundi within the site's catchment which is involved in catering services for site. The supplier could not provide water consumption data due to non-availability of water meter at their premises.
The initial communication with suppliers was done on 23rd May this year to provide water related data. The site needs to do reasonable and timely efforts to gather the information.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000606

Finding No:	TNR-005324
Checklist Item No:	1.5.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Jul-10
Checklist item:	Water governance initiatives shall be identified, including catchment plan(s), water-related public policies, major publicly-led initiatives under way, and relevant goals to help inform site of possible opportunities for water stewardship collective action.
Findings:	The site need to engage with relevant authorities such as Department of Environment, Bangladesh Water Development Board (BWDB) and Local Government Engineering Department (LGED), etc. for water stewardship collective action. 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 was missing in the evidence provided.
Corrective action:	The site will explore opportunities to communicate to regional departmental offices of BWDB, LGED etc.
Finding No:	TNR-005325
Checklist Item No:	1.5.2
Status:	Open
Finding level:	Observation
Checklist item:	Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.
Findings:	The responsible persons for the various licenses are defined as department for some licenses and individual for some licenses, it is not uniform. Also, the renewal for Environment clearance was due on 20.06.2023 and is under process.
Finding No:	TNR-005533
Checklist Item No:	1.5.3
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Jul-10
Checklist item:	The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.
Findings:	A catchment water-balance has been provided but it is not clear what catchment is represented in the data provided.
Corrective action:	Summary of the catchment water balance to be better represented.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000606

Finding No:	TNR-005459
Checklist Item No:	1.5.5
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Jul-10
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 Important Water-Related Areas identified were only within 7km of the site and not a representation of the entire catchment.
Corrective action:	The site will explore further to check and incorporate feasible important water related area within the catchment.
Finding No:	TNR-005539
Checklist Item No:	1.5.6
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Jul-10
Checklist item:	Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.
Findings:	Existing Infrastructure has been identified, there was no indication of planned infrastructure or whether the infrastructure provided covers the entire catchment or the 7km radius previously proposed.
Corrective action:	The site will explore further to check planned activities by public/private entities.
Finding No:	TNR-005326
Checklist Item No:	1.5.7
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Jul-10
Checklist item:	The adequacy of available WASH services within the catchment shall be identified.
Findings:	The site has captured pictures of some of the WASH facilities at the catchment and Govt. /NGO initiatives in the Savar area. However, the overall scenario of WASH facilities at the catchment is not known because the information about the entire catchment the site falls under was missed.
Corrective action:	The site will further explore if there are other WASH facilities within the catchment area

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000606

Finding No:	TNR-005327
Checklist Item No:	1.6.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Jul-10
Checklist item:	Shared water challenges shall be identified and prioritized from the information gathered.
Findings:	<p>The site has mentioned the challenges as low, medium or high priority. It is required to describe the process by which prioritization was undertaken.</p> <p>The site has identified a no. of stakeholders in the supporting document. But, there no evidence of relevant discussion with the stakeholders such as DOE, BWDB, DPHE.</p>
Corrective action:	The site to mention priority matrix in this section as well along with the stakeholders reference
Finding No:	TNR-005330
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:	<p>The current status is not clear as it is different in the two sheets i) Risk Assessment and ii) Mitigation plan and Actions.</p> <p>In first sheet it is mentioned done / ongoing / planned.</p> <p>In second sheet it is mentioned as ongoing.</p>
Finding No:	TNR-005518
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 four water related opportunities which have not been prioritized.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000606

Finding No:	TNR-005574
Checklist Item No:	2.1.1
Status:	Open
Finding level:	Observation
Checklist item:	<p>A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:</p> <ul style="list-style-type: none">- That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes- That the site implementation will be aligned to and in support of existing catchment sustainability plans- That the site's stakeholders will be engaged in an open and transparent way- That the site will allocate resources to implement the Standard.
Findings:	<p>The site needs to update the policy document as the following commitment is not properly covered in the policy:</p> <ul style="list-style-type: none">- That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes. <p>The following statements are found in the site statement which attempt to do this but not clearly:</p> <p>'Uphold the AWS water Stewardship outcomes(good water governance, sustainable water balance, good water quality status and healthy status of Important Water Related Areas).'</p> <p>'Disclose material on water related information to relevant parties.'</p>
Finding No:	TNR-005334
Checklist Item No:	2.2.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Jul-10
Checklist item:	<p>The system to maintain compliance obligations for water and wastewater management shall be identified, including:</p> <ul style="list-style-type: none">- Identification of responsible persons/positions within facility organizational structure- Process for submissions to regulatory agencies.
Findings:	<p>The responsible persons have been listed but it is not clear what their roles are. Also, the renewal for Environment clearance was due on 20.06.2023 and is under process.</p>
Corrective action:	<p>"Responsible person who deals with the government bodies will be identified.</p> <p>The ECC license renewal has been completed."</p>

