

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)



Audit Number: AO-000629

SITE DETAILS

Site: **Philip Morris Manufacturing Senegal**
Address: KM 11.5 Route de Rufisque, 50596, Dakar, SENEGAL
Contact Person: Moustapha Wele
AWS Reference Number: AWS-000571
Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Core
Date of certification decision: 2023-Dec-22
Validity of certificate: 2026-Dec-22

AUDIT DETAILS

Audited Service(s): AWS Standard v2.0 (2019)
Audit Type(s): Initial Audit
Audit Start Date: 2023-Oct-23
Lead Auditor: Warrick Stewart
Audit team participants:
Fridolin Choula, Local Auditor
Warrick Stewart, Lead Auditor

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Site Participants:

Cheikh Diop, PMI Senegal - Dakar: Manager Sustainability
Layth Haddad, PMI: Manufacturing Director West Africa
Dia Modou, PMI Senegal - Dakar: Sustainability Specialist
Moustapha Sarr, PMI Senegal - Dakar: Program Manager
Maimouna Kane, PMI Senegal - Dakar: Manager OPEN+
Assane Gueye, PMI Senegal - Dakar: Manager Factory Services
Moustapha Wele, PMI Senegal - Dakar: AWS Local Lead
Jumoke Agbelusi, PMI: Director Manufacturing, ZA
Mthokozisi Zondo, PMI: Sustainability Specialist, ZA
Nabilahi Niang, PMI Senegal - Dakar: Primary Technician
Jovan Piljevic, PMI: Europe CC & TPM Manufacturing
Ramatoulaye Wilson, PMI Senegal - Dakar: Line Lead
Amadou Diawara, PMI Senegal - Dakar: Factory Logistics Coordinator
Jean Sané, Contractor to PMI: Canteen
Mariama Ndiaye, PMI Senegal - Dakar: Sustainability
Alioune Badara Sow, PMI Senegal - Dakar: IFMS Engineer Trainee
Aminata Ndiaye, PMI: AMF Soft Service
Bara Guisse, PMI: Manager Production
Beatrice Bizzaro, PMI: HPC
Isaam Abufreiha, PMI: MEA Sustainability Manager
Seemole Lehong, PMI: Manager Sustainability, ZA
Chiara Rizzi, PMI: Manager Global AWS Certification
Mohamed Al Nadi, PMI: Specialist EHS

AUDIT TIMES

Dates	Audit from	Duration	Auditor	Description
2023-Oct-2 3	08:00:00 - 17:15:00	09:15	Warrick Stewart	
2023-Oct-2 4	07:30:00 - 17:00:00	09:30	Warrick Stewart	
2023-Oct-2 5	07:30:00 - 17:00:00	09:30	Warrick Stewart	

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ADDITIONAL INFO

Summary of Audit Findings: A total of 22 findings were raised during the certification audit, 0 major non-conformities, 12 minor non-conformities, and 10 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 60 days of receipt of the audit report by 05/02/2024.

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

The audit team recommends certification of the PMI Senegal - Dakar site at Core level pending approval of the corrective actions plan.

Scope of Assessment: The scope of services covers the Initial certification audit for assessing conformity of Philip Morris International (PMI) Senegal Dakar site against the AWS International Water Stewardship Standard Version 2.

The site is a tobacco manufacturing facility at km 11.5 Route de Rufisque in the Pikine Ouest/Thiaroye Sur Mer area of Dakar, Senegal. The site occupies an area of 15,128 m2 approximately 300m north of the coastline of Baie de Hann.

Site infrastructure includes potable water input to the site and an associated storage tank, a water treatment plant, manufacturing equipment, chemical stores and tanks, fuel storage and handling areas, a canteen, waste management and handling facilities, WASH facilities, and a stormwater system.

The facility is located in the Thiaroye sub-catchment within the City of Dakar, outside of the Sebikhotane and Lake Guiers catchments from which it obtains its input water. The site use all its treated wastewater for the watering of its gardens on site.

The audit was conducted onsite on 23 to 25 October 2023.

The onsite site visit included the assessment of the site infrastructure including potable water input to the site and an associated storage tank, a water treatment plant, manufacturing equipment, chemical stores and tanks, fuel storage and handling areas, a canteen, waste management and handling facilities, WASH facilities, and a stormwater system.

The following external stakeholders were interviewed during the audit:

- DEEC: Ministere de L'Environnement et du Developpement Durable (Ministry of the Environment);
- DEEC: Ministere de L'Environnement et du Developpement Durable (Ministry of the Environment);
- Secetaire Municipale Commune Pikine Ouest (Pikine Ouest Municipality: Sanitary Department);
- ONAS: L'Office National de l'Assainissement du Sénégal (National Sanitation Office of Senegal);
- SENEAU: DQSE (Quality Safety Environment Department).

FINDINGS

NUMBER OF FINDINGS PER LEVEL

Observation	10
Minor	12

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FINDING DETAILS

Finding No:	TNR-006867
Checklist Item No:	1.2.1
Status:	Response received
Finding level:	Observation
Due date:	2024-Oct-22
Checklist item:	Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall: <ul style="list-style-type: none">- Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people;- Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies;- Provide evidence of stakeholder consultation on water-related interests and challenges;- Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups;- Identify the degree of stakeholder engagement based on their level of interest and influence.
Findings:	Water-related challenges of the stakeholders were documented where stakeholders responded to the questionnaires distributed by the site. However, this will require updating as further responses are received.
Corrective action:	'Send E-mail reminder about the questionnaire not yet received. Organize, if applicable, visit to the stakeholder' site to discuss further about the questionnaire and their involvement in the Water Stewardship journey of PMMSN.

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Finding No:	TNR-006765
Checklist Item No:	1.3.4
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Oct-22
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:	<p>The site has documented data that they have been able to source on the water quality of the site's water source(s), namely Guiers Lake and the Sebikhotane aquifer, but this information is limited particularly in terms of recent data and annual, seasonal, high and low variances for the Sebikhotane aquifer that has water scarcity issues. The site has requested more comprehensive data, but not received any yet.</p> <p>The site has not documented the water quality of the shallow aquifer into which its stormwater flows and treated effluent may ultimately percolate into.</p>
Corrective action:	<ol style="list-style-type: none">1. Follow Up calls/emails with SENEAU to ask for updated data about the Sebikhotane aquifer water quality and updated data about Guiers lake.2. Follow Email to DEEC for data about the shallow aquifer of Thiaroye's groundwater quality. Email to the DGPRES for up to dated data about Thiaroye aquifer.

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Finding No: TNR-006768
Checklist Item No: 1.3.5
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Oct-22
Checklist item: Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.
Findings: The site has provided a map with potential pollution sources. However:
(a) There are a number of locations on site where there is physical evidence of spills, including hydrocarbons, that the site has not identified as current sources of pollution.
(b) 1.3.5_a_PMMSN_map_of_potential_sources_of_pollution.pdf does not reflect the location of used chemical containers awaiting collection by suppliers for re-use, which still contain some chemical content that if spilt would potentially flow into the stormwater system. In addition, various scrap parts are being stored at the back of the site that are currently not covered that could potentially contain oils and greases that could flow into the stormwater system during rainfall events, with no containment currently in place.
(c) There are a number of areas where no or insufficient bunding is in place around potential pollution sources.
(d) The canteen has not been identified as a source of potential pollution, particularly as oils are used (in limited quantities) and current disposal methods may be inappropriate.
Corrective action: 1. map the transitory/supplementary locations and add the waste location of the Glue.
2.. Isolate the stormwater drainage system near the canteen to avoid waste disposal through it.
3. Build a wastewater disposal point for canteen employees.
4. accompany the catering service in their used oil disposal procedure. Providing internally, the necessary procedure.
5. Accelerate the scraping process and throw away all materials near the dry well.

Finding No: TNR-006770
Checklist Item No: 1.3.8
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Oct-22
Checklist item: Levels of access and adequacy of WASH at the site shall be identified.
Findings: 1.3.8._PMMSN_WASH_adequacy_and_availability.pptx illustrates some of the drinking water stations and hand wash basins on site, but does not document the levels of access and adequacy of WASH at the site, nor per building and gender, compared to applicable requirements or standard.
Corrective action: Inventory of the number of employees. Map the WASH adequacy and access per building and ratio per male and female.

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Audit Number: AO-000629

Finding No: TNR-007648
Checklist Item No: 1.4.1
Status: Response received
Finding level: Observation
Due date: 2024-Oct-22
Checklist item: The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be identified.
Findings: The site requested data on the water quality and quantity of embedded water use per raw material within the site's catchment from their suppliers, but have not received feedback on this yet from some suppliers despite requesting this information on 11 August 2023 and some suppliers advised that their products do not have any embedded water. This information should be updated in the site's documentation once it is received.
Corrective action: Send follow up email to stakeholders and update the information on the documentation once received.

Finding No: TNR-007649
Checklist Item No: 1.4.2
Status: Response received
Finding level: Observation
Due date: 2024-Oct-22
Checklist item: The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.
Findings: The site requested their suppliers of outsourced services in August 2023 to identify if there is any embedded water use in their outsourced services to the site, and if those services originate within the site's catchment to quantify the embedded water. The site has not received feedback yet from two of their service providers and the other two advised that their services provided do not have any embedded water. The outstanding information should be updated in the site's documentation once it is received.
Corrective action: 'Send follow up email to stakeholders and update the information on the documentation once received.

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Finding No: TNR-006781
Checklist Item No: 1.5.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Oct-22
Checklist item: Water governance initiatives shall be identified, including catchment plan(s), water-related public policies, major publicly-led initiatives under way, and relevant goals to help inform site of possible opportunities for water stewardship collective action.
Findings: The evidence provided includes very little policy context, no information on relevant catchment plan/s beyond a high level overview of the Somone sub-UGP pilot project (i.e., for Guier Lake area) as only Somone is currently being implemented, and no information on relevant goals to help inform the site of possible opportunities for water stewardship collective action.
Corrective action: 1. Add the Sectoral Development Policy Letter on Water and Sanitation (Objective 2025) and its action plan.
2. Literature review and interview with stakeholders (owner of water related infrastructures, institutions) for updated information about the policies.

Finding No: TNR-007616
Checklist Item No: 1.5.3
Status: Response received
Finding level: Observation
Due date: 2024-Oct-22
Checklist item: The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.
Findings: A catchment water-balance was reflected in 1.5.3. PMMSN catchment area water balance analysis.23.10.17.pdf for the Lake Guiers sub-catchment and Sebikhotane groundwater system (catchment). The data reflects a net positive situation for the Lake Guiers sub-catchment, but a net negative situation for the Sebikhotane groundwater system (catchment).
Scarcity was quantified and variance between 2002 and 2014 was quantified for the Lake Guiers sub-catchment and for 2015 and 2016 for the greater catchment within which Sebikhotane is located.
The site should update this information once new data becomes available.
Corrective action: Screening for literature related to water balance of the Sebikhotane and Lake Guiers's catchments (thesis, reports, studies). Request the data from the Institutions as well (SONES, SENEAU, DGPRE).

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Finding No: TNR-006782
Checklist Item No: 1.5.4
Status: Response received
Finding level: Observation
Due date: 2024-Oct-22
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: 1.5.4. PMMSN Catchment water quality.23.10.10.pdf includes physical and chemical data for Guiers Lake catchment and its biological status, as well as physical and chemical data for the Sebikhotane catchment but not the biological status. The data is sourced from 2012 and 2014. This information needs to be updated when new data becomes available.
Corrective action: Update the document once received the data requested from the Water Agencies (DGPRES, SENEAU).

Finding No: TNR-006784
Checklist Item No: 1.7.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Oct-22
Checklist item: Water risks faced by the site shall be identified, and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.
Findings: 1.7.1 - 1.7.2 PMMSN risks and opportunities.23.08.29.xlsm reflects the water risks faced by the site, including: a detail description of each risk; an assessment of the likely impact in terms of magnitude, frequency, and priority; whether the impact will be on-site and/or in the catchment; water-related opportunities in terms of a description, likelihood, positive impact, and priority; and lastly, how the site may participate (where deemed appropriate by the site). However, the potential costs of the risks have not been documented
Corrective action: Estimate the number of days necessary to fix the issue/risk and evaluate it in term of business cost (production shutdown). Liaise with FM Global (Insurance Company) if applicable to get the cost evaluation.

