CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000859

WSAS WATER STEWARDSHIP ASSURANCE SERVICES

SITE DETAILS

Site: **Leonard Dingler (Pty) Ltd**
Address: Cnr Siding & Barry Streets, 1459, Boksburg, SOUTH AFRICA
Contact Person: Mthokozisi Zondo
AWS Reference Number: AWS-000556
Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Core
Date of certification decision: 2024-Jan-24
Validity of certificate: 2027-Jan-24

AUDIT DETAILS

Audited Service(s): AWS Standard v2.0 (2019)
Audit Type(s): Initial Audit
Audit Start Date: 2023-Oct-31
Lead Auditor: Warrick Stewart

Audit team participants:
Cornelis Van Den Berg, Observer
Warrick Stewart, Lead Auditor

WSAS
2 Quality StreetNorth Berwick, EH39 4HW, UNITED KINGDOM

CERTIFICATION REPORT

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Site Participants:

Molly Lehong, Leonard Dingler: Manager Sustainability
Jumoke Agbelusi, Leonard Dingler: Manufacturing Director
Tebogo Zulu, Leonard Dingler: Manager Quality
Sewzo Zulu, Leonard Dingler: Line Leader Trainer
Herman Kekana, Leonard Dingler: Business Unit Manager
Mthokozisi Zondo, Leonard Dingler: EHS Specialist
Nomvula Ledwaba, Leonard Dingler: Strategy Planning Analyst
Fumani Marunda, Leonard Dingler: Factory Controlling Analyst
Velly Boroko, Leonard Dingler: Manager Security & Market Safety
Eric Mathisa, Leonard Dingler: Facilities Manager
Nothando Khumalo, Leonard Dingler: Executive – Internal Logistics
Thabang Shaku, Leonard Dingler: Quality
Pontsho Hiokwe, Leonard Dingler: IS
Thabiso Ntombela, Leonard Dingler: Engineering Manager
Suren Reddy, Leonard Dingler: Technical Services
Isaam Abufreina, Leonard Dingler: Manager Sustainability (PM Jordan)
Beans Ralton, Leonard Dingler: Line Leader (Primary)
Sandiso Lubisi, Leonard Dingler: Empact
Dia Modou, Leonard Dingler: Sustainability Specialist
Diop Cheikh, Leonard Dingler: Sustainability Manager
Nothando Makhumalo, Leonard Dingler: Internal Logistic Executive
Mokotini Refiloe, Leonard Dingler: Quality Technician
Nina Brenda, Leonard Dingler: Product Services Engineer
Panda Nthabiseng, Leonard Dingler: Line Lead (SNUFF)
Neo Phala, Leonard Dingler: Line Co-ordinator (SNUFF)
Milly Matlala, Leonard Dingler: Occupational Health Practitioner
Nelson Rabalao, Leonard Dingler: Line Co-ordinator
Johann Schoeman, Leonard Dingler: Supervisor LEAF
Nomvula Sithebe, Leonard Dingler: Line Co-ordinator
Moustapha Wele, PMI Senegal: Sustainability Specialist
Fiona Sutton, SRK: Consultant
Kivana Naidoo, SRK: Consultant
Johan Breet, RTT: Health and Safety Manager
Chiara Rizzi, PMI: Manager AWS Global Certification

CERTIFICATION REPORT

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AUDIT TIMES

Dates	Audit from	Duration	Auditor	Description
2023-Oct-31	08:00:00 - 17:15:00	09:15	Warrick Stewart	
2023-Nov-01	08:00:00 - 17:00:00	09:00	Warrick Stewart	
2023-Nov-02	08:00:00 - 13:00:00	05:00	Warrick Stewart	

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ADDITIONAL INFO

Summary of Audit Findings: A total of 37 findings were raised during the certification audit, 0 major non-conformities, 21 minor non-conformities, and 16 observations.

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 30 days of receipt of the audit report by 18/01/2024.

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

The audit team recommends certification of the Leonard Dingler Boksburg site at Core level pending approval of the corrective actions plan.

CLOSURE OF FINDINGS AND CORRECTIVE ACTION PLAN:

The Client has successfully submitted the corrective action plans 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.

CERTIFICATION REPORT

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Scope of Assessment: The scope of services covers the initial certification audit for assessing conformity of Leonard Dingler Boksburg site against the AWS International Water Stewardship Standard Version 2.

The Leonard Dingler Boksburg site is located at the corner of Siding and Barry Streets, Boksburg, Gauteng, South Africa.

The site facilities that were included in the assessment were as follows: pipe primary and secondary areas, stores, workshop, boiler room, compressor room, transformer room, vacudyne room, fermentation, snuff secondary area, new auto hammer mill, old hammer mill, old blending, old laboratory, buffer room, snuff packaging, Tambuti packaging, palletising area, NTM warehouse, forklift workshop, PPE and chemical kitchen area, flammable store room, waste recycling area, pump house, fire tanks, effluent tanks, rainwater tanks, pallet warehouse, main warehouse, return warehouse, car wash, canteen, relax room, induction room, reception, and offices.

The facility is located in quaternary catchment C22B (Natalspruit/Elsburgspruit) of the Vaal/Klip River catchment.

The groundwater resources potential and quality characteristics of the greater Johannesburg area are influenced by the mixing process of fresh and polluted water at shallow zones within the weathered crystalline rocks and dissolution cavities in the dolomites. The solute composition of the water results from two basic contributions: the reaction of meteoric water with weathered zones in the near surface area and direct infiltration through dolomite dissolution cavities. The provenance of groundwater circulation is limited to shallow depths, however, dissolution cavities, fractured and sheared zones allow deeper circulation of groundwater. The natural water quality is found to be highly impacted by acid mine drainage which is derived from the gold mines in the Witwatersrand basin as it has been observed in previous studies.

The site obtains its potable input water from the Ekurhuleni Municipality, which is sourced from Rand Water (water service provider) via the Vaal Dam outside catchment area.

Leonard Dingler Boksburg discharges its sewage to the Vlakplaats ERWAT (Ekurhuleni Water Care Company (ERWAT)) waste water treatment works.

Approximately 4000 m3/a of municipal water is used as operational process water by the site, while approximately 80 m3/a of industrial effluent is generated. This effluent is in turn treated and used for irrigation. Domestic use totals approximately 5550 m3/a of which approximately 4560 m/a is lost and fed into the municipal sewer line.

The audit was conducted onsite on 31 October to 2 November 2023.

The onsite site visit included the assessment of all of the above listed facilities.

The following external stakeholders were interviewed during the audit: Lesotho Highlands Water Project (LHWP), Ekurhuleni Municipality; and Terraquip (neighbour)

FINDINGS

NUMBER OF FINDINGS PER LEVEL

Observation	16
Minor	21

FINDING DETAILS

Finding No:	TNR-007055
Checklist Item No:	1.2.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Oct-29
Checklist item:	Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall: - Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people; - Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies; - Provide evidence of stakeholder consultation on water-related interests and challenges; - Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups; - Identify the degree of stakeholder engagement based on their level of interest and influence.
Findings:	Identified stakeholders do not include civil society organisations and/or communities that may have in interest in the site, be affected by the site, or have in interest in water stewardship issues in the catchment, nor vulnerable, women, and minorities groups. Stakeholder water-related challenges are reflected, but in a very generic manner and from the information provided it is not clear if these stakeholders were actually consulted on this issue. The site needs to engage more comprehensively with its stakeholders, and solicit feedback, to ensure its Stakeholder List and Memorandum is fully reflective of stakeholder and catchment challenges.
Corrective action:	(a) Update current stakeholder list and Memorandum with relevant stakeholder groups including vulnerable, women, and minorities groups identified inside the catchment. (b) Share questionnaire with them and collect them back for analysis. Further engage in order to define action plans and targets to address any identified water stewardship issues in the catchment. (c) Update the WS plan to reflect the defined actions and targets that will be done .

Finding No:	TNR-007056
Checklist Item No:	1.2.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Oct-29
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 site needs to engage more comprehensively with its stakeholders, and solicit feedback, to ensure its Stakeholder List and Memorandum are fully reflective of the current and potential degree of influence between the site and its stakeholders, particularly regarding the site's ultimate water sources and ultimate receiving water body for wastewater.
Corrective action:	1. Arrange a workshop to engagement with stakeholders preferable on site to conduct site walkabout, present Leonard Dingler Water Stewardship Report and WS Plan with other site initiatives. 2. Share questionnaire with them, collect them back in order to complete the analysis and update both Stakeholder List and Memorandum and WS Plan. 3. Ensure that the fully reflective of the current and potential degree of influence between the site and its stakeholders, particularly regarding the site's ultimate water sources and ultimate receiving water body for wastewater.

Finding No:	TNR-007058
Checklist Item No:	1.3.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Oct-29
Checklist item:	Existing water-related incident response plans shall be identified.
Findings:	Emergency_Preparedness__Response.docx (No: ZA EHS.PR.0010; Version No: 4.0) (provided on 20231029) includes some consideration of impacts and risks on external communities, but not on the natural environment. The proposed mitigation measures are also insufficient to adequately address the risks and impacts in a meaningful way.
Corrective action:	1. Review Emergency Preparedness Response plan and include risks and impacts on natural environmental. 2. Review and update the mitigation measures to ensure that they are adequately addressing risk and impact identified. 3. Share with supporting departments Engineering and Production for review.

Finding No:	TNR-007063
Checklist Item No:	1.3.4
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Oct-29
Checklist item:	Water quality of the site's water source(s), provided waters, effluent and receiving water bodies shall be quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be quantified.
Findings:	Data for input water quality at various manufacturing points in the operation were provided for 2022 and 2023, and then very sporadically from 2014 and 2019. Consistent water quality sampling was not conducted for the site's incoming water from Rand Water, the site's effluent before and after treatment, to determine annual and seasonal high and low variances, except for 2022 and 2023 for input water for 2022 and 2023 for the canteen. Water quality data for receiving water bodies (e.g., Klip River) prior to July 2022 should also be sourced, to enable the site to more comprehensively understand annual and seasonal water quality trends.
Corrective action:	1. Raise annual open PO with appointed service provider to conduct quarterly water quality sampling at various manufacturing points 2. Review result and share with Ekurhuleni Water and Sanitation. 3. Source the annual water quality data for the site receiving water bodies (klip River)
Finding No:	TNR-007065
Checklist Item No:	1.3.5
Status:	Open
Finding level:	Observation
Due date:	2024-Oct-29
Checklist item:	Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.
Findings:	The waste recycling area does not have any bunding or other forms of containment, to avoid potential polluted run-off entering the site's effluent or stormwater system. Also, waste tobacco is being stored in open containers (next to the site's waste skips near the dispatch gate) with some run-off evident from them.

Finding No:	TNR-007067
Checklist Item No:	1.3.7
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Oct-29
Checklist item:	Annual water-related costs, revenues, and a description or quantification of the social, cultural, environmental, or economic water-related value generated by the site shall be identified and used to inform the evaluation of the plan in 4.1.2.
Findings:	A description or quantification was not provided of the social, cultural, environmental, or economic water-related value generated by the site, only links to the categories of social, cultural, environmental, or economic water-related value.
Corrective action:	1. Attend AWS Standard refresher training to understand the requirement. 2. Gather all information and develop quantification of the social, cultural, environmental, or economic water-related value generated by the site.

Finding No:	TNR-007078
Checklist Item No:	1.3.8
Status:	Open
Finding level:	Observation
Due date:	2024-Oct-29
Checklist item:	Levels of access and adequacy of WASH at the site shall be identified.
Findings:	Overall, the site provides sufficient adequacy and access to WASH facilities on site, in line with the SANS 10400A. However, the number of WASH facilities at the Finished Goods Warehouse are insufficient. The site has developed an action plan to address this inadequacy in its Water Stewardship Plan.

