

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)



Audit Number: AO-000704

SITE DETAILS

Site: **BAT Jordan - Amman**

Address: Airport Road Al Qastal Industrial Area Air Cargo Road, 11185, Amman, JORDAN

AWS Reference Number: AWS-000488

Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: **Certified Core**

Date of certification decision: 2024-Feb-01

Validity of certificate: 2027-Feb-01

AUDIT DETAILS

Audited Service(s): AWS Standard v2.0 (2019)

Audit Type(s): Initial Audit

Audit Start Date: 2023-Oct-10

Lead Auditor: Nathalie Karam

Audit team participants:

Nathalie Karam, Lead Auditor

Site Participants:

Ayman Eladly, Other

Marwa Al Sharif, Other

Waleed Altubeishi, Other

Mohamed Laouedj, Observer

Muayyad Hamarneh, Other

Michel Aoun, Director

Audit Number: AO-000704

ADDITIONAL INFO

Summary of Audit Findings: A total of thirty-four findings were raised during the certification audit, 4 major non-conformities, 10 minor non-conformities, 20 observations. The major non-conformities were of sufficient concern to warrant the categorization of the non-conformity as major and related to governance and water balance.

The Client is requested to perform a root cause analysis and define corrective actions for each of the non-conformities and to submit these to WSAS within 30 days of receipt of the audit report by 4 January 2024.

The major non-conformities must be sufficiently addressed, and evidence submitted to WSAS within 90 days of receipt of the report 04-03-2024.

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

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

CLOSURE OF FINDINGS AND CORRECTIVE ACTION PLAN:

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

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

Scope of Assessment: The scope of services covers the Initial certification audit for assessing conformity of British American Tobacco Jordan (BAT Jordan) against the AWS International Water Stewardship Standard Version 2.

The BAT Jordan facility is a comprehensive cigarette packaging center where cigarettes are assembled, packaged, and subsequently distributed both domestically and internationally. Situated in the Al-Qastal Industrial Area, approximately 32 kilometers south of Amman. The assessment of the BAT Jordan tackled all the facilities and processes on site i.e. secondary unit, water infrastructure, septic tank, canteen, warehouses, utilities, and administrative building.

The facility is located within he catchment area of the Mujib surface water basin and the Dead Sea groundwater basin.

The audit was conducted onsite on 10 to 12 October 2023.

The onsite site visit included the assessment of processing lines, warehouses, chemical storage area, water storage locations, fire fighting system, on site clinic, recreational areas, tree plantation on site, wastewater storage locations that were visited onsite as part of the audit.

FINDINGS

NUMBER OF FINDINGS PER LEVEL

Table with 2 columns: Finding Level, Number of Findings. Rows: Observation (20), Minor (10), Major (4).

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FINDING DETAILS

Finding No:	TNR-007771
Checklist Item No:	1.1.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Nov-30
Checklist item:	<p>The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including:</p> <ul style="list-style-type: none">- Site boundaries;- Water-related infrastructure, including piping network, owned or managed by the site or its parent organization;- Any water sources providing water to the site that are owned or managed by the site or its parent organization;- Water service provider (if applicable) and its ultimate water source;- Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies;- Catchment(s) that the site affect(s) and is reliant upon for water.
Findings:	<p>The site did not provide:</p> <ul style="list-style-type: none">- Firefighting water network map- Mapping of water source- Identification and mapping of ultimate receiving water body
Corrective action:	<p>The below documents shall be prepared:</p> <ol style="list-style-type: none">1. Firefighting water network map, by the Site Engineer Executive2. Mapping of water source, by the Sustainability Team3. Identification and mapping of ultimate receiving water body, by the Sustainability Team

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Finding No:	TNR-007810
Checklist Item No:	1.2.1
Status:	Closed
Finding level:	Observation
Due date:	2024-Nov-30
Checklist item:	<p>Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall:</p> <ul style="list-style-type: none">- Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people;- Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies;- Provide evidence of stakeholder consultation on water-related interests and challenges;- Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups;- Identify the degree of stakeholder engagement based on their level of interest and influence.
Findings:	<p>It is recommended to view the stakeholder list as a dynamic document, regularly updated throughout the AWS journey. This ensures that stakeholder information remains current, facilitating effective communication and collaboration. Regular reviews contribute to an accurate representation of stakeholders, their interests, and involvement levels, ultimately enhancing overall stakeholder engagement and support.</p>
Corrective action:	<p>A stakeholder engagement plan will be developed. This plan will be prepared by both sustainability and Engagement (LEX) teams to ensure the list of stakeholders are up to date.</p>
Finding No:	TNR-007007
Checklist Item No:	1.2.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Nov-30
Checklist item:	<p>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.</p>
Findings:	<p>The site assessed only the stakeholders that they have engaged with / cooperative stakeholders, while assessment is to be done for all the identified stakeholders.</p>
Corrective action:	<p>A new of list of stakeholders will be developed to cover all developed stakeholders by Sustainability and Engagement (LEX) teams.</p>

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Finding No: TNR-007242
Checklist Item No: 1.3.3
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Nov-30
Checklist item: Site water balance, inflows, losses, storage, and outflows, including indication of annual variance in water usage rates, shall be quantified. Where there is a water-related challenge that would be a threat to good water balance for people or environment, an indication of annual high and low variances shall be quantified.
Findings: There is lack of data allowing the site to quantify their annual water balance and to produce their water balance variance, the site is required to rectify this going forward.
Corrective action: Water consumption data are tracked on a daily basis and the annual water balance will be quantified on a later basis by the Site Engineer Executive.

Finding No: TNR-007811
Checklist Item No: 1.3.4
Status: Closed
Finding level: Observation
Due date: 2024-Nov-30
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: The site is advised to persist in collecting the required data to initiate tracking variances in the future to track variances.
Corrective action: More frequent water quality tests will be conducted as per the water quality testing plan by the Sustainability Team.

Finding No: TNR-007244
Checklist Item No: 1.3.7
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Nov-30
Checklist item: Annual water-related costs, revenues, and a description or quantification of the social, cultural, environmental, or economic water-related value generated by the site shall be identified and used to inform the evaluation of the plan in 4.1.2.
Findings: The site did not describe nor quantify the value creation
Corrective action: The site will elaborate and quantify the value creation from social, cultural, environmental, or economic point of view by the AWS project team.

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Finding No:

Checklist Item No:

Status:

Finding level:

Due date:

Checklist item:

Findings:

Corrective action:

TNR-007812

1.4.1

Closed

Observation

2024-Nov-30

The embedded water use of primary inputs, including quantity, quality and level of water risk within the site’s catchment, shall be identified.

To improve the evaluation of water stress risks, it is generally recommended to implement a more detailed classification system based on varying levels of water stress.

Evaluation of water stress risks to be enhanced for all our primary inputs suppliers, by AWS project team.

Finding No:

Checklist Item No:

Status:

Finding level:

Due date:

Checklist item:

Findings:

Corrective action:

TNR-007245

1.4.2

Closed

Major

2024-Mar-02

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

Service providers were not identified, and their embedded water were not assessed

All outsourced services to be listed, and engage with all of them to understand their water consumption related to our services.

Finding No:

Checklist Item No:

Status:

Finding level:

Due date:

Checklist item:

Findings:

Corrective action:

TNR-007813

1.5.2

Closed

Observation

2024-Nov-30

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

It is recommended to conduct a more detailed assessment of each legal text, pinpointing specific articles necessitating site compliance and assigning corresponding control measures.

A more detailed assessment of each legal text will be conducted by Sustainability team and reviewed with LEX team to ensure compliance.

