

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)



Audit Number: AO-000612

SITE DETAILS

Site: **BAT Fiji - Nadi**
Address: Carreras Rd, Votualevu, Nadi, FIJI
Contact Person: Nikhat Khan
AWS Reference Number: AWS-000498
Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: **Certified Core**
Date of certification decision: 2023-Oct-18
Validity of certificate: 2026-Oct-18

AUDIT DETAILS

Audited Service(s): AWS Standard v2.0 (2019)
Audit Type(s): Initial Audit
Audit Start Date: 2023-Aug-01
Lead Auditor: Warrick Stewart

Audit team participants:
Akiko Nicholls, Local Auditor
Warrick Stewart, Lead Auditor

Site Participants:

AUDIT TIMES

Dates	Audit from	Duration	Auditor	Description
2023-Aug-01	08:00:00 - 17:00:00	09:00	Warrick Stewart	
2023-Aug-02	08:00:00 - 17:00:00	09:00	Warrick Stewart	
2023-Aug-03	08:00:00 - 13:00:00	05:00	Warrick Stewart	

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ADDITIONAL INFO

Summary of Audit Findings: A total of 37 findings were raised during the certification audit, 1 major non-conformity, 24 minor non-conformities, and 12 observations. The major non-conformity was of sufficient concern to warrant the categorisation of the non-conformity as major and related to the Good Water Governance AWS outcome.

The Client is requested to perform a root cause analysis and define corrective actions for each of the non-conformities and to submit these to WSAS within 60 days of receipt of the audit report 19 November 2023.

The major non-conformities must be sufficiently addressed and evidence submitted to WSAS within 90 days of receipt of the report 19 December 2023.

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

The audit team recommends certification of the BAT Nadi Fiji site at level pending approval of the corrective actions plan and closure of the major non-conformity.

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.

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

The site is located in Votualevu, approximately 8km due east of Nadi in the south-west of Viti Levu, Fiji. Site operations include a nursery with multiple green houses, tobacco curing barns (including driers), Green Leaf Threshing (GLT) plant, offices, stores, residences, a borehole with on-site metering, input water supplied by the Water Authority of Fiji, water tanks and pumphouses, a boiler, a chemical store, fuel storage tanks, a mechanical maintenance workshop, septic tanks, a soak pit, and a storm water system.

The facility is located in the Vaturu catchment. The catchment is characterised by the Nadi River with various tributaries, forest in the upper reaches of the catchment, and mangroves in the estuarine part of the system. The Vaturu dam is located in the upper reaches of the catchment. The forest at Vaturu is protected to conserve the water supply for Nadi. There is a 900 millimetre high-pressure pipeline that transports raw water from the Vaturu Dam to the Nagado water treatment plant.

The audit was conducted onsite from 1 to 3 August 2023.

The onsite site visit included the assessment of the nursery with multiple green houses, tobacco curing barns (including driers), Green Leaf Threshing (GLT) plant, offices, stores, residences, a borehole with on-site metering, input water supplied by the Water Authority of Fiji, water tanks and pumphouses, a boiler, a chemical store, fuel storage tanks, a mechanical maintenance workshop, septic tanks, a soak pit, and a storm water system as part of the audit.

FINDINGS

NUMBER OF FINDINGS PER LEVEL

Table with 2 columns: Finding Level, Count. Rows: Observation (12), Minor (24), Major (1).

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FINDING DETAILS

Finding No:	TNR-005225
Checklist Item No:	1.2.1
Status:	Open
Finding level:	Observation
Due date:	2024-Jul-29
Checklist item:	Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall: - Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people; - Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies; - Provide evidence of stakeholder consultation on water-related interests and challenges; - Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups; - Identify the degree of stakeholder engagement based on their level of interest and influence.
Findings:	The site consulted collectively but also separately with the upper, middle, and lower Nadi catchment. Some of the stakeholders in the lower catchment could be impacted if the WAF treatment plant was to release poor quality treated waste water, but none of these stakeholders have raised this as a potential issue of concern. Future consultations and stakeholder identification should consider impacts on fishing communities/stakeholders, and the stakeholder mapping document should be updated to more comprehensively reflect lower catchment stakeholders.
Corrective action:	As part of our future consultations and stakeholder identification BAT will take into account impacts on fishing communities/stakeholders, and the stakeholder mapping document will be updated to more comprehensively reflect lower catchment stakeholders.