Finding No:	TNR-007079
Checklist Item No:	1.4.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Oct-29
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:	Chemicals, packaging, and labelling are sourced from within and outside the catchment. However, the site has not determined which of these chemicals are manufactured in or outside the catchment. The quantity, quality and level of water risk of embedded water in primary inputs from within the site's catchment were not specified.
Corrective action:	1. Follow up with suppliers which did not respond on the questionnaires and update the suppliers list in order to reflect which materials are manufacture within and outside the catchment 2. Further engage with suppliers within the catchment, that have responded towards the questionnaires in order to address the identified quality, quantity and level of water risks of embedded water in primary inputs

Finding No:	TNR-007081
Checklist Item No:	1.4.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Oct-29
Checklist item:	The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.
Findings:	RTT Group provides distribution services to the site for finished goods and they are located in the site's catchment. The site has quantified RTT Group's total company water use, but not the quantity of water used in the provision of services to Leonard Dingler.
Corrective action:	1. Re-share questionnaire with RTT Group, and collect them back for analysis in order to determine the quantity of water used by RTT Group in the provision of services to Leonard Dingler. Define action plans.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000859

Finding No:	TNR-007083
Checklist Item No:	1.5.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Oct-29
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:	597766_PMZA_AWS_GA_Step_1.5_-_Catchment_data.docx includes various information on the background to the catchment, the Thukela-Vaal Water Transfer Scheme, Rand Water Supply System and Distribution Network, and the Lesotho Highlands Water Project. However, no catchment plan/s; major public-led initiatives regarding water quality, IWRAs, and WASH; and relevant goals to help inform the site of possible opportunities for water stewardship collective action were identified.
Corrective action:	1. Follow up on the contact details requested for Ekurhuleni Planning Department from Water and Sanitation department. 2. Update 1.5.1 Catchment Data using received data from Ekurhuleni Planning Department and Lesotho Highlands Water Project for catchment plan/s; major public-led initiatives regarding water quality, IWRAs, and WASH.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

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Finding No:	TNR-007084
Checklist Item No:	1.5.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Oct-29
Checklist item:	Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.
Findings:	A summary of the current water related legislation in South Africa was provided in 597766_PMZA_AWS_GA_Step_1.5_-_Catchment_data, including the National Water and Sanitation Master Plan and current national water-related legislation in South Africa. However, the specific legal requirements applicable to the site were not documented to enable the site to know what it's exact obligations are. Environmental_Legal_Requirements_Water.pdf reflects the results of the site water-related legal requirements audit. This specifies the likely applicable water-related legal requirements, but does not confirm which is applicable. However, none of the applicable municipal by-laws regarding potable water use, and storm water and wastewater management and discharge were identified.
Corrective action:	1. Review audit report from both Red-On-Line and Ariscu system and determine applicable site legal requirement. 2. Document all site applicable legal requirement including local municipal by-laws regarding potable water use, and storm water and wastewater management and discharge 3. Conduct annual site Legal Requirement Audit to ensure compliance

Finding No:	TNR-008284
Checklist Item No:	1.5.4
Status:	Open
Finding level:	Observation
Due date:	2024-Oct-29
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:	1.5-18_Colour_Codes_for_PES_(1).PNG is a legend of the impact score range and health category of aquatic ecosystems based on South Africa's Present Ecological State (PES) system. 1.5-19_Present_Ecological_Scores_of_Water_Bodies_in_C22B_(1).PNG is a map of the PES scores of the water bodies in the catchment. However, no other biological information was provided for the catchment. Water quality data prior to July 2022 should also be sourced, to enable the site to more comprehensively understand annual and seasonal water quality trends.

Finding No:	TNR-007088
Checklist Item No:	1.5.5
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Oct-29
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 made a good attempt at mapping the IWRAs and collecting information about them, however (a) it is not sufficiently clear how some of them meet the definition of IWRAs based on their ecological and/or social importance; (b) the status of these IWRAs has not been specified, nor the risks to them. In addition to Present Ecological State, Ecological Importance and Ecological Sensitivity should also be documented for each IWRA. Also: - The catchment boundaries used in IWRAs_1.5.5a_(1).jpg and 1.5-19_Present_Ecological_Scores_of_Water_Bodies_in_C22B_(1).PNG differ. - 1.5-19_Present_Ecological_Scores_of_Water_Bodies_in_C22B_(1).PNG does not reflect the PES of the southern part of catchment C22B as per the catchment boundary in IWRAs_1.5.5a_(1).jpg.
Corrective action:	1. The site to get a clear and understanding definition of IWRAs. 2. Identify and map IWRAs within the catchment in line with the clear definition of IWRAs, based on their ecological and/or social importance. 3. Specify and documet the status and risks of each IWRAs , In addition to its present Ecological State, Ecological Importance and Ecological Sensitivity. 4.Update WS Plan with actions plans to address the risk identified to IWRAs.

Finding No:	TNR-007089
Checklist Item No:	1.5.6
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Oct-29
Checklist item:	Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.
Findings:	No information was documented about the Rand Water potable water treatment plant from which the site receives its input water. Also, the site identified most water-relate infrastructure in catchment C22B (at a sub/quaternary catchment level), but not all key infrastructure within the primary, secondary or tertiary catchment.
Corrective action:	1. Site to join Rand Water quarterly committee meeting in order to gather information. 2. Site to gather more information during this meetings regarding water quality being supplied, water infrastructure and future plans. 3. The site to review and update the list with all key infrastructure within the primary, secondary or tertiary catchment.

Finding No:	TNR-007091
Checklist Item No:	1.7.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Oct-29
Checklist item:	Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.
Findings:	1.7.2_Water_Opportunities.pptx and 1.7.2_Leonard_Dingler_risks_and_opportunities.xlsm reflect the various current and potential initiatives, how the site may participate, likely timing and certainty of implementation, predicted impact, prioritisation, and how the site may participate. However, potential savings and business opportunities were not documented.
Corrective action:	1. Review catchment and site water risk assessment to identify potential savings and business opportunities .

Finding No:	TNR-007092
Checklist Item No:	1.8.1
Status:	Open
Finding level:	Observation
Due date:	2024-Oct-29
Checklist item:	Relevant catchment best practice for water governance shall be identified.
Findings:	The site should remove standard practices that are not best practice (e.g., development of a Water Stewardship Plan that is a fundamental requirements of the AWS Standard).

Finding No:	TNR-007093
Checklist Item No:	1.8.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Oct-29
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:	1.8.2_Water Balance.pdf reflects various site best practice for water balance, but no best practices for water re-use were identified. Practices at a catchment level should also be looked at.
Corrective action:	1. Site to further engage with officials from Ekurhuleni and Rand Water to solicit any best practices identified. 2. Also engage and identify best practices for the catchment water re-use.

Finding No:	TNR-007095
Checklist Item No:	1.8.3
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Oct-29
Checklist item:	Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.
Findings:	1.8.3_Water Quality.pdf reflects five water quality relates best practices. However, two of these relate to ensuring legal compliance that is not a best practice. Greater consideration can be given to catchment and sectoral best practices, beyond site-based practices.
Corrective action:	1. Review and update only catchment water quality related best practices. 2. Engage with stakeholder from Ekurhuleni, Rand Water, private sectors and local communities to identify more water quality best practices.

Finding No:	TNR-007097
Checklist Item No:	1.8.5
Status:	Open
Finding level:	Observation
Due date:	2024-Oct-29
Checklist item:	Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.
Findings:	1.8.5_WASH.pdf includes five best practices for the site provision of WASH facilities, but none relate to the catchment level. Opportunity also exists to identify additional sectoral best practices.

Finding No:	TNR-007102
Checklist Item No:	2.3.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Oct-29
Checklist item:	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.
Findings:	Budget has been specified for some of the proposed actions, including during the current year, but not all. The proposed targets and actions have been quantified for many or described, but more comprehensive quantification or description would make the WSP consistently Specific, Measurable, Achievable, Realistic and Time-bound (SMART) to enable effective evaluation and monitoring of implementation. The planned timeframes for commencement of each action have been clearly quantified, but not the completion dates. The timing of actions to be undertaken "Annually" should be more clearly specified (e.g., 2 rounds of monitoring, in spring and summer respectively).
Corrective action:	1. Review proposed targets and actions with responsible departments/budget owners. 2. Assign budget to other proposed targets and actions with budget owners. 3. Review current tagets and actions, define and implement SMART targets and actions. 4. Include specific completion dates and timeliness in the proposed WSP action

Finding No:	TNR-007103
Checklist Item No:	2.4.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Oct-29
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 an Emergency Response Plan as per Emergency_Preparedness__Response.docx (No: ZA EHS.PR.0010; Version No: 4.0) (provided on 20231029). However, the site has not conducted any consultation yet with relevant public-sector and infrastructure agencies to inform the site's Emergency Response Plan and Business Continuity Plan.
Corrective action:	1. Arrange meeting with Environmental Affairs and neighbors to inform them of site`s Emergency Response plan. 2. Involve Ekurhuleni department of Disaster & Emergency Management Services (DEMS) and neighboring stakeholders during site emergency drill.

Finding No:	TNR-007108
Checklist Item No:	3.3.2
Status:	Open
Finding level:	Observation
Due date:	2024-Oct-29
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 annual water balance targets have not been met yet as the proposed actions are all preparatory nature and will facilitate the achievement of these targets, but have directly not resulted in quantified water reductions yet.

Finding No:	TNR-007109
Checklist Item No:	3.4.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Oct-29
Checklist item:	Where water quality is a shared water challenge, continual improvement to achieve best practice for the site's effluent shall be identified and where applicable, quantified.
Findings:	Copy of Water Stewardship Plan_Leonard Dingler_2023 reflects the proposed action of an "Effluent system upgrade" in row 62. The site identified "> 90% compliance with set water quality parameters and Maintenance of LD's infrastructure" as its targets, but these will not lead to continual improvement that will result in achievement of best practice for effluent quality as per this indicator. The site needs to set targets that will lead to continual improvement that will result in achievement of best practice for effluent quality.
Corrective action:	1. Engage with IFMS to understanding planned actions with their targets 2. Update with relevant targets that will lead to continual improvement that will result in achievement of best practice for effluent quality.

Finding No:	TNR-007110
Checklist Item No:	3.5.1
Status:	Open
Finding level:	Observation
Due date:	2024-Oct-29
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 begun an initial action of the four proposed, but no actions have been implemented to date that have led to maintenance and/or enhancement of the site's Important Water-Related Areas in the catchment.

Finding No:	TNR-007112
Checklist Item No:	3.7.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Mar-14
Checklist item:	Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.
Findings:	3.7.1 & 3.7.2 Leonard Dingler evidence of indirect water use improvement [Autosaved].pptx reflects actions taken by the site to date to inform the setting of targets for indirect water use. However, no targets have been set yet to reduce indirect water use.
Corrective action:	(a) Further engage two DIM suppliers that have responded in order to define and set the targets. (b) Follow up the five DIM suppliers that have not responded, engage and set targets. (c) AWS team to attend refresher training on the AWS Standard.

Finding No:	TNR-007114
Checklist Item No:	3.7.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Mar-14
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:	3.7.1 & 3.7.2 Leonard Dingler evidence of indirect water use improvement [Autosaved].pptx reflects consultation by the site with some key suppliers and service providers regarding indirect water use. However, no related actions have been implemented by these suppliers to date. Also, no engaged has been undertaken yet with the site's tobacco supplier, which includes the primary quantity of embedded water in the site's manufacturing inputs.
Corrective action:	(a) Further engage two stakeholders that have responded in order to define actions, set the targets and implement. (b) Identify and map PMI tobacco leaves suppliers. (c) Including quantity, quality and level of water risk within the site's catchment and define action and targets to reduce water use. (d) AWS team to attend refresher training on AWS Standard.

Finding No:	TNR-008287
Checklist Item No:	3.8.1
Status:	Open
Finding level:	Observation
Due date:	2024-Oct-29
Checklist item:	Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.
Findings:	The site should engage with the Ekurhuleni Municipality to discuss the recent emergence of flooding in Christopher Street.

Finding No:	TNR-007128
Checklist Item No:	4.1.1
Status:	Open
Finding level:	Observation
Due date:	2024-Oct-29
Checklist item:	Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.
Findings:	Copy of Water Stewardship Plan_Leonard Dingler_2023 (20231101).xlsx describes the actions completed to date per quarter, but does not include a rate of performance progress.

Finding No:	TNR-008288
Checklist Item No:	4.1.2
Status:	Open
Finding level:	Observation
Due date:	2024-Oct-29
Checklist item:	Value creation resulting from the water stewardship plan shall be evaluated.
Findings:	Copy of Water Stewardship Plan_Leonard Dingler_2023 (20231101).xlsx describes the value creation to the site of each action where relevant, but does not include any financial quantification nor a cost-benefit analysis.

Finding No:	TNR-008289
Checklist Item No:	4.1.3
Status:	Open
Finding level:	Observation
Due date:	2024-Oct-29
Checklist item:	The shared value benefits in the catchment shall be identified and where applicable, quantified.
Findings:	Copy of Water Stewardship Plan_Leonard Dingler_2023 (20231101).xlsx describes the value creation to the catchment of each action where relevant, but does not include any financial quantification nor a cost-benefit analysis.

Finding No:	TNR-007132
Checklist Item No:	4.3.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Oct-29
Checklist item:	Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.
Findings:	2023-10-25 12-59.pdf reflects that the Leonard Dingler Water Stewardship Report was shared with key stakeholders, which reflects the actions the site has undertaken to date in relation of the actions and targets it set in its WSP. However, this does not include a quantified evaluation of performance to date. The site should more actively seek to facilitate input from its stakeholders on its water stewardship performance.
Corrective action:	1. Quantify evaluation of performance against actions and targets set in the WSP.

Finding No:	TNR-007133
Checklist Item No:	5.1.1
Status:	Open
Finding level:	Observation
Due date:	2024-Oct-29
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:	Leonard Dingler Water Stewardship Report.pdf was shared with key stakeholders, which reflects the positions, names, and roles and responsibilities of key staff regarding water-related issues. The site has not explicitly stated who is responsible for water-related legal compliance, but this can be inferred from the details provided.