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Finding No: TNR-006785
Checklist Item No: 1.7.2
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Oct-22
Checklist item: Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.
Findings: 1.7.1_- 1.7.2_PMMSN_risks_and_opportunities.23.08.29.xlsm reflects the water risks faced by the site, including: a detail description of each risk; an assessment of the likely impact in terms of magnitude, frequency, and priority; whether the impact will be on-site and/or in the catchment; water-related opportunities in terms of a description, likelihood, positive impact, and priority; and lastly, how the site may participate (where deemed appropriate by the site)(i.e., business opportunities). However, the potential savings have not been documented.
Corrective action: Calculate the potential savings through the water related opportunities (water volume, economic and social savings)

Finding No: TNR-006786
Checklist Item No: 2.3.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Oct-22
Checklist item: A water stewardship strategy shall be identified that defines the overarching mission, vision, and goals of the organization towards good water stewardship in line with this AWS Standard.
Findings: 2.3.1._PMMSN_WS_Strategy.docx is the site's water stewardship strategy. This includes goals of the site towards good water stewardship in line with this AWS Standard, but not an overarching mission and vision.
Corrective action: Add a sentence highlighting the overall mission of the AWS strategy in line with PMI overall ambition towards water and biodiversity.

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Finding No:	TNR-006787
Checklist Item No:	2.3.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Oct-22
Checklist item:	A water stewardship plan shall be identified, including for each target: <ul style="list-style-type: none">- How it will be measured and monitored- Actions to achieve and maintain (or exceed) it- Planned timeframes to achieve it- Financial budgets allocated for actions- Positions of persons responsible for actions and achieving targets- Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.
Findings:	In the site's water stewardship plan, the allocated financial budgets have been specified for most actions, but a few still need to be specified by drawing out the allocated cost from the already allocated budget and specifying these budgets per action. Human resource costs for activities should also be specified.
Corrective action:	<ol style="list-style-type: none">1. Calculate human resources cost for the WR actions with Utility services.2. Add cost related to logistic to visit stakeholders, gather data
Finding No:	TNR-006788
Checklist Item No:	2.4.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Oct-22
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:	1.3.1 - d. PMMSN Emergency Preparedness BCP.pdf and 1.3.1 - a. PMMSN Emergency Response Plan.pdf are the site's emergency response plan and BCP. The site has engaged with a suite of relevant authorities (e.g., ONAS, Municipality fire response and training for site staff), but evidence of this was not provided.
Corrective action:	<ol style="list-style-type: none">'1. Follow Up email for Visit's confirmation by ONAS for Benchmarking on the WWTP, BCP and Emergency Response Plan.2. Adding as a collaboration with ONAS in the BCP in case of malfunctioning of the Wastewater Treatment Plan to drain the wastewater storage tank.2. Include the collaboration with Agencies in the WSP

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Finding No:	TNR-006792
Checklist Item No:	3.2.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Oct-22
Checklist item:	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.
Findings:	<p>There are a number of locations on site where bunding and pollution avoidance and control measures need to be improved, to ensure that water (as a common good of the people of Senegal) is not impacted negatively. The site is currently constructing a new chemical store and has an approved plan for new bunding for certain parts of the site where chemicals are present, but this has not been implemented yet.</p> <p>Also various scrap parts are being stored across the site that could potentially result in run-off containing pollution (e.g., grease, oil) during rainfall events into the site's stormwater system and into the site's dry pit and then into the shallow aquifer.</p> <p>Condensate from air conditions is being captured in plastic containers and then used to water plants on site, but the original chemical contents of these containers has not all been removed before use for this purpose.</p>
Corrective action:	<ol style="list-style-type: none">1. Bunding plan for transitory storage location on site. Training for a rapid disposal of the waste in the onsite dedicated area.2. Procedure of filtering and disposal of the scrap parts to outsource service providers.3. Implement a triple cleaning procedure for any container to be used for storing the Water coming from the condensate.4. Accelerate the scraping process and dispose of all materials (scraps) near the dry well and rainwater canals.5. Install condensate water drainage system including a proper water storage tank.
Finding No:	TNR-006855
Checklist Item No:	3.4.1
Status:	Response received
Finding level:	Observation
Due date:	2024-Oct-22
Checklist item:	Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.
Findings:	The site should specify in its WSP all the actions/targets that relate to water quality, as some of the water balance targets also relate to water quality but are not stated as such in the current WSP.
Corrective action:	Set the actions/targets related to Water quality in the WSP.

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Finding No: TNR-006856
Checklist Item No: 3.4.2
Status: Response received
Finding level: Observation
Due date: 2024-Oct-22
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: Quantified targets for continual effluent quality improvement for all relevant parameters (e.g., N, P, BOD) should be set once the investigation has been concluded.
Corrective action: 'Set a water quality improvement plan for the monitored water quality parameters in line with the legislations' regulation/threshold and add it in the WSP.

Finding No: TNR-006857
Checklist Item No: 3.6.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Oct-22
Checklist item: Evidence of the site's provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers onsite shall be identified and where applicable, quantified.
Findings: Currently the site has WASH facilities for all buildings on site, including 28 toilets, 4 dressing rooms with showers and lockers, hand wash basins, soap and sanitizer dispenser, bins, and 10 drinking water fountains. However, the total number of WASH facilities and associated access has not been quantified yet per building and per gender, and compared to relevant requirements or standard.
Corrective action: Map the occupants (both employees and suppliers) of the building per gender and the existing facilities and comparison with the regulations (ratio per gender).

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Finding No: TNR-006858
Checklist Item No: 3.6.2
Status: Response received
Finding level: Observation
Due date: 2024-Oct-22
Checklist item: Evidence that the site is not impinging on the human right to safe water and sanitation of communities through their operations, and that traditional access rights for indigenous and local communities are being respected, and that remedial actions are in place where this is not the case, and that these are effective.
Findings: The site does not discharge any effluent. It also has various pollution prevention and control measures in place, which are currently being upgraded but additional measures are required for all key potential pollution source areas. This was only raised as an Observation, as it was already raised as a Minor finding under indicator 3.2.2.
Corrective action: Bunding plan on site, procedure for scraps rapid disposal on site, training, awareness raising about environmental issues and best practices toward conserving our mutual resources. Add the action on the WSP.

Finding No: TNR-006815
Checklist Item No: 3.7.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Oct-22
Checklist item: Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.
Findings: No indirect water use targets were set in the WSP. Meetings were held with La Rochette, Diallo et Freres, Elixir, GANIC, MAERSK (the site's key suppliers) and a questionnaire was sent to them requesting data on their indirect water use, but they have not provided any responses yet to the questionnaire to enable the site to set indirect water use targets.
Corrective action: 1. Follow Up emails/visit to set targets for indirect water use improvement with the Key suppliers.
2. Organize an event inviting the stakeholders to discuss about the engagement of the site and the possible collaboration and filling of the questionnaires.
3. Add the event on the WSP

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Finding No: TNR-007973
Checklist Item No: 3.7.2
Status: Response received
Finding level: Observation
Due date: 2024-Oct-22
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: Evidence was provided of the meetings held and questionnaires submitted to suppliers for completion. However, the site does not have any evidence of actions these suppliers have taken in the catchment related to indirect water use. This is due to indirect water use targets and associated actions not having been determined yet due to the lack of feedback to date from these suppliers on their indirect water use. Progress on this should be demonstrated by the time of the site's first Surveillance Audit.

Corrective action: Follow up email to the stakeholders to engage on indirect water use targets. Set mutual actions on the catchment level.

Finding No: TNR-007974
Checklist Item No: 3.9.1
Status: Response received
Finding level: Observation
Due date: 2024-Oct-22
Checklist item: Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.

Findings: The site should clearly document which actions they believe constitute best practice, so there is a clear and consistent differentiation with other actions that are not deemed best practices, instead of stating that all actions are best practices as some are only good practice.

Corrective action: Identify best practices based on the duplicability of the action on a broader level (not only under legal requirement but the recognition of the action as a best practice on a bigger scale).

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Report Details

Report	Value
Report prepared by	Warrick Stewart
Report approved by	Neringa Pumputyte
Report approved on (Date)	05 December 2023

Surveillance

Proposed date for next audit
2024-Oct-21

Comment Surveillance Audit 1 should be scheduled on or before 21 October 2024.

Stakeholder Announcements

Date of publication	Location
17/08/2023	Email to key stakeholders
17/08/2023	LinkedIn post of stakeholder announcement
20/07/2023	https://watersas.org/wp-content/uploads/2023/07/20230414-StakeAnn-Philip-Morris-Manufacturing-Senegal.pdf
Comment	The site's Stakeholder Announcement for the audit was shared via LinkedIn and email, as PMI Dakar is not legally allowed to run advertisements in print media due to tobacco-related legislation, as such advertisements could be viewed as promoting tobacco products.

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Catchment Information

Catchment Information

The site obtains its water from two separate catchments, namely the deeper Maastrichtian and more recent Palaeocene aquifers of the Sebikhotane ground water catchment and the Lake Guiers surface catchment area. The Sebikhotane ground water catchment is located between 22km and 115km to the south-east of Dakar and the Lake Guiers surface catchment area in the northern part of Senegal, on the left bank of the Senegal River, between 134km and 334km to the north-east of Dakar . The site itself is located in the Thiaroye sub-catchment within the City of Dakar, outside of the Sebikhotane and Lake Guiers catchments.

According to a Senegal water resources profile overview issued by USAID, invasive aquatic plant growth has reduced the flow and oxygenation of surface waters and is impacting Guiers Lake. Aquatic plants have reduced water quality, slowed water velocity, and increased siltation, which have disrupted ecosystems and impacted agriculture, fishing and animal husbandry. Agricultural runoff has caused eutrophication and plant growth in the Guiers Lake surface water catchment area.

In July 2020 conductivity levels were below the WHO recommendation (388 to 1,000 $\mu\text{S}/\text{cm}$ vs. threshold limit of 1,500 $\mu\text{S}/\text{cm}$) in the Palaeocene aquifer, within the northern part of the Sebikhotane ground water catchment, and water quality was deemed to be good. In the central part of the Sebikhotane ground water catchment, the quality of water was poor. While, in the southern part the quality of water was moderate, with levels of conductivity between 1000-1500 $\mu\text{S}/\text{cm}$.



DakarBoreholes.jpg



BasinGuiers.jpg

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Client Description and Site Details

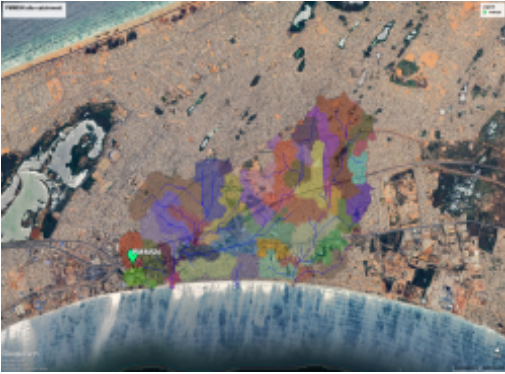
Client/Site Background

The site operates a tobacco manufacturing facility at km 11.5 Route de Rufisque in the Pikine Ouest/Thiaroye Sur Mer area of Dakar, Senegal. The site occupies an area of 15,128 m2 approximately 300m north of the coastline of Baie de Hann.

Site infrastructure includes potable water input to the site and an associated storage tank, a water treatment plant, manufacturing equipment, chemical stores and tanks, fuel storage and handling areas, a canteen, waste management and handling facilities, WASH facilities, and a stormwater system. The site uses all its treated wastewater for the watering of its gardens on site.



PMMSN area Physical Scope.jpg



PMMSN catchment.jpg

Summary of Shared Water Challenges




Summary of Shared Water Challenges

Shared water challenges of the greatest priority were identified as Loss/degradation of IWRAs, Future increase in flooding, Degraded quality of superficial/groundwater bodies, and Scarcity/baseline water stress.