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000606

Finding No:	TNR-005385
Checklist Item No:	2.4.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Jul-10
Checklist item:	A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.
Findings:	The requirement of this indicator is to identify a plan (or site's responsiveness and resilience) to respond or mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies. No element of it was prepared in coordination with relevant agencies.
Corrective action:	The plan will be reviewed upon coordination with relevant agencies with evidence of discussion.
Finding No:	TNR-005386
Checklist Item No:	3.1.1
Status:	Open
Finding level:	Observation
Checklist item:	Evidence that the site has supported good catchment governance shall be identified.
Findings:	The site had a meeting with the Chairman, Zila Parishad but there are no details of engagement with relevant government authorities for improved water governance and water management policies. The site needs to engage with the relevant government authorities such as DoE, NWDB, etc.
Finding No:	TNR-005389
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:	After stability in production and water withdrawn by end of 2023, the actual water consumption could be established and the status of water balance targets could be assessed only by next year.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000606

Finding No:	TNR-005602
Checklist Item No:	3.3.2
Status:	Open
Finding level:	Observation
Checklist item:	Where water scarcity is a shared water challenge, annual targets to improve the site's water use efficiency, or if practical and applicable, reduce volumetric total use shall be implemented.
Findings:	The production and water withdrawn shall be stabilized by the end of 2023 and the site's water use efficiency could be assessed only by next year.
Finding No:	TNR-005879
Checklist Item No:	3.7.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Jul-10
Checklist item:	Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.
Findings:	In the water stewardship plan, indirect water use targets have been set however they were not quantified.
Corrective action:	Upon receiving feasibility analysis from the suppliers, actions to be generated through which quantified improvement targets will be incorporated in the stewardship plan.
Finding No:	TNR-005429
Checklist Item No:	3.9.1
Status:	Open
Finding level:	Observation
Checklist item:	Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.
Findings:	The site could into more engagement with Public Agencies.
Finding No:	TNR-005432
Checklist Item No:	3.9.4
Status:	Open
Finding level:	Observation
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 need to identify and implement actions for maintenance of other Important Water-Related Areas identified in the catchment.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000606

Finding No:	TNR-005433
Checklist Item No:	4.1.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Jul-10
Checklist item:	Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.
Findings:	The details on the status of the targets and the contribution to achieving water stewardship outcomes are not evaluated. The site did not clearly compare the current performance against the targets set in the WSP, using the metrics for the respective targets e.g. actual water use efficiency compared to the target.
Corrective action:	The site will prepare comparison to target for better representation of the evaluation.
Finding No:	TNR-005434
Checklist Item No:	4.1.3
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Jul-10
Checklist item:	The shared value benefits in the catchment shall be identified and where applicable, quantified.
Findings:	The site has categorised the shared value benefits to the catchment but they are worded in a very generic way rather than actual shared value benefits achieved to date.
Corrective action:	The site will estimate achieved shared value benefits (where applicable) and update accordingly.
Finding No:	TNR-005451
Checklist Item No:	4.3.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Jul-10
Checklist item:	Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.
Findings:	The site has not presented evidence relating to consultation efforts on the site's water stewardship performance.
Corrective action:	Evidence of consultation efforts on stewardship performance to be better represented in the document.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000606

Finding No:	TNR-005880
Checklist Item No:	5.2.1
Status:	Open
Finding level:	Observation
Checklist item:	The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.
Findings:	<p>The site has shared evidence which indicates that the Water Stewardship Plan has been shared with the stakeholders on 21st May 2023.</p> <p>The site's revised Water Stewardship Plan prepared in June 2023 was not shared with the stakeholders.</p>
Finding No:	TNR-005455
Checklist Item No:	5.4.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Jul-10
Checklist item:	The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.
Findings:	The site needs to disclose the efforts made to address shared water related challenges. It is not clearly presented in the evidence provided.
Corrective action:	The evidence of disclosure to be better represented in the document.
Finding No:	TNR-005668
Checklist Item No:	5.4.2
Status:	Open
Finding level:	Observation
Checklist item:	Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.
Findings:	The site's engagement with the government authorities and public sector agencies is very limited.
Finding No:	TNR-005457
Checklist Item No:	5.5.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Jul-10
Checklist item:	Any site water-related compliance violations and associated corrections shall be disclosed.
Findings:	The renewal for Environment clearance / certificate was due on 20.06.2023 and was under process during the audit.
Corrective action:	The ECC license renewal has been completed.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)



Audit Number: AO-000606

Finding No:	TNR-005458
Checklist Item No:	5.5.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Jul-10
Checklist item:	Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.
Findings:	As the environment certificate of site is valid for one year and the same issue will be there every year, the site should plan actions for timely receipt of Environment Certificate.
Corrective action:	The ECC license renewal has been completed. The site will assess the total time required for the entire process and trigger renewal as early as required to ensure renewal completion before expiry.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)



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Report Details

Report	Value
Report prepared by	Amit Singh
Report approved by	Ruth Wandera
Report approved on (Date)	12 September 2023

Surveillance

Proposed date for next audit
2024-Jul-09

Stakeholder Announcements

Date of publication	Location
08/05/2023	AWS Website
08/05/2023	WSAS Website
09/06/2023	Local Newspaper & eNewspaper
Comment	The attachment provides the announcement in the newspaper as well as the original announcement provided by WSAS.