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Finding No:

TNR-007814

Checklist Item No:

1.5.3

Status:

Closed

Finding level:

Observation

Due date:

2024-Nov-30

Checklist item:

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

Findings:

While the provided information is valuable, there is potential for additional efforts to be invested in data collection from various stakeholders and a detailed assessment of variances.

Corrective action:

More data related to the catchment water balance will be gathered by Sustainability team with the support of stakeholders in the catchment.

Finding No:

TNR-007815

Checklist Item No:

1.5.4

Status:

Closed

Finding level:

Observation

Due date:

2024-Nov-30

Checklist item:

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

Findings:

The recommendation is to concentrate on water quality assessment within their catchment area to gain deeper insights into variances. This focused approach aims to provide a detailed understanding of the quality of water resources directly impacting their operations. Utilizing this data can inform and enhance their water stewardship practices, ensuring a more proactive and informed approach to managing water-related challenges.

Corrective action:

More data related to the catchment water quality will be gathered by Sustainability team with the support of stakeholders in the catchment.

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Finding No:	TNR-007816
Checklist Item No:	1.5.5
Status:	Closed
Finding level:	Observation
Due date:	2024-Nov-30
Checklist item:	Important Water-Related Areas shall be identified, and where appropriate, mapped, and their status assessed including any threats to people or the natural environment, using scientific information and through stakeholder engagement.
Findings:	It is acknowledged that the identification and assessment were predominantly rooted in scientific references. A crucial recommendation is to involve relevant stakeholders in the process to identify IWRAs and assess their status and associated risks. Engaging with stakeholders can offer valuable insights, local knowledge, and a more comprehensive understanding of the catchment's IWRAs, thereby enriching the assessment process.
Corrective action:	Involve and engage more stakeholders in the IWRA assessment exercise to benefit from their insights and local knowledge.
Finding No:	TNR-006458
Checklist Item No:	1.5.6
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Nov-30
Checklist item:	Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.
Findings:	A proper identification and assessment of water related infrastructure including conditions (age, condition, percentage of catchment population served, risks, exposure to extreme events...) for instance the water network was identified as water infrastructure yet its condition was not assessed
Corrective action:	Engage with relevant stakeholders to understand more about the status of the water related infrastructure.
Finding No:	TNR-007817
Checklist Item No:	1.5.7
Status:	Closed
Finding level:	Observation
Due date:	2024-Nov-30
Checklist item:	The adequacy of available WASH services within the catchment shall be identified.
Findings:	While the provided data is insightful, obtaining additional information about the adequacy of WASH practices in their specific catchment area would be beneficial.
Corrective action:	Engage with relevant stakeholders to gather WASH related information specific to our catchment.

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Finding No:	TNR-007818
Checklist Item No:	1.6.1
Status:	Closed
Finding level:	Observation
Due date:	2024-Nov-30
Checklist item:	Shared water challenges shall be identified and prioritized from the information gathered.
Findings:	It is recommended to cross-reference the identification using scientific resources to validate the accuracy and reliability of the data. This step ensures a robust and evidence-based approach, enhancing the credibility of the identification process of shared water challenges.
Corrective action:	Update the current water challenges after cross checking with scientific resources by Sustainability team.
Finding No:	TNR-006461
Checklist Item No:	1.6.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Nov-30
Checklist item:	Initiatives to address shared water challenges shall be identified.
Findings:	The site identified their own initiatives to address the shared water challenges however the site is yet to identify initiatives of other stakeholders in the catchment.
Corrective action:	Engage with relevant stakeholders by Sustainability team to understand more about their initiatives to address the shared water challenges.
Finding No:	TNR-007271
Checklist Item No:	1.7.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Nov-30
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:	While the site did present and prioritize their identified risks, there is lack of clarity on the prioritization procedure including the classification levels and definitions for likelihood and consequences. Considering the evidence presented in previous indicators additional risks to the site can be identified. In addition, the site did not provide potential costs and business impact as required by the indicator
Corrective action:	Definitions for likelihood and consequences will be listed down by Sustainability team and how frequent they are. Risks listed are to be revised and compared with previous indicators adding the potential costs and any applicable business impacts.

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Finding No:

TNR-006462

Checklist Item No:

1.7.2

Status:

In Progress - CA plan approved

Finding level:

Minor

Due date:

2024-Nov-30

Checklist item:

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

Findings:

Opportunities identified are very high level and limited to the site initiatives, the site is to identify the opportunities at a broader level considering other stakeholders and national authorities, the site is to identify how they can contribute to these opportunities prioritize them and identify potential savings and business opportunities including but not limited to business growth, reputational growth...

Corrective action:

Further water-related opportunities are to be identified by Sustainability Team with reference to both the site and catchment including other stakeholders, while linking the identified benefits to potential savings.

Finding No:

TNR-007820

Checklist Item No:

1.8.1

Status:

Closed

Finding level:

Observation

Due date:

2024-Nov-30

Checklist item:

Relevant catchment best practice for water governance shall be identified.

Findings:

The site has the opportunity to broaden its efforts by identifying additional best practices from other stakeholders. This approach can offer a more comprehensive perspective and potentially uncover innovative strategies that can be adopted to enhance their operations or initiatives.

Corrective action:

Additional best practices will be identified through engagement with future stakeholders to enhance initiatives within both the site and catchment by Sustainability Team.

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Finding No:	TNR-007823
Checklist Item No:	1.8.2
Status:	Closed
Finding level:	Observation
Due date:	2024-Nov-30
Checklist item:	Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.
Findings:	The site has the opportunity to broaden its efforts by identifying additional best practices from other stakeholders. This approach can offer a more comprehensive perspective and potentially uncover innovative strategies that can be adopted to enhance their operations or initiatives.
Corrective action:	Additional best practices will be identified through engagement with future stakeholders to enhance initiatives within both the site and catchment by Sustainability Team.
Finding No:	TNR-007824
Checklist Item No:	1.8.3
Status:	Closed
Finding level:	Observation
Due date:	2024-Nov-30
Checklist item:	Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.
Findings:	The site has the opportunity to broaden its efforts by identifying additional best practices from other stakeholders. This approach can offer a more comprehensive perspective and potentially uncover innovative strategies that can be adopted to enhance their operations or initiatives.
Corrective action:	Additional best practices will be identified through engagement with future stakeholders to enhance initiatives within both the site and catchment by Sustainability Team.

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Finding No:	TNR-007863
Checklist Item No:	1.8.4
Status:	Closed
Finding level:	Observation
Due date:	2024-Nov-30
Checklist item:	Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.
Findings:	The site has the opportunity to broaden its efforts by identifying additional best practices from other stakeholders. This approach can offer a more comprehensive perspective and potentially uncover innovative strategies that can be adopted to enhance their operations or initiatives.
Corrective action:	Additional best practices will be identified through engagement with future stakeholders to enhance initiatives within both the site and catchment by Sustainability Team.
Finding No:	TNR-007821
Checklist Item No:	1.8.5
Status:	Closed
Finding level:	Observation
Due date:	2024-Nov-30
Checklist item:	Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.
Findings:	The site has the opportunity to broaden its efforts by identifying additional best practices from other stakeholders. This approach can offer a more comprehensive perspective and potentially uncover innovative strategies that can be adopted to enhance their operations or initiatives.
Corrective action:	Additional best practices will be identified through engagement with future stakeholders to enhance initiatives within both the site and catchment by Sustainability Team.