Finding No:	TNR-007136
Checklist Item No:	5.2.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Oct-29
Checklist item:	The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.
Findings:	Leonard Dingler Water Stewardship Report.pdf was shared with key stakeholders, which reflects the key actions implemented by the site under each AWS Outcome, but did not state how the site's WSP and actions contributed to the AWS Standard outcomes beyond water balance. This indicator requires communication of the plan to stakeholders.
Corrective action:	1. Arrange engagement meeting with relevant stakeholders to communicate how water stewardship plan and actions contributed to AWS Standard outcomes.

Finding No:	TNR-007137
Checklist Item No:	5.3.1
Status:	Open
Finding level:	Observation
Due date:	2024-Oct-29
Checklist item:	A summary of the site’s water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.
Findings:	The site should ensure that its annual performance evaluation includes quantification of performance against targets, and associated disclosed to stakeholders.

Finding No:	TNR-007138
Checklist Item No:	5.4.1
Status:	Open
Finding level:	Observation
Due date:	2024-Oct-29
Checklist item:	The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.
Findings:	The site should more explicitly disclose its water-related challenges with stakeholders and the associated actions it is implementing to specifically address these challenges.

Finding No:	TNR-007139
Checklist Item No:	5.4.2
Status:	Open
Finding level:	Observation
Due date:	2024-Oct-29
Checklist item:	Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.
Findings:	The site has engaged with the Ekurhuleni Municipality and sought to coordinate and support water-related actions with them. It is recognised that the site is at an early stage in its AWS journey and stakeholder consultation. However, opportunity exists to consult and seek to coordinate and support water-related actions with a broad suite of public-sector agencies, such as Rand Water etc.

Finding No:	TNR-007140
Checklist Item No:	5.5.1
Status:	Open
Finding level:	Observation
Due date:	2024-Oct-29
Checklist item:	Any site water-related compliance violations and associated corrections shall be disclosed.
Findings:	Environmental_Legal_Requirements_Water (2).pdf is a voluntary external audit report of the site's water-related legal compliance undertaken by Ariscu. Four findings were raised in the report, but the site has not had an opportunity to respond to the auditors on the findings as the report was submitted to the site on 6 October 2023. In addition, some of the findings do not appear to be accurate, as some of the legal requirements specified may not be applicable to the site. The site should provide a copy of its response to the WSAS auditors on the findings they raised, to enable WSAS to be aware of the potential accuracy/inaccuracy. of these findings. Should any of these findings be accurate and the site is consequently determined as having had water-related compliance violations, these compliance violations and associated corrections should be disclosed to all the site's stakeholders.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000859

WSAS WATER STEWARDSHIP ASSURANCE SERVICES

Report Details

Report	Value
Report prepared by	Warrick Stewart
Report approved by	Neringa Pumputyte
Report approved on (Date)	18 December 2023

Surveillance

Proposed date for next audit
2024-Oct-29

Comment The site's first surveillance should be schedule on or before 29 October 2024.

Stakeholder Announcements

Date of publication	Location
29/09/2023	Email to the site's key stakeholders
01/06/2023	AWS and WSAS Websites

Comment The site informed their stakeholders of the audit via email, on 29 September 2023, including sharing the formal audit announcement.

Catchment Information

Catchment Information

The facility is located in quaternary catchment C22B (Natalspruit/Elsburgspruit) of the Vaal/Klip River catchment.

The groundwater resources potential and quality characteristics of the greater Johannesburg area are influenced by the mixing process of fresh and polluted water at shallow zones within the weathered crystalline rocks and dissolution cavities in the dolomites. The solute composition of the water results from two basic contributions: the reaction of meteoric water with weathered zones in the near surface area and direct infiltration through dolomite dissolution cavities. The provenance of groundwater circulation is limited to shallow depths, however, dissolution cavities, fractured and sheared zones allow deeper circulation of groundwater. The natural water quality is found to be highly impacted by acid mine drainage which is derived from the gold mines in the Witwatersrand basin as it has been observed in previous studies. The Rietspruit and Klip River are the nearest surface water systems to the site.

The Klip River originates from the Witwatersrand springs and flows in a southerly direction draining the southern Witwatersrand region, until its confluence with the Vaal River in Vereeniging. There are substantial ecological risks to the Klip River catchment due to anthropogenic activities which result in heavy metals finding their way into this freshwater system. High Heavy Metal Pollution Index (HPI) values for aquatic, domestic and agricultural uses that exceeded the critical index value have been determined. Consequently, the water in this system is not fit for its designated domestic and agricultural uses and also aquatic ecosystem protection (Marara & Palamuleni, 2019).

Catchment_C22_1.1.1.jpg

Catchment_C22B_1.1.1d.jpg

Catchment_C22B_1.1.1.jpg

Client Description and Site Details

Client/Site Background
The Leonard Dingler Boksburg site is located at the corner of Siding and Barry Streets, Boksburg, Gauteng, South Africa.

The site facilities that were included in the assessment were as follows: pipe primary and secondary areas, stores, workshop, boiler room, compressor room, transformer room, vacudyne room, fermentation, snuff secondary area, new auto hammer mill, old hammer mill, old blending, old laboratory, buffer room, snuff packaging, Tambuti packaging, palletising area, NTM warehouse, forklift workshop, PPE and chemical kitchen area, flammable store room, waste recycling area, pump house, fire tanks, effluent tanks, rainwater tanks, pallet warehouse, main warehouse, return warehouse, car wash, canteen, relax room, induction room, reception, and offices.

The site obtains its potable input water from the Ekurhuleni Municipality, which is sourced from Rand Water (water service provider) via the Vaal Dam outside the catchment area.

Leonard Dingler Boksburg discharges its sewage to the Vlakplaats ERWAT (Ekurhuleni Water Care Company (ERWAT)) waste water treatment works.

Approximately 4,000 m3/a of municipal water is used as operational process water by the site, while approximately 80 m3/a of industrial effluent is generated. This effluent is in turn treated and used for irrigation. Domestic use totals approximately 5550 m3/a of which approximately 4560 m/a is lost and fed into the municipal sewer line.

Site_Layout_1.1.1.jpg

	Summary of Shared Water Challenges

Summary of Shared Water Challenges
The following shared water challenges were identified by the site:

Water quantity: Poor water use efficiency and levels of non-revenue water in the catchment.
Water quality: Degraded state of quaternary catchment wetlands, weak financial management of municipal government, and reduced technical capabilities within these municipalities to maintain and operate infrastructure.
Important water related areas: Degraded condition of rivers and wetlands (local and some source catchments) that exhibit poor river/wetland health, and invasive plant species.
Extreme weather events: Susceptibility to flood and drought, need for greater climate change resilience.
WASH: Limited access to safe water, sanitation and hygiene for some communities in the catchment.
Water governance: Weak financial management of municipal government. Reduced technical capabilities within municipalities to maintain and operate infrastructure.

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
Comment	The site occupies a single catchment.	
0.1.1.2	*The scope of the proposed certification shall be under the control of a single management system.*	Yes
Comment	The site is under the control of a single management system.	
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
Comment	The site is homogeneous with respect to its primary production system, water management, product range, and main market structures.	

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.*	Yes

Comment

Evidence:
Water Main 2_1.1.1.jpg
Water Main 1_1.1.1.jpg
Water Main 1_1.1.1g.jpg
Water Main 2_1.1.1h.jpg
Vlakplaats ERWAT WWTW_1.1.1.PNG
Vlakplaats ERWAT WWTW_1.1.1e.PNG
Water related infrastructure_1.1.1.jpg
Site Layout_1.1.1.jpg
Site Layout_1.1.1f.jpg
Catchment C22_1.1.1.jpg
Catchment C22B_1.1.1.jpg
Catchment C22B_1.1.1d.jpg
Site Boundary_1.1.1a.pptx
Indicator 1.1 Compilation (1).pptx
Water related infrastructure_1.1.1b.jpg
1.1.1 MicrosoftTeams-image (1).png
LDZA_Discharges.jpg
LZDA Discharge Points_New.jpg
Water Stewardship Plan_Leonard Dingler_2023_20231002.xlsx

Comments:
Site_Boundary_1.1.1a.pptx and Site_Layout_1.1.1.jpg spatially reflect the site boundaries.

Site_Boundary_1.1.1a.pptx, Site_Layout_1.1.1.jpg, and Water_related_infrastructure_1.1.1.jpg spatially reflect the site's water-related infrastructure, including piping network, owned or managed by the site or its parent organization, and the location of the WWTW to which the site's effluent is ultimately discharged.

Catchment_C22_1.1.1.jpg and Catchment_C22B_1.1.1.jpg spatially reflect the catchment that the site is located in.

Indicator 1.1 Compilation.pptx reflects the site's water service provider and its ultimate water source the Vaal Dam catchment, including the two water transfer schemes that feed this catchment, as well as the location of the Natalspruit that is the site's ultimate receiving water body after treatment at the Vlakplaats WWTW.

Vlakplaats_ERWAT_WWTW_1.1.1.PNG is an image of the Vlakplaats WWTW to which the site's effluent is ultimately discharged. Catchment_C22B_1.1.1d.jpg reflects the location of the Vlakplaats WWTW.

Water_Main_1_1.1.1.jpg and Water_Main_2_1.1.1.jpg are photographs of water mains and meters on site.

Indicator 1.1 Compilation.pptx reflects the location of the Rand Water Potable Treatment Works downstream of the Vaal Dam. The Vaal Dam receives water from multiple sources, including the Mohale Dam, Katse Dam, Mashai Dam (all Lesotho Highlands Water Project sources), Sterkfontein Dam, Grootdraai Dam etc.
Figure_1.5-5_Vaal_Dam_Source_Water_Transfers_(1).png also reflects the site's ultimate water sources. Figure_1.5-6_Rand_Water_Bulk_Distribution_Network_(1).png reflects the site's water service provider.

No water sources provide water to the site that are owned or managed by the site or its parent organization.

1.1.1 MicrosoftTeams-image (1).png, LDZA_Discharges.jpg, and LZDA Discharge Points_New.jpg as provided on 1 November 2023 are the most comprehensive maps of the potential pollution sources on site.

Site Discharge Points.jpg reflects the sewer and irrigation discharge points, and most but not

all the stormwater discharge points on site. LDZA_Discharges.jpg and LZDA Discharge Points_New.jpg reflect all the stormwater discharge points on site.

In the past the site exceeded CoD national standards for discharged effluent, so they installed an effluent treatment plant to improve CoD levels prior to discharge.

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

Comment

Evidence:
1.2.1 Stakeholders Consultation Evidence.pdf
1.2.1. Stakeholder List and Memorandum Leonard Dingler.xlsm
1.2.1 Stakeholders Engagement and Meetings.pdf
1.2.a. Stakeholder List and Memorandum PMILD (1).xlsm
2023-10-25 12-59.pdf (shown on-screen)
ZA 597766 PMI AWS CERT SURT.pdf (shown on-screen)

Comments:
1.2.a._Stakeholder_List_and_Memorandum_PMILD_(1).xlsm reflects the stakeholders identified by the site, including water utilities; the municipal waste water treatment provider, fire fighting services etc.; and various private sector companies in proximity to the site and/or service providers; but not any civil society organisations and/or communities that may have in interest in the site, be affected by the site, or have in interest in water stewardship issues in the catchment, nor vulnerable, women, and minorities groups.

1.2.a._Stakeholder_List_and_Memorandum_PMILD_(1).xlsm documents the methodology to be applied by the site during stakeholder identification and mapping, but not the actual process applied by this particular site.

The shared water-related challenges of these stakeholders are reflected, but in a very generic manner and from the information provided it is not clear if these stakeholders were actually consulted on this issue. Only limited feedback was received from stakeholders to date. Most of the stakeholder interaction was via email. 2023-10-25 12-59.pdf reflects the feedback from Terraquip regarding water-related challenges that was shown on-screen. ZA 597766 PMI AWS CERT SURT.pdf that reflects similar feedback from service providers (outsourced services), but not other neighbours or catchment stakeholders, was shown on-screen.

The degree of proposed stakeholder engagement was identified based on their level of interest and influence.

The site needs to engage more comprehensively with its stakeholders, and solicit feedback, to ensure its Stakeholder List and Memorandum is fully reflective of stakeholder and catchment challenges.

Finding No: TNR-007055

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

Evidence:
1.2.a. Stakeholder List and Memorandum PMILD (1).xlsm

Comments:
1.2.a._Stakeholder_List_and_Memorandum_PMILD_(1).xlsm reflects the stakeholders identified by the site.

The degree of proposed stakeholder engagement was identified based on their level of interest and influence, but it not clear if they were actually consulted to determine their level of interest and influence, or if this was only undertaken as a desktop exercise without any stakeholder input or feedback.

It is also not clear if the stakeholder list and associated mapping is fully reflective of the site's physical scope, ultimate water source and ultimate receiving water body for wastewater.

The site needs to engage more comprehensively with its stakeholders, and solicit feedback, to ensure its Stakeholder List and Memorandum are fully reflective of the current and potential degree of influence between the site and its stakeholders, particularly regarding the site's ultimate water source and ultimate receiving water body for wastewater.