- Corrective Action Plan
1. Engagement with communities in the lower catchment
 2. Engage with Ministry of Fisheries
 3. During the stakeholder consultation on the outcome of the AWS audit, discuss on the water quality in the catchment area and monitoring to ensure WAF treatment plant does not release poorly treated wastewater into the waterways that could impact the lower catchment communities that might source food from the river system.
 4. Carrying out awareness session with the communities/stakeholders are aware of good water governance including vulnerable, women, minority through smaller forums.

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Finding No:	TNR-005501
Checklist Item No:	1.2.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Jul-30
Checklist item:	Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall: - Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people; - Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies; - Provide evidence of stakeholder consultation on water-related interests and challenges; - Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups; - Identify the degree of stakeholder engagement based on their level of interest and influence.
Findings:	1.2.1AWS_Stakeholder_Mapping.xlsm reflects the process to identify stakeholders, the identified stakeholders, a local issues analysis, the identification of influence and interest, the site's plan for stakeholder engagement, the history of relations with stakeholders, and the contact details of the stakeholders. This includes a description of the stakeholder mapping process applied and a list of general challenges, but not the identification of water-related challenges per stakeholder (where relevant).
Corrective action:	1. Identification of water-related challenges per stakeholder 2. The inclusion of water related challenges faced by each stakeholder to be stated in the stakeholder mapping document.
Finding No:	TNR-005243
Checklist Item No:	1.3.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Jul-30
Checklist item:	Existing water-related incident response plans shall be identified.
Findings:	WAF explained during one of the external stakeholder interviews that severe drought is currently being experienced in Suva, which has required water rationing. In 2015, a drought was experienced in the western region, which had impacts on farmers. The site does not believe drought to be risk, which resulted in the site not including drought in any of its incident response plans. However, it clearly is an emerging that requires inclusion in the site's incident response plan/s.
Corrective action:	1 Include drought as an emerging risk around the Nadi area in our site's incident response plan. 2. Engage with Fiji Meteorological Services on the weather patterns to ensure response plan reflects this.

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Finding No: TNR-005244
Checklist Item No: 1.3.4
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Jul-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: 1.3.4_analysis.xlsx reflects the on-site and some off-site water quality data, but does not specify exactly where these samples were taken (and why) in relation to the site's water source/s, provided waters, and receiving water bodies.

1.3.4_Drinking_Water_Quality.docx reflects the quality of received potable water, but does not specify where this was sampled.

The site's effluent sampling has been of the actual effluent before it was removed from site for treatment. This was undertaken as it was the best that the site could implement. WAF does not make data of the quality of its treated effluent available.

No data was provided for receiving water bodies.

1.3.4_water_analysis_sample_location.pptx reflects the site's water sampling locations on-site and in the catchment, but this is only for drinking water, not freshwater (e.g., Nadi River) or estuarine water quality in the catchment. The site's middle catchment sampling point (for drinking water) is just downstream of where the site's stormwater enters the Nadi river, but is taken at a staff member's house from their domestic drinking water source.

The site now has data for the pond and GLT pit, but not the receiving water body (Nadi river).

The site should map the locations of its sampling sites, both on-site and in the catchment, to ensure future consistency in sampling locations. This hasn't been problematic, but could result in future inconsistencies.