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0.1 General Requirements for Single Sites, Multi-Sites and Groups		
0.1.1	<i>Eligibility Criteria</i>	
0.1.1.1	<i>The site(s) occupy one catchment OR an exception has been granted.</i>	 Yes
Comment	The site is located in a single catchment, but receives its input water from two different catchments via a utility.	
0.1.1.2	<i>The scope of the proposed certification shall be under the control of a single management system.</i>	 Yes
Comment	The site is under the control of a single management system.	
0.1.1.3	<i>The scope of the proposed certification shall be homogeneous with respect to primary production system, water management, product or service range, and the main market structures.</i>	 Yes
Comment	The scope of the proposed certification was homogeneous with respect to primary production system, water management, product or service range, and the main market structures.	

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1 STEP 1: GATHER AND UNDERSTAND

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

- 1.1.1** *The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including:*
- Site boundaries;
 - Water-related infrastructure, including piping network, owned or managed by the site or its parent organization;
 - Any water sources providing water to the site that are owned or managed by the site or its parent organization;
 - Water service provider (if applicable) and its ultimate water source;
 - Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies;
 - Catchment(s) that the site affect(s) and is reliant upon for water.



Yes

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Comment	Evidence:
	<p>1.1.1 - d1. PMMSN Catchment area - Google Earth.23.10.06.kmz 111-B3~1.PDF 111-B3~2.PDF 111-B3~3.PDF 111-B3~4.PDF 111B3W~1.JPG 1.1.1 - b3. PMSN Boiler 2.pdf 1.1.1 - c2. SEN'EAU - PMMSN connection contract.pdf 1.1.1 - c1. PMMSN water sourcing points & catchment area delimitation.23.10.01.pdf 1.1.1 - a1. PMMSN Site boundaries - Google Earth23.10.06.kmz 1.1.1 - a1. PMMSN boundaries and layout.23.09.19.pdf 1.1.1.a.Site Boundaries.zip 1.1.1 - b3. PMSN Boiler 2.pdf 1.1.1 - b3. PMSN Boiler 1.pdf 1.1.1 - b3. PMSN Compressed Air System.pdf 1.1.1 - b3. PMSN Generator 3.pdf 1.1.1 - b3. PMSN Generator 2.pdf 1.1.1 - b3. PMSN Generator 1.pdf 1.1.1 - b3. PMSN Chillers 2.pdf 1.1.1 - b3. PMSN Chillers 1.pdf 1.1.1 - b3. PMSN UPS Dynamic.pdf 1.1.1 - b3. PMSN City Water + Reused water system.pdf 1.1.1 - b3. PMSN Deshumidifier.pdf 1.1.1 - b3. PMSN water system assessment.pdf 1.1.1 - b3. PMSN Water pumps.pdf 1.1.1.b3 WWTP technical features.jpg 1.1.1 - b1. PMMSN water-related infrastructures.pdf 1.3.2.c. Water meters.jpg</p>
	<p>Comments:</p> <p>1.1.1 - a1. PMMSN boundaries and layout.pptx reflects the site boundary, plant layout, local (site) catchment, and delineation of the nearest surface and groundwater resources.</p> <p>1.1.1- a2. PMMSN Operation Permit.pdf reflects the site's development permit and approved developable surface area, but does not relate directly to this indicator.</p> <p>1.1.1.b3_WWTP_technical_features.jpg spatially reflects the site's sanitary system.</p> <p>1.1.1_ _b1_ _PMMSN_water-related_infrastructures.pptx spatially reflects the site's treatment plan; hot, cold and mixed water system; shut-off valves; dry well into which the site's storm water is discharged for percolation into the shallow groundwater system; and the recycled (treated effluent) faucets and green spaces into which the site's treated effluent is discharged..</p> <p>1.1.1_ _b3_ _PMSN_Boiler_1.pdf to 1.1.1_ _b3_ _PMSN_water_system_assessment.pdf are checklists of all the water-related infrastructure on site.</p> <p>1.1.1_ _b1_ _PMMSN_water-related_infrastructures.pdf reflects the movement across and exit of stormwater from the site.</p> <p>1.1.1_ _a1_ _PMMSN_boundaries_and_layout.pptx and 1.1.1_ _c1_ _PMMSN_water_sourcing_points_&_catchment_area_delimitation.23.10.01.pdf map and describe the Lake Surface water zone, and The Groundwater source.</p> <p>1.1.1_ _c1_ _PMMSN_water_sourcing_points_&_catchment_area_delimitation.23.10.01.pdf also maps and describes the water distribution network for the region, including treatment units.</p> <p>1.3.2.c. Water meters.jpg reflects the site's withdrawal/input water point and associated water meter and discharge point/s.</p>

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- 1.2** *Understand relevant stakeholders, their water related challenges, and the site's ability to influence beyond its boundaries.*
- 1.2.1** *Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall:*
- *Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people;*
 - *Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies;*
 - *Provide evidence of stakeholder consultation on water-related interests and challenges;*
 - *Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups;*
 - *Identify the degree of stakeholder engagement based on their level of interest and influence.*

 Obs.

Comment

Evidence:

- 1.2.1-1.2.2 - a. PMMSN Stakeholder list and memorandum - summary.23.10.23.pdf
- 1.2.1-1.2.2 - b. PMMSN Stakeholder map - Google Earth.23.10.06.kmz
- 1.2.1-1.2.2 - a. PMMSN Stakeholder list and memorandum.23.10.06.xlsm
- 1.2.1-1.2.2 - a. PMMSN Stakeholder list and memorandum - summary.23.10.06.pdf
- 1.2.1-1.2.2 - b. PMSN Stakeholder map.23.08.29.kmz
- 1.2.1-1.2.2 - a. PMSN Stakeholder list and memorandum.23.08.29.xlsm

Comments:

1.2.1-1.2.2 - a. PMSN Stakeholder list and memorandum.23.08.29.xlsm reflects the stakeholders identified by the site, including the methodology applied, the interest of the stakeholders and the site, the power of the stakeholders and site to influence one another, the attitude of each stakeholder towards the site, the proposed type/level of engagement, the relationship level to date, and the engagement trend to date. The stakeholders identified span a broad spectrum from public sector institutions (e.g., Government Ministries, regulators, Municipalities, research institutions), to private companies and services providers to the site, to environmental NGOs and vulnerable community groups, women, and youth.

1.2.1-1.2.2 - a. PMMSN Stakeholder list and memorandum - summary.23.10.06.pdf describes and maps the identified stakeholders, as well as the process the site applied in identifying and engaging with their stakeholders.

1.2.1-1.2.2 - b. PMSN Stakeholder map.23.08.29.kmz reflects the spatial location of each stakeholder in GoogleEarth.

Water-related challenges of the stakeholders were documented where stakeholders responded to the questionnaires distributed by the site. However, this will require updating as further responses are received.

The site has documented the distribution of indigenous people in Senegal 1.2.1-1.2.2 - a. PMMSN Stakeholder list and memorandum - summary.23.10.23.pdf and confirmed that none are present within the site's catchment/s.



- 1.2.2** *Current and potential degree of influence between site and stakeholder shall be identified, within the catchment and considering the site's ultimate water source and ultimate receiving water body for wastewater.*

 Yes

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Comment	<p>Evidence: 1.2.1-1.2.2 - a. PMMSN Stakeholder list and memorandum - summary.23.10.23.pdf 1.2.1-1.2.2 - b. PMMSN Stakeholder map - Google Earth.23.10.06.kmz</p> <p>SEP 1.2.1-1.2.2 - a. PMMSN Stakeholder list and memorandum.23.10.06.xlsm 1.2.1-1.2.2 - a. PMSN Stakeholder list and memorandum.23.08.29.xlsm 1.2.1-1.2.2 - b. PMSN Stakeholder map.23.08.29.kmz</p> <p>Comments: 1.2.1-1.2.2 - a. PMSN Stakeholder list and memorandum.23.08.29.xlsm reflects the stakeholders identified by the site, including the interest of the stakeholders and the site, the power of the stakeholders and site to influence one another, the attitude of each stakeholder towards the site, the proposed type/level of engagement, the relationship level to date, and the engagement trend to date.</p> <p>The stakeholder list specifies whether stakeholders are located in the same catchment as the site or not, and which specific catchment they are in, both in terms of the site's ultimate water source and ultimate receiving water body for wastewater.</p>
1.3	<p><i>Gather water-related data for the site, including: water balance; water quality, Important Water-Related Areas, water governance, WASH; water-related costs, revenues, and shared value creation.</i></p>
1.3.1	<p><i>Existing water-related incident response plans shall be identified.</i></p> <div style="text-align: right; padding-right: 20px;">  Yes </div>
Comment	<p>Evidence: 131-CP~1.PDF 131-BP~1.PDF 1.3.1 - d. PMMSN Emergency Preparedness BCP.pdf</p> <p>SEP 1.3.1 - a. PMMSN Emergency Response Plan.pdf</p> <p>Comments: 1.3.1 - a. PMMSN Emergency Response Plan.docx reflects the types of emergency incidents potentially likely at the site and related management actions. This includes (amongst other issues), water contamination, flooding, chemical spills, interruptions in water supply to the site.</p> <p>1.3.1 - d. PMMSN Emergency Preparedness BCP.pdf is a procedure to manage any disruptive incident, and ensure the continuity of the production activities until full recovery, including water supply, contamination, steam boiler break downs, and flooding.</p>
1.3.2	<p><i>Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped</i></p> <div style="text-align: right; padding-right: 20px;">  Yes </div>

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Comment	<p>Evidence: OCT 1.3.2 - a. PMMSN Sankey Diagram.pdf</p> <p>SEP 1.3.2 - b. PMMSN Raw data for water balance Sankey Diagram.xlsx 1.3.2 - d. PMMSN Map of water reuse scenario.jpg 1.3.2 - c. PMMSN Map of water meters .jpg</p> <p>Comments: 1.3.2 - b. PMMSN Raw data for water balance Sankey Diagram.xlsx reflects the quantitative water use (consumption) through various parts of the site, but not any inflows, outflows, storage or losses.</p> <p>1.3.2 - a. PMMSN Sankey Diagram.pdf is a schematic of the flow of water into, through, and from the site, including associated quantities.</p> <p>1.3.2 - c. PMMSN Map of water meters .jpg reflects the spatial location of recycled water faucets on site.</p> <p>1.3.2 - d. PMMSN Map of water reuse scenario.jpg reflects the spatial location of water meters on site.</p> <p>1.3.2 - a. PMMSN Sankey Diagram.pdf is a schematic of the flow of water into, through, and from the site, including associated quantities. This includes losses and storage.</p>	
1.3.3	<p><i>Site water balance, inflows, losses, storage, and outflows, including indication of annual variance in water usage rates, shall be quantified. Where there is a water-related challenge that would be a threat to good water balance for people or environment, an indication of annual high and low variances shall be quantified.</i></p>	 Yes
Comment	<p>Evidence: 1.3.2 - a. PMMSN Sankey Diagram.pdf 1.3.3 - b. PMSN raw data for water consumption .xlsx 1.3.3 - a. PMSN water consumption and seasonality trend.pdf 1.3.3 - a. PMMSN water consumption and seasonality trend.pptx</p> <p>Comments: 1.3.3 - a. PMSN water consumption and seasonality trend.pptx and 1.3.3 - a. PMMSN water consumption and seasonality trend.pdf reflect the site's water consumption trends from 2020 to 2022, including inflows, production (consumption), and re-use both annually and monthly. It also reflects the annual consumption rate per million cigarettes from 2016 to 2022.</p> <p>1.3.3 - b. PMSN raw data for water consumption .xlsx is a detailed spreadsheet on which most of which 1.3.3 - a. PMSN water consumption and seasonality trend.pptx is based.</p> <p>1.3.2 - a. PMMSN Sankey Diagram.pdf is a schematic of the flow of water into, through, and from the site, including associated quantities. This includes losses and storage.</p>	
1.3.4	<p><i>Water quality of the site's water source(s), provided waters, effluent and receiving water bodies shall be quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be quantified.</i></p>	 in progress