Finding No: TNR-007056

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

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

in progress

Comment

Evidence:
Emergency_Preparedness Response.doc (provided on 20231024)
Emergency_Preparedness__Response.docx (No: ZA EHS.PR.0010; Version No: 4.0)

Comment:
Emergency_Preparedness Response.doc (provided on 20231024) reflects the site's Emergency Preparedness and Response Plan. The plan addresses water-related emergency situations associated with fire, disease outbreak, mechanic failure, faulty sprinkler system (for fire suppression), a hazardous chemical spill, and flooding. However, the plan did not address interruptions or a cessation in the water supply to the site, or drought. Also, the chemical spill incident response actions only considered impacts to site staff and visitors, and not to external communities or the environment.

Emergency_Preparedness__Response.docx (No: ZA EHS.PR.0010; Version No: 4.0) (provided on 20231029) now addresses water disruptions and drought conditions. It includes some consideration of impacts and risks on external communities, but not on the natural environment. The proposed mitigation measures are also insufficient to adequately address the risks and impacts in a meaningful way.

Finding No: TNR-007058

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

Yes

Comment	Evidence: Water_related_infrastructure_1.1.1b.jpg 1.3.2_Leonard_Dingler_Water_Balance_Report.pdf Comments: Water_related_infrastructure_1.1.1b.jpg reflects the layout of water-related infrastructure on site. 1.3.2_Leonard_Dingler_Water_Balance_Report.pdf includes a water balance diagram and the site's water balance was quantified including inputs, storage, uses, losses, and discharges.	
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.*	Yes
Comment	Evidence: 1.3.3 Leonard Dingler water consumption and seasonality trend.pptx Water_related_infrastructure_1.1.1b.jpg 1.3.2_Leonard_Dingler_Water_Balance_Report.pdf Comments: Water_related_infrastructure_1.1.1b.jpg reflects the layout of water-related infrastructure on site. 1.3.2_Leonard_Dingler_Water_Balance_Report.pdf includes a water balance diagram and the site's water balance was quantified including inputs, storage, uses, losses, and discharges. Copy_of_Copy_of_True_Cost_of_Water.2021_PM_MTB.xlsx in the True Cost of Water worksheet reflects the volume of potable water received from HERA and the volume of effluent discharge to the HERA system, but not any losses and storage, and a total site water balance calculation. 1.3.3_Leonard_Dingler_water_consumption_and_seasonality_trend.pptx reflects the site's Annual Water consumption trends (as Consumption rate per Mio cig.) for 2018 – 2022, Total Annual Water in and consumed for 2020 to 2022, Monthly Water Consumption for 2020, 2021 and 2022.	
1.3.4	*Water quality of the site's water source(s), provided waters, effluent and receiving water bodies shall be quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be quantified.*	in progress

Comment

Evidence:
Water_Quality_Database (2).xlsx
2022-03-31-178_Water_Certificate_of_Analysis_(1).pdf
2022-03-31-178_Water_Outsource_Results_(1).pdf
230731-01_Certificate_of_Analysis_.pdf
21. 01_august_2023_230731-01-06_hot_well.pdf
21. 01_august_2023_230731-01-17_source.pdf

Comment:
Water_Quality_Database.xlsx, 2022-03-31-178_Water_Certificate_of_Analysis_(1).pdf, 2022-03-31-178_Water_Outsource_Results_(1).pdf, 230731-01_Certificate_of_Analysis_.pdf, and
21. 01_august_2023_230731-01-06_hot_well.pdf through
21. 01_august_2023_230731-01-17_source.pdf reflect the results of microbiological, physical and chemical water quality results from 2023 for the site's Hot Well, Vacudyne Cooling Tower, Fire Water, Treated Effluent, Untreated Effluent, Rain Water, Boiler Softner, Boiler Water, and Water Source.

Water_Quality_Database (2).xlsx reflects the site's microbiological, physical and chemical water quality results for 2023 for the site's Hot Well, Vacudyne Cooling Tower, Fire Water, Treated Effluent, Untreated Effluent, Rain Water, Boiler Softner, Boiler Water, and Water Source. These are assessed against the SANS 2015 Drinking Water Standard, the South African Water Quality Guideline Concentration range (mg/L) for relevant uses after treatment and discharge (i.e., receiving environment and subsequent receptor use), In-Stream Water Quality Guidelines for the Klip Catchment, and In-Stream Water Quality Guidelines for the Rietspruit Catchment. Annual data for the site's effluent were provided for 2020, 2021, and 2023, but not 2022. Data for input water quality at various manufacturing points in the operation were provided for 2022 and 2023, and then very sporadically from 2014 and 2019. Consistent water quality sampling was not conducted for the site's incoming water from Rand Water, the site's effluent before and after treatment, to determine annual and seasonal high and low variances, except for 2022 and 2023 for input water for 2022 and 2023 for the canteen.

Water quality data for receiving water bodies (e.g., Klip River) prior to July 2022 should also be sourced, to enable the site to more comprehensively understand annual and seasonal water quality trends.

Finding No: TNR-007063

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

Obs.

Comment

Evidence:
1.3.5 Potential Sources of Pollution.pptx
Waste Area_1.3.5e.jpg
Car Wash Drain_1.3.5f.jpg
Chemical Kitchen_1.3.5d.jpg
Chemical Storage Facilities and MSDS_1.3.5a.jpg
Flameable Store and MSDS_1.3.5b.jpg
Potential Sources of Pollution_1.3.5g.jpg

Comments:
Potential_Sources_of_Pollution_1.3.5g.jpg and Chemical_Storage_Facilities_and_MSDS_1.3.5a.jpg are maps of the potential sources of pollution on site.

Car_Wash_Drain_1.3.5f.jpg, Chemical_Kitchen_1.3.5d.jpg, Flameable_Store_and_MSDS_1.3.5b.jpg, and Waste_Area_1.3.5e.jpg are photographs of the some of the potential sources of pollution on site.

1.3.5_Potential_Sources_of_Pollution.pptx includes photographs of various key potential pollution sources on site.

The waste recycling area does not have any bunding or other forms of containment, to avoid potential polluted run-off entering the site's effluent or stormwater system. Also, waste tobacco is being stored in open containers (next to the site's waste skips near the dispatch gate) with some run-off evident from them.

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

Evidence:
1.3.6.docx
Water_related_infrastructure_1.1.1.jpg

Comments:
Water_related_infrastructure_1.1.1.jpg spatially reflects the site's important water-related infrastructure, but no reference is made to IWRAs.

In 1.3.6.docx the site stated that “There are currently no Important Water-Related Areas on site.”. This was confirmed on site by the auditors.

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.*

in progress

Comment	Evidence: AWS WATER COST 1.3.7 Revision 2.xlsx 1.3.7 On-site WASH Adequacy and Availability.pptx Copy_of_Copy_of_True_Cost_of_Water.2021_PM_MTB.xlsx Comments: Copy_of_Copy_of_True_Cost_of_Water.2021_PM_MTB.xlsx and AWS WATER COST 1.3.7 Revision 2.xlsx collectively reflect the site's water-related costs in 2021, 2022 and 2023 to date. The site's water-related revenues were displayed on-screen during the audit and are reflected in AWS WATER COST 1.3.7 Revision 2.xlsx in worksheet "Leonard Dingler AWS Revenues". Water-related savings achieved via reductions in effluent discharged that the site would otherwise be billed for, and savings via rainwater harvesting are also reflected. A description or quantification was not provided of the social, cultural, environmental, or economic water-related value generated by the site, only links to the categories of social, cultural, environmental, or economic water-related value. ***Finding No: TNR-007067***
1.3.8	*Levels of access and adequacy of WASH at the site shall be identified.* — No
Comment	Evidence: WASH Facilities Map_1.3.8a.PNG Copy of 1-3-8 WASH Register Adequacy.xlsx WASH Facilities Map_1.3.8a.jpg Wash_Register.docx 1.3.7_On-site_WASH_Adequacy_and_Availability.pptx Comments: 1.3.7_On-site_WASH_Adequacy_and_Availability.pptx is a presentation of photographs of WASH facilities on site, including hand wash basins, chemical showers, hand sanitizer stations, and drinking water fountains. Wash_Register.docx reflects the number of toilets, taps, urinals, and hand wash basins for men and women in each of the building/s. WASH_Facilities_Map_1.3.8a.jpg reflects the spatial location of these facilities across the site. Overall, the site provides sufficient adequacy and access to WASH facilities on site, in line with the SANS 10400A. However, the number of WASH facilities at the Finished Goods Warehouse are insufficient. The site has developed an action plan to address this inadequacy in its Water Stewardship Plan. ***Finding No: TNR-007078***
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

Evidence:
Supplier_list.xlsx
1.4.b - 1. Indirect water use of outsource services_ZA Leonard Dingler.xlsb
Outsourced_Suppliers_within_and_outside_catchment_1.4.2.xlsx

Comments:
Indirect water use is primarily from tobacco, chemicals used in the manufacturing process, packaging, and labelling.

RE AWS_Certification_Preparation_-_Leaf_Suppliers.msg reflects communication within PMI regarding embedded water use of primary inputs, which confirms that none of the tobacco sourced to the plant is from within the catchment.

Tobacco is sourced from South Africa, India, Philippines, Pakistan, Malawi, Mozambique Brazil, and occasionally from Argentina, but none from within the site's catchment.

Chemicals, packaging, and labelling are sourced from within and outside the catchment. However, the site has not determined which of these chemicals are manufactured in or outside the catchment. The quantity, quality and level of water risk of embedded water in primary inputs from within the site's catchment were not specified.

Finding No: TNR-007079

1.4.2 *The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.*

in progress

Comment

Evidence:
Outsourced Suppliers within and outside catchment 1.4.2.xlsx
1.4.b - 1. Indirect water use of outsource services_ZA Leonard Dingler.xlsb

Comments:
1.4.b_-_1._Indirect_water_use_of_outsource_services_ZA_Leonard_Dingler.xlsb lists the site's various Outsource Services providers, including those that utilise water and/or are water demanding and whether they utilise water on-site (i.e., Leonard Dingler's water), off-site in the catchment, or off-site outside the catchment.

RTT Group provides distribution services to the site for finished goods. They are located in the site's catchment. They have quantified their total company water use, but not the quantity of water used in the provision of services to Leonard Dingler.

Super Care provides hygiene and cleaning services, which use chemicals with embedded water, but are not located in the site's catchment. A total of 2,700L of embedded water is used in chemicals.

Life Green Groupprovides landscaping services, but on-site water is used.

Finding No: TNR-007081

1.5 *Gather water-related data for the catchment, including water governance, water balance, water quality, Important Water-Related Areas, infrastructure, and WASH*

Finding No: TNR-007083

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	Evidence: 1.5_General Catchment Information.pdf 1.5.1_Water governance initiatives.pdf 1.5-20 IEP23 Contribution to the Five-Year CAPEX Plan (Millions) (1).PNG 1.5-22 Percentage Respondents to Access to Adequate Sanitation (1).PNG 1.5-21 Toilet Facilities in the CoE (1).PNG 1.5-23 Population by Water Supply (1).PNG 1.5-24 Percentage Respondents to Access to Water and Satisfaction Levels (1).PNG 1.5-18 Colour Codes for PES (1).PNG 1.5-19 Present Ecological Scores of Water Bodies in C22B (1).PNG 1.5-13 Colour Codes for Key Performance Areas (1).PNG 1.5-14 Green Drop Scorecard 2021 (1).PNG 1.5-15 Flow vs Capacity 2019 - 2020 (1).PNG 1.5-16 Blue Drop Score 2022 (1).PNG 1.5-10 Gauteng SIV and NRW.PNG 1.5-11 Gauteng Population and Litres per Capita per Day Trend.PNG 1.5-12 Gauteng Water Losses Trend.PNG 1.5-7 Rand Water System Balance for Target Reconciliation Strategy (2021).PNG 1.5-8 Rand Water Demand vs Supply Growth Scenario (March 2022).PNG 1.5-9 Gauteng Water Balance (May 2023).PNG 597766_PMZA AWS GA_Step 1.5 - Catchment data.docx Comments: Figure_1.5-5_Vaal_Dam_Source_Water_Transfers_(1).PNG and Figure_1.5-6_Rand_Water_Bulk_Distribution_Network_(1).PNG reflect Rand Water's raw water resources and bulk distribution network. 597766_PMZA_AWS_GA_Step_1.5_-_Catchment_data.docx includes various information on the background to the catchment, the Thukela-Vaal Water Transfer Scheme, Rand Water Supply System and Distribution Network, and the Lesotho Highlands Water Project. However, no catchment plan/s; major public-led initiatives regarding water quality, IWRAs, and WASH; and relevant goals to help inform the site of possible opportunities for water stewardship collective action were identified.
1.5.2	*Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.*

in progress

Comment

Evidence:
1.5_General Catchment Information.pdf
1.5.2_Legal and Regulatory Requirements.pdf
597766_PMZA AWS GA_Step 1.5 - Catchment data.docx
1.5.2. Catchment water-related legal and regulatory requirements_PMZA.pptx
1.5-20 IEP23 Contribution to the Five-Year CAPEX Plan (Millions) (1).PNG
1.5-22 Percentage Respondents to Access to Adequate Sanitation (1).PNG
1.5-21 Toilet Facilities in the CoE (1).PNG
1.5-23 Population by Water Supply (1).PNG
1.5-24 Percentage Respondents to Access to Water and Satisfaction Levels (1).PNG
1.5-18 Colour Codes for PES (1).PNG
1.5-19 Present Ecological Scores of Water Bodies in C22B (1).PNG
Environmental_Legal_Requirements_Water.pdf
Site legal register (Legal_Register_Site and Legal_Register_Screen_Shot)

Comments:
1.5.2._Catchment_water-related_legal_and_regulatory_requirements_PMZA.pptx reflects the requirements of the Occupational Health and Safety Act in terms of drinking water requirements for employees and the National Water Act in terms registration of irrigation with wastewater, and the discharge of domestic and industrial wastewater into water resources.