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Audit Number: AO-000704

Finding No:	TNR-007822
Checklist Item No:	2.2.1
Status:	Closed
Finding level:	Observation
Due date:	2024-Nov-30
Checklist item:	<p>The system to maintain compliance obligations for water and wastewater management shall be identified, including:</p> <ul style="list-style-type: none">- Identification of responsible persons/positions within facility organizational structure- Process for submissions to regulatory agencies.
Findings:	<p>The recommendation is to undertake a more detailed assessment of each legal text, explicitly identifying articles that necessitate compliance and assigning corresponding control measures. This approach aims to provide a clearer and more specific guide for meeting legal requirements, enhancing the organization's ability to ensure compliance with both external and internal standards.</p>
Corrective action:	<p>Further enhancement will be done to what was submitted, legal texts will be viewed more deeply. External standards will be viewed where applicable plus internal, by LEX and Sustainability Team.</p>

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Finding No:	TNR-007278
Checklist Item No:	2.3.2
Status:	Closed
Finding level:	Major
Due date:	2024-Mar-02
Checklist item:	<p>A water stewardship plan shall be identified, including for each target:</p> <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:	<p>While the site has a clear structure for the WSP it was noted that NC and obs were identified in the content of the WSP:</p> <ul style="list-style-type: none">- While the WSP is a plan for the site to implement yet the site assigned responsibility for stakeholders- Some of the identified measure of success are not considered SMART target hence the site is to have Specific, Measurable, Achievable, Relevant, and Time-bound targets- The site assigned only due date to actions and not a timeframe (start and end date) <p>In addition in order to link actions with more than one outcome the site repeated the same action within the plan which can create confusions</p>
Corrective action:	<p>Water Stewardship Plan to be updated with the following:</p> <ol style="list-style-type: none">1. SMART targets2. Clear timeframe (start date, end date)3. Right linkage to challenges, risks and opportunities
Finding No:	TNR-006486
Checklist Item No:	2.4.1
Status:	Closed
Finding level:	Major
Due date:	2024-Mar-02
Checklist item:	<p>A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.</p>
Findings:	<p>The site did not present the risk mitigation and adaptation plan.</p>
Corrective action:	<p>The following is to be complete:</p> <ol style="list-style-type: none">1. Revise/develop a plan to mitigate or adapt to identified water risks.2. Share the updated plan with relevant stakeholders

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Finding No:	TNR-007825
Checklist Item No:	3.2.1
Status:	Closed
Finding level:	Observation
Due date:	2024-Nov-30
Checklist item:	A process to verify full legal and regulatory compliance shall be implemented.
Findings:	It would be advantageous for the site to delineate specific procedures or mechanisms to ensure continuous adherence to relevant legal texts. This may encompass periodic reviews, assessments, or monitoring activities to verify ongoing compliance with applicable regulations and standards. Establishing such processes can enhance the organization's ability to sustain compliance over time.
Corrective action:	Periodic review meetings to be scheduled with LEX team for changes in any relevant laws to verify compliance.
Finding No:	TNR-007286
Checklist Item No:	3.2.2
Status:	Closed
Finding level:	Major
Due date:	2024-Mar-02
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:	The site did not address the requirement of this indicator
Corrective action:	<p>The following is to be complete:</p> <ol style="list-style-type: none">1. Gather applicable legislations related to water rights2. Benchmark our operations against national and international legislations3. Showcase our projects and how we are not affecting the water rights of indigenous people.
Finding No:	TNR-007826
Checklist Item No:	3.4.1
Status:	Closed
Finding level:	Observation
Due date:	2024-Nov-30
Checklist item:	Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.
Findings:	The evidence for this indicator should be reevaluated following the integration of smart targets and the identification of additional actions to be undertaken.
Corrective action:	Additional actions related to water quality are to be explored by Sustainability team.

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Finding No: TNR-007827
Checklist Item No: 3.4.2
Status: Closed
Finding level: Observation
Due date: 2024-Nov-30
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: The site is recommended to properly allocate evidence as per the requirement of the indicator
Corrective action: Evidences shall be properly allocated as per the requirement of the indicator by Sustainability Team.

Finding No: TNR-007299
Checklist Item No: 4.1.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Nov-30
Checklist item: Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.
Findings: The site did not properly quantify the achievements of the targets hence the evaluation of performance couldn't be properly done
Corrective action: Achievements and benefits of the targets and plans are to be more properly addressed by Sustainability Team, to give a better evaluation of the performance.

Finding No: TNR-007300
Checklist Item No: 4.1.2
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Nov-30
Checklist item: Value creation resulting from the water stewardship plan shall be evaluated.
Findings: BAT Jordan to conduct a financial cost-benefit analysis, providing specific and quantifiable data on both costs and benefits.
Corrective action: Enhancement on the financial cost-benefit analysis to be complete, providing specific and quantifiable data on both costs and benefits by Sustainability Team.

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Audit Number: AO-000704

Finding No:	TNR-007829
Checklist Item No:	4.1.3
Status:	Closed
Finding level:	Observation
Due date:	2024-Nov-30
Checklist item:	The shared value benefits in the catchment shall be identified and where applicable, quantified.
Findings:	While a qualitative assessment provides valuable insights, for a more comprehensive understanding, it is recommended that BAT Jordan considers incorporating quantitative metrics or indicators where applicable. This dual approach can provide a more balanced and nuanced evaluation, offering both qualitative insights and quantitative data for a more robust analysis
Corrective action:	Quantitative assessment option to be explored for the actions in parallel with the qualitative by Sustainability Team.
Finding No:	TNR-007831
Checklist Item No:	5.2.1
Status:	Closed
Finding level:	Observation
Due date:	2024-Nov-30
Checklist item:	The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.
Findings:	Additional communication efforts can be undertaken to engage a broader range of stakeholders.
Corrective action:	Further stakeholders are to be identified, engaged with and to share the water stewardship plan with through different communication methods by Sustainability Team.

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Report Details

Report	Value
Report prepared by	Nathalie Karam
Report approved by	Juan Carlos Ceron
Report approved on (Date)	04-12-2023

Surveillance

Proposed date for next audit
2024-Oct-10

Comment Not applicable

Stakeholder Announcements

Date of publication	Location
09/08/2023	On Company website in both Arabic and English
09/08/2023	Email to stakeholders
29/08/2023	Electronic news paper
03/08/2023	WSAS Website: https://watersas.org/wp-content/uploads/2023/08/AWS-000611-Stakeholder-Announcement-Coca-Cola-Egypt.pdf
25/07/2023	https://a4ws.org/wp-content/uploads/2023/08/AWS-000611-CEEgypt-2023-Stakeholder-Announcement.pdf
Comment	AT Jordan shared the AWS public stakeholder announcement via 3 different channels. - 9th August: On Company website in both Arabic and English- British American Tobacco Middle East (batme.com) - 9th August: Via email to all stakeholders. - 29th August: Local electronic newspaper: BAT provides a role model for building a better tomorrow "A Better TomorrowTM" Through its care for the environment in Jordan Miscellaneous Amman News Agency (ammannews.net)

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Catchment Information

Catchment Information

The factory is located within the Mujib surface water basin. The basin covers an area of about 6,600 square kilometers, with the highest altitude of about 1170 m above sea level, in the southern part of the basin, specifically in the southern of Al-Mazar area.

Mujib basin is considered one of the important basins in Jordan located in the central part of Jordan. The area is bounded by Amman-Zarqa basin in the north and Hasa basin in the south, while it extends to Azraq and Sirhan basins in the east and to the Dead Sea to the west.

The factory is located within the boundaries of the Dead Sea groundwater basin. It is generally located in the central-western parts of Jordan. The Basin is in the central-western parts of Jordan and covers an area of 1525 km².

During the catchment tour, a visit to fine was conducted where the site explained their water management and provided a tour in their waste water treatment plant. A visit to the well was not possible due to the unavailability of the landlord.