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Catchment Information

Catchment Information

The site carried out a Hydrogeological study. On the basis of study, the catchments have been identified and one of the considerations of physical scope was the distance between the closest and farthest water bodies - Rivers. In between important water related areas from Mojarmil lake at 0.2 km and Turag River which is 6.5 km away from BATB Savar Factory.

There are two significant rivers situated near the BATB Savar Factory. These are the Bangshi River, 3.16 Km from the site, and the Turag River, 6.57 Km from the site. 7 Km has been considered as the catchment area's radius, considering both rivers in the surface water catchment.

The catchment was not named in the evidence provided.



Catchment.jpg

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Client Description and Site Details

Client/Site Background

BAT Bangladesh/ BATB Savar Factory is a major cigarette manufacturer in Bangladesh. The activities include tobacco cigarettes manufacturing and distribution via a third party, throughout Bangladesh. The plant is located at Dhamsona Union of Savar Upazila of Dhaka District, Bangladesh, which lies around the coordinates 23.75°N 90.25°E.

Savar and its surrounding area are located in the Bengal Basin, a large sedimentary basin formed by the convergence of the Indian Plate and the Eurasian Plate. It is situated in the Gangetic-Brahmaputra alluvial plain near the Ganges-Brahmaputra Delta, where the rivers meet the Bay of Bengal. Quaternary deposits dominate the recent geological history of the area. The Madhupur Clay Formation, the oldest exposed rock in the region, is represented by the upland of the Madhupur Tract in the Dhaka and Savar areas.

The climate in the area is mainly tropical monsoon type, with a uni-modal rainfall pattern. The main source of rainfall over the entire area is evaporation from rivers and tributaries, transpiration from vegetation covers, and proximity to the water bodies of the Bay of Bengal. The mean annual rainfall ranges between 2200 and 2500 mm, with mean maximum and minimum temperatures of 40°C and 11.5 °C, respectively.



Figure 2: Location of BAT Savar Factory

Study Area Location Map 2.jpg

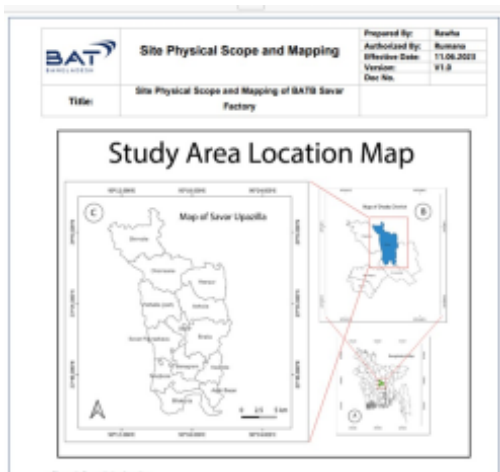


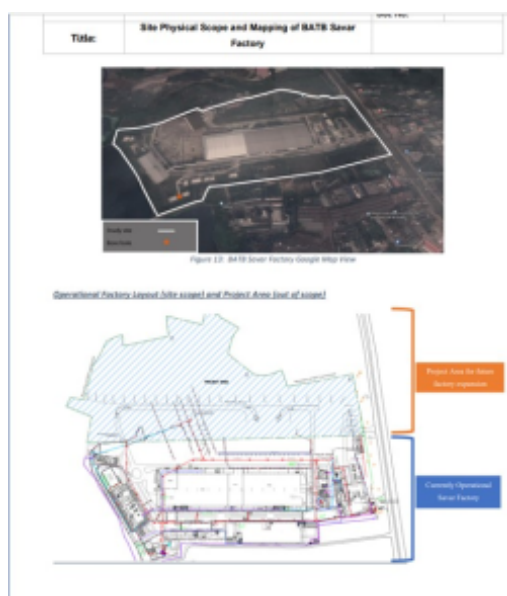
Figure 1: Savar Union location

Study Area Location Map.jpg

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000606



Study Area Location Map 3.jpg

Summary of Shared Water Challenges

Summary of Shared Water Challenges

The site has identified following Shared Water Challenges of concern to stakeholders:

- Poor Water quality for discharging wastewater
- Water and/or wastewater prices
- Increasing risk of drought and water scarcity
- Insufficient WASH facility
- Risk of flood

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

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000606

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 physical scope of BAT Bangladesh Savar Factory is mapped. The site has installed one no. of borehole with submersible pump which withdraws the groundwater for treatment at WTP before utilisation at factory. In WTP the water gets filtered and distributed to the process and domestic usage in factory. The wastewater from the plant operations is treated at the ETP and treated wastewater is utilised within the campus due to which Savar factory is considered as zero liquid discharge factory. The stormwater is discharged outside the plant. The above are mapped in the layout.