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Comment	<p>Evidence: 1.3.4 - c. PMMSN 2023 drinking water analysis PO (Devis).pdf SEP 1.3.4 - b3. PMSN Wastewater analytical results 2022.pdf</p> <p>Comments: 1.3.4 - b3. PMSN Wastewater analytical results 2022.pdf reflects 13 sets of analytical water quality results for wastewater and drinking water from the site.</p> <p>1.5.4. PMMSN Catchment water quality.23.08.29 (1).pptx reflects that the Directorate for Water Resources Management and Planning (DGPRE), set by Decree No. 2003-358 of 26 May 2003, located in the territory of Dakar, is the Water Authority responsible for managing water resources at National level. The DGPRE supervises National water quality studies of both groundwater and surface water. The site has documented data that they have been able to source on the water quality of the site's water source(s), namely Guiers Lake and the Sebikhotane aquifer, but this information is limited particularly in terms of recent data and annual, seasonal, high and low variances for the Sebikhotane aquifer that has water scarcity issues. The site has requested more comprehensive data, but not received any yet.</p> <p>The site has not documented the water quality of the shallow aquifer into which its stormwater flows and treated effluent may ultimately percolate into.</p>	
		Finding No: TNR-006765
1.3.5	<i>Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.</i>	 in progress
Comment	<p>Evidence: SEP 1.3.5 - b. PMMSN list of chemical substances.xls 1.3.5 - a. PMMSN map of potential sources of pollution.pdf</p> <p>Comments: 1.3.5 - a. PMMSN map of potential sources of pollution.pptx reflects the potential sources of pollution on site and the location of spill kits across the site.</p> <p>1.3.5 - b. PMMSN list of chemical substances.xls lists the various chemicals stored on site, including links to the relevant MSDS per chemical and categorisation of the hazards of each.</p> <p>However, there are a number of locations on site where there is physical evidence of spills, including hydrocarbons, that the site has not identified as current sources of pollution.</p> <p>1.3.5 - a. PMMSN map of potential sources of pollution.pdf does not reflect the location of used chemical containers awaiting collection by suppliers for re-use, which still contain some chemical content that if spilled would potentially flow into the stormwater system. In addition, various scrap parts are being stored at the back of the site that are currently not covered that could potentially contain oils and greases that could flow into the stormwater system during rainfall events, with no containment currently in place.</p> <p>There are a number of areas where no or insufficient bunding is in place around potential pollution sources.</p> <p>The canteen has not been identified as a source of potential pollution by the site, particularly as oils are used (in limited quantities) and current disposal methods may be inappropriate.</p>	
1.3.6	<i>On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.</i>	 Yes

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Comment	<p>Evidence: 1.3.6 - 1.5.5 - b. PMMSN IWRA Map - Google Earth.23.10.04.kmz 1.3.6 - 1.5.5 - b. PMMSN IWRA Map - Google Earth - Screenshot 3.jpg 1.3.6 - 1.5.5 - b. PMMSN IWRA Map - Google Earth - Screenshot 2.jpg 1.3.6 - 1.5.5 - b. PMMSN IWRA Map - Google Earth - Screenshot 1.jpg 1.3.6 - 1.5.5 - a. PMMSN IWRA assessment.23.10.04.xlsm 1.3.6 - 1.5.5 PMMSN IWRA assessment.xlsm 1.3.6 - 1.5.5. Google Earth - IWRA.23.08.29.kmz</p> <p>Comments: 1.3.6_-_1.5.5._Google_Earth_-_IWRA.23.08.29.kmz reflects the location of four IWRA in fairly close proximity to the site, and various IWRA within the catchment (beyond the site), but none within the site.</p> <p>1.3.6_-_1.5.5._PMMSN_IWRA_assessment.xlsm lists and describes the detailed status of the suite of IWRA within the catchment as reflected in 1.3.6_-_1.5.5._Google_Earth_-_IWRA.23.08.29.kmz.</p>	
1.3.7	<p><i>Annual water-related costs, revenues, and a description or quantification of the social, cultural, environmental, or economic water-related value generated by the site shall be identified and used to inform the evaluation of the plan in 4.1.2.</i></p>	 Yes
Comment	<p>Evidence: 1.3.7 - a. PMMSN True Cost of Water.23.10.06.xlsm revised version</p> <p>Comments: Annual water-related costs were documented for various aspects of the operation, including a description of the social, cultural, environmental, or economic water-related value generated by the site.</p> <p>The site's revenue is confidential and therefore was not specified in this report nor documented in any of the evidence provided by the site. However, the site's revenues were disclosed to the auditors on-site, recognising that the site does not sell any water but water is an input into the tobacco products the site sells and the packaging and labelling used in the final product sold to market.</p>	
1.3.8	<p><i>Levels of access and adequacy of WASH at the site shall be identified.</i></p>	 in progress
Comment	<p>Evidence: 1.3.8., 3.1.2., 3.2.2. PMMSN Self Assessment WASH - HRWS.23.09.26.xlsx</p> <p>SEP 1.3.8. PMMSN WASH adequacy and availability.pdf</p> <p>Comments: 1.3.8._PMMSN_WASH_adequacy_and_availability.pptx illustrates some of the drinking water stations and hand wash basins on site, but does not document the levels of access and adequacy of WASH at the site, nor per building and gender.</p>	
		Finding No: TNR-006770
1.4	<p><i>Gather data on the site's indirect water use, including: its primary inputs; the water use embedded in the production of those primary inputs the status of the waters at the origin of the inputs (where they can be identified); and water used in out-sourced water-related services.</i></p>	
1.4.1	<p><i>The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be identified.</i></p>	 Obs.

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Comment Evidence:
 1.4.1-1.4.2 - a. PMMSN Indirect water use of raw materials and service providers.23.10.04.xlsm
 1.4.1 - 1.4.2 - b. PMSN Stakeholder questionnaire on indirect water use.pptx

Comments:
 1.4.1 - 1.4.2 - b. PMSN Stakeholder questionnaire on indirect water use.pptx reflects a questionnaire to raw material and outsourced service providers operating, either within the site premises or inside the catchment area, to obtain information on their indirect water use.

1.4.1-1.4.2 - a. PMSN Indirect water use of raw materials and service providers.xlsm reflects the products that constitute raw materials to the site, outsourced services, the quantity of the materials provided to the site annually, and whether the raw materials or services originate within the catchment, amongst other information. However, none of this information includes a quantification of the embedded water use of primary inputs (where relevant).

The questionnaires did result in suppliers quantifying the level of water risk per risk type within the site's catchment.

The site requested data on the water quality and quantity of embedded water use per raw material within the site's catchment, but have not received feedback on this yet from some suppliers despite requesting this information on 11 August 2023 and some suppliers advised that their products do not have any embedded water. This information should be updated in the site's documentation once it is received.

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

Comment Evidence:
 1.4.1-1.4.2 - a. PMMSN Indirect water use of raw materials and service providers.23.10.04.xlsm
 1.4.1 - 1.4.2 - b. PMSN Stakeholder questionnaire on indirect water use.pptx

Comments:
 1.4.1 - 1.4.2 - b. PMSN Stakeholder questionnaire on indirect water use.pptx reflects a questionnaire to raw material and outsourced service providers operating, either within the site premises or inside the catchment area, to obtain information on their indirect water use.

1.4.1-1.4.2 - a. PMSN Indirect water use of raw materials and service providers.xlsm reflects the products that constitute raw materials to the site, outsourced services, the quantity of the materials provided to the site annually, and whether the raw materials or services originate within the catchment, amongst other information. However, none of this information includes a quantification of the embedded water use of primary inputs (where relevant).

The questionnaires resulted in some suppliers and outsourced services providers quantifying the level of water risk per risk type within the site's catchment.

The site requested their suppliers of outsourced services in August 2023 to identify if there is any embedded water use in their outsourced services to the site, and if those services originate within the site's catchment to quantify the embedded water. The site has not received feedback yet from two of their service providers and the other two advised that their services provided do not have any embedded water. The outstanding information should be updated in the site's documentation once it is received.

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

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1.5.1 *Water governance initiatives shall be identified, including catchment plan(s), water-related public policies, major publicly-led initiatives under way, and relevant goals to help inform site of possible opportunities for water stewardship collective action.* 🚧 in progress

Comment Evidence:
 1.5.1. PMMSN Water governance initiatives and plans.23.09.25.pdf
 1.5.1. PMMSN Water governance initiatives and plans.23.10.09.pdf

SEP
 1.5.1. PMMSN Water governance initiatives and plans.23.08.29.pptx

Comments:
 1.5.1._PMMSN_Water_governance_initiatives_and_plans.23.08.29.pptx reflects various water governance initiatives in Senegal, including water sector management reforms, the Integrated Water Resources Management (IWRM) Project in Somone, the Rainwater Management and Climate Change Adaptation Project (PROGEP II), Ferlo Ecosystem Resilience Enhancement Project (PREFERLO), the Faecal Sludge Management (FSM) Program, Pôle Eau Dakar Initiative, and the Janicki Omni Processor Project.

1.5.1. PMMSN Water governance initiatives and plans.23.10.09.pdf also reflects the Organisation pour la Mise en Valeur du fleuve Senegal initiatives; as well as the current Senegal sub-catchment plans that are being developed.

However, the evidence provided includes very little policy context, no information on relevant catchment plan/s beyond a high level overview of the Somone sub-UGP pilot project (i.e., for Guier Lake area) as only Somone is currently being implemented, and no information on relevant goals to help inform the site of possible opportunities for water stewardship collective action.

Finding No: TNR-006781

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

Comment Evidence:
 3.1.2., 3.2.2 & 3.6.2. PMMSN Evidence actions to respect water rights.23.10.09.pdf
 1.3.8., 3.1.2., 3.2.2. PMMSN Self Assessment WASH - HRWS.23.09.26.xlsx

SEP
 152PMM~1.PPT

Comments:
 152PMM_1.PPT specifies a suite of applicable catchment water-related legal and regulatory requirements at a national and international level. No details were provided regarding any local (municipal) legal requirements (e.g., wastewater disposal, storm water management etc.)

The evidence provided for 1.5.4 (i.e., 1.5.4._PMMSN_Catchment_water_quality.23.08.29.pptx) also includes details of the Water Code Law No. 81-13 of 4 March 1981; Law No. 2001-01 of 15 January 2001, Title III, on the Environment Code; the Ministerial Decree No. 98-556 of 25 June 1998 that implements the requirements of the Water Code relating to the Water Police, defining the monitoring stations in correspondence to the discharge points for the surface water and the monitoring piezometers for the ground water. It also defines the dispositions for the water quality monitoring, the sampling and analysis procedures; and the Senegalese Standard 05-061 of July 2001 that defines the wastewater standard, amongst other related requirements (e.g., Decree No. 2003-358 of 26 May 2003).

3.1.2., 3.2.2 & 3.6.2. PMMSN Evidence actions to respect water rights.23.10.09.pdf and 1.3.8., 3.1.2., 3.2.2. PMMSN Self Assessment WASH - HRWS.23.09.26.xlsx. document that the Fouta-Toro community is present in the far south-east of the Guier Lake catchment and that there are water-related resource constraints and conflicts linked to this.