Picture1.png



Picture2.png

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Client Description and Site Details

Client/Site Background

The BAT Jordan facility is a comprehensive cigarette packaging center where cigarettes are assembled, packaged, and subsequently distributed both domestically and internationally. Situated in the Al-Qastal Industrial Area, approximately 32 kilometers south of Amman.



BAT JORDAN.png



BAT JORDAN 1.png

Summary of Shared Water Challenges

Summary of Shared Water Challenges




The site has identified the following main Shared Water Challenges:

- Water scarcity
- Surface water quality due to poor human behavior
- Unlawful consumption of ground water
- Water depletion
- Sewage discharge management limitations /lack of proper infrastructure
- WASH provisions

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

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1 STEP 1: GATHER AND UNDERSTAND

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

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

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

 in progress

Comment British American Tobacco - Jordan (BAT) has carefully outlined the physical scope of their operations, which can be summarized as follows:

- Site Boundaries: BAT has provided precise details, including the site's location, GPS coordinates, area, and supplemented this with Google Maps images that delineate the site's boundaries. Additionally, they have furnished copies of permits and lease agreements for added clarity.
- Water-Related Infrastructure: The site has offered comprehensive layouts and a water flow diagram, along with specific maps detailing the fresh water piping, wastewater pipelines, locations of flow meters, and the infrastructure for water systems.
- Wastewater discharge: BAT store wastewater using two onsite septic tanks. These tanks are regularly emptied, and the wastewater is then transported to Ain Al Ghazal and further to Alsamra, all the while maintaining chain of custody records. A location on google maps for the El Ghazal Wastewater treatment plant was provided, however the final discharge water point for effluents were not identified and mapped.
- Water Source: While the site doesn't possess a private well, they source (buy) their water from a well belonging to the landlord, located in a different area (Water source was not mapped by the site).
- Catchment Area: The site has identified its catchment area as the Mujib surface water basin and the Dead Sea groundwater basin based on a provided hydrogeological study. However, it's important to note that while BAT did present their firefighting water network during the site audit, they did not include evidence of it in their documentation. This thorough documentation provides a clear and comprehensive overview of BAT's physical scope and water-related operations, with the noted exception of:
 - firefighting water network
 - Mapping of water source
 - identification and mapping of ultimate receiving water body

Finding No: TNR-007771

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

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- 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 The site has established a stakeholder identification process and has compiled a comprehensive list of stakeholders, encompassing NGOs, public sector organizations. Furthermore, they have provided photographic evidence from meetings with these stakeholders, demonstrating their engagement.

In addition, the site identified their shared water challenges by distributing questionnaires to their stakeholders, and they have presented three completed questionnaires as evidence of this effort.

To enhance the site's stakeholder management practices, it is recommended that they treat the stakeholder list as a living document, subject to continuous updates and revisions throughout their AWS journey.

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

 in progress

Comment The site has conducted an analysis of the interests and influences associated with the stakeholders they have engaged with. These interests and influences have been categorized into low and high ratings, forming the basis for their current engagement matrix. The site is to extend this assessment to all identified stakeholders, not just those they have engaged with.

For a more comprehensive and nuanced mapping of stakeholders, it is recommended that they adopt a ranking system that goes beyond the binary low and high parameters. This approach will provide a more detailed and refined understanding of stakeholder interests and influences, facilitating more effective and tailored engagement strategies.

Finding No: TNR-007007

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

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

 Yes

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Comment The site has presented a set of water-related emergency response plans, which include:

1- Updated Denial of Site Plan - January 2023: This plan outlines immediate actions to be taken in the event of various emergencies such as fire or smoke incidents, earthquakes, bomb threats, and medical emergencies. It also specifies the roles and responsibilities of each team involved.


2- Updated Pandemic Disease Outbreak Business Continuity Plan - February 2023: This plan addresses responses and strategies to ensure business continuity in the face of a pandemic disease outbreak.

3- Updated Water-Related Emergency Response Plan - August 2023: This plan is designed to address emergent situations related to incoming water, including water flow and quality issues, water distribution concerns such as leakage from water pipes or tanks, spills, and water quality deterioration in storage (e.g., algae and bacterial growth). Additionally, it covers responses to wastewater discharge problems, including overflow from septic tanks and odor issues. The plan also defines roles and responsibilities for managing these situations.

It's important to note that the on-site chemical storage is limited to very minimal quantities of diesel with prevention methods and spill kits available onsite. As a result, a specific chemical spill response plan is not deemed a core requirement for the site.

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

Comment BAT Jordan provided two diagrams that illustrate the water flows, water meters, water storage, and volumes within their operations. The flow chart reveals the handling of effluents, with the distinction that effluents from administrative and factory areas are stored in septic tanks before being transferred to the Waste Water Treatment Plant. In contrast, effluents from HVAC, gardening, and the fire system are connected to the stormwater drainage system. These diagrams offer a clear overview of BAT Jordan's water balance mapping, specifically regarding inflows, storage and outflows.


1.3.3 *Site water balance, inflows, losses, storage, and outflows, including indication of annual variance in water usage rates, shall be quantified. Where there is a water-related challenge that would be a threat to good water balance for people or environment, an indication of annual high and low variances shall be quantified.*  **in progress**

Comment BAT Jordan has provided the below valuable data:

- They presented a diagram and a table quantifying their water balance for September 2023 and August 2023. The table offers a breakdown of inflows, outflows, and the differences in storage, revealing that the water balance for September was 1.5% and for August was 0.9%, which are relatively low figures.
- BAT Jordan shared daily readings from flow meters since September, along with monthly averages. Furthermore, data for "main 1" (inflow water before water tank) and "main 2" (after water tank) was provided since January 2023.
- They presented a variance of yearly water consumption (withdrawn water) from 2017 until the present year (YTD) in both tabular and chart formats, showcasing the changes in their water use over time.

It is worth noting that they recently started their Water Stewardship journey and installed water meters in August 2023. As a result, there is no historical data available for quantifying their yearly water balance or providing an annual variance in water balance. However, the site is to continue gathering the necessary data to quantify their yearly balance and begin tracking the variance in the future.

Finding No: TNR-007242

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

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Comment	BAT Jordan has presented their water testing plan, which includes testing both water sources and effluents. They initiated water testing in 2023 and provided the testing results, comparing them to national limits.	
	It's notable that during the testing, three parameters of wastewater exceeded the established limits. However, BAT Jordan presented a comprehensive response, which included: Root Cause Analysis, Corrective Actions and Retesting (the site performed retesting of the three parameters, demonstrating their commitment to resolving the issue and confirming compliance with the established limits).	
	It is worth noting that they recently started their Water Stewardship journey. As a result, there is no historical data available for providing an annual variance in water quality. However, the site is to continue gathering the necessary data to begin tracking the variance in the future.	
1.3.5	<i>Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.</i>	Yes
Comment	BAT Jordan identified and mapped their potential sources of pollution, including onsite chemical storage with their MSDSs, the small diesel backup generator, the waste storage room (for recycling), and the 2 septic tanks.	
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
Comment	BAT Jordan identified and mapped both on-site IWRAs and water-related infrastructure (differentiating between the 2 categories). The site has assessed their conditions, considering factors such as status, value, and water-related risks. This comprehensive assessment allows BAT Jordan to have a clear understanding of the water-related landscape within their operations. Furthermore, they proposed improvement plans.	
1.3.7	<i>Annual water-related costs, revenues, and a description or quantification of the social, cultural, environmental, or economic water-related value generated by the site shall be identified and used to inform the evaluation of the plan in 4.1.2.</i>	in progress
Comment	BAT Jordan provided a breakdown of their water-related costs for the years 2022 and 2023. These costs encompass various aspects as relevant for each year such as cost of water supply (raw and drinking water), water treatment system, waste water discharge, Hydrological study, awareness material, risk assessment, meters installation, water testing and inspection ad maintenances. They identified value creations as economic, social, environmental and cultural without quantification or description of the value generated. Noting that the indicator requires the "description or quantification of the social, cultural, environmental, or economic water-related value generated" hence not only ticking which water related value category was created.	
	Finding No: TNR-007244	
1.3.8	<i>Levels of access and adequacy of WASH at the site shall be identified.</i>	Yes
Comment	BAT Jordan uploaded a document showing the WASH related facilities (photographic evidence, certificates of food provider...) as well as as well as their compliance with the International Building Code in relation to WASH facility numbers. It is worth noting that high level of WASH services was observed on site during the audit.	
1.4	<i>Gather data on the site's indirect water use, including: its primary inputs; the water use embedded in the production of those primary inputs the status of the waters at the origin of the inputs (where they can be identified); and water used in out-sourced water-related services.</i>	
1.4.1	<i>The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be identified.</i>	Obs.