Based on the Hydrogeological study, the site has identified the catchment with one of the considerations of physical scope as the distance between the closest and farthest water bodies, Rivers. Therefore, in between important water related areas from Mojarmil lake at 0.2km and Turag River which is 6.5km away from BATB Savar Factory. There are two significant rivers situated near the BATB Savar Factory. These are the Bangshi River, 3.16 Km from the site, and the Turag River, 6.57 Km from the site. 7 Km has been considered as the catchment area's radius, considering both rivers in the surface water catchment.

Finding No: TNR-005311

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

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

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



in progress

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000606

Comment The stakeholders have been identified considering the influence of stakeholders on site and influence of site on stakeholders.
The site has established engagement with key stakeholders such as Walton Hi-Tech Industries PLC, Kushiara composite BD Limited, Atomic Energy Commission, DEPZ, Jahangirnagar University, Fazilatunnesa Mujib Hospital, Gildan Bangladesh (GAB Limited), Beximco (Shinepukur Ceramics), Dhamshona Union Parishad, etc.


The site has identified following stakeholder selection criteria:

- Organisations in catchment area under same aquifer
- Those who impact on organization (e.g., regulators, other water users, polluters, special interest groups)
- Those on whom organization has (or is perceived to have) an impact (e.g., other water users, neighbours, conservation management organizations)
- Those who have a common interest (e.g., similar business sectors)
- Those with no specific link but with whom it is beneficial to maintain a positive reputation & relationship (neutral)

The stakeholders have been part of meetings being organised from March 2023 to July 2023.

Vulnerable, women, minority, and Indigenous people have not been considered in the stakeholder identification. However, site has mentioned about engagement with Indigenous people through Jahangirnagar University on 7th July 2023.


Finding No: TNR-005312

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.*  in progress

Comment The site has identified the stakeholders based on the degree of influence between site and stakeholders.


Finding No: TNR-005532

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

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


Comment The site has identified Water related emergency response plan for the following reasons / emergency for water unavailability:

- Failure of distribution system
- Leakage(s) in distribution lines
- Failure of water treatment plant
- Failure of WWTP

1.3.2 *Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped*  No

Comment The site has mapped the inflows, groundwater storage and usage areas in the water balance including the estimation of rainfall water for a period from 6th May to 8th July 2023. The site has shown usage of 14 m3/day of ETP treated water in road cleaning and finally discharging to stormwater. This contradicts the site's statement of zero liquid discharge plant.

Finding No: TNR-005314


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.*  Obs.

CERTIFICATION REPORT


Alliance for Water Stewardship (AWS)

Audit Number: AO-000606

Comment The site has provided water withdrawal values from May 2022 (likely month of production start date) to May 2023. The production has not been stable due to increase in production lines. The production and water withdrawn shall be stabilised by the end of 2023. The graphical representation of variances in water withdrawal have been shown.


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 performs daily testing of treated water and treated wastewater at the inhouse laboratory. The treated water and treated wastewater are also tested by external laboratories with frequency of after every 3 months.

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


Comment The site has identified, mapped and categorised the pollution sources based on the level of risk of the pollution sources.

Finding No: TNR-005317

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


Comment The site has identified and mapped the following On-site Important Water-Related Areas alongwith the description of their status:

- Borehole
- Water storage tank
- Water Treatment Plant (WTP)
- Wastewater Treatment Plant (WWTP)
- WWTP Treated Water Discharge Point
- Boiler
- Stormwater Discharge point

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 identified annual water related costs, including costs for treating water and maintaining water-related infrastructure, expert cost, testing costs and costs of AWS implementation and has also categorised the activities as social, environmental, or economic value creation.

The water related revenue have also been identified by the site.

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

Comment The site has mapped WASH facilities such as:

- drinking water facility
- male / female washrooms
- handwashing facilities
- pantry
- WASH Facilities for Management
- WASH Facilities for Women
- WASH Facilities for Contractor

The site has quantified WASH facilities and represented in a table with photographs which provide details of the above facilities at site.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000606

- 1.4** *Gather data on the site's indirect water use, including: its primary inputs; the water use embedded in the production of those primary inputs the status of the waters at the origin of the inputs (where they can be identified); and water used in out-sourced water-related services.*
- 1.4.1** *The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be identified.* in progress
- Comment The site has identified several Suppliers providing inputs to the factory. The only supplier in the catchment is MAST Packaging Ltd. The initial communication with suppliers was done on 23rd May this year to provide water related data. The suppliers have provided water abstraction data for year 2022.
- Finding No: TNR-005320**
- 1.4.2** *The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.* Q
Obs.
- Comment The site has identified one of the outsourced service providers, M/s Kashundi within the site's catchment which is involved in catering services for site. The supplier could not provide water consumption data due to non-availability of water meter at their premises.
- 1.5** *Gather water-related data for the catchment, including water governance, water balance, water quality, Important Water-Related Areas, infrastructure, and WASH*
- 1.5.1** *Water governance initiatives shall be identified, including catchment plan(s), water-related public policies, major publicly-led initiatives under way, and relevant goals to help inform site of possible opportunities for water stewardship collective action.* in progress
- Comment The site has shared document highlighting various catchment water governance initiatives. However, most are not related to water governance. The site has also shared document providing details of water quality testing assessment and comparison study by Department of Environment. But, the cited water quality parameters are quite old ranging from year 2012 to 2015.
- The catchment plan, water-related public policies, major publicly-led initiatives under way, and relevant goals of possible opportunities for water stewardship collective action have not been linked / identified.
- The site has shared document for discussion with community leader - Union Parishad Chairman and willingness to engage for activities in the catchment.
- Finding No: TNR-005324**
- 1.5.2** *Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.* Q
Obs.
- Comment The site has identified and tabulated water related legal and regulatory requirements in the site license tracker.
- 1.5.3** *The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.* in progress