Corrective action:

1. The site to label all sample points on site and in catchment - inclusion of geographical co-ordinates of sampling points on the site/catchment map.
2. Testing of receiving water bodies to be conducted as well as water bodies in the catchment area as per the parameters as the receiving bodies of the storm water drainage is near the site.
3. Provide relevant justification on the sampling points, the sampling points were mainly drinking water around the BAT site and related catchment areas. Many points of testing do not have access road thus more planning is needed around taking samples from the water bodies around the catchment.
4. Maintain a water quality database to track the water quality parameters for site and catchment

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Finding No:	TNR-005227
Checklist Item No:	1.3.5
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Jul-30
Checklist item:	Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.
Finding No:	TNR-005246
Checklist Item No:	1.3.8
Status:	Open
Finding level:	Observation
Due date:	2024-Aug-01
Checklist item:	Levels of access and adequacy of WASH at the site shall be identified.
Findings:	The number of staff per gender type and the number of toilets has been quantified per site building. However, the site should quantify other WASH facilities per building and per gender in the future.
Corrective action:	BAT to quantify other WASH facilities per building and per gender as per required. Other WASH facilities such as sinks, wash basins should be quantified in accordance to gender and per building.
Finding No:	TNR-005231
Checklist Item No:	1.4.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Jul-30
Checklist item:	The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be identified.
Findings:	The quality of the embedded water in the green leaf tobacco it receives has not been documented.
Corrective action:	1. Water quality tests to be conducted for the water source used for green leaf tobacco which is the rivers near the farms. 2. Water samples to be taken from the catchment areas surrounding the farms as these are the sources of water for irrigation in field. 3. Water testing to be carried out for rainwater received by the station and surrounding fields.

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Finding No:	TNR-005260
Checklist Item No:	1.5.1
Status:	Open
Finding level:	Observation
Due date:	2024-Aug-02
Checklist item:	Water governance initiatives shall be identified, including catchment plan(s), water-related public policies, major publicly-led initiatives under way, and relevant goals to help inform site of possible opportunities for water stewardship collective action.
Findings:	A few catchment governance initiatives/project are also being undertaken that the site is aware of that are not yet reflected in 1.5.1 water governance (2), for example Afforestation project, JIKA project for flood alleviation etc.
Corrective action:	1. Identify catchment governance initiatives/project are also being undertaken and review projects mentioned in 1.5.1 2. Amend 1.5.1 to reflect any new or ongoing projects
Finding No:	TNR-005261
Checklist Item No:	1.5.2
Status:	Open
Finding level:	Observation
Due date:	2024-Aug-02
Checklist item:	Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.
Findings:	The site should include the Qoliqoli Bill (not enacted yet) to its current legal register, due to its potential future implications.
Corrective action:	1. The Qoliqoli bill can have future implication on the site operations and restriction on use of water bodies for its operations. The Qoliqoli bill will have implications on stakeholders and communities if it is enacted. 2. The site will include the Qoliqoli Bill to its current legal register, due to chances of future implications.

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Finding No:	TNR-005262
Checklist Item No:	1.5.3
Status:	Open
Finding level:	Observation
Due date:	2024-Aug-02
Checklist item:	The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.
Findings:	1.5.3_Availability_of_clean_drinking_water_and_Areas_with_drought.docx reflects a summary of available climate data for the country of Fiji, including flood and drought events from 1980 to 2020, but not for the Nadi Basin Catchment. The site has documented that "There is not much information on the catchment water balance, inflows, outflows & consumption. This is one of action items which is under the National Development Plan for 2030 and WAF 2020 – 2025 WAF 5 year Strategic Plan. Nevertheless, we did our own research and we managed to find information of the water balance for the entire Fiji. This was an exercise conducted by GHD "Project Preparatory Work and Capacity Building Contract no. CS01A between the Water Authority of Fiji and GHD Pty Ltd ...". The National Water Balance from 2012 to 2015 was calculated, as well as for the Vaturu catchment that is essentially the Nadi Basin Catchment, but this data only relates to inflows and outflows to and from water treatment plants, not the catchment as a whole (i.e., streams, rivers, dams, use, ecological reserve etc.). Also, the data does not extend beyond 2015. The need therefore exists for a catchment water balance to be quantified, including scarcity and an indication of annual, and where appropriate, seasonal, variance. However, this is beyond BAT Fiji's legal mandate, which falls under the National Development Plan for 2030 and the WAF 2020 – 2025 WAF 5 year Strategic Plan. This evidence should be included by the site once it has been completed.
Corrective action:	1. A catchment water balance to be quantified, including scarcity and an indication of annual, and where appropriate, seasonal, variance as the National Development Plan for 2030 and the WAF 2020 – 2025 WAF 5 year Strategic Plan is completed and made accessible 2. Evidences will be included in the site documentation and updated water balance for the catchment water balance, inflows, outflows & consumption.