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Comment BAT Jordan identified their primary inputs and assessed the embedded water use in these inputs. Their approach involves classifying primary inputs into two categories: imported, with the identification of the country of origin, and locally produced.

They've also provided evidence of their communication with their suppliers to gather information related to embedded water use in the locally produced primary inputs.

However, it's important to note that the site classified the water stress in the origin of these inputs as either "Yes" or "No." To enhance the assessment of water stress risks, a more detailed classification system based on levels of water stress is typically required. This would provide a more comprehensive understanding of the potential water-related risks associated with their primary inputs. Therefore, improving the assessment of water stress levels would be advisable.

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



No

Comment BAT Jordan acknowledged that their assessment includes both primary inputs and services. However, it was observed that all three identified suppliers are providing primary inputs, and no services have been identified. It's crucial to conduct a more comprehensive assessment of services.

One important aspect to note is that if a service provider is using water within BAT Jordan's facility (e.g., for cleaning, maintenance, or other activities), this water use is typically not considered "embedded water." Therefore, a more detailed assessment of services, along with the distinction between embedded water and on-site service water, is needed to provide a more accurate picture.

Finding No: TNR-007245

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

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



Yes

Comment BAT Jordan identified the key public institutions and their respective roles in water management. They've also briefly described the policies, action plans, and strategies of these institutions in relation to water. Furthermore, they provided copies of these policies, which is essential for transparency and accountability.

The site has also identified and categorized publicly led initiatives according to the 2016-2025 water strategy, distinguishing between water and wastewater initiatives. This demonstrates their commitment to aligning their water stewardship efforts with national strategies and priorities.

Additionally, BAT Jordan has identified water-related actions and projects according to the 2040 National Water Plans.

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



Obs.

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Comment BAT Jordan presented their regulatory identification and updating procedure, highlighting their commitment to compliance with national legal requirements and internal standards. They have provided several key elements to support their approach:

- License Renewal: They've listed the licenses that require annual renewal and provided copies of the renewals for 2023.
- National Legal Texts: BAT Jordan has categorized and listed applicable national legal texts, assigning responsibilities for each category and specifying controls and evidences to ensure compliance and presenting copies of the listed evidences.
- Internal Standards: They've outlined internal standards that the site must adhere to, with descriptions of each standard and assigned roles and responsibilities.

The recommendation for a more detailed assessment of each legal text, identifying specific articles that require site compliance, and assigning relevant control measures is well-founded. This approach would enhance their legal compliance framework by providing a clear and comprehensive guide for meeting legal requirements. It would also strengthen their ability to track and ensure compliance with legal and internal standards, ultimately contributing to responsible and sustainable operations.

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

Comment BAT Jordan uploaded a study conducted by the Ministry of Water and Irrigation in 2020, providing information about the inflows and outflows in their catchment. A third party consultant assessed the water balance and indicated a deficit of -26.8 million cubic meters (mcm) for the basin.

The study presented facts and figures spanning from 2010 to 2020. While the provided information is valuable, there is potential for additional efforts to be invested in data collection from various stakeholders and a detailed assessment of variances.

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.* Q
Obs.

Comment BAT Jordan presented the latest water quality assessment conducted by the Ministry of Environment in 2020. The fact that the Ministry of Environment tracks water quality through 138 sites across the country, encompassing groundwater, surface water, and wastewater, is a valuable source of information.

By extracting relevant data from this assessment, including standards, frequency of testing, parameters, and their compliance, BAT Jordan has demonstrated its commitment to understanding the broader water quality landscape in the region.

It is recommended to focus on water quality assessment within their catchment and gain more insights into variance to gain a more detailed understanding of the quality of water resources that directly impact their operations. This data can inform their water stewardship practices.

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.* Q
Obs.


Comment BAT Jordan identified and mapped the catchment IWRA, such as Wala Dam, Al Mujib Biosphere Reserve, and the landlord well. They've provided descriptions of these areas, their current status, and the water risks associated with them.

However, it is noted that this identification and assessment were primarily based on scientific references. An important recommendation is to consider engaging with relevant stakeholders to identify the IWRAs and assess their status and related risks. Involving stakeholders in the process can provide valuable insights, local knowledge, and a more comprehensive understanding of the catchment's IWRAs.

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

Comment BAT Jordan identified key water infrastructure in their catchment area, such as the Ain Ghazal wastewater treatment plant. They've provided information about the plant's age and its historical role in its conversion into a pre-treatment facility after the establishment of Essamra WWTP.

However, there are some areas that need further attention:

- Condition Assessment: While they've mentioned the water sources for Amman and the northern area and the related water network, it's important to conduct an assessment of the conditions of these infrastructures. This assessment can provide insights into the infrastructure's integrity, performance, and any potential vulnerabilities specially that water supply network leakage is estimated to be as high as 50%.
- Exposure to Extreme Events: BAT Jordan has yet to assess the potential exposure of water-related infrastructure to extreme events


Finding No: TNR-006458

1.5.7 *The adequacy of available WASH services within the catchment shall be identified.*  Obs.

Comment BAT Jordan has gathered valuable information about the state of WASH in Jordan from two credible sources, including Washdata online and a recent report by UNICEF (2022). This data provides a clear picture of the access to drinking water and sanitation, highlighting the presence of inadequate WASH facilities in more than two-thirds of the schools.

While this data is insightful, further information about the adequacy of WASH in their specific catchment area would be beneficial. This can be obtained through national assessments and active engagement with local stakeholders. Understanding the specific challenges and needs of the catchment area will enable BAT Jordan to tailor their water stewardship efforts more effectively and address the unique WASH-related issues in their immediate vicinity


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

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

Comment BAT Jordan identified their shared water challenges, prioritizing them, and providing root cause analysis. Their approach of considering stakeholders' feedback, either verbally or as evidenced by questionnaires, is a positive initiative.

However, there is an opportunity for improvement. While stakeholders' input is valuable, it's advisable for BAT Jordan to further validate these water challenges with scientific references and additional resources. This dual approach, combining stakeholder engagement and scientific validation, can provide a more comprehensive and well-informed view of the shared water challenges in their specific context.

Additionally, it is recommended to establish a more robust prioritization criteria that can be validated by stakeholders. This will help ensure that the prioritization of water challenges aligns with both scientific understanding and the concerns of the community and other stakeholders. Balancing these perspectives will strengthen their water stewardship efforts and contribute to a more effective and holistic approach to addressing water-related challenges.

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

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Comment BAT Jordan has taken a positive step by identifying their own initiatives to address shared water challenges and linking these initiatives to the AWS outcomes. They have also estimated the level of benefits both on-site and in the catchment.