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000606

Comment The site has shared water balance for the catchment. The identified catchment consists of rivers and lakes. There is inflow (precipitation/ rain), outflow (runoff and evaporation/transpiration), storage (recharge/storage/aquifers), and change in storage by moving to other catchment.
The equation of the hydrological budget is as follows:
 $P = ET + R + GWR$;
where, P= precipitation or rainfall
ET= Evapotranspiration
R = Surface runoff
GWR = Groundwater recharge
The site has gathered secondary data of precipitation for 2000 to 2017 from CHIRPS (Climate Hazards Group InfraRed Precipitation with Station data).
The data for year 2017 onwards could be gathered from relevant govt. authorities.

Finding No: TNR-005533

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 The site has conducted a hydrogeological assessment for the catchment. The summary of water quality data from various sources for different lakes / rivers are as follows:
1. Except for Dhorartek Lake and Turag River, all the water bodies comply with the standard for pH.
2. Turag River is a highly polluted river. Some areas of Turag have higher values of pH.
3. The majority of the water body carries more BOD than standard. It indicates that water contains much higher levels of organic waste.
4. All the water bodies except Mojammel Lake exceed the standard COD level. It also indicates releasing chemical waste from the surrounding industries without proper treatment.
5. As for the DO, Turag and Dhorartek show a low amount. The remaining water bodies have an acceptable DO level.
6. The presence of NH₃-N indicates that the lakes receive domestic wastewater discharge.
7. In the Bangshi and Turag, there is the presence of heavy metal which indicates the discharge of industrial waste. But none was found in the lakes.

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

Comment The site has identified and mapped the following river / lakes as Important Water-Related Areas and assessed their status:
- Turag river
- Bangshi river
- Dhoretek lake
- Ashulia lake
- Mojarmil lake
The site has also identified other stakeholders as IWRA's. However, the IWRA's at site and status of their condition is not available.






Finding No: TNR-005459

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

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)






Audit Number: AO-000606

Comment	The site has identified the following water-related infrastructures with the current condition: 1. Ground Water Observation Well near SF Catchment area by Bangladesh Water Development Board (BWDB) 2. Central Effluent Treatment Plant (CETP) in Dhaka Export Processing Zone (DEPZ) 3. Digital Walkway (Recreational Zone) by 4. Accessible & Well Maintained Sanitation Facilities at Savar 5. Effluent treatment plant at Walton Hi-Tech Factory 6. Wastewater treatment at Fazilatunnisa Hospital 7. Wastewater treatment at Kushiara Textile 8. Wastewater treatment at Fazilatunnisa Hospital	
		Finding No: TNR-005539
1.5.7	<i>The adequacy of available WASH services within the catchment shall be identified.</i>	 in progress
Comment	The site has shared the following information for the country: - 64.1% People source potable water from their arrangement - 42.8% Population use improved sanitation - 103 mln People lack safely managed sanitation facility - 48.8% Household use sanitary latrines without flush - 68.3 mln People in Bangladesh lack of safe drinking water	
		Finding No: TNR-005326
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>	 in progress
Comment	The site has mentioned a no. of challenges with the Cause, Proposed Initiatives and Mitigation Actions, Responsible person, Identified Stakeholders and the current Status. It is not clear whether these challenges have been identified by site or (shared by the site and one or more of its stakeholders) or which challenges are shared challenges.	
		Finding No: TNR-005327
1.6.2	<i>Initiatives to address shared water challenges shall be identified.</i>	 Yes
Comment	The site has listed Proposed Initiatives and Mitigation Actions to address the identified shared water challenges.	
1.7	<i>Understand the site's water risks and opportunities: Assess and prioritize the water risks and opportunities affecting the site based upon the status of the site, existing risk management plans and/or the issues and future risk trends identified in 1.6.</i>	
1.7.1	<i>Water risks faced by the site shall be identified, and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.</i>	 Obs.
Comment	The site has identified water risks faced by site. Against each risk, the site has mentioned the mitigation plan, type of risk, likelihood and damage level and the risks have been prioritized.	
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 four water related opportunities and have not been prioritized. The current status of the identified opportunities have been mentioned as on track. There is no detail about the actual status. The site has made a generic attempt to address this indicator.	