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- 1.5.3** *The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.* 🔍
Obs.
- Comment Evidence:
1.5.3. PMMSN catchment area water balance analysis.23.10.17.pdf
- Comments:
A catchment water-balance was reflected in 1.5.3. PMMSN catchment area water balance analysis.23.10.17.pdf for the Lake Guiers sub-catchment and Sebikhotane groundwater system (catchment). The data reflects a net positive situation for the Lake Guiers sub-catchment, but a net negative situation for the Sebikhotane groundwater system (catchment).
- Scarcity was quantified and variance between 2002 and 2014 was quantified for the Lake Guiers sub-catchment and for 2015 and 2016 for the greater catchment within which Sebikhotane is located.
- The site should update this information once new data becomes available.
- 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:
1.5.4. PMMSN Catchment water quality.23.10.10.pdf
- SEP
1.5.4. PMMSN Catchment water quality.23.08.29.pptx
- Comments:
1.5.4. PMMSN Catchment water quality.23.08.29.pptx reflects the limited understanding of the quality and availability of water resources and of the risks of pollution in Senegal, as well as limited data collection, issues with the management of monitoring systems, limited coordination between Authorities and/or Agencies, and insufficient funding, which have introduced uncertainty regarding existing water quality data. It was also noted that the Maastrichtian aquifer of the Sebikhotane ground water catchment, which is the main potable water resource for Dakar, is not periodically monitored as yet.
- Included are some water quality data for Guiers Lake and descriptive information on its ecological state, as well as conductivity data for the Sebikhotane aquifer.
- 1.5.4. PMMSN Catchment water quality.23.10.10.pdf also includes physical and chemical data for Guiers Lake catchment and its biological status, as well as physical and chemical data for the Sebikhotane catchment but not the biological status due to a lack of currently available information. Also, the data is sourced from 2012 and 2014. This information needs to be updated when new data becomes available.
- 1.5.5** *Important Water-Related Areas shall be identified, and where appropriate, mapped, and their status assessed including any threats to people or the natural environment, using scientific information and through stakeholder engagement.* ✅
Yes



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Comment	<p>Evidence: 1.3.6 - 1.5.5 - b. PMMSN IWRA Map - Google Earth.23.10.04.kmz 1.3.6 - 1.5.5 - b. PMMSN IWRA Map - Google Earth - Screenshot 3.jpg 1.3.6 - 1.5.5 - b. PMMSN IWRA Map - Google Earth - Screenshot 2.jpg 1.3.6 - 1.5.5 - b. PMMSN IWRA Map - Google Earth - Screenshot 1.jpg 1.3.6 - 1.5.5 - a. PMMSN IWRAs assessment.23.10.04.xlsm</p> <p>SEP 1.3.6 - 1.5.5 PMMSN IWRAs assessment.xlsm 1.3.6 - 1.5.5. Google Earth - IWRAs.23.08.29.kmz</p> <p>Comments: 1.3.6_-_1.5.5_Google_Earth_-_IWRAs.23.08.29.kmz reflects the location of one IWRA on-site, one immediately adjacent to the site, and various IWRAs within the catchment (beyond the site).</p> <p>1.3.6_-_1.5.5_PMMSN_IWRAs_assessment.xlsm lists and describes the detailed status of a suite of IWRAs within the catchment.</p> <p>The information provided is very comprehensive. It includes an assessment of the value of the features identified; references, and the priority status of each for site implementation using Multi-Criteria Decision Analysis.</p>	
1.5.6	<p><i>Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.</i></p>	 Yes
Comment	<p>Evidence: 1.5.6. PMMSN Catchment water-related infrastructures.pdf 1.5.6. PMMSN Catchment water-related infrastructures.23.10.05.pptx</p> <p>SEP 1.5.6. PMMSN Catchment water-related infrastructures.23.08.29.pptx</p> <p>Comments: 1.5.6_PMMSN_Catchment_water-related_infrastructures.23.08.29.pptx reflects the two main water resources for the region, namely water treatment plants (WTPs) located at Keur Momar Sarr (KMS) and Ngnith, wells distributed in three main clusters, the related water transmission lines and pump stations, and the Cambérène and Niayes wastewater treatment plants.</p> <p>In 1.5.6. PMMSN Catchment water-related infrastructures.23.10.05.pptx, the exposure of key infrastructure in terms of water scarcity and flood risk has been documented, as well as the current condition of each.</p>	
1.5.7	<p><i>The adequacy of available WASH services within the catchment shall be identified.</i></p>	 Yes
Comment	<p>Evidence: 1.5.7. PMMSN Catchment WASH adequacy and availability.23.10.05.pdf</p> <p>SEP 1.5.7. PMMSN Catchment WASH adequacy and availability.23.08.29.pptx</p> <p>Comments: 1.5.7_PMMSN_Catchment_WASH_adequacy_and_availability.23.08.29.pptx reflects the extent of WASH services in Senegal and drinking water, sanitation and hygiene provision in Dakar and the regions in which Lake Guiers and Sebikhotane are located.</p>	
1.6	<p><i>Understand current and future shared water challenges in the catchment, by linking the water challenges identified by stakeholders with the site's water challenges.</i></p>	

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1.6.1	<i>Shared water challenges shall be identified and prioritized from the information gathered.</i>	 Yes
Comment	<p>Evidence:</p> <p>1.6.1 - 1.6.2 - a. PMMSN catchment shared water challenges.23.10.06.xlsx 1.6.1 - 1.6.2 - c. RNUGND President of the Fisherman community - shared water challenges questionnaire feedback.23.09.26.pdf 1.6.1 - 1.6.2 - c. PMMSN - shared water challenges questionnaire feedback.pdf 1.6.1 - 1.6.2 - c. MAERSK - shared water challenges questionnaire feedback.23.09.20.pdf 1.6.1 - 1.6.2 - c. La Rochette - shared water challenges questionnaire feedback.23.10.03.pdf 1.6.1 - 1.6.2 - c. Diallo et Frères - shared water challenges questionnaire feedback.23.10.05.jpeg 1.6.1 - 1.6.2 - c. Alphamead - shared water challenges questionnaire feedback.23.09.20.pdf 1.6.1 - 1.6.2 - c. MAERSK - data request on shared water challenges questionnaire.23.08.11.msg 1.6.1 - 1.6.2 - c. La Rochette Dakar - data request on shared water challenges questionnaire.23.08.14.eml 1.6.1 - 1.6.2 - c. GANIC - data request on shared water challenges questionnaire.23.08.11.msg 1.6.1 - 1.6.2 - c. Alphamead - data request on shared water challenges questionnaire.23.08.11.eml 1.6.1 - 1.6.2 - c. Elyxir - data request on shared water challenges questionnaire.23.08.11.msg 1.6.1 - 1.6.2 - c. - data request on shared water challenges questionnaire.23.08.11.msg</p> <p>SEP</p> <p>1.6.1 - 1.6.2 - a. PMMSN catchment shared water challenges.xlsm 1.6.1 - 1.6.2 - b. PMMSN Stakeholder questionnaire on shared water challenges.pptx</p> <p>Comments:</p> <p>1.6.1 - 1.6.2 - b. PMMSN Stakeholder questionnaire on shared water challenges.pptx is the questionnaire template the site is using to obtain feedback from the stakeholders on their shared water challenges.</p> <p>1.6.1 - 1.6.2 - a. PMMSN catchment shared water challenges.xlsm is a shared water challenges identification and prioritisation tool that the site has populated with the feedback received from stakeholders. This includes the identification and scoring of root causes of the challenges.</p>	
1.6.2	<i>Initiatives to address shared water challenges shall be identified.</i>	 Yes

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Comment Evidence:


- 1.6.1 - 1.6.2 - a. PMMSN catchment shared water challenges.23.10.18.xlsm
- 1.6.1 - 1.6.2 - a. PMMSN catchment shared water challenges.23.10.06.xlsb
- 1.6.1 - 1.6.2 - c. RNUGND President of the Fisherman community - shared water challenges questionnaire feedback.23.09.26.pdf
- 1.6.1 - 1.6.2 - c. PMMSN - shared water challenges questionnaire feedback.pdf
- 1.6.1 - 1.6.2 - c. MAERSK - shared water challenges questionnaire feedback.23.09.20.pdf
- 1.6.1 - 1.6.2 - c. La Rochette - shared water challenges questionnaire feedback.23.10.03.pdf
- 1.6.1 - 1.6.2 - c. Diallo et Frères - shared water challenges questionnaire feedback.23.10.05.jpeg
- 1.6.1 - 1.6.2 - c. Alphamead - shared water challenges questionnaire feedback.23.09.20.pdf
- 1.6.1 - 1.6.2 - c. MAERSK - data request on shared water challenges questionnaire.23.08.11.msg
- 1.6.1 - 1.6.2 - c. La Rochette Dakar - data request on shared water challenges questionnaire.23.08.14.eml
- 1.6.1 - 1.6.2 - c. GANIC - data request on shared water challenges questionnaire.23.08.11.msg
- 1.6.1 - 1.6.2 - c. Alphamead - data request on shared water challenges questionnaire.23.08.11.eml
- 1.6.1 - 1.6.2 - c. Elyxir - data request on shared water challenges questionnaire.23.08.11.msg
- 1.6.1 - 1.6.2 - c. - data request on shared water challenges questionnaire.23.08.11.msg
- 1.6.1 - 1.6.2 - a. PMMSN catchment shared water challenges.23.10.06.xlsb
- 1.6.1 - 1.6.2 - b. PMMSN Stakeholder questionnaire on shared water challenges.pptx
- 1.6.1 - 1.6.2 - a. PMMSN catchment shared water challenges.xlsm

Comments:
 1.6.1 - 1.6.2 - b. PMMSN Stakeholder questionnaire on shared water challenges.pptx is the questionnaire template the site is using to obtain feedback from the stakeholders on their shared water challenges.

1.6.1 - 1.6.2 - a. PMMSN catchment shared water challenges.23.10.18.xlsm is a shared water challenges identification and prioritisation tool that includes identified mitigation measures and existing sector efforts (initiatives) for each challenge.

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

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

 in progress

Comment Evidence:
 SEP
 1.7.1 - 1.7.2 PMMSN risks and opportunities.23.10.06.xlsm

Comments:
 1.7.1 - 1.7.2 PMMSN risks and opportunities.23.08.29.xlsm reflects the water risks faced by the site, including: a detail description of each risk (across the columns on risk, impact on site, and impact on catchment area); an assessment of the likely impact in terms of magnitude, frequency, and priority; whether the impact will be on-site and/or in the catchment; water-related opportunities in terms of a description, likelihood, positive impact, and priority; and lastly, how the site may participate (where deemed appropriate by the site). However, the potential costs of the risks have not been documented.

Finding No: TNR-006784




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

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Comment	<p>Evidence: SEP 1.7.1 - 1.7.2 PMMSN risks and opportunities.23.10.06.xlsm</p> <p>Comments: 1.7.1 - 1.7.2 PMMSN risks and opportunities.23.08.29.xlsm reflects the water risks faced by the site, including: a detail description of each risk; an assessment of the likely impact in terms of magnitude, frequency, and priority; whether the impact will be on-site and/or in the catchment; water-related opportunities in terms of a description, likelihood, positive impact, and priority; and lastly, how the site may participate (where deemed appropriate by the site) (i.e., business opportunities). However, the potential savings have not been documented.</p> <p style="text-align: right;">Finding No: TNR-006785</p>
1.8	<p><i>Understand best practice towards achieving AWS outcomes: Determining sectoral best practices having a local/catchment, regional, or national relevance.</i></p>
1.8.1	<p><i>Relevant catchment best practice for water governance shall be identified.</i></p> <p style="text-align: right;"> Yes</p>
Comment	<p>Evidence: SEP 1.8 PMMSN catchment best practices 2023.xlsm</p> <p>Comments: 1.8_PMMSN_catchment_best_practices_2023.xlsm reflects a number of existing public, private sector, community, and civil society water governance initiatives that the site could potentially co-operate, collaborate, and/or partner on; as well as public disclosure of the site's water stewardship commitment and resilient water stewardship plan as a "leading example for continuous improvements in the local territory".</p> <p>The proposed disclosure, as one potential practice, in itself would not serve as a global best practice, as it is a requirement of the AWS Standard, but within the local territorial context it would be.</p>
1.8.2	<p><i>Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.</i></p> <p style="text-align: right;"> Yes</p>
Comment	<p>Evidence: 1.8 PMMSN catchment best practices 2023.xlsm</p> <p>Comments: 1.8_PMMSN_catchment_best_practices_2023.xlsm reflects a number of existing public, private sector, and community water balance initiatives that the site could co-operate, collaborate, and/or partner on across the areas of policy and planning, water resource management, infrastructure, and training.</p>
1.8.3	<p><i>Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.</i></p> <p style="text-align: right;"> Yes</p>