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Finding No:	TNR-005495
Checklist Item No:	1.5.4
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Jul-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:	1.5.4.docx and 1.5.5_catchment_IWRA.pptm reflect very general physico-chemical and biological descriptions for the catchment. 1.5.4 biological data.pptm reflects detailed biological information from the upper, middle, and lower catchment, but this is only for drinking water supplied by WAF. Importantly, the site has physico-chemical and bacteriological data it collects for drinking water (supplied by WAF) for the upper, middle and lower catchment, which it collected for the first time in July 2023, as reflected in 1.3.4 water analysis sample location.pptx. This reflects the results of the site's first round of water quality sampling in the catchment. The site has not been implementing AWS and undertaking catchment water quality sampling long enough to have data to reflect an indication of annual and/or seasonal high and low variances. However, the site's future catchment water quality sampling will enable the determination of annual and/or seasonal high and low variances. These variances must be determined going forward. However, all this data is for drinking water, not the water quality of the freshwater and/or estuarine environment within the catchment.
Corrective action:	1. BAT to carry out water quality analysis of drinking water as well as water from the upper, middle, and lower catchment area 2. Continue water sampling and analysis as mentioned in the AWS water stewardship plan for the site's future catchment water quality sampling will be carried out annually and/or seasonal to denote high and low variance

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Finding No:

TNR-005263

Checklist Item No:

1.5.5

Status:

Open

Finding level:

Observation

Due date:

2024-Aug-02

Checklist item:

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

Findings:

The site should consider information on ProtectedPlanet.net regarding the protected area status of the Vaturu dam.

Corrective action:

IWRA's to be reviewed using literature review and as per the recommendation ProtectedPlanet.net to be used as a reliable source of information on protected area status of the Vaturu dam.

Finding No:

TNR-005286

Checklist Item No:

1.5.6

Status:

In Progress - CA plan approved

Finding level:

Minor

Due date:

2024-Jul-30

Checklist item:

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

Findings:

Some of the infrastructure was identified by the site and stakeholders as currently impacted by or exposed to extreme events (e.g., Vaturu dam, Nadi Town Bridge Water Gauge, scouring of Magunia Bridge etc.), but this is not reflected in 1.5.6 Infrastructure.pptx where no exposure to extreme events were specified.

Corrective action:

Proposed future infrastructure should be added going forward.

1. Existing and planned water-related infrastructure to be reviewed and new/future infrastructure details to be added along with the magnitude of exposure to extreme events.

2. During the next stakeholder consultation discuss with attendees on the exposure of infrastructure to extreme weather events and remedial actions.