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000606

1.8	<i>Understand best practice towards achieving AWS outcomes: Determining sectoral best practices having a local/catchment, regional, or national relevance.</i>	
1.8.1	<i>Relevant catchment best practice for water governance shall be identified.</i>	 Yes
Comment	<p>The site has identified following catchment best practice for water governance:</p> <ul style="list-style-type: none"> - A comprehensive water stewardship plan that has already been reviewed and updated in 2023 - Daily tracking and monitoring system of Department-wise water consumption and action plan generation - Communicating on your own water stewardship to set a leading example to others - Communicating our own water stewardship to set a leading example - AWS Policy Board installed at noticeable and relevant places at SF - Designating responsibility for water stewardship to senior staff - Training of all employees and third party contractors on the principles of water stewardship and how they can incorporate them within their daily tasks and responsibilities - Engaging with peer organizations and stakeholders to promote water stewardship 	
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>	 Yes
Comment	<p>The site has identified following best practice for water balance:</p> <ul style="list-style-type: none"> - Air cooled chiller to minimize water consumption - Automated spray system for efficient spraying to maintain relative humidity - Efficient Water Taps (Sensor Based) - Efficient Sprinkler system for gardening - Employee Training of efficient usage of Water - Frequent communication for leak detection and follow up actions - Daily Mandatory Near Miss Reporting which includes Leakage/ Spillage related issues 	
1.8.3	<i>Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.</i>	 Yes
Comment	<p>The site has identified following best practice for site water quality:</p> <ul style="list-style-type: none"> - Inhouse water testing facility ensures tracking and monitoring of water quality parameters - RO system is designed in way where both RO accepts and RO rejects are utilized for intended usage - Water quality parameters are maintained as per Govt. dictated standards for its intended usage - Only RO rejects are used for landscape maintenance 	
1.8.4	<i>Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.</i>	 Yes
Comment	<p>The site has identified following best practice for site maintenance of Important Water-Related Areas:</p> <ul style="list-style-type: none"> - Strainer used to prevent pollute from surface run off - Shore protection system considering adjacent Mozarmil Lake - Tree saplings distribution and references of the plantation near IWRA around factory - BATB SF team engaged with Jahangirnagar University to appreciate their public signage and to continue the initiatives 	
1.8.5	<i>Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.</i>	 Yes

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)



Audit Number: AO-000606




Comment The site has identified following best practice for site provision of equitable and adequate WASH services:

- adequate Handwash facility on site
- Training on WASH on site
- Fresh drinking water supply on site
- Fresh drinking water supply observed at stakeholder
- Shower facility on site
- adequate toilet facility on site

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)



Audit Number: AO-000606

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. 	 Obs.
Comment	<p>The site has prepared AWS policy document signed by Head of Operations and Country Sustainability manager and the signed policy is displayed at certain locations on site. The organizational commitment that is signed and publicly disclosed includes the following commitments amongst others:</p> <ul style="list-style-type: none"> - Engage stakeholders in an open and transparent manner to identify shared water challenges - Implementation of good water governance to ensure better catchment water quality and to support of existing catchment sustainability plans - Maintain the organisational capacity necessary to successfully implement the AWS standard, including ensuring that staffs have time and resources necessary to undertake the implementation 	
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. 	 in progress
Comment	<p>The site has identified and tabulated water related legal and regulatory requirements in the site license tracker. The process for submission to regulatory agencies was provided., in the response the following steps have been listed:</p> <ul style="list-style-type: none"> - Sustainability team initiates the annual review - LEX team assess for any change - Legal Register is updated based on LEX input - Updated Legal Register shared with relevant process owners - Action & follow up for applicable changes 	
Finding No: TNR-005334		
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

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000606

Comment	<p>The site has developed a water specific strategy which has the following vision and mission. Vision: To make a concerted effort to minimize the impact of our activities by ensuring the amount, quality of water while conducting business and will treat the water as a treasured legacy by preventing pollution. Mission: To conduct its business in full compliance with Alliance for Water Stewardship requirement by proper water monetary process and open to support any stakeholders for this purpose with continuous improvements. Goals: 1. Sustainable Business Operation for creating a better tomorrow 2. Preserve &/or protect our operating work environment 3. Provide clean water supply & sanitation services to all employees working at our premises</p>	
2.3.2	<p><i>A water stewardship plan shall be identified, including for each target:</i> - 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.</p>	 Yes
Comment	<p>The site has prepared a water stewardship plan and tabulated the Risk & Opportunities, Risk Category, Actions & Best Practices, Measure of Success along with the timeline and status against each risk.</p>	
2.4	<p><i>Demonstrate the site's responsiveness and resilience to respond to water risks</i></p>	
2.4.1	<p><i>A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.</i></p>	 in progress
Comment	<p>The site has provided similar plan as identified for site emergency response procedures for Step 1.7. The indicator also acknowledges that all the risks may not be associated with emergencies and the water risks to be developed in co-ordination with relevant public-sector and infrastructure agencies.</p>	