However, it's important to note that the objective of this indicator is not only to identify initiatives undertaken by the site itself but also to identify and engage with other initiatives in the catchment. Collaborating with other stakeholders and initiatives in the catchment is a fundamental aspect of responsible water stewardship, as it can lead to a more comprehensive and impactful approach to addressing shared water challenges.

Finding No: TNR-006461

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 BAT Jordan identified and classified their risks into physical, regulatory, and reputational categories. They've also presented prioritization (all risks are of Medium priority), likelihood (all risks are of low likelihood), and consequences (all risks are of high consequences) assessments.

BAT Jordan is to maintain consistency with conclusions from previous indicators (1.3, 1.4, 1.5, and 1.6). Adopting a more robust risk classification and prioritization criteria, along with clearly defined levels for likelihood and severity of impacts, will contribute to a more comprehensive and accurate risk assessment. Furthermore, BAT Jordan are yet to identify and articulate the potential costs and business impacts associated with the identified risks.

Finding No: TNR-007271

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

 in progress

Comment BAT Jordan identified initiatives and listed them under broad opportunities classification (IWRA, WASH and Water re-use/reduction) and identified the benefits from the identified initiatives. While the requirements go beyond that, the site is to identify the opportunities at a broader level considering other stakeholders and national authorities, the site is to identify how they can contribute to these opportunities, prioritize them and identify potential savings and business opportunities including but not limited to business growth, reputational growth...

BAT Jordan identified initiatives and categorized them under broad opportunities such as IWRA, WASH, and water reuse/reduction. They've also outlined the benefits associated with these initiatives.

To enhance their approach, BAT Jordan is to broaden their perspective on opportunities. This includes considering opportunities beyond their immediate operations and engaging with other stakeholders and national authorities. By identifying how they can contribute to broader opportunities and prioritizing them, the site can uncover additional potential savings and business opportunities. This approach extends beyond internal benefits and encompasses contributions to the community, industry, and national water management goals, fostering both sustainability and corporate responsibility.

Finding No: TNR-006462

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

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

 Obs.

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Comment	BAT Jordan has outlined a list of actions they consider as best practices. However, there is room for improvement in the classification of these practices, ensuring alignment with the AWS outcomes. Some practices may be more aligned with internal standards practices and not necessarily catchment-related best practices. Additionally, there's an opportunity to refine the categorization, distinguishing between practices that contribute to water balance, governance, and other relevant AWS outcomes. For instance conducting the hydrological study of the catchment can be considered as a best practice for water balance while sharing it with the Ministry of Water can be considered as a governance best practice. Furthermore, the site is to identify best practices that they can adopt and not only their current practice.	
1.8.2	<i>Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.</i>	Q Obs.
Comment	Most of the identified best practices are more of internal standards practices and not catchment related best practices and some can be considered as best practices. During the audit the site explained the identified best practice "Explore water reduction/reuse projects" as the adoption of the reuse of storm water in the irrigation of the planted trees and their and installation of a water drip technology.	
1.8.3	<i>Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.</i>	Q Obs.
Comment	The site identified best practices related to water quality such as "Preventive measures in place to avoid and react to spills such as oil spill kits", It is worth noting that the site adopted extreme measures of prevention of pollution such as very high availability of spill kits, use of secondary containments... However, most of the identified best practices are more of internal standards practices and not catchment related best practices.	
1.8.4	<i>Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.</i>	Q Obs.
Comment	The site identified IWRA related best practices such as "Work with local NGOs to increase green areas in the catchment". However, most of the identified best practices are more of internal standards practices and not catchment related best practices and some can be considered as best practices.	
1.8.5	<i>Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.</i>	Q Obs.
Comment	The site identified best practices related to WASH such as "Adequate number of toilets and shower facilities that are cleaned and well maintained frequently". It is worth noting that the provision of sufficient and high standard facilities for toilets and washrooms for men and women was noted during the audit. However, most of the identified best practices are more of internal standards practices and legal compliance and not catchment related best practices.	

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2	STEP 2: COMMIT & PLAN - Commit to be a responsible water steward and develop a Water Stewardship Plan	
2.1	<i>Commit to water stewardship by having the senior-most manager in charge of water at the site, or if necessary, a suitable individual within the organization head office, sign and publicly disclose a commitment to water stewardship, the implementation of the AWS Standard and achieving its five outcomes, and the allocation of required resources.</i>	
2.1.1	<i>A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:</i> <ul style="list-style-type: none"> - That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes - That the site implementation will be aligned to and in support of existing catchment sustainability plans - That the site's stakeholders will be engaged in an open and transparent way - That the site will allocate resources to implement the Standard. 	 Yes
Comment	BAT Jordan has demonstrated their commitment to the AWS Standard by disclosing a signed copy of the AWS commitments on site. They have also extended this commitment to their identified stakeholders through email and presentations	
2.2	<i>Develop and document a process to achieve and maintain legal and regulatory compliance.</i>	
2.2.1	<i>The system to maintain compliance obligations for water and wastewater management shall be identified, including:</i> <ul style="list-style-type: none"> - Identification of responsible persons/positions within facility organizational structure - Process for submissions to regulatory agencies. 	 Obs.
Comment	<p>BAT Jordan's presentation of their regulatory identification and updating procedure, along with their commitment to compliance, demonstrates a proactive stance toward legal requirements. Defining roles and responsibilities in this context is a positive step in ensuring accountability.</p> <p>It is recommended to conduct a more detailed assessment of each legal text, specifying articles that require compliance, and assigning relevant control measures. This approach will not only enhance the clarity of legal obligations but also contribute to a more robust system for ensuring adherence.</p> <p>Continuing to refine and strengthen their legal compliance framework will position BAT Jordan for responsible and sustainable operations in alignment with regulatory standards.</p>	
2.3	<i>Create a water stewardship strategy and plan including addressing risks (to and from the site), shared catchment water challenges, and opportunities.</i>	
2.3.1	<i>A water stewardship strategy shall be identified that defines the overarching mission, vision, and goals of the organization towards good water stewardship in line with this AWS Standard.</i>	 Yes
Comment	BAT Jordan presented their mission and vision in regard to the water stewardship as well as their broader sustainability Agenda. They identified the goals in regard to the different AWS outcomes.	

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

 No

Comment The clear structure of BAT Jordan WSP , including location specification, focus areas, objectives, success measures, and prioritization, showcases the site's commitment to strategic water stewardship.

However, there below was noted:

- Stakeholder Assignment: The site assigned actions under stakeholders responsibility however the WSP is primarily an internal plan and responsibility must be assigned to internal department/ person, the plan can highlight on any external collaborations or stakeholder involvement to add clarity but without assigning responsibilities.
- SMART Targets: Making targets Specific, Measurable, Achievable, Relevant, and Time-bound ensures they are more actionable and measurable, contributing to the overall effectiveness of the plan.
- Time Frame Specification: Providing start and due dates for actions rather than due date only offers a clearer timeline, aiding in tracking progress and maintaining accountability.
- Action Linkage without Repetition: Ensuring that actions are linked to relevant outcomes without unnecessary repetition streamlines the plan and prevents redundancy.

Continuous review and updates to the WSP will indeed contribute to its effectiveness, aligning it with evolving challenges and opportunities.

Finding No: TNR-007278

- 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.*

 No

Comment It's crucial for the site to align their documentation with the specific requirements of the indicator. The emergency response plans provided do not meet the criteria of adaptation and mitigation plans addressing the identified risks from section 1.7.1. It would be beneficial for BAT Jordan to review and update their evidence to include documents that specifically address adaptation and mitigation strategies related to the identified risks. This ensures a more accurate representation of their preparedness and risk management efforts.