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Finding No:	TNR-005265
Checklist Item No:	1.5.7
Status:	Open
Finding level:	Observation
Due date:	2024-Aug-02
Checklist item:	The adequacy of available WASH services within the catchment shall be identified.
Findings:	The site should identify which of the 100 villages without access to a potable water main are located in the Nadi catchment to understand the adequacy of available WASH services within the catchment
Corrective action:	BAT to carry out stakeholder consultation to identify which of the 100 villages without access to a potable water main are located in the Nadi catchment. This information should be with WAF, BAT will engage with WAF to get this data.
Finding No:	TNR-005266
Checklist Item No:	1.6.2
Status:	Open
Finding level:	Observation
Due date:	2024-Aug-02
Checklist item:	Initiatives to address shared water challenges shall be identified.
Findings:	The various projects being implemented and/or proposed, which the site is already aware of, should be added to the current lists (e.g., Afforestation, Jica projects).
Corrective action:	Initiatives to address shared water challenges sych as the afforestation projects and projects initiated by JICA to be added to the current list as this was not noted previously.
Finding No:	TNR-005267
Checklist Item No:	1.7.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Jul-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.

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Finding No:	TNR-005268
Checklist Item No:	1.7.2
Status:	Open
Finding level:	Observation
Due date:	2024-Aug-02
Checklist item:	Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.
Findings:	The site should continue to consider additional opportunities in the future.
Corrective action:	Through future stakeholder consultations and through our Global ESG team if there are other water related opportunities identified, these will be added to the list.
Finding No:	TNR-005224
Checklist Item No:	1.8.1
Status:	Open
Finding level:	Observation
Checklist item:	Relevant catchment best practice for water governance shall be identified.
Findings:	Opportunity exists for the site to identified best practice water governance initiatives outside of Fiji and/or within the tobacco sector. Also, importantly, the legal requirements specified do not constitute best practice.
Corrective action:	Scope best practice for water governance initiatives outside of Fiji and/or within the tobacco sector.
Finding No:	TNR-005228
Checklist Item No:	1.8.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Jul-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:	1.8.2 best practice for water efficiency.docx reflects various proposed, current and recent past initiatives by The Water Authority of Fiji (WAF). However, some of these initiatives constitute good practice, but not best practice. In addition, opportunity exists for the identification of additional relevant sector and/or catchment best practice for water balance beyond these initiatives by WAF.
Corrective action:	1. Differentiate between best practices and good practices water efficiency initiatives and water balance in other relevant sector and/or catchment. 2. Identify other opportunities on water efficiency relevant sector and/or catchment (Benchmark against other sectors not only WAF)

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Finding No:	TNR-005230
Checklist Item No:	1.8.3
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Jul-30
Checklist item:	Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.
Findings:	1.8.3 Sectors and Catchment Best Practices.docx and 1.8.3 best practise for water quality.docx reflect various proposed, current and recent past water quality initiatives by The Water Authority of Fiji (WAF) and the Ministry of Infrastructure and Meteorological Services. However, some of these initiatives constitute standard or good practice, but not all are best practice. In addition, opportunity exists for the identification of additional relevant sector and/or catchment best practice for water quality beyond these initiatives. 1.8.3_2021_Water_Quality_Results.pdf and 1.8.3_2022_Water_Quality_Results.pdf reflect water quality results for chemical, physical, and bacteriological parameters for water from the BAT site (Admin Office, Residence, Green House, Field Office, and GLT), but it is not specified how these data relate to sectoral and/or catchment best practices. 1.8.3 British American Tobacco [Nadi] 05 07 23.pdf and 1.8.3 British American Tobacco [Leaf Division] 18 05 23.pdf reflect water quality results for chemical, physical, and bacteriological parameters for water from nine (9) sampling points within the site and the catchment, but it is not specified how these data relate to sectoral and/or catchment best practices for water quality.
Corrective action:	1. Differentiate between good practice and best practices for 1.8.3 Sectors and Catchment Best Practices.docx and 1.8.3 best practice for water quality.docx 2. Scope for more opportunities for water quality other relevant I relevant sector and/or catchment best practice for water quality beyond these initiatives 3. Quantify the data on best and god practices if possible 4. The data in 1.8.3_2021_Water_Quality_Results.pdf and 1.8.3_2022_Water_Quality_Results.pdf to be co-related to sectoral and/or catchment good/best practices 5. Relate the water sampling points mentioned in 1.8.3 British American Tobacco [Nadi] 05 07 23.pdf and 1.8.3 British American Tobacco [Leaf Division] 18 05 23.pdf to sectoral and/or catchment best practices for water quality. 5. The test results and analysis to be discussed and explained on how this is a BEST practise by the site.