1.5.2_Legal_and_Regulatory_Requirements reflects the policy context in South Africa.

A summary of the current water related legislation in South Africa was provided in 597766_PMZA_AWS_GA_Step_1.5_-_Catchment_data, including the National Water and Sanitation Master Plan and current national water-related legislation in South Africa. However, the specific legal requirements applicable to the site were not documented to enable the site to know what its exact obligations are.

Environmental_Legal_Requirements_Water.pdf reflects the results of the site water-related legal requirements audit. This specifies the likely applicable water-related legal requirements, but does not confirm which is applicable.

However, none of the applicable municipal by-laws regarding potable water use, and storm water and wastewater management and discharge were identified.

The Red-On-Line system is currently being rolled out at the site, which will include all relevant legal requirements.

Finding No: TNR-007084

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

Yes

Comment

Evidence:
1.5_General Catchment Information.pdf
1.5.3_Catchment Water Balance.pdf
597766_PMZA AWS GA_Step 1.5 - Catchment data.docx
1.5-20 IEP23 Contribution to the Five-Year CAPEX Plan (Millions) (1).PNG
1.5-22 Percentage Respondents to Access to Adequate Sanitation (1).PNG
1.5-21 Toilet Facilities in the CoE (1).PNG
1.5-23 Population by Water Supply (1).PNG
1.5-24 Percentage Respondents to Access to Water and Satisfaction Levels (1).PNG
1.5-18 Colour Codes for PES (1).PNG
1.5-19 Present Ecological Scores of Water Bodies in C22B (1).PNG
1.5-13 Colour Codes for Key Performance Areas (1).PNG
1.5-14 Green Drop Scorecard 2021 (1).PNG
1.5-15 Flow vs Capacity 2019 - 2020 (1).PNG
1.5-16 Blue Drop Score 2022 (1).PNG
1.5-10 Gauteng SIV and NRW.PNG
1.5-11 Gauteng Population and Litres per Capita per Day Trend.PNG
1.5-12 Gauteng Water Losses Trend.PNG
1.5-7 Rand Water System Balance for Target Reconciliation Strategy (2021).PNG
1.5-8 Rand Water Demand vs Supply Growth Scenario (March 2022).PNG
1.5-9 Gauteng Water Balance (May 2023).PNG

Comments:
1.5-7_Rand_Water_System_Balance_for_Target_Reconciliation_Strategy_(2021).PNG is a graph of the 2021 Rand Water System Balance, with various water requirement and yield scenarios applied from 2002 to 2050.

1.5-8_Rand_Water_Demand_vs_Supply_Growth_Scenario_(March_2022).PNG is a graph of the Rand Water Supply vs Demand Growth Scenario (March 2022), which indirectly reflects scarcity.

1.5-9_Gauteng_Water_Balance_(May_2023).PNG quantifies the system water balance.

1.5-10_Gauteng_SIV_and_NRW.PNG is a graph of the system input volume of billed and non-revenue water from June 2011 to June 2022.

1.5-11_Gauteng_Population_and_Litres_per_Capita_per_Day_Trend.PNG is a graph of the Gauteng Province's population numbers and water use per capita per day from June 2011 to June 2022.

1.5-12_Gauteng_Water_Losses_Trend.PNG s a graph of the Gauteng Province's water losses trend from June 2011 to June 2022.

1.5-10_Gauteng_SIV_and_NRW.PNG,
1.5-11_Gauteng_Population_and_Litres_per_Capita_per_Day_Trend.PNG, and
1.5-12_Gauteng_Water_Losses_Trend.PNG reflect annual variances.

597766_PMZA_AWS_GA_Step_1.5_-_Catchment_data.docx includes further descriptive information on the catchment water balance and all the graphs above.

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

Obs.

Comment

Evidence:
1.5_General Catchment Information.pdf
1.5.4_Catchment Water Quality_LDZA.pdf
1.5.4_Catchment Water Quality_Latest.pdf
1.5-20 IEP23 Contribution to the Five-Year CAPEX Plan (Millions) (1).PNG
1.5-22 Percentage Respondents to Access to Adequate Sanitation (1).PNG
1.5-21 Toilet Facilities in the CoE (1).PNG
1.5-23 Population by Water Supply (1).PNG
1.5-24 Percentage Respondents to Access to Water and Satisfaction Levels (1).PNG
1.5-18 Colour Codes for PES (1).PNG
1.5-19 Present Ecological Scores of Water Bodies in C22B (1).PNG
1.5-13 Colour Codes for Key Performance Areas (1).PNG
1.5-14 Green Drop Scorecard 2021 (1).PNG
1.5-15 Flow vs Capacity 2019 - 2020 (1).PNG
1.5-16 Blue Drop Score 2022 (1).PNG
1.5-10 Gauteng SIV and NRW.PNG
1.5-11 Gauteng Population and Litres per Capita per Day Trend.PNG
1.5-12 Gauteng Water Losses Trend.PNG
1.5-7 Rand Water System Balance for Target Reconciliation Strategy (2021).PNG
1.5-8 Rand Water Demand vs Supply Growth Scenario (March 2022).PNG
1.5-9 Gauteng Water Balance (May 2023).PNG
597766_PMZA AWS GA_Step 1.5 - Catchment data.docx
Leonard_Dingler_-_Request_for_information_-_18_October_2023.pdf

Comments:
1.5-13_Colour_Codes_for_Key_Performance_Areas_(1).PNG is a key for the Green Drop Standard that serves as a guide for wastewater management in South Africa.

1.5-14_Green_Drop_Scorecard_2021_(1).PNG reflects the Green Drop wastewater management results for the Vlakplaats catchment for 2021.

1.5-15_Flow_vs_Capacity_2019_-_2020_(1).PNG reflects the volumetric low of effluent through the various WWTWs in the catchment in 2019/20 in relation to their design capacities.

1.5-16_Blue_Drop_Score_2022_(1).PNG reflects the catchment's Blue Drop (drinking water quality guide for South Africa) results for the Vlakplaats catchment for 2022.

However, all of the information listed above provided is highly summarised for various high-level criteria in the scorecard results. None of the information includes detailed quantitative data of the physical, chemical, and biological status of the catchment.

An indication of annual and seasonal high and low variances was also not identified, which is particularly important within the context of the Gauteng Province due to its pronounced variances between summer and winter rainfall and river/stream flow.

597766_PMZA_AWS_GA_Step_1.5_-_Catchment_data.docx includes various descriptive information on catchment water quality, in addition the above graphs. However, this document was not uploaded as evidence for this indicator or any of the other indicators under 1.5.

1.5.4_Catchment_Water_Quality_LDZA.pdf Table 1.5-1 to Table 1.5-3 reflects physical and chemical results for May 2019 to August 2019 and November 2019 to February 2020. However, no annual data was provided. 1.5.4_Catchment Water Quality_LDZA.pdf page 12 includes tables of physical and chemical water quality for the Klip River catchment from 1 October 2022 to 30 September 2023. 1.5.4_Catchment Water Quality_Latest.pdf reflects this data at quarterly intervals, covering four periods from January 2022 to December 2022 for Rand Water data and from October 2021 to September 2023 for City of Ekurhuleni data. The key concerns that emerged from the analysis included elevated levels of E. coli, faecal coliforms, sulfates, electrical conductivity, ammonium and fluoride content.

1.5-18_Colour_Codes_for_PES_(1).PNG is a legend of the impact score range and health category of aquatic ecosystems based on South Africa's Present Ecological State (PES) system. 1.5-19_Present_Ecological_Scores_of_Water_Bodies_in_C22B_(1).PNG is a map of the PES scores of the water bodies in the catchment. However, no other biological information was provided for the catchment.

Leonard_Dingler_-_Request_for_information_-_18_October_2023.pdf reflects a request to the Ekurhuleni Municipality requesting such information, but no data has been received yet.

Water quality data prior to July 2022 should also be sourced, to enable the site to more comprehensively understand annual and seasonal water quality trends.

Finding No: TNR-007088

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

Evidence:
1.5_General Catchment Information.pdf
1.5.5_Catchment IWRAs.pdf
1.5-20 IEP23 Contribution to the Five-Year CAPEX Plan (Millions) (1).PNG
1.5-22 Percentage Respondents to Access to Adequate Sanitation (1).PNG
1.5-21 Toilet Facilities in the CoE (1).PNG
1.5-23 Population by Water Supply (1).PNG
1.5-24 Percentage Respondents to Access to Water and Satisfaction Levels (1).PNG
1.5-18 Colour Codes for PES (1).PNG
1.5-19 Present Ecological Scores of Water Bodies in C22B (1).PNG
IWRAs_1.5.5a (1).jpg
1.5-13 Colour Codes for Key Performance Areas (1).PNG
1.5-14 Green Drop Scorecard 2021 (1).PNG
1.5-15 Flow vs Capacity 2019 - 2020 (1).PNG
1.5-16 Blue Drop Score 2022 (1).PNG
1.5-10 Gauteng SIV and NRW.PNG
1.5-11 Gauteng Population and Litres per Capita per Day Trend.PNG
1.5-12 Gauteng Water Losses Trend.PNG
1.5-7 Rand Water System Balance for Target Reconciliation Strategy (2021).PNG
1.5-8 Rand Water Demand vs Supply Growth Scenario (March 2022).PNG
1.5-9 Gauteng Water Balance (May 2023).PNG
597766_PMZA AWS GA_Step 1.5 - Catchment data.docx

Comments:
IWRAs_1.5.5a_ (1).jpg is a map of IWRAs in the catchment and adjacent catchments.

1.5-18_Colour_Codes_for_PES_(1).PNG is a legend of the impact score range and health category of aquatic ecosystems based on South Africa's Present Ecological State (PES) system.

1.5-19_Present_Ecological_Scores_of_Water_Bodies_in_C22B_(1).PNG is a map of the PES scores of the water bodies in the catchment.

However, the catchment boundaries used in IWRAs_1.5.5a_(1).jpg and 1.5-19_Present_Ecological_Scores_of_Water_Bodies_in_C22B_(1).PNG differ. 1.5-19_Present_Ecological_Scores_of_Water_Bodies_in_C22B_(1).PNG does not reflect the PES of the southern part of catchment C22B as per the catchment boundary in IWRAs_1.5.5a_(1).jpg.

597766_PMZA_AWS_GA_Step_1.5_-_Catchment_data.docx listed various IWRAs in the catchment. A number of additional IWRAs are reflected in the maps above, but based on the IWRA definition some of these may not qualify as IWRAs based on their ecological and/or social importance.

Table 1.5-5 Classification of IWRAs within C22B in 1.5.5_Catchment_IWRAs.pdf lists the IWRAs identified from the natural and man-made aquatic features/water bodies reflected in Figure 1.5-17: Important Water Related Areas (IWRAs).

The site made a good attempt at mapping the IWRAs and collecting information about them, however (a) it is not sufficiently clear how some of them meet the definition of IWRAs based on their ecological and/or social importance; (b) the status of these IWRAs has not been specified, nor the risks to them. In addition to Present Ecological State, Ecological Importance and Ecological Sensitivity should also be documented for each IWRA.