Finding No: TNR-006486

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3 STEP 3: IMPLEMENT - Implement the site's stewardship plan and improve impacts	
3.1	Implement plan to participate positively in catchment governance.
3.1.1	Evidence that the site has supported good catchment governance shall be identified. ✓ Yes
Comment	BAT Jordan's efforts in supporting good water governance are evident through their coordination with stakeholders, including USAID and other partners. Sharing essential information such as booklets, details about water challenges, and the results of the hydrological study with the Ministry of Water and Irrigation is a commendable practice. This collaboration fosters transparency, information exchange, and contributes to the overall improvement of water governance in the region.
3.1.2	Measures identified to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be implemented. ✓ Yes
Comment	BAT Jordan's engagement with the YWCA to identify needs of minor Women groups related to WASH and access to water, reflects a commendable commitment and respect to their water to addressing essential needs within local communities.
3.2	Implement system to comply with water-related legal and regulatory requirements and respect water rights.
3.2.1	A process to verify full legal and regulatory compliance shall be implemented. Q Obs.
Comment	BAT Jordan has demonstrated their commitment to compliance by uploading documents confirming the renewal of their licenses. The site also shared their process for updating applicable legal texts and provided a list of identified legal texts relevant to their operations. While BAT Jordan has provided evidence of compliance with the renewal of licenses, the process of verifying ongoing compliance with legal requirements could be further clarified. It would be beneficial for the site to outline specific procedures or mechanisms in place to ensure continuous adherence to relevant legal texts. This may involve periodic reviews, assessments, or monitoring activities to confirm ongoing compliance with applicable regulations and standards.
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. ✗ No
Comment	The site did not address the requirement of this indicator
Finding No: TNR-007286	
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	BAT Jordan's presented their water balance and efforts to improve water use efficiency, along with progress in meeting targets classifying them planned and 100% completed targets. However, incorporating SMART criteria into their targets can enhance the effectiveness of goal-setting and provide a more structured framework for assessing progress.
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	This indicator was tackled with the 3.3.1 in broad term stating the increase of flow meter and the measurement of the water consumption on a daily basis. During the audit BAT Jordan did present the reduction in their water use consumption in terms of volume, however evidences were not provide	
3.3.3	<i>Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.</i>	 Yes
Comment	BAT Jordan doesn't have a water source of its own and relies on purchasing water from the landlord well. The only water reallocation activity is within the site itself through the reuse of rainwater in irrigation of the onsite trees which doesn't require any legally binding document.	
3.4	<i>Implement plan to achieve site water quality targets</i>	
3.4.1	<i>Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.</i>	 Obs.
Comment	BAT Jordan uploaded a document presenting the water quality target from the water stewardship, it shows the progress in meeting targets. Noting that in the presented document only completed targets were listed and none were listed as on going or in progress. However, incorporating SMART criteria into their targets can enhance the effectiveness of goal-setting and provide a more structured framework for assessing progress. In addition the change in the WSP and the identification of actions would impact the compliance of this indicator. That being said, the evidence of this indicator must be revisited after the integration of smart targets and the identification of additional actions to be performed.	
3.4.2	<i>Where water quality is a shared water challenge, continual improvement to achieve best practice for the site's effluent shall be identified and where applicable, quantified.</i>	 Obs.
Comment	BAT Jordan outlined their efforts in improving water quality by testing wastewater effluents and taking corrective actions to address parameters exceeding national limits. The site also implemented measures such as septic tank inspection and cleaning, as well as behavior changes regarding solid material disposal in the sewage system. Subsequent tests confirmed compliance with acceptable limits. While the details were initially provided under a different indicator (1.3.4), documenting these actions comprehensively and under the specific indicator will enhance their overall water stewardship narrative.	
3.5	<i>Implement plan to maintain or improve the site's and/or catchment's Important Water-Related Areas.</i>	
3.5.1	<i>Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.</i>	 Yes
Comment	BAT Jordan's presented their efforts to improve IWRAs on site and in the catchment area, along with progress in meeting targets classifying them planned and 100% completed targets. It is worth noting that the site tackled both on site water infrastructure and IWRAs under this indicator.	
3.6	<i>Implement plan to provide access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers at all premises under the site's control.</i>	
3.6.1	<i>Evidence of the site's provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers onsite shall be identified and where applicable, quantified.</i>	 Obs.

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Comment	BAT Jordan documented their targets related to WASH in the Water Stewardship Plan (WSP) and reported progress on both planned and 100% completed targets. The site, however, did not offer specific evidence regarding the provision of adequate access to WASH services for all workers under this particular indicator. Although related evidence was provided under indicator 1.3.8, considering the importance of water and sanitation services for workers, it might be beneficial for BAT Jordan to ensure that such documentation is comprehensive and directly corresponds to each relevant indicator. It is worth noting that during the audit the high quality of WASH services were observed.	
3.6.2	<i>Evidence that the site is not impinging on the human right to safe water and sanitation of communities through their operations, and that traditional access rights for indigenous and local communities are being respected, and that remedial actions are in place where this is not the case, and that these are effective.</i>	 Yes
Comment	BAT Jordan conducted a comparative analysis of their water consumption per capita, highlighting their responsible water usage by presenting it as the third of the average in Jordan. Additional evidence such as effluent water tests were shared. Nevertheless, showing more positive examples for their contributions toward human rights access to safe water and sanitation can be added.	
3.7	<i>Implement plan to maintain or improve indirect water use within the catchment:</i>	
3.7.1	<i>Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.</i>	 Yes
Comment	BAT Jordan don't have specific targets in their Water Stewardship Plan related to the reduction of embedded water use. They have, however, communicated with their local suppliers who are reportedly working on reducing their water use. Additionally, they highlighted their suppliers specific actions or initiatives that contribute to water reduction efforts. While it's positive that the site is engaging with suppliers on water reduction initiatives, setting specific targets within the WSP for embedded water use reduction would provide a clearer framework for their commitment to sustainable practices.	
3.7.2	<i>Evidence of engagement with suppliers and service providers, as well as, when applicable, actions they have taken in the catchment as a result of the site's engagement related to indirect water use, shall be identified.</i>	 Yes
Comment	BAT Jordan provided their communication with their local suppliers as evidence of their engagement. and highlighted on the practices performed by their suppliers to reduce the water use.	
3.8	<i>Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have.</i>	
3.8.1	<i>Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.</i>	 Yes
Comment	BAT Jordan has communicated their water stewardship journey, challenges, risks, and the conducted hydrological study with the Ministry of Water and Irrigation as the responsible entity for the management of the water network in the country.	
3.9	<i>Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.</i>	

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3.9.1	<i>Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.</i>	 Yes
Comment	Example of actions towards achieving best practices related to water governance were presented. Document attached in 3.9. It is worth noting that some of these activities can be considered as best practices some as compliance practice either with the regulation or with the requirement of the standard.	
3.9.2	<i>Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.</i>	 Yes
Comment	Example of actions towards achieving best practices related to water balance were presented. Document attached in 3.9.	
3.9.3	<i>Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.</i>	 Yes
Comment	Example of actions towards achieving best practices related to water quality were presented. Document attached in 3.9. It is worth noting that some of these activities can be considered as best practices some as compliance practice either with the regulation or with the requirement of the standard.	
3.9.4	<i>Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.</i>	 Yes
Comment	Example of actions towards achieving best practices related to IWRA were presented. Document attached in 3.9. It is worth noting that some of these activities are IWRA related some are for Water infrastructure.	
3.9.5	<i>Actions towards achieving best practice related to targets in terms of WASH shall be implemented.</i>	 Yes
Comment	Example of actions towards achieving best practices related to WASH were presented. Document attached in 3.9. It is worth noting that some of these activities can be considered as best practices some as compliance practice either with the regulation or with the requirement of the standard.	