Finding No: TNR-005385

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000606

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. Q Obs.
Comment	<p>The site has engaged with the stakeholders and identified the following activities for good catchment governance:</p> <ul style="list-style-type: none"> - Lake side cleaning and Tree plantation - Social forest park development - Sapling distribution - Engagement with Community leader discuss on catchment good governance - Creating awareness among people - Engaging influential stakeholder
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 site has mentioned about engaging with local community and indigenous people on their water related rights, efficient water usage and WASH as well as highlighted other water rights by WHO & UNDP.
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	To ensure full legal and regulatory compliance in BATB Savar factory, the site tracks licenses update on a weekly basis. In weekly DDS, after reviewing all the legal requirement, new action is generated.
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	The site has provided a Standard Operating Procedure which explains the water rights of the communities including underprivileged and indigenous people.
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. Q Obs.
Comment	The site has mentioned of reducing 35% water usage from baseline as per BAT Bangladesh commitment by 2025. However, there has been lot of fluctuation in the production and has not been stable due to increase in production lines. The production and water withdrawn shall be stabilized by the end of 2023. The Water withdrawal glidepath seems to show that Dhaka Factory is the one reducing withdrawal volumes while Savar Factory increases but the combined withdrawal is on track to meet the 35% reduction target.
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. Q Obs.
Comment	Water scarcity is a shared water challenge. The Factory has a target of 30% recycling target which seems to be on track between May 2022 and May 2023.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000606

3.3.3	<i>Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.</i>	 Yes
Comment	There is no legal binding on the site for the re-allocation of water to social, cultural or environmental needs. However, the site has re-allocated ETP treated water for maintaining the green area named as Social Forest located outside the plant main gate.	
3.4	<i>Implement plan to achieve site water quality targets</i>	
3.4.1	<i>Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.</i>	 Yes
Comment	<p>The site has identified the following risks:</p> <ol style="list-style-type: none"> 1. Violation of on-site water quality parameter for drinking, WASH facilities, production usage and treated water reuse 2. Violation of catchment water parameter (surface water) 3. Expensive infrastructure for water withdrawal and treatment 4. Surface water contamination <p>The progress towards above risks is inline with the requirements as the site is maintaining water and wastewater treatment plants for achieving desired water and wastewater quality.</p>	
3.4.2	<i>Where water quality is a shared water challenge, continual improvement to achieve best practice for the site's effluent shall be identified and where applicable, quantified.</i>	 Yes
Comment	The site is maintaining the water quality and treated effluent quality as per the legal or regulatory requirements with the list of actions it is implementing. The site has installed internal lab to monitor the parameters of treated wastewater with the monitoring facility o measure 17 parameters which is more than the legal requirement.	
3.5	<i>Implement plan to maintain or improve the site's and/or catchment's Important Water-Related Areas.</i>	
3.5.1	<i>Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.</i>	 Yes
Comment	The practices set in the water stewardship plan include improvement the catchment's Important Water Related Areas e.g. the social forest park.	
3.6	<i>Implement plan to provide access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers at all premises under the site's control.</i>	
3.6.1	<i>Evidence of the site's provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers onsite shall be identified and where applicable, quantified.</i>	 Yes
Comment	<p>The site has provided evidence of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for workers onsite. The evidence includes details of following sections:</p> <ul style="list-style-type: none"> - Drinking Water Facilities with locations - Details of adequate nos. of urinals / toilets for male & female - WASH Facilities for Management - WASH Facilities at Female washrooms - WASH Facilities at Gate - WASH Facilities at change room - WASH Facilities for contractor - WASH Facilities at canteen / pantry - WASH Facilities at shop floor 	

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)




Audit Number: AO-000606

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 indication was found that the site would be impinging on the human rights to safe water and sanitation of communities through the plant operations.	
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	In the water stewardship plan, indirect water use targets have been set however they were not quantified.	
	Finding No: TNR-005879 Finding No: TNR-005427	
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>	 Yes
Comment	The site has initiated communication (e.g. via mail on 23rd May 2023) with the suppliers and service providers to share their annual water consumption data. The water consumption data shared by suppliers and service provided have been tabulated.	
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	The site has engaged with the following owners of shared water related infrastructure: 1. Engagement with Jahangirnagar University 2. Central Effluent Treatment Plant (CETP) in Dhaka Export Processing Zone (DEPZ) 3. Digital Walkway (Recreational Zone) 4. Effluent treatment plant at Walton Hi Tech Factory 5. Wastewater treatment at Fazilatunnisa Hospital 6. Wastewater treatment at Kushiara Textile 7. Meeting with Union Parishad Chairman - Public Leader	
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>	 Obs.
Comment	The site has provided details of actions towards the best practices identified in step 1.8.1. The site has mentioned the comprehensive water stewardship plan has been reviewed and updated in 2023.	
3.9.2	<i>Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.</i>	 Yes