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

in progress

Comment	Evidence: 1.5_General Catchment Information.pdf 1.5.6_Catchment_Water_Infrastructure.pdf Figure 1.5-5_Vaal Dam Source Water Transfers (1).PNG Figure 1.5-6_Rand Water Bulk Distribution Network (1).PNG 1.5-20 IEP23 Contribution to the Five-Year CAPEX Plan (Millions) (1).PNG 1.5-22 Percentage Respondents to Access to Adequate Sanitation (1).PNG 1.5-21 Toilet Facilities in the CoE (1).PNG 1.5-23 Population by Water Supply (1).PNG 1.5-24 Percentage Respondents to Access to Water and Satisfaction Levels (1).PNG 1.5-18 Colour Codes for PES (1).PNG 1.5-19 Present Ecological Scores of Water Bodies in C22B (1).PNG 597766_PMZA AWS GA_Step 1.5 - Catchment data.docx Comments: 1.5-20_IEP23_Contribution_to_the_Five-Year_CAPEX_Plan_(Millions)_(1).PNG is a graph of Rand Water's 5-year CAPEX Plan for its Integrated Execution Programme (IEP23), which involves the grouping of 232 water infrastructure projects into 42 packages. However, this graph does not identify the existing and planned water-related infrastructure in the catchment, nor the condition and potential exposure of each to extreme events. 597766_PMZA_AWS_GA_Step_1.5_-_Catchment_data.docx includes various descriptive information on existing and planned water-related infrastructure in the catchment, in addition to the above graph. Included therein is information on the Vlakplaats WWTW, which is deemed to have inadequate capacity to treat wastewater. The rehabilitation of the Boksburg Lake and developments on the Rondebult outfall sewer were also identified. No information was documented about the Rand Water potable water treatment plant from which the site receives its input water. Also, the site identified most water-relate infrastructure in catchment C22B (at a sub/quaternary catchment level), but not all key infrastructure within the primary, secondary or tertiary catchment. ***Finding No: TNR-007089***	
1.5.7	*The adequacy of available WASH services within the catchment shall be identified.*	Yes

Comment	Evidence: 1.5_General Catchment Information.pdf 1.5.7_Catchment WASH.pdf 597766_PMZA AWS GA_Step 1.5 - Catchment data.docx 1.5-20 IEP23 Contribution to the Five-Year CAPEX Plan (Millions) (1).PNG 1.5-22 Percentage Respondents to Access to Adequate Sanitation (1).PNG 1.5-21 Toilet Facilities in the CoE (1).PNG 1.5-23 Population by Water Supply (1).PNG 1.5-24 Percentage Respondents to Access to Water and Satisfaction Levels (1).PNG 1.5-18 Colour Codes for PES (1).PNG 1.5-19 Present Ecological Scores of Water Bodies in C22B (1).PNG 1.5-13 Colour Codes for Key Performance Areas (1).PNG 1.5-14 Green Drop Scorecard 2021 (1).PNG 1.5-15 Flow vs Capacity 2019 - 2020 (1).PNG 1.5-16 Blue Drop Score 2022 (1).PNG 1.5-10 Gauteng SIV and NRW.PNG 1.5-11 Gauteng Population and Litres per Capita per Day Trend.PNG 1.5-12 Gauteng Water Losses Trend.PNG 1.5-7 Rand Water System Balance for Target Reconciliation Strategy (2021).PNG 1.5-8 Rand Water Demand vs Supply Growth Scenario (March 2022).PNG 1.5-9 Gauteng Water Balance (May 2023).PNG Comments: 1.5-21_Toilet_Facilities_in_the_CoE_(1).PNG reflects the extent of sanitation to citizens in the municipality in which the site is located. 1.5-22_Percentage_Respondents_to_Access_to_Adequate_Sanitation_(1).PNG is a graph of citizen's access to and satisfaction with current access to adequate sanitation in the municipal area from 2015/16 to 20220/21. 1.5-23_Population_by_Water_Supply_(1).PNG is a graph of potable water supply access to citizens in the municipal area. 1.5-24_Percentage_Respondents_to_Access_to_Water_and_Satisfaction_Levels_(1).PNG is a graph of potable water supply access and citizens' satisfaction with current potable water supply access in the municipal area from 2015/16 to 20220/21. 597766_PMZA_AWS_GA_Step_1.5_-_Catchment_data.docx includes various descriptive information on WASH access and adequacy in the catchment, in additional to the above graphs.
1.6	*Understand current and future shared water challenges in the catchment, by linking the water challenges identified by stakeholders with the site's water challenges.*
1.6.1	*Shared water challenges shall be identified and prioritized from the information gathered.* — Yes

Comment	Evidence: Leonard Dingler AWS Step 1.6 - Shared water challenges.docx 597766_PMSA AWS GA_Step 1.6 - Shared water challenges.docx Comments: 597766_PMSA_AWS_GA_Step_1.6_-_Shared_water_challenges.docx and Leonard Dingler AWS Step 1.6 - Shared water challenges.docx document strategic-level shared water challenges in the Integrated Vaal River System (IVRS), and the site's water targets for how it will reduce its water risk and contribute to meeting the desired condition for relevant water challenges. 1.2.1._Stakeholder_List_and_Memorandum_Leonard_Dingler.xlsx in the List worksheet specifies the Water Related Challenges identified associated with the stakeholders. Leonard Dingler AWS Step 1.6 - Shared water challenges.docx in Table 5: Share water challenges reflects the prioritisation of the various shared water challenges.	
1.6.2	*Initiatives to address shared water challenges shall be identified.*	Yes
Comment	Evidence: Leonard Dingler AWS Step 1.6 - Shared water challenges.docx 597766_PMSA AWS GA_Step 1.6 - Shared water challenges.docx Comments: Leonard Dingler AWS Step 1.6 - Shared water challenges.docx in Table 5: Share water challenges reflects various initiatives being implemented or proposed both the site and external parties to address the different shared water challenges identified.	
1.7	*Understand the site's water risks and opportunities: Assess and prioritize the water risks and opportunities affecting the site based upon the status of the site, existing risk management plans and/or the issues and future risk trends identified in 1.6.*	
1.7.1	*Water risks faced by the site shall be identified, and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.*	Yes
Comment	Evidence: 1.7.1 Catchment and site water risk assessment _Leonard Dingler.pdf Comments: 1.7.1 Catchment and site water risk assessment _Leonard Dingler.pdf documents the catchment geohydrological and hydrological setting, and the site's water risk assessment based on the WWF Water Risk Filter, WRI Aqueduct Tool, and local environmental reports and data portals. The identified risks include flooding, surface water quality and related pollutants, projected change in water discharge, drought, delays in infrastructure development, operational challenges, climate change, low access to drinking water and sanitation, projected impacts on freshwater biodiversity, and rising water demand. The risks of these risks were assessed, based on likelihood in a 10 year time-frame and severity. The potential costs and business impact of the risks were rated, and quantified financially.	
1.7.2	*Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.*	in progress

Comment

Evidence:
1.7.2 Water Opportunities.pptx
1.7.2 Leonard Dingler risks and opportunities.xlsm

Comments:
1.7.2_Water_Opportunities.pptx and 1.7.2_Leonard_Dingler_risks_and_opportunities.xlsm reflect the various current and potential initiatives, how the site may participate, likely timing and certainty of implementation, predicted impact, prioritisation, and how the site may participate. However, potential savings and business opportunities were not documented.

Finding No: TNR-007091

1.8 *Understand best practice towards achieving AWS outcomes: Determining sectoral best practices having a local/catchment, regional, or national relevance.*

1.8.1 *Relevant catchment best practice for water governance shall be identified.*

Obs.

Comment

Evidence:
1.8.1_Water Governance.pdf

Comments:
1.8.1_Water_Governance.pdf reflects various water governance best and good practices, of which the support and collaboration with stakeholders in the catchment are the most relevant in terms of best practice.

The site should remove standard practices that are not best practice (e.g., development of a Water Stewardship Plan that is a fundamental requirements of the AWS Standard).

1.8.2 *Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.*

in progress

Comment

Evidence:
1.8.2_Water Balance.pdf

Comments:
1.8.2_Water Balance.pdf reflects various site best practice for water balance, but none at a catchment level. Also, no best practices for water re-use were identified.

Finding No: TNR-007093

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

in progress

Comment

Evidence:
1.8.3_Water Quality.pdf

Comments:
1.8.3_Water Quality.pdf reflects five water quality relates best practices. However, two of these relate to ensuring legal compliance that is not a best practice.

Greater consideration can be given to catchment and sectoral best practices, beyond site-based practices.

Finding No: TNR-007095

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

Yes

Comment	Evidence: 1.8.4_IWRAs.pdf Comments: 1.8.4_IWRAs.pdf reflects three best practice actions the site could implement, including restoration, public awareness, and clean-up campaigns.	
1.8.5	*Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.*	Obs.
Comment	Evidence: 1.8.5_WASH.pdf Comments: 1.8.5_WASH.pdf includes five best practices for the site provision of WASH facilities, but none relate to the catchment level. Opportunity also exists to identify additional sectoral best practices.	

2	**STEP 2: COMMIT & PLAN - Commit to be a responsible water steward and develop a Water Stewardship Plan**	
2.1	*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.*	
2.1.1	*A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:* *- That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes* *- That the site implementation will be aligned to and in support of existing catchment sustainability plans* *- That the site's stakeholders will be engaged in an open and transparent way* *- That the site will allocate resources to implement the Standard.*	Yes
Comment	Evidence: scan123441.pdf pdf Leonard_Dingler_Water_Stewardship_Report 1.2.1 Stakeholders Consultation Evidence.pdf 1.2.1 Stakeholders Engagement and Meetings.pdf Comment: scan123441.pdf pdf is the site's water stewardship commitment that includes all the necessary content aspects in alignment with this indicator, as well as additional commitments. Leonard_Dingler_Water_Stewardship_Report that reflects the site's water stewardship commitment was shared with stakeholders via email and face-to-face meetings as per the correspondence in 1.2.1 Stakeholders Consultation Evidence.pdf and 1.2.1 Stakeholders Engagement and Meetings.pdf.	
2.2	*Develop and document a process to achieve and maintain legal and regulatory compliance.*	
2.2.1	*The system to maintain compliance obligations for water and wastewater management shall be identified, including:* *- Identification of responsible persons/positions within facility organizational structure* *- Process for submissions to regulatory agencies.*	Yes

Comment

Evidence:
2.2.b Water-related Roles and Responsibilities Leonard Dingler.pptx
2.2.1.a Compliance Obligations for Water and Wastewater Management.pptx
2.2.2. b Water-related Roles and Responsibilities Leonard Dingler.pptx
SHE and IFMS Plan.xlsx

Comments:
Legal_Register_Screen_Shot.png and Legal_Register_Site.png are screenshots of the Ariscu system the site uses and the compliance register component of the system, including evidence of the site receiving legal updates through this system.

2.2.b_Water-related_Roles_and_Responsibilities_Leonard_Dingler.pptx specifies the Water-related Roles and Responsibilities for the site across the Leonard Dingler site staff, Legal Department, Corporate Affairs, and key Service Providers.

2.2.1.a_Compliance_Obligations_for_Water_and_Wastewater_Management.pptx documents how Leonard Dingler uses the Red-on-Line Global system to manage all legal requirements that are applicable to site. The system sends out weekly notification regarding legal updates and any permit/license renewal requirements. The site also uses an Ariscu online legal compliance system, which is being replaced by the Red-on-Line Global system.

Leonard Dingler conducts Legal Compliance Audit once every two years to evaluate compliance on Environmental Health and Safety and other requirements. Any identified non-conformities are investigated to determine the root cause and the action plan is defined to address the gap, including responsible person and timelines for gap closure.

The site's procedure for legal compliance requires audits every two years. The site's sole water-related permit requirements (e.g., Water Use License) relates to landscape irrigation with the site's treated effluent. This is in process, but has not been finalised and received yet.

The site has an annual EHS Plan (SHE and IFMS Plan.xlsx) that is applicable for a three year period. This is developed annually in November. This includes all key EHS actions, including all compliance obligation actions. Implementation is checked on a monthly basis and upcoming actions identified.

2.3 *Create a water stewardship strategy and plan including addressing risks (to and from the site), shared catchment water challenges, and opportunities.*

2.3.1 *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.*

Yes

Comment

Evidence:
Leonard_Dingler_Water_Stewardship_Strategy.docx

Comment:
Leonard_Dingler_Water_Stewardship_Strategy.docx is the site's water stewardship strategy. It includes an over-arching vision, mission, guiding principles, roles and responsibilities, objectives, goals, outcomes, in alignment with the AWS Standard.

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

in progress

Comment

Evidence:
Copy of Water Stewardship Plan_Leonard Dingler_2023 (20231101).xlsx

Comment:
Copy of Water Stewardship Plan_Leonard Dingler_2023 (20231101) is the site's latest Water Stewardship Plan.

It includes issue categories, targets, measurement and monitoring method, action, (whether implementation is) immediate or long-term, proposed timeline for implementation, budget (Rand), and responsible person (position).

Targets and Actions have been linked to relevant AWS Outcomes, and Best Practices where relevant.

Budget has been specified for some of the proposed actions, including during the current year, but not all.

The proposed targets and actions have been quantified for many or described, but more comprehensive quantification or description would make the WSP consistently Specific, Measurable, Achievable, Realistic and Time-bound (SMART) to enable effective evaluation and monitoring of implementation.

The planned timeframes for commencement of each action have been clearly quantified, but not the completion dates. The timing of actions to be undertaken "Annually" should be more clearly specified (e.g., 2 rounds of monitoring, in spring and summer respectively).

Finding No: TNR-007102

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

Evidence:
Emergency_Preparedness__Response.docx (No: ZA EHS.PR.0010; Version No: 4.0) (provided on 20231029)

Comment:
The site has an Emergency Response Plan as per Emergency_Preparedness__Response.docx (No: ZA EHS.PR.0010; Version No: 4.0) (provided on 20231029). The site has a draft Business Continuity Plan (BCP) that is currently being finalised. However, the site has not conducted any consultation yet with relevant public-sector and infrastructure agencies to inform the site's Emergency Response Plan and Business Continuity Plan.