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4 STEP 4: EVALUATE - Evaluate the site's performance.	
4.1	<i>Evaluate the site's performance in light of its actions and targets from its water stewardship plan and demonstrate its contribution to achieving water stewardship outcomes.</i>
4.1.1	<i>Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.</i> in progress 
Comment	<p>BAT Jordan has evaluated the progress toward achieving their targets in the WSP with a general assessment indicating that they have completed 82% of their WSP, with the remaining divided between ongoing and planned actions.</p> <p>While the completion percentage provides an overview, adopting of SMART targets for individual actions would allow for a more precise and quantifiable evaluation of performance as currently targets performance evaluation is limited to 100% complete or 0% planned or ongoing that being said the site did evaluate performance against actions only and not against targets as required by the indicator.</p> <p style="text-align: right;">Finding No: TNR-007299</p>
4.1.2	<i>Value creation resulting from the water stewardship plan shall be evaluated.</i> in progress 
Comment	<p>BAT Jordan has quantified the cost of conducted activities, but they provided general benefits without specific quantification. The site believes that the benefits of the conducted activities outweigh their costs. To fully meet the requirements of the indicator, it is recommended that BAT Jordan conduct a financial cost-benefit analysis, providing specific and quantifiable data on both costs and benefits. This analysis will enhance the understanding of the economic aspects of their water stewardship initiatives.</p> <p style="text-align: right;">Finding No: TNR-007300</p>
4.1.3	<i>The shared value benefits in the catchment shall be identified and where applicable, quantified.</i> Obs. 
Comment	<p>BAT Jordan performed a qualitative assessment of the value benefits resulting from the implementation of their WSP. They classified the benefits into environmental, social, and cultural categories. While a qualitative assessment provides valuable insights, for a more comprehensive understanding, it is recommended that BAT Jordan considers incorporating quantitative metrics or indicators where applicable. This could enhance the specificity and clarity of the value benefits associated with their water stewardship initiatives.</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> Yes 
Comment	<p>BAT Jordan reported a single incident in 2023, specifically a water leakage. The site conducted a thorough analysis, identifying root causes, implementing preventive actions, and taking corrective measures. Evidences supporting these actions were provided.</p>
4.3	<i>Evaluate stakeholders' consultation feedback regarding the site's water stewardship performance, including the effectiveness of the site's engagement process.</i>

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4.3.1	<i>Consultation efforts with stakeholders on the site’s water stewardship performance shall be identified.</i>	<div><div></div><div>Yes</div></div>
Comment	BAT Jordan is in the early stages of their water stewardship journey, and their water stewardship performance is still evolving. However, the site has taken steps to communicate their commitment to AWS, sharing booklets summarizing their water stewardship journey, commitments, and providing a high-level overview of WSP and performance. Further evaluation of their progress will be conducted during the surveillance audit.	
4.4	<i>Evaluate and update the site’s water stewardship plan, incorporating the information obtained from the evaluation process in the context of continual improvement.</i>	
4.4.1	<i>The site’s water stewardship plan shall be modified and adapted to incorporate any relevant information and lessons learned from the evaluations in this step and these changes shall be identified.</i>	<div><div></div><div>Yes</div></div>
Comment	BAT Jordan has demonstrated their commitment to continuous improvement by providing two versions of their WSP – one from January 2023 and another from August 2023. The evolution of the WSP reflects the site’s ongoing efforts to refine and enhance their approach to water stewardship.	

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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>	✓ Yes
Comment	The site disclosed their structure as well as roles and responsibilities in relation to water governance on their website.	
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>	Q Obs.
Comment	BAT Jordan communicated their WSP with one of their stakeholders through presentations and discussions. As the WSP evolves and matures, additional communication efforts can be undertaken to engage a broader range of stakeholders. The upcoming surveillance audit will provide an opportunity to assess and enhance these communication efforts.	
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>	✓ Yes
Comment	BAT Jordan disclosed their 2023 water stewardship booklet and shared it with their stakeholders. It is noted that the booklet did contain their performance against targets that were identified at the time of publishing. The upcoming surveillance audit will provide an opportunity to assess and enhance these disclosure efforts of a more advanced site performance evaluation.	
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	BAT Jordan has demonstrated a proactive approach in sharing their efforts to address shared water challenges through various media platforms, including their website, email, LinkedIn, internal communications with BAT employees, and BAT social media platforms. This multi-channel communication strategy helps in reaching different audiences and stakeholders, fostering awareness, and showcasing their commitment to water stewardship.	
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	BAT Jordan has shown commitment to engaging with public sector stakeholders by conducting meetings and communicating through email. The site shared key documents, including their hydrology study and the 2023 water stewardship summary, indicating a transparent and collaborative approach with relevant public authorities.	

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

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



Yes

Comment BAT Jordan presented a document signed by the Operation manager - Levant declaring that there was no violation and that all incidents such as leakages are being recorded. It is worth noting that the Jordanian legislation doesn't require the disclosure of spills below 5L.

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



Yes

Comment BAT Jordan presented a document signed by the Operation manager - Levant declaring that there was no violation and that all incidents such as leakages are being recorded. It is worth noting that the Jordanian legislation doesn't require the disclosure of spills below 5L.

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 BAT Jordan presented a document signed by the Operation manager - Levant declaring that there was no violation and that all incidents such as leakages are being recorded. It is worth noting that the Jordanian legislation doesn't require the disclosure of spills below 5L.

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Photographic Evidence from Audit



fire fighting system

IMG_20231010_103238.jpg



chemical storage

IMG_20231010_101822.jpg



Toilets

IMG_20231010_104507.jpg

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water treatment

IMG_20231010_102726.jpg



Kitchen with waste segregation bin

IMG_20231010_104644.jpg



spill kit

IMG_20231010_101926.jpg

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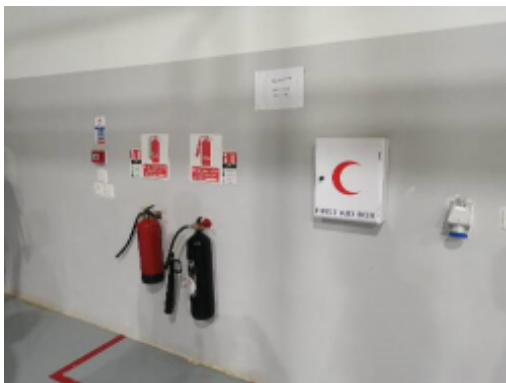


water storage tank

IMG_20231010_102516.jpg



IMG_20231010_100409.jpg



fire extinguishers and first aid kit

IMG_20231010_110237.jpg

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warehouses

IMG_20231010_110328.jpg



tree plantation on site

IMG_20231010_103822.jpg



packaging warehouse

IMG_20231010_105637.jpg

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IMG_20231010_095636.jpg

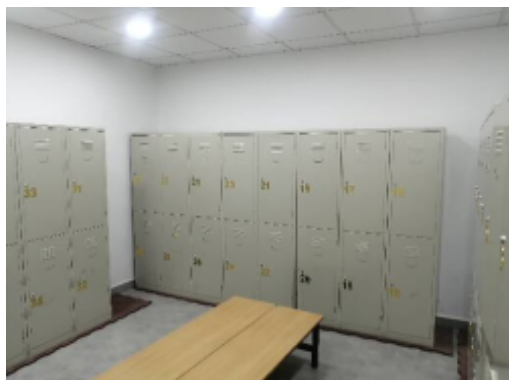


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AWS commitment

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Yes