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Comment	<p>Evidence: 1.8 PMMSN catchment best practices 2023.xlsm</p> <p>Comments 1.8_PMMSN_catchment_best_practices_2023.xlsm reflects a number of water quality related public and private sector initiatives that the site could potentially co-operate, collaborate, and/or partner on across the areas of water quality monitoring; maintenance, monitoring, periodic replacement and/or amelioration activities for water-related infrastructure; waste management; ecological restoration etc. References were provided for relevant opportunities (i.e., a data source).</p> <p>However, the desalination best practice identified appears to relate to the provision of good quality drinking water and should rather be reflected under WASH.</p>
1.8.4	<p><i>Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.</i></p> <p style="text-align: right;"> Yes</p>
Comment	<p>Evidence: 1.8 PMMSN catchment best practices 2023.xlsm</p> <p>Comments: 1.8_PMMSN_catchment_best_practices_2023.xlsm reflects various public sector, community, and civil society initiatives regarding maintenance of Important Water-Related Areas that the site could potentially co-operate, collaborate, and/or partner with across the areas of awareness raising; monitoring and groundwater replenishment; restoration; improvement of Guiers Lake to improve its water provision capability; and biodiversity conservation.</p>
1.8.5	<p><i>Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.</i></p> <p style="text-align: right;"> Yes</p>
Comment	<p>Evidence: 1.8 PMMSN catchment best practices 2023.xlsm</p> <p>Comments: 1.8_PMMSN_catchment_best_practices_2023.xlsm reflects a number of existing public, private sector, and civil society WASH initiatives that the site could potentially co-operate, collaborate, and/or partner on related to the design and building of a new wastewater treatment plant in Hann Bay; the Janicki Omni Processor Project; the PASWA-RD Project; and the PAEP Programme, amongst others.</p>



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2	STEP 2: COMMIT & PLAN - Commit to be a responsible water steward and develop a Water Stewardship Plan	
2.1	<i>Commit to water stewardship by having the senior-most manager in charge of water at the site, or if necessary, a suitable individual within the organization head office, sign and publicly disclose a commitment to water stewardship, the implementation of the AWS Standard and achieving its five outcomes, and the allocation of required resources.</i>	
2.1.1	<p><i>A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:</i></p> <ul style="list-style-type: none"> - <i>That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes</i> - <i>That the site implementation will be aligned to and in support of existing catchment sustainability plans</i> - <i>That the site's stakeholders will be engaged in an open and transparent way</i> - <i>That the site will allocate resources to implement the Standard.</i> 	 Yes
Comment	<p>Evidence:</p> <p>2.1.1 Evidence of disclosure to the main entrance.png 211-BE~4.JPE</p> <p>2.1.1 - b. Evidence of disclosure of PMMSN Commitment - Canteen.jpeg</p> <p>SEP</p> <p>2.1.1 - b. Evidence of disclosure of PMMSN Commitment - Admin.jpeg 211-BE~3.JPE 211-BE~2.JPE</p> <p>2.1.1 - a. PMMSN AWS Commitment French - English.pdf</p> <p>Comments:</p> <p>2.1.1 - a. PMMSN_AWS_Commitment_French_-_English.pdf is the site's water stewardship commitment that includes all the necessary aspects in alignment with this indicator, as well as additional commitments.</p> <p>2.1.1 - b. Evidence_of_disclosure_of_PMMSN_Commitment_-_Admin.jpeg (amongst other images of availability to view elsewhere on site) reflects disclosure of this commitment on site, and 2.1.1 Evidence of disclosure to the main entrance.png reflects it being presence open the external wall of the factory where the general public can see it.</p>	
2.2	<i>Develop and document a process to achieve and maintain legal and regulatory compliance.</i>	
2.2.1	<p><i>The system to maintain compliance obligations for water and wastewater management shall be identified, including:</i></p> <ul style="list-style-type: none"> - <i>Identification of responsible persons/positions within facility organizational structure</i> - <i>Process for submissions to regulatory agencies.</i> 	 Yes

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Comment	<p>Evidence: 2.2.1 - 3.2.1 - a. PMMSN water-related legal register.xlsx 2.2.1 - 3.2.1 - c. PMMSN procedure (EHS.D011) for non-conformity management.pdf</p> <p>SEP 2.2.1 - 3.2.1 - b. PMMSN Evidence of Red-On-Line System.pdf</p> <p>Comment: 2.2.1 - 3.2.1 - PMMSN_Evidence_of_Red-On-Line_System.pptx reflects the site's Red-On-Line System that covers the site's different legal requirements.</p> <p>2.2.1 - 3.2.1 - c. PMMSN procedure (EHS.D011) for non-conformity management.pdf specifies the responsibilities of the Director of Operations, Sustainability Team, and Management.</p> <p>EHS.D003 Exigencies Legales Et Autres Exigencies.docx describes the roles and responsibilities of the Sustainability Department.</p> <p>2.2.1 - 3.2.1 - b. PMMSN Evidence of Red-On-Line System.pdf reflects the ability in the system to select water-related legal compliance obligations. This includes weekly notifications of any proposed changes or new legal requirements.</p> <p>The site's Red-on-Line System specifies all the site's legal requirements, current status of compliance, when and by whom compliance was checked/confirmed.</p> <p>The site does not have any specific permits that need to be renewed, but there is a requirement for pH and N thresholds that need to be adhered to. The regulations do not require any reporting of performance, but the authorities could come at any time to take a sample.</p>	
2.3	<i>Create a water stewardship strategy and plan including addressing risks (to and from the site), shared catchment water challenges, and opportunities.</i>	
2.3.1	<i>A water stewardship strategy shall be identified that defines the overarching mission, vision, and goals of the organization towards good water stewardship in line with this AWS Standard.</i>	 in progress
Comment	<p>Evidence: SEP 2.3.1 PMMSN WS Strategy.pdf</p> <p>Comments: 2.3.1 - PMMSN_WS_Strategy.docx is the site's water stewardship strategy. This includes goals of the site towards good water stewardship in line with this AWS Standard, but not an overarching mission and vision.</p>	
		Finding No: TNR-006786
2.3.2	<p><i>A water stewardship plan shall be identified, including for each target:</i></p> <ul style="list-style-type: none"> - <i>How it will be measured and monitored</i> - <i>Actions to achieve and maintain (or exceed) it</i> - <i>Planned timeframes to achieve it</i> - <i>Financial budgets allocated for actions</i> - <i>Positions of persons responsible for actions and achieving targets</i> - <i>Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.</i> 	 in progress

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Comment Evidence:
SEP
2.3.2. - 4.1. PMMSN WS Plan + Evaluation.23.10.09.xlsm


Comments:
2.3.2. - 4.1. PMMSN WS Plan + Evaluation.23.08.29.xlsm is the site's Water Stewardship Plan (WSP) that includes goals, quantified targets, implementation time-frames, a quantified monitoring modality, detailed implementation actions required, the implementation start date, frequency of evaluation, the responsible personnel (for some actions), and a linkages to each of the five AWS outcomes where relevant. Numerical targets are also specified within clear time-frames, to enable future evaluation of progress. Links were clearly specified between each target and the achievement of best practice.

The allocated financial budgets have been specified for most actions, but a few still need to be specified by drawing out the allocated cost from the already allocated budget and specifying these budgets per action. Human resource costs for activities should also be specified.

Finding No: TNR-006787

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:
1.3.1 - d. PMMSN Emergency Preparedness BCP.pdf
1.3.1 - a. PMMSN Emergency Response Plan.pdf

Comment:
1.3.1 - d. PMMSN Emergency Preparedness BCP.pdf and 1.3.1 - a. PMMSN Emergency Response Plan.pdf are the site's emergency response plan and BCP.

The site has engaged with a suite of relevant authorities (e.g., ONAS, Municipality fire response and training for site staff), but evidence of this was not provided.

Finding No: TNR-006788

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3	STEP 3: IMPLEMENT - Implement the site's stewardship plan and improve impacts	
3.1	<i>Implement plan to participate positively in catchment governance.</i>	
3.1.1	<i>Evidence that the site has supported good catchment governance shall be identified.</i>	 Yes
Comment	<p>Evidence: 3.1.1. & 3.9.1. PMMSN Evidence of good governance.23.10.03.pdf</p> <p>Comments: 3.1.1. & 3.9.1. PMMSN Evidence of good governance.23.10.03.pdf reflects Sustainability Week workshop and awareness raising, various external stakeholder engagement (60% if 15 priority external stakeholders) including ,meetings and questionnaires, as well as correspondence to suppliers.</p>	
3.1.2	<i>Measures identified to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be implemented.</i>	 Yes
Comment	<p>Evidence: 3.1.2., 3.2.2 & 3.6.2. PMMSN Evidence actions to respect water rights.23.10.09.pdf 1.3.8., 3.1.2., 3.2.2. PMMSN Self Assessment WASH - HRWS.23.09.26.xlsx</p> <p>Comments: 3.1.2., 3.2.2 & 3.6.2. PMMSN Evidence actions to respect water rights.23.10.09.pdf and 1.3.8., 3.1.2., 3.2.2. PMMSN Self Assessment WASH - HRWS.23.09.26.xlsx. document that the Fouta-Toro community is present in the far south-east of the Guier Lake catchment and that there are water-related resource constraints and conflicts linked to this. To date the site has not implemented any related actions, but does not directly affect this community from a water-rights perspective.</p>	
3.2	<i>Implement system to comply with water-related legal and regulatory requirements and respect water rights.</i>	
3.2.1	<i>A process to verify full legal and regulatory compliance shall be implemented.</i>	 Yes
Comment	<p>Evidence: 2.2.1 - 3.2.1 - a. PMMSN water-related legal register.xlsx 2.2.1 - 3.2.1 - c. PMMSN procedure (EHS.D011) for non-conformity management.pdf 2.2.1 - 3.2.1 - b. PMMSN Evidence of Red-On-Line System.pdf 3.4.1, 3.4.2 1 3.9.3 PMMSN evidence of good water quality.23.10.02.pptx. #####</p> <p>SEP 2.2.1 - 3.2.1. PMMSN Evidence of Red-On-Line System.pptx</p> <p>Comments: 2.2.1 - 3.2.1 - a. PMMSN water-related legal register.xlsx, 2.2.1 - 3.2.1 - c. PMMSN procedure (EHS.D011) for non-conformity management.pdf, 2.2.1 - 3.2.1 - b. PMMSN Evidence of Red-On-Line System.pdf and 2.2.1 - 3.2.1. PMMSN Evidence of Red-On-Line System.pptx all reflect the system the site has in place and is implementing.</p> <p>3.4.1, 3.4.2 1 3.9.3 PMMSN evidence of good water quality.23.10.02.pptx documents the site's treated wastewater quality and its current compliance. Ministry of Environment could undertake inspections and take samples of the site's treated wastewater, but has not yet.</p>	

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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.* 🚧
in progress

Comment Evidence:
3.1.2., 3.2.2 & 3.6.2. PMMSN Evidence actions to respect water rights.pdf
1.3.8., 3.1.2., 3.2.2. PMMSN Self Assessment WASH - HRWS.23.09.26.xlsx

Comments:
The Water Code for Senegal specifies water as a common good and any exploitation of water resources is subject to prior authorization and control. Articles 47 to 58 specifically require actions to be taken to avoid pollution events and related responsibilities.

However, there are a number of locations on site where bunding and pollution avoidance and control measures need to be improved, to ensure that water (as a common good of the people of Senegal) is not impacted negatively. The site is currently constructing a new chemical store and has an approved plan for new bunding for certain parts of the site where chemicals are present, but this has not been implemented yet.

Also various scrap parts are being stored across the site that could potentially result in run-off containing pollution (e.g., grease, oil) during rainfall events into the site's stormwater system and into the site's dry pit and then into the shallow aquifer.

Condensate from air conditions is being captured in plastic containers and then used to water plants on site, but the original chemical contents of these containers has not all been removed before use for this purpose.