Finding No: TNR-007103

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.* ✓ Yes

Comment

Evidence:
Copy of Water Stewardship Plan_Leonard Dingler_2023 (20231101).xlsx
3.6.1, 3.9.1, 3.9.2, 3.9.3, 3.9.4 & 3.9.5 Good practices action.pptx

Comment:
Copy of Water Stewardship Plan_Leonard Dingler_2023 (20231101).xlsx documents the actions implemented to date in relation to the 15 Good Catchment Governance targets and actions identified in the WSP.

3.6.1, 3.9.1, 3.9.2, 3.9.3, 3.9.4 & 3.9.5 Good practicesaction.pptx provides evidence of actions implemented to date related to Good Catchment Governance.

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

Evidence:
3.1.2, 3.2.1, & 3.2.2.pptx
3.1.2 Leonard Dingler evidence of action taken.pdf

Comments:
3.1.2,_3.2.1,_&_3.2.2.pptx reflects the actions the site is taken to ensure legal compliance, which is applicable to 3.2 but not 3.1.2.

The site does not have any indigenous peoples in the catchment or Gauteng, as reflected in 3.1.2 Leonard Dingler evidence of action taken/pdf.

The site implements various pollution prevention measures to avoid or mitigation impacts on the water-rights of others.

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

Evidence:
3.2.1, & 3.2.2.pptx

Comments:
3.2.1, & 3.2.2.pptx reflects the site's various legal compliance and water quality management actions, including the Ariscu and Red-On-Line system, Legal Compliance Audit, and the site's Action Plan to Address Non-conformities identified in the Water Legal Compliance Audit.

The site stopped discharging its effluent to the Municipal system in 2019. Consequently, the site's effluent discharge period was still current at that time, as it expired in 2020. This was confirmed during the interview with the Ekurhuleni Municipality, who advised that the site's effluent discharge period expired on 5 June 2020. They also confirmed that the Municipality last took a sample of the site's effluent on 23 January 2019. Based on previous samples, TSS and CoD were periodically slightly elevated, based on before the site's effluent tanks were implemented, but this was periodic and always immediately rectified. No non-compliance events took place.

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

Evidence:
3.2.1, & 3.2.2.pptx
3.6.1, 3.9.1, 3.9.2, 3.9.3, 3.9.4 & 3.9.5 Good practices action.pptx

Comments:
3.1.2, 3.2.1, & 3.2.2.pptx reflects the site's various legal compliance and water quality management actions, including the Ariscu and Red-On-Line system, Legal Compliance Audit, and the site's Action Plan to Address Non-conformities identified in the Water Legal Compliance Audit.

The site has documented the various pollution prevention and control measures it has in place on site to respect the water rights of others, as per 3.6.1, 3.9.1, 3.9.2, 3.9.3, 3.9.4 & 3.9.5 Good practices action.pptx.

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.*

Yes

Comment

Evidence:
3.3.1 & 3.9.2 Leonard Dingler evidence of sustainable water balance.pptx
Copy of Water Stewardship Plan_Leonard Dingler_2023.xlsx

Comments:
Water Stewardship Plan_Leonard Dingler_2023 reflects the progress to date in implementing the site's five water balance targets and actions. To date, one has been completed, three have had initial actions completed but further actions are required, and one is still be commenced in Q4 2023 or Q1 2024 as per the WSP.

3.3.1 & 3.9.2 Leonard Dingler evidence of sustainable water balance.pptx is descriptive and photographic evidence of progress to date.

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.*

Obs.

Comment

Evidence:
3.3.2 & 3.3.3 Water Scarcity Shared Challenges Legal Binding.pptx
3.3.1 & 3.9.2 Leonard Dingler evidence of sustainable water balance.pptx
Copy of Water Stewardship Plan_Leonard Dingler_2023.xlsx

Comments:
The site identified water balance in the catchment as a shared water challenge.

Copy of Water Stewardship Plan_Leonard Dingler_2023.xlsx reflects annual water balance targets set by the site.

Copy of Water Stewardship Plan_Leonard Dingler_2023.xlsx reflects the progress to date in implementing the site's five water balance targets and actions. 3.3.1 & 3.9.2 Leonard Dingler evidence of sustainable water balance.pptx is descriptive and photographic evidence of progress to date. However, the annual targets have not been met yet as the proposed actions are all preparatory nature and will facilitate the achievement of these targets, but have directly not resulted in quantified water reductions yet.

The action item (slide 9) in 3.3.1 & 3.9.2 Leonard Dingler evidence of sustainable water balance.pptx related to bunding of the generator should be removed and re-allocated to pollution prevention measures.

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

Evidence:
3.3.2 & 3.3.3 Water Scarcity Shared Challenges Legal Binding.pptx

Comments:
The site does not have any re-allocation of water to social, cultural or environmental needs.

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

Evidence:
3.4.1 Water Quality Status.pptx
Copy of Water Stewardship Plan_Leonard Dingler_2023.xlsx

Comments:
Copy of Water Stewardship Plan_Leonard Dingler_2023 reflects a total of six water quality targets and actions for implementation. Four required action in 2023, and actions have been undertaken for each of these.

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.*

in progress

Comment

Evidence:
Copy of Water Stewardship Plan_Leonard Dingler_2023.xlsx

Comments:
Copy of Water Stewardship Plan_Leonard Dingler_2023 reflects the proposed action of an "Effluent system upgrade" in row 62. The site identified "> 90% compliance with set water quality parameters and Maintenance of LD's infrastructure" as its targets, but these will not lead to continual improvement that will result in achievement of best practice for effluent quality as per this indicator.

The site needs to set targets that will lead to continual improvement that will result in achievement of best practice for effluent quality.

Finding No: TNR-007109

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.*

Obs.

Comment

Evidence:
Step 3.5.docx
Copy of Water Stewardship Plan_Leonard Dingler_2023.xlsx

Comments:
Copy of Water Stewardship Plan_Leonard Dingler_2023.xlsx in rows 49, 50 and 52 identifies actions for IWRAs, although the AWS Outcomes column does not reflect 2 of these 3 as relating to IWRAs.

These relate to i) Participate in clean up events for the catchment held by Boksburg Initiative Committee to conserve or rehabilitate IWRAs; Raising awareness through stakeholder engagement on status of water bodies within catchment; and Explore opportunities to monitor water quality of key water bodies within the catchment.

To date, a face-to-face meeting was held on the 13th of October with the Municipality, Reiger Park community, Boksburg Improvement Campaign and other Private sectors. From the meeting it was determined that there is an ongoing Boksburg City campaign, Rand Water monthly general forum and an invitation will be extended to Leonard Dingler. The action has been adjusted accordingly with the intention to attend. More details are enclosed in minutes.

The site has began an initial action of the four proposed, but no actions have been implemented to date that have led to the maintenance and/or enhancement of Important Water-Related Areas.

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

Evidence:
All evidence as uploaded for 1.8.5, namely:
WASH Facilities Map_1.3.8a.PNG
Copy of 1-3-8 WASH Register Adequacy.xlsx
WASH Facilities Map_1.3.8a.jpg
Wash_Register.docx
1.3.7_On-site_WASH_Adequacy_and_Availability.pptx

Comments:
1.3.7_On-site_WASH_Adequacy_and_Availability.pptx is a presentation of photographs of WASH facilities on site, including hand wash basins, chemical showers, hand sanitizer stations, and drinking water fountains.

Wash_Register.docx reflects the number of toilets, taps, urinals, and hand wash basins for men and women in each of the building/s.

WASH_Facilities_Map_1.3.8a.jpg reflects the spatial location of these facilities across the site.

Overall, the site provides sufficient adequacy and access to WASH facilities on site, in line with the SANS 10400A. However, the number of WASH facilities at the Finished Goods Warehouse are insufficient. The site has developed an action plan to address this inadequacy in its Water Stewardship Plan. However, on a practical basis, the staff and contractors present in the Finished Goods Warehouse are able to access adequate WASH facilities in the adjacent building next to the canteen.

There are not any limitations to contractors that are on site being able to access site WASH facilities.

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.*

Yes

Comment

Evidence:
3.6.2 Evidence that the site is not impinging on the human right to safe water and sanitation.pptx
3.1.2 Leonard Dingler evidence of action taken.pdf

Comments:
3.6.2 Evidence that the site is not impinging on the human right to safe water and sanitation.pptx reflects how the site manages (through treatment and/or discharge to the Municipal WWTW) how it avoids and/or minimises impacts on the human right to safe water and sanitation of communities.

3.1.2 Leonard Dingler evidence of action taken.pdf reflects some of the key pollution prevention measures it has in place for its stormwater, to avoid and/or minimise impacts on the human right to safe water and sanitation of communities.

3.7 *Implement plan to maintain or improve indirect water use within the catchment:*

3.7.1 *Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.*

in progress

Comment

Evidence:
3.7.1 & 3.7.2 Leonard Dingler evidence of indirect water use improvement [Autosaved].pptx

Comments:
3.7.1 & 3.7.2 Leonard Dingler evidence of indirect water use improvement [Autosaved].pptx reflects actions taken by the site to date to inform the setting of targets for indirect water use. However, no targets have been set yet to reduce indirect water use.

Finding No: TNR-007112

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

in progress

Comment

Evidence:
3.7.1 & 3.7.2 Leonard Dingler evidence of indirect water use improvement [Autosaved].pptx

Comments:
3.7.1 & 3.7.2 Leonard Dingler evidence of indirect water use improvement [Autosaved].pptx reflects consultation by the site with some key suppliers and service providers regarding indirect water use. However, no related actions have been implemented by these suppliers to date. Also, no engaged has been undertaken yet with the site's tobacco supplier, which includes the primary quantity of embedded water in the site's manufacturing inputs.

actions taken by the site to date to inform the setting of targets for indirect water use. However, no targets have been set yet to reduce indirect water use.

Finding No: TNR-007114

3.8 *Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have.*

3.8.1 *Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.*

Obs.

Comment

Evidence:
Step 3.8.docx

Comments:
Water infrastructure external to the site is under the ownership of the municipality and/or government institutions, whereas the internal infrastructure is exclusively owned by the site and is not shared with any other entities.

The site has engaged with the Ekurhuleni Municipality regarding its AWS journey, but did not have any concerns it needed to raise at the time of these consultations.

The site should engage with the Ekurhuleni Municipality to discuss the recent emergence of flooding in Christopher Street.

3.9 *Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.*

3.9.1 *Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.*

Yes

Comment	Evidence: 3.6.1, 3.9.1, 3.9.2, 3.9.3, 3.9.4 & 3.9.5 Good practices action.pdf Copy of Water Stewardship Plan_Leonard Dingler_2023 (20231101).xlsx Comment: Copy of Water Stewardship Plan_Leonard Dingler_2023 (20231101).xlsx reflects the actions the site identified in its WSP that relate to Best Practices. 3.6.1, 3.9.1, 3.9.2, 3.9.3, 3.9.4 & 3.9.5 Good practices action.pdf reflects the Water Governance Best Practices the site has implemented to date, including AWS introductory training to site leadership, training on water related topics to all employees including contractors onsite, the site's Every drop Counts initiative, recently AWS introductory training to all on site, employees were engaged in water related activities and responsibilities during Sustainability Week, collaboration with the City Improvement Project team to clean up the Boksburg area with the aim of expanding to other areas, engagement with stakeholders (Ward 32 counsellor, Ekurhuleni Water and Sanitation and outsourced services providers, amongst others).	
3.9.2	*Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.*	Yes
Comment	Evidence: 3.6.1, 3.9.1, 3.9.2, 3.9.3, 3.9.4 & 3.9.5 Good practices action.pdf Copy of Water Stewardship Plan_Leonard Dingler_2023 (20231101).xlsx Comment: Copy of Water Stewardship Plan_Leonard Dingler_2023 (20231101).xlsx reflects the actions the site identified in its WSP that relate to Best Practices. 3.6.1, 3.9.1, 3.9.2, 3.9.3, 3.9.4 & 3.9.5 Good practices action.pdf reflects the actions implemented by the site that relate to Water Balance best practices, including installation of sensor taps in the admin department.	
3.9.3	*Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.*	Yes
Comment	Evidence: 3.6.1, 3.9.1, 3.9.2, 3.9.3, 3.9.4 & 3.9.5 Good practices action.pdf Copy of Water Stewardship Plan_Leonard Dingler_2023 (20231101).xlsx Comment: Copy of Water Stewardship Plan_Leonard Dingler_2023 (20231101).xlsx reflects the actions the site identified in its WSP that relate to Best Practices. 3.6.1, 3.9.1, 3.9.2, 3.9.3, 3.9.4 & 3.9.5 Good practices action.pdf reflects the actions implemented by the site that relate to Water Quality best practices, including World Clean Up Day activities, collaborate with the City Improvement Project team to clean up Boksburg area with the aim of expanding to other areas, installation of a production effluent treatment system to prevent discharge of industrial effluent downstream, and voluntary monitoring of drinking water fountain quality.	
3.9.4	*Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.*	Yes

Comment

Evidence:
3.6.1, 3.9.1, 3.9.2, 3.9.3, 3.9.4 & 3.9.5 Good practices action.pdf
Copy of Water Stewardship Plan_Leonard Dingler_2023 (20231101).xlsx

Comment:
Copy of Water Stewardship Plan_Leonard Dingler_2023 (20231101).xlsx reflects the actions the site identified in its WSP that relate to Best Practices.