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000606

Comment	The site has implemented following actions for achieving best practices in water efficiency: - Air cooled chiller to minimize water consumption - Automated spray based humidifier - Automated spray system for efficient spraying to maintain relative humidity - Efficient Water Taps - Employee Training of efficient usage of Water - Frequent communication for leak detection and follow up actions	
3.9.3	<i>Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.</i>	 Yes
Comment	The site has implemented following actions for achieving best practices in water efficiency: - Inhouse laboratory testing for data on daily, weekly and monthly basis - External lab testing every quarter - Regular maintenance and monitoring of the RO plant	
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>	 Obs.
Comment	The site ESS and Sustainability team jointly have celebrated World Environment Day and carried out a clean up activity at the shore of Dhorartek lake and Mozarmil Lake.	
3.9.5	<i>Actions towards achieving best practice related to targets in terms of WASH shall be implemented.</i>	 Yes
Comment	The site has demonstrated actions towards achieving best practices in terms of WASH. The WASH Facilities installed at site comply the Law and regulation requirements. The actions includes the following: - Internal awareness session on WASH - External awareness session on WASH - Adequate WASH facilities for female - WASH facilities for special needs - Sensor based taps - WASH Signage are installed at hand wash area to encourage proper hygiene and sanitation awareness.	

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)


Audit Number: AO-000606

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	Site has mentioned the status as done for most of the targets and others as on track or continuous. The site need to update the targets so that there are targets for continual improvement. The site should also report on how the actions have contributed in achieving AWS outcomes. Finding No: TNR-005433
4.1.2	<i>Value creation resulting from the water stewardship plan shall be evaluated.</i> Yes 
Comment	The Value creation resulting from the activities that have resulted in water savings have been evaluated.
4.1.3	<i>The shared value benefits in the catchment shall be identified and where applicable, quantified.</i> in progress 
Comment	The shared value benefits in the catchment have been categorized (as Economic, Environmental, Social or Cultural). However, the shared value benefits shall also be quantified. Finding No: TNR-005434
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 has informed that there was no water related emergency incident at BAT Bangladesh Savar Factory since its operation in 2021. However, the site has prepared Water Contamination Management Procedure to address any water contamination which is scheduled to be reviewed once in two years or after the identification of probable source of contamination.
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 
Comment	The site has shared stakeholders survey in a general format to stakeholders understanding about AWS (dt. 07.06.2023 for internal stakeholders and dt. 22.05.2023 for external stakeholders) as evidence against the indicator. No evidence is provided that the site has consulted with the stakeholders on the site's performance. Finding No: TNR-005451

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)


Audit Number: AO-000606

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>	<div> Yes</div>
Comment	The site's water stewardship plan has been modified and adapted to incorporate relevant information and lessons learned from the evaluations of October 2022 Water Stewardship Plan. These changes have also been identified and an updated WSP for June 2023 was provided.	

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)




Audit Number: AO-000606

5STEP 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.	 Yes
Comment	The disclosure of the site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations has been shared with the stakeholders.	
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.	 Obs.
Comment	The site has shared evidence which indicates that the Water Stewardship Plan has been shared with the stakeholders on 21st May 2023. However, the WSP was prepared in 2022. The site has also mentioned about revised WSP prepared in June 2023 which is not shared with the stakeholders.	
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.	 Yes
Comment	BAT group's water stewardship performance has been disclosed in the ESG report. The recycled water and water withdrawn performance against the targets for the BAT sites in Bangladesh have been reported in the ESG report.	
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	The site has shared communication dt. 06.06.2023 in which meeting minutes were shared for identifying shared water challenges along with the engagement with stakeholders for water usage and WASH awareness. The evidence of disclosure of these efforts is not shared.	
Finding No: TNR-005455		
5.4.2	Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.	 Obs.
Comment	The site's engagement with the government authorities and public sector agencies is very limited.	
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.	

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000606

- 5.5.1** *Any site water-related compliance violations and associated corrections shall be disclosed.*  in progress
- Comment The site has informed that no water related compliance violations were observed at site since the operation of site from 2021. However, the renewal for Environment Certificate was due on 20.06.2023 and was under process during the audit.
- Finding No: TNR-005457**
- 5.5.2** *Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.*  in progress
- Comment No corrective actions were taken by site as no compliance violations were identified.
- Finding No: TNR-005458**
- 5.5.3** *Any site water-related violation that may pose significant risk and threat to human or ecosystem health shall be immediately communicated to relevant public agencies and disclosed.*  Yes
- Comment No water related compliance violations that may pose a significant risk and threat to human, or ecosystem health were recorded.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000606

Photographic Evidence from Audit

✓
Yes

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

- Boiler
- Chemical Storage area
- Fuel storage area
- RO plant
- Stormwater discharge point
- Treated water usage point
- Water use at garden
- Water Treatment Plant
- Waste Water Treatment Plant
- Water meter (Borewell)
- Water usage in process area (Maintaining Humidity)
- Air Cooled Chiller



Treated water usage point.jpeg



Air Cooled Chiller.jpeg

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000606



RO plant.jpeg



Fuel storage area.jpeg



Waste Water Treatment Plant.jpeg

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000606



Chemical Storage area.jpeg



Water meter (Borewell).jpeg



Water Treatment Plant.jpeg

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000606



Boiler.jpeg



Stormwater discharge point.png



Water usage in process area (Maintaining Humidity).png

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000606



Water use at garden.jpeg