Finding No: TNR-006792

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., 3.3.2 & 3.9.2 PMMSN evidence of sustainable water balance.23.10.04.pdf
2.3.2._- 4.1._PMMSN_WS_Plan_+_Evaluation.23.10.09.xlsm

Comments:
2.3.2._- 4.1._PMMSN_WS_Plan_+_Evaluation.3.10.09.xlsm reflects and 3.3.1., 3.3.2 & 3.9.2 PMMSN evidence of sustainable water balance.23.10.04.pdf reflect 4 related targets.




Actions to date are the installation of additional water meters in the piping network to identify leaks, installation of small nets along the small canal adjacent to the site boundary to capture solid waste is still at feasibility and not being implemented yet but materials for installation have been received, installation of tap sensors, and removal of pressurizers in the admin area as the pressure was too high and installation in production area and installation of a tank booster in production.

3.3.2 *Where water scarcity is a shared water challenge, annual targets to improve the site's water use efficiency, or if practical and applicable, reduce volumetric total use shall be implemented.* ✅
Yes

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Comment	<p>Evidence: 3.3.1., 3.3.2 & 3.9.2 PMMSN evidence of sustainable water balance.23.10.04.pdf 2.3.2._4.1._PMMSN_WS_Plan+_Evaluation.23.10.09.xlsm</p> <p>Comments: Annual targets to improve the site's water use efficiency and reduce volumetric total use are specified in the WSP (2.3.2._4.1._PMMSN_WS_Plan+_Evaluation.23.10.09.xlsm). A target of 613.128 m3 water use reduction was set in the WSP from January to December 2023. To date from Q1 to Q3 2023, a total of 834 m3 has been reduced and saved (the sum of water use reduced from all the relevant proposed actions/targets in the WSP).</p>	
3.3.3	<p><i>Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.</i></p>	 Yes
Comment	<p>The site does not have any legally-binding commitment to re-allocate water to social, cultural or environmental needs.</p>	
3.4	<p><i>Implement plan to achieve site water quality targets</i></p>	
3.4.1	<p><i>Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.</i></p>	 Obs.
Comment	<p>Evidence: 2.3.2._4.1._PMMSN_WS_Plan+_Evaluation.23.10.09.xlsm 3.4.1., 3.4.2 & 3.9.3 PMMSN evidence of good water quality.23.10.02.pdf</p> <p>Comments: A total of 4 water quality targets were set in the WSP (2.3.2._4.1._PMMSN_WS_Plan+_Evaluation.23.10.09.xlsm), but only 1 is specified quantitatively. However, the action related to this target is only set to commence in 2024.</p> <p>Proposed actions included installation of a new WWTP that is currently being investigated but not implemented yet, extra-ordinary maintenance of the WWTP that is also under investigation, voluntary monitoring of drinking water fountains on site and to date some of the historical stations have been re-installed after Covid-19 with 1 round of sampling having been undertaken to date and 1 more round to be undertaken before year end, testing of incoming water from Sen'Eau and the test results were received on 24 October 2023, and engagement with the Municipal Development Agency regarding water quality risks and to date email correspondence was sent by PMI but no response has been received from the MDA yet.</p> <p>The site should specify in its WSP all the actions/targets that relate to water quality, as some of the water balance targets also relate to water quality but are not stated as such in the current WSP.</p>	
3.4.2	<p><i>Where water quality is a shared water challenge, continual improvement to achieve best practice for the site's effluent shall be identified and where applicable, quantified.</i></p>	 Obs.
Comment	<p>Evidence: 3.4.1., 3.4.2 & 3.9.3 PMMSN evidence of good water quality.23.10.02.pdf 2.3.2._4.1._PMMSN_WS_Plan+_Evaluation.23.10.09.xlsm</p> <p>Comments: The WSP reflects a target of obtaining below threshold limits for P, N and BOD but specific values had not been determined as the installation of a new WWTP is currently investigated and not constructed yet. So specific values will be determined once the investigation has been concluded.</p> <p>Quantified targets for continual effluent quality improvement for all relevant parameters (e.g., N, P, BOD) should be set once the investigation has been concluded.</p>	

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- 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.* ✔
Yes
- Comment Evidence:
3.5.1 & 3.9.4. PMMSN evidence of IWRAs maintenance.23.10.03.pdf
2.3.2._4.1._PMMSN_WS_Plan+_Evaluation.23.10.09.xlsm
- Comments:
Three actions related to IWRAs were identified in the site's WSP. Actions implemented included the installation of the nets around the site to catch solid waste from the adjacent storm water system for which the equipment has been delivered and is ready for installation, and planting of 150 indigenous trees and solid waste clean-up in the Réserve Naturelle Urbaine de la Grande Niaye de Pikine et Dépendance that was implemented.
- 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.* ✎
in progress
- Comment Evidence:
3.6.1 & 3.9.5 PMMSN evidence of adequate WASH actions.23.10.03.pdf
- Comments:
Three actions were identified in the WSP related to the site's provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers onsite.
- Awareness activities regarding WASH were implemented during Sustainability Week involving 60 people as planned, re-introduction of drinking water fountains after Covid-19 that is currently being rolled out, voluntary monitoring of drinking water on site was implemented, and trusting of incoming water from Sen`Eau.
- Currently the site has WASH facilities for all buildings on site, including 28 toilets, 4 dressing rooms with showers and lockers, hand wash basins, soap and sanitizer dispenser, bins, and 10 drinking water fountains. However, the total number of WASH facilities and associated access has not been quantified yet per building and per gender.
- Finding No: TNR-006857**
- 3.6.2** *Evidence that the site is not impinging on the human right to safe water and sanitation of communities through their operations, and that traditional access rights for indigenous and local communities are being respected, and that remedial actions are in place where this is not the case, and that these are effective.* 🔍
Obs.
- Comment Evidence:
3.1.2., 3.2.2 & 3.6.2. PMMSN Evidence actions to respect water rights.pdf
- Comments:
The site does not discharge any effluent. It also has various pollution prevention and control measures in place that are currently being upgraded, but additional measures are required for all key potential pollution source areas.
- This was only raised as an observation, as it was already raised as a Minor finding under indicator 3.2.2.

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- 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 PMMSN evidence of indirect water use improvement.pdf
- Comments: No indirect water use targets were set in the WSP. Meetings were held with La Rochette, Diallo et Freres, Elixir, GANIC, MAERSK (the site's key suppliers) and a questionnaire was sent to them requesting data on their indirect water use, but they have not provided any responses yet to the questionnaire to enable the site to set indirect water use targets. **Finding No: TNR-006815**
- 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.* 🔍 Obs.
- Comment Evidence: 3.7.1 & 3.7.2 PMMSN evidence of indirect water use improvement.pdf
- Comments: Evidence was provided of the meetings held and questionnaires submitted to suppliers for completion. However, the site does not have any evidence of actions these suppliers have taken in the catchment related to indirect water use. This is due to indirect water use targets and associated actions not having been determined yet due to the lack of feedback to date from these suppliers on their indirect water use.
- 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.* ✅ Yes
- Comment Evidence: 3.8.1. SENEAU questionnaire on shared water related infrastrcutures.23.09.29.msg
3.8.1. ONAS questionnaire on shared water related infrastrcutures.23.09.29.msg
- Comments: Questionnaires were sent to ONAS and SENEAU and a meeting was held with each to discuss shared-water related challenges and concerns regarding shared water-related infrastructure. The site also requested an opportunity to engage with them on the de-pollution project for Hann Bay.
- 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.* 🔍 Obs.

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Comment	<p>Evidence: 2.3.2. - 4.1. PMMSN WS Plan + Evaluation.23.10.25 3.1.1. & 3.9.1. PMMSN Evidence of good governance.23.10.03.pdf</p> <p>Comments: 2.3.2. - 4.1. PMMSN WS Plan + Evaluation.23.10.25.xlsm reflects the specific best practices identified in 1.8 regarding Water Governance and the linkage with relevant actions and targets in the site's WSP and implementation to date.</p> <p>3.1.1. & 3.9.1. PMMSN Evidence of good governance.23.10.03.pdf documents actions implemented to date in related to good water governance, although not all relate to best practice.</p> <p>The site should clearly document which actions they believe constitute best practice, so there is a clear and consistent differentiation with other actions that are not deemed best practices, instead of stating that all actions are best practices as some are only good practice.</p>	
3.9.2	<p><i>Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.</i></p>	<p> Yes</p>
Comment	<p>Evidence: 3.3.1., 3.3.2 & 3.9.2 PMMSN evidence of sustainable water balance.23.10.04.pdf 2.3.2. - 4.1. PMMSN WS Plan + Evaluation.23.10.25.xlsm</p> <p>Comments: 2.3.2. - 4.1. PMMSN WS Plan + Evaluation.23.10.25.xlsm reflects the specific best practices identified in 1.8 regarding Water Balance and the linkage with relevant actions and targets in the site's WSP and implementation to date.</p> <p>3.3.1., 3.3.2 & 3.9.2 PMMSN evidence of sustainable water balance.23.10.04.pdf documents evidence of implemented action related to sustainable water balance.</p>	
3.9.3	<p><i>Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.</i></p>	<p> Yes</p>
Comment	<p>Evidence: 3.4.1., 3.4.2 & 3.9.3 PMMSN evidence of good water quality.23.10.02.pdf 2.3.2. - 4.1. PMMSN WS Plan + Evaluation.23.10.25.xlsm</p> <p>Comments: 2.3.2. - 4.1. PMMSN WS Plan + Evaluation.23.10.25.xlsm reflects the specific best practices identified in 1.8 regarding Water Quality and the linkage with relevant actions and targets in the site's WSP and implementation to date.</p> <p>3.4.1., 3.4.2 & 3.9.3 PMMSN evidence of good water quality.23.10.02.pdf documents evidence of implemented action related to good water quality.</p>	
3.9.4	<p><i>Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.</i></p>	<p> Yes</p>
Comment	<p>Evidence: 3.5.1 & 3.9.4. PMMSN evidence of IWRA's maintenance.23.10.03.pdf 2.3.2. - 4.1. PMMSN WS Plan + Evaluation.23.10.25.xlsm</p> <p>Comments: 2.3.2. - 4.1. PMMSN WS Plan + Evaluation.23.10.25.xlsm reflects the specific best practices identified in 1.8 regarding IWRA's and the linkage with relevant actions and targets in the site's WSP and implementation to date.</p> <p>3.5.1 & 3.9.4. PMMSN evidence of IWRA's maintenance.23.10.03.pdf documents evidence of implemented action related to IWRA's.</p>	

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3.9.5	<i>Actions towards achieving best practice related to targets in terms of WASH shall be implemented.</i>	 Yes
Comment	<p>Evidence: 3.6.1 & 3.9.5 PMMSN evidence of adequate WASH actions.23.10.25.pdf 2.3.2. - 4.1. PMMSN WS Plan + Evaluation.23.10.25.xlsm</p> <p>Comments: 2.3.2. - 4.1. PMMSN WS Plan + Evaluation.23.10.25.xlsm reflects the specific best practices identified in 1.8 regarding WASH and the linkage with relevant actions and targets in the site's WSP and implementation to date.</p> <p>3.6.1 & 3.9.5 PMMSN evidence of adequate WASH actions.23.10.03.pdf documents evidence of implemented action related to WASH.</p>	