3.6.1, 3.9.1, 3.9.2, 3.9.3, 3.9.4 & 3.9.5 Good practices action.pdf reflects the action implemented to date by the site that relates to IWRA best practices, namely collaboration with the City Improvement Project team to clean up Boksburg area with the aim of expanding to other areas.

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

Yes

Comment

Evidence:
3.6.1, 3.9.1, 3.9.2, 3.9.3, 3.9.4 & 3.9.5 Good practices action.pdf
Copy of Water Stewardship Plan_Leonard Dingler_2023 (20231101).xlsx

Comment:
Copy of Water Stewardship Plan_Leonard Dingler_2023 (20231101).xlsx reflects the actions the site identified in its WSP that relate to Best Practices.

3.6.1, 3.9.1, 3.9.2, 3.9.3, 3.9.4 & 3.9.5 Good practices action.pdf reflects the actions implemented by the site that relate to WASH best practices, including installation of waterless urinals, voluntary monitoring of drinking water fountain quality, re-introduction of drinking water fountains for employee use on site after the Covid-19 pandemic, and awareness raising on the site's Every Drop Counts initiative with the aim of providing employees with knowledge to apply at home as well as on site.

4	STEP 4: EVALUATE - Evaluate the site's performance.

4.1 *Evaluate the site's performance in light of its actions and targets from its water stewardship plan and demonstrate its contribution to achieving water stewardship outcomes.*

4.1.1 *Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.* Obs.

Comment

Evidence
Copy of Water Stewardship Plan_Leonard Dingler_2023 (20231101).xlsx

Comment:
Copy of Water Stewardship Plan_Leonard Dingler_2023 (20231101).xlsx describes the actions completed to date per quarter, but does not include a rate of performance progress.

4.1.2 *Value creation resulting from the water stewardship plan shall be evaluated.* Obs.

Comment

Evidence
Copy of Water Stewardship Plan_Leonard Dingler_2023 (20231101).xlsx

Comment:
Copy of Water Stewardship Plan_Leonard Dingler_2023 (20231101).xlsx describes the value creation to the site of each action where relevant, but does not include any financial quantification nor a cost-benefit analysis.

4.1.3 *The shared value benefits in the catchment shall be identified and where applicable, quantified.* Obs.

Comment

Evidence
Copy of Water Stewardship Plan_Leonard Dingler_2023 (20231101).xlsx

Copy of Water Stewardship Plan_Leonard Dingler_2023 (20231101).xlsx describes the value creation to the catchment of each action where relevant, but does not include any financial quantification nor a cost-benefit analysis.

4.2 *Evaluate the impacts of water-related emergency incidents (including extreme events), if any occurred, and determine the effectiveness of corrective and preventative measures.*

4.2.1 *A written annual review and (where appropriate) root-cause analysis of the year's emergency incident(s) shall be prepared and the site's response to the incident(s) shall be evaluated and proposed preventative and corrective actions and mitigations against future incidents shall be identified.* Yes

Comment

Evidence:
Alex Magadla (Spillage)IR - chemical spill.pdf (shown on-screen during audit)
Copy of IF EHS IPS V2.0 Chemical Spillage (shown on-screen during audit)

Comment:
A spill occurred on site on 11 September 2023 in the flavouring kitchen, but did not qualify as a water-related emergency incident.

The site implemented clean-up within the required procedural time-frame.

4.3 *Evaluate stakeholders' consultation feedback regarding the site's water stewardship performance, including the effectiveness of the site's engagement process.*

4.3.1	*Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.*	in progress
Comment	Evidence: MicrosoftTeams-image (13).png 2023-10-25 12-59.pdf (shown on-screen) 1.2.1 Stakeholder Consultation Evidence.pdf 1.2.1 Stakeholder Engagement and Meetings.pdf Leonard Dingler Water Stewardship Report.pdf Comment: 2023-10-25 12-59.pdf reflects that the Leonard Dingler Water Stewardship Report was shared with key stakeholders, which reflects the actions the site has undertaken to date in relation of the actions and targets it set in its WSP. However, this does not include a quantified evaluation of performance to date. The site should more actively seek to facilitate input from its stakeholders on its water stewardship performance. ***Finding No: TNR-007132***	
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.*	Yes
Comment	Evidence Copy of Water Stewardship Plan_Leonard Dingler_2023 (20231101).xlsx Comment: The site has not reached a full year of implementation yet, so there has not been a need to modify the WSP yet, but the site has revised the WSP to reflect ongoing greater understanding of the AWS Standard.	

5	**STEP 5: COMMUNICATE & DISCLOSE - Communicate about water stewardship and disclose the site's stewardship efforts**

5.1 *Disclose water-related internal governance of the site's management, including the positions of those accountable for legal compliance with water-related local laws and regulations.*

5.1.1 *The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.*

Obs.

Comment

Evidence:
MicrosoftTeams-image (13).png
2023-10-25 12-59.pdf (shown on-screen)
1.2.1 Stakeholder Consultation Evidence.pdf
1.2.1 Stakeholder Engagement and Meetings.pdf
Leonard Dingler Water Stewardship Report.pdf
2.2.b_Water-related_Roles_and_Responsibilities_Leonard_Dingler.pptx

Comment:
Leonard Dingler Water Stewardship Report.pdf was shared with key stakeholders, which reflects the positions, names, and roles and responsibilities of key staff regarding water-related issues. The site has not explicitly stated who is responsible for water-related legal compliance, but this can be inferred from the details provided.

2.2.b_Water-related_Roles_and_Responsibilities_Leonard_Dingler.pptx explicitly reflects who is responsible for water-related legal compliance, but this was not disclosed to the site's 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.*

in progress

Comment

Evidence:
MicrosoftTeams-image (23).png
2023-10-25 12-59.pdf (shared on-screen during audit)
1.2.1 Stakeholder Consultation Evidence.pdf
1.2.1 Stakeholder Engagement and Meetings.pdf
Leonard Dingler Water Stewardship Report.pdf

Comment:
Leonard Dingler Water Stewardship Report.pdf was shared with key stakeholders, which reflects the key actions implemented by the site under each AWS Outcome, but did not state how the site's WSP and actions contributed to the AWS Standard outcomes beyond water balance.

Finding No: TNR-007136

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.*

Obs.

Comment

Evidence:
MicrosoftTeams-image (23).png
2023-10-25 12-59.pdf (shared on-screen during audit)
1.2.1 Stakeholder Consultation Evidence.pdf
1.2.1 Stakeholder Engagement and Meetings.pdf
Leonard Dingler Water Stewardship Report.pdf

Comment:
Leonard Dingler Water Stewardship Report.pdf was shared with key stakeholders, which describes the actions the site has implemented to date in relation to the target and actions in the WSP. However, the site has not reached a full year of implementation yet, as which point annual evaluation is required.

The site should ensure that its annual performance evaluation includes quantification of performance against targets, and associated disclosed to stakeholders.

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.* Obs.

Comment

Evidence:
MicrosoftTeams-image (23).png
2023-10-25 12-59.pdf (shared on-screen during audit)
1.2.1 Stakeholder Consultation Evidence.pdf
1.2.1 Stakeholder Engagement and Meetings.pdf
Leonard Dingler Water Stewardship Report.pdf

Comment:
Leonard Dingler Water Stewardship Report.pdf was shared with key stakeholders, including actions implemented to date in relation to the water-related challenges identified. These challenges were also discussed by the site with its stakeholders.

The site should more explicitly disclose its water-related challenges with stakeholders and the associated actions it is implementing to specifically address these challenges.

5.4.2 *Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.* Obs.

Comment

Evidence:
MicrosoftTeams-image (23).png
2023-10-25 12-59.pdf (shared on-screen during audit)
1.2.1 Stakeholder Consultation Evidence.pdf
1.2.1 Stakeholder Engagement and Meetings.pdf
Leonard Dingler Water Stewardship Report.pdf

Comment:
The site has engaged with the Ekurhuleni Municipality and sought to coordinate and support water-related actions with them. It is recognised that the site is at an early stage in its AWS journey and stakeholder consultation. However, opportunity exists to consult and seek to coordinate and support water-related actions with a broad suite of public-sector agencies, such as Rand Water etc.

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

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

Comment	Evidence: Environmental_Legal_Requirements_Water (2).pdf Comment: Environmental_Legal_Requirements_Water (2).pdf is a voluntary external audit report of the site's water-related legal compliance undertaken by Ariscu. Four findings were raised in the report, but the site has not had an opportunity to respond to the auditors on the findings as the report was submitted to the site on 6 October 2023. In addition, some of the findings do not appear to be accurate, as some of the legal requirements specified may not be applicable to the site. The site should provide a copy of its response to the WSAS auditors on the findings they raised, to enable WSAS to be aware of the potential accuracy/inaccuracy of these findings. Should any of these findings be accurate and the site is consequently determined as having had water-related compliance violations, these compliance violations and associated corrections should be disclosed to all the site's stakeholders.	
5.5.2	*Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.*	Yes
Comment	Evidence: Environmental_Legal_Requirements_Water (2).pdf Comment: Environmental_Legal_Requirements_Water (2).pdf is a voluntary external audit report of the site's water-related legal compliance undertaken by Ariscu. Four findings were raised in the report, but the site has not had an opportunity to respond to the auditors on the findings as the report was submitted to the site on 6 October 2023. In addition, some of the findings do not appear to be accurate, as some of the legal requirements specified may not be applicable to the site. The site has not had any past compliance violations that have required correction actions to prevent future occurrences.	
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	The site has not had any past compliance violations that may have posed significant risk and threat to human or ecosystem health that required immediate communicated to relevant public agencies and disclosure.	

Photographic Evidence from Audit

Canteen kitchen basin.jpg

Eyewash station at factory entrance.jpg

Site handwash basins at factory entrance.jpg

Handwash basin in factory womens bathroom.jpg

Chemicals on spill trays in factory.jpg

Site water stewardship commitment.jpg

Snuff primary area.jpg

Canteen facilities.jpg

Exterior meter and fire suppression connections.jpg

Rainwater flowing off site from the warehouse roof.jpg

Meter for canteen.jpg

Fire suppression system in factory.jpg

Second drinking water dispenser.jpg

Liquid chemical storage cabinet.jpg

Eyewash station and chemicals at site effluent treatment facility.jpg

Kitchen for factory.jpg

Site rainwater and effluent tanks.jpg

Urinals in factory mens bathroom.jpg

Sanitizer station in factory womens bathroom.jpg

Waste handling area with no bunding or stormwater run-off capture.jpg

Canteen.jpg

Waste handling area with no bunding.jpg

Fire water tank.jpg

Cardboard boxes used for product packaging.jpg

Stormwater system.jpg

Site stormwater drain.jpg

Flavour tank.jpg

Flammable storage area.jpg

Chemical storage in chemical kitchen.jpg

Chemical spill kits.jpg

MSDS in factory.jpg

Stem conditioning.jpg

Booster pumps for storage tanks for production.jpg

Handwash basins in factory mens bathroom.jpg

Site solid waste separation receptacles.jpg

Drinking water dispenser in factory.jpg

Used cooking oil from canteen kitchen not stored appropriately prior to collection for disposal.jpg

Chemicals inappropriately stored overhanding a spill tray.jpg

Spill kit contents.jpg

Canteen kitchen bathroom shower.jpg

Contents of eyewash station.jpg

Tanks inside the factory.jpg

Used cooking oil from the canteen kitchen awaiting disposal.jpg

Site responsible water management awareness materials.jpg

Yes

Comment The following photographs reflect the water-related infrastructure, WASH facilities, and water management on site.

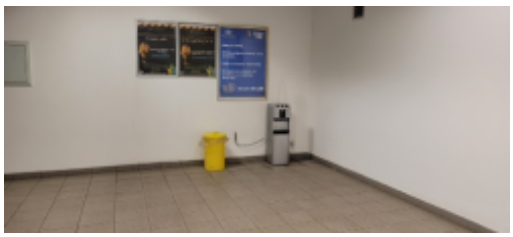
Site boiler.jpg

Site kitchen.jpg

Digital water meters in factory.jpg

Discarded tobacco awaiting disposal with run-off from containers.jpg

Leaf condtioning.jpg



Relaxation room.jpg

Fire suppression sprinkler system.jpg

Incoming water line and meter.jpg

Site rainwater and effluent tanks photo 2.jpg

Canteen kitchen bathroom basin and urinal.jpg

Chemical spill shower in chemical kitchen.jpg

Soft water plant.jpg

Shut-off valve and meter in factory.jpg

Toilet in factory womens bathroom.jpg

Site water dispenser.jpg

Site effluent tanks.jpg

Site effluent treatment facility.jpg

Puratex stored over spill tray.jpg

Toilet in factory mens bathroom.jpg