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4 STEP 4: EVALUATE - Evaluate the site's performance.	
4.1	<i>Evaluate the site's performance in light of its actions and targets from its water stewardship plan and demonstrate its contribution to achieving water stewardship outcomes.</i>
4.1.1	<i>Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.</i>
Comment	<p>Evidence: 2.3.2. - 4.1. PMMSN WS Plan + Evaluation.23.10.09.xlsm</p> <p>Comments 2.3.2. - 4.1. PMMSN WS Plan + Evaluation.23.08.29.xlsm includes an evaluation of performance to date in relation to the actions and targets set, including a description of progress per quarter in 2023 and a quantification of overall progress as a percentage. The descriptive and quantitative status of progress is aligned with the actions and targets set for 2023 in the WSP.</p>
4.1.2	<i>Value creation resulting from the water stewardship plan shall be evaluated.</i>
Comment	<p>Evidence: 2.3.2. - 4.1. PMMSN WS Plan + Evaluation.23.10.09.xlsm</p> <p>Comments: The value creation of implementation to date for each action was evaluated at both the site and catchment level for environmental, economic and social aspects (where relevant), including financial quantification where possible.</p>
4.1.3	<i>The shared value benefits in the catchment shall be identified and where applicable, quantified.</i>
Comment	<p>Evidence: 2.3.2. - 4.1. PMMSN WS Plan + Evaluation.23.10.09.xlsm</p> <p>Comments: The value creation of implementation to date for each action was evaluated at both the site and catchment level for environmental, economic and social aspects (where relevant), including financial quantification where possible.</p>
4.2	<i>Evaluate the impacts of water-related emergency incidents (including extreme events), if any occurred, and determine the effectiveness of corrective and preventative measures.</i>
4.2.1	<i>A written annual review and (where appropriate) root-cause analysis of the year's emergency incident(s) shall be prepared and the site's response to the incident(s) shall be evaluated and proposed preventative and corrective actions and mitigations against future incidents shall be identified.</i>

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Comment	<p>Evidence: 4.2.1. RE_ Water related Emergency Incident.eml 421-AI~1.PDF 4.2.1 - a. Inspection from MoE - LETTERE DE PRESCRIPTION DECC.21.07.05 .pdf</p> <p>Comments: No emergency incidents occurred on site during the last calendar year (2022) that would have necessitated a written annual review and (where appropriate) root-cause analysis of the year's emergency incident(s) and an evaluation of the site's response to the incident(s) and proposed preventative and corrective actions and mitigations against future incidents.</p> <p>4.2.1 - a. Inspection from MoE - LETTERE DE PRESCRIPTION DECC.21.07.05 .pdf instructed the site to implement various actions to mitigate potential fire risks, ensure appropriate fire control, mitigate potential waste management risk and impacts, have appropriate first aid in place on site, and provide air pollution results. This links to the site using water in part for fire control and the appropriate management of waste, both of which were implemented by the site as observed during the audit.</p>
4.3	<p><i>Evaluate stakeholders' consultation feedback regarding the site's water stewardship performance, including the effectiveness of the site's engagement process.</i></p>
4.3.1	<p><i>Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.</i></p>
Comment	<p>Evidence: 4.3.1 - a. PMMSN Stakeholder questionnaire on consultation feedback.pptx 431-BM~1.PDF 431-BL~1.PDF 431-BA~1.PDF 431-BS~2.MSG 431-BS~1.MSG 431-BO~1.MSG</p> <p>Comments: The questionnaires sent to stakeholders included the site's WSP and explicitly requested them to provide input on the site's performance to date, which some did provide feedback on.</p>
4.4	<p><i>Evaluate and update the site's water stewardship plan, incorporating the information obtained from the evaluation process in the context of continual improvement.</i></p>
4.4.1	<p><i>The site's water stewardship plan shall be modified and adapted to incorporate any relevant information and lessons learned from the evaluations in this step and these changes shall be identified.</i></p>
Comment	<p>As this is the site's first version of its WSP, modification of the Plan will only be required after 1 full year of implementation. However, the site has revised the WSP adaptively as new information becomes available, as reflected in the versions before and after the WSAS Desktop Pre-Assessment before the audit (DPA).</p>


Yes


Yes


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5 STEP 5: COMMUNICATE & DISCLOSE - Communicate about water stewardship and disclose the site's stewardship efforts	
5.1	<i>Disclose water-related internal governance of the site's management, including the positions of those accountable for legal compliance with water-related local laws and regulations.</i>
5.1.1	<i>The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.</i>
Comment	<p>Evidence: 5.1.1. PMMSN organizational chart AWS local team.pdf 5.1.1, 5.2.1, 5.3.1 & 5.4. PMMSN Water Stewardship Report FR.pdf 5.1.1, 5.2.1, 5.3.1 & 5.4. PMMSN Water Stewardship Report ENG.pdf 5.5.1%2c 5.2.1%2c 5.3.1_%26 5.4_- _b._Evidence_of_disclosure_of_PMMSN_Water_Stewardship_Report.23.09.25.eml</p> <p>Comments: 5.1.1, 5.2.1, 5.3.1 & 5.4. PMMSN Water Stewardship Report FR.pdf and 5.1.1, 5.2.1, 5.3.1 & 5.4. PMMSN Water Stewardship Report ENG.pdf were shared with stakeholders (as per 5.5.1%2c 5.2.1%2c 5.3.1_%26 5.4_- _b._Evidence_of_disclosure_of_PMMSN_Water_Stewardship_Report.23.09.25.eml) that reflects the site's water stewardship commitment, and water-related roles and responsibilities including legal.</p>
5.2	<i>Communicate the water stewardship plan with relevant stakeholders.</i>
5.2.1	<i>The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.</i>
Comment	<p>Evidence: 5.5.1, 5.2.1, 5.3.1 & 5.4 - b. Evidence of disclosure of PMMSN Water Stewardship Report.23.09.25.eml 5.1.1, 5.2.1, 5.3.1 & 5.4. PMMSN Water Stewardship Report FR.pdf 5.1.1, 5.2.1, 5.3.1 & 5.4. PMMSN Water Stewardship Report.ENG.pdf</p> <p>Comments: 5.5.1, 5.2.1, 5.3.1 & 5.4 - b. Evidence of disclosure of PMMSN Water Stewardship Report.23.09.25.eml reflects the email sent to stakeholders, within which the site's AWS report (5.1.1, 5.2.1, 5.3.1 & 5.4. PMMSN Water Stewardship Report FR.pdf and 5.1.1, 5.2.1, 5.3.1 & 5.4. PMMSN Water Stewardship Report.ENG.pdf) was attached. The report is a summary of the site's AWS planning process, identified risks and shared water-related challenges, WSP targets, how these relate to AWS outcomes (graphically), and performance information.</p>
5.3	<i>Disclose annual site water stewardship summary, including: the relevant information about the site's annual water stewardship performance and results against the site's targets.</i>
5.3.1	<i>A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.</i>

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Comment	<p>Evidence: 5.5.1, 5.2.1, 5.3.1 & 5.4 - b. Evidence of disclosure of PMMSN Water Stewardship Report.23.09.25.eml 5.1.1, 5.2.1, 5.3.1 & 5.4. PMMSN Water Stewardship Report FR.pdf 5.1.1, 5.2.1, 5.3.1 & 5.4. PMMSN Water Stewardship Report.ENG.pdf</p> <p>Comments: 5.5.1, 5.2.1, 5.3.1 & 5.4 - b. Evidence of disclosure of PMMSN Water Stewardship Report.23.09.25.eml reflects the email sent to stakeholders, within which the site's AWS report (5.1.1, 5.2.1, 5.3.1 & 5.4. PMMSN Water Stewardship Report FR.pdf and 5.1.1, 5.2.1, 5.3.1 & 5.4. PMMSN Water Stewardship Report.ENG.pdf) was attached. The report is a summary of the site's AWS planning process, identified risks and shared water-related challenges, WSP targets, how these relate to AWS outcomes (graphically), and performance information.</p>	
5.4	<i>Disclose efforts to collectively address shared water challenges, including: associated efforts to address the challenges; engagement with stakeholders; and co-ordination with public-sector agencies.</i>	
5.4.1	<i>The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.</i>	 Yes
Comment	<p>Evidence: 5.5.1, 5.2.1, 5.3.1 & 5.4 - b. Evidence of disclosure of PMMSN Water Stewardship Report.23.09.25.eml 5.1.1, 5.2.1, 5.3.1 & 5.4. PMMSN Water Stewardship Report FR.pdf 5.1.1, 5.2.1, 5.3.1 & 5.4. PMMSN Water Stewardship Report.ENG.pdf 5.3.1-5.4 PMMSN Water Stewardship Report (ongoing) (1).pptx</p> <p>Comments: 5.5.1, 5.2.1, 5.3.1 & 5.4 - b. Evidence of disclosure of PMMSN Water Stewardship Report.23.09.25.eml reflects the email sent to stakeholders, within which the site's AWS report (5.1.1, 5.2.1, 5.3.1 & 5.4. PMMSN Water Stewardship Report FR.pdf and 5.1.1, 5.2.1, 5.3.1 & 5.4. PMMSN Water Stewardship Report.ENG.pdf) was attached. The report is a summary of the site's AWS planning process, identified risks and shared water-related challenges, WSP targets, how these relate to AWS outcomes (graphically), and performance information.</p>	
5.4.2	<i>Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.</i>	 Yes
Comment	<p>Evidence: 5.3.1-5.4 PMMSN Water Stewardship Report (ongoing) (1).pptx 5.5.1, 5.2.1, 5.3.1 & 5.4 - b. Evidence of disclosure of PMMSN Water Stewardship Report.23.09.25.eml 5.1.1, 5.2.1, 5.3.1 & 5.4. PMMSN Water Stewardship Report FR.pdf 5.1.1, 5.2.1, 5.3.1 & 5.4. PMMSN Water Stewardship Report.ENG.pdf</p> <p>Comments: The correspondence and meetings with stakeholders to engage, coordinate and support public-sector agencies confirmed that this has taken place. This was also verified during the stakeholder interviews as part of the audit, during which the public-sector agencies were very complementary of the site's efforts in this regard.</p>	
5.5	<i>Communicate transparency in water-related compliance: make any site water-related compliance violations available upon request as well as any corrective actions the site has taken to prevent future occurrences.</i>	
5.5.1	<i>Any site water-related compliance violations and associated corrections shall be disclosed.</i>	 Yes

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Comment Evidence:
5.5.1, 5.2.1, 5.3.1 & 5.4 - b. Evidence of disclosure of PMMSN Water Stewardship Report.23.09.25.eml
4.2.1. RE_ Water related Emergency Incident.eml
1.3.4 - b3. PMSN Wastewater analytical results_2022_(1).pdf
1.3.4. Waste_Recycled Analysis 2022_2023

Comments:
The site has not had any compliance violations during 2022 or 2023 to date, which would have required site water-related compliance violations and associated corrections to be disclosed. This was confirmed by the government stakeholders interviewed.

1.3.4 - a. PMMSN water quality.pptx and the suite of effluent quality reports for 2023 to date reflect that there were not any ongoing or repeat exceedances for pH and N in 2022, as per the treated wastewater irrigation requirements that the site has to comply with. The limits are a maximum of 150mg/L for N and between 6.5 and 8.5 for pH. No other parameters are applicable for the disposal of treated effluent onto horticultural areas as the site is doing. The site's sample from September 2023 was elevated above the legal limit for N, but this is not an ongoing trend that would constitute a compliance violation and the site has had a second sample taken to verify if the result was due to laboratory analysis error or a site upset condition.

5.5.2 *Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.* ✔
Yes

Comment Evidence:
5.5.1, 5.2.1, 5.3.1 & 5.4 - b. Evidence of disclosure of PMMSN Water Stewardship Report.23.09.25.eml
4.2.1. RE_ Water related Emergency Incident.eml
1.3.4 - a. PMMSN water quality.pptx
Suite of effluent quality reports for 2023 to date (Certif PM 2023-01.pdf to Certif PM 2023-0ç.pdf) and associated Excel spreadsheet was displayed on screen.

Comments:
The site has not had any compliance violations during 2022 or 2023 to date as per the above evidence, which would have required the site to disclose necessary corrective actions taken 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 Evidence:
5.5.1, 5.2.1, 5.3.1 & 5.4 - b. Evidence of disclosure of PMMSN Water Stewardship Report.23.09.25.eml
4.2.1. RE_ Water related Emergency Incident.eml
1.3.4 - a. PMMSN water quality.pptx
Suite of effluent quality reports for 2023 to date (Certif PM 2023-01.pdf to Certif PM 2023-0ç.pdf) and associated Excel spreadsheet was displayed on screen.

Comments:
The site has not had any compliance violations during 2022 or 2023 to date as per the above evidence that may have posed significant risk and threat to human or ecosystem health, which would have required the site to immediately communicate to relevant public agencies and disclosed such violations.

Photographic Evidence from Audit

✔
Yes

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