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Finding No:	TNR-005232
Checklist Item No:	1.8.4
Status:	In Progress - CA plan approved
Finding level:	Minor
Checklist item:	Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.
Findings:	1.8.4 IWRA Best practice (Catchment).docx reflects a wide range of initiatives in Fiji related to IWRAs (e.g., United Nations Ridge to Reef Project, My Mangroves, My Livelihood project by the Ministry of Forestry Fiji Forest Emission Reductions Program etc.). However, it is not clearly documented how these initiatives could relate to site maintenance of Important Water-Related Areas. 1.8.4_British_American_Tobacco_[Leaf_Division]_18_05_23 and 1.8.4_British_American_Tobacco_[Nadi]_05_07_23 reflect water quality results for chemical, physical, and bacteriological parameters for water from a total of ten (10) sampling points within the site and the catchment, but it is not specified how these data relate to sectoral and catchment best practices for IWRAs.
Corrective action:	1. Relate the initiatives mentioned in 1.8.4 IWRA Best practice (Catchment).docx and how these initiatives could relate to site maintenance of Important Water-Related Areas. 2. Relate the water sampling taken within the site and the catchment mentioned in 1.8.4_British_American_Tobacco_[Leaf_Division]_18_05_23 and 1.8.4_British_American_Tobacco_[Nadi]_05_07_23 to the sectoral and catchment best practices for IWRAs. 3. The test results and analysis to be discussed and explained on how this is a BEST practise by the site.

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Finding No:	TNR-005497
Checklist Item No:	1.8.5
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Jul-30
Checklist item:	Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.
Findings:	1.8.5 best practice for WASH.docx reflects various WASH initiatives in Fiji, including efforts by BAT to raise awareness of the importance of WASH. However, some of this information is more than three (3) years old and/or does not constitute best practice. 1.8.5access to WASH.docx reflects WASH practices by the site, some of which constitute best practice (e.g., standalone water filtration unit for each drinking station, analysis of drinking water against World Health Organization (WHO) standards, not just local legal requirements). However, some of the initiatives specified only constitute standard or good practice. Opportunity exists to identify additional relevant sector best practices for site provision of equitable and adequate WASH services.
Corrective action:	1. Identify more best practices on WASH services within the site and sector. 2. Identify additional relevant sector best practices for site provision of equitable and adequate WASH services. 3. Update best practice for WASH.docx reflects various WASH initiatives in Fiji with recent information and data

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Finding No:	TNR-005237
Checklist Item No:	2.1.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Jul-30
Checklist item:	A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments: - That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes - That the site implementation will be aligned to and in support of existing catchment sustainability plans - That the site's stakeholders will be engaged in an open and transparent way - That the site will allocate resources to implement the Standard.
Findings:	2.3.1AWS_Signed_Policy.pdf is the site's signed AWS Policy, which includes three of the four key requirements of this indicator (amongst other commitments), namely that: - Site implementation will be aligned to and in support of existing catchment sustainability plans - The site's stakeholders will be engaged in an open and transparent way - The site will allocate resources to implement the Standard. However, this commitment does not include the requirement that "The site implements and discloses progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes".
Corrective action:	Include the requirement that "The site implements and discloses progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes" in the AWS_Signed_Policy.pdf and have it signed off by the GM.

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Audit Number: AO-000612

Finding No: TNR-005238
Checklist Item No: 2.2.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Jul-30
Checklist item: The system to maintain compliance obligations for water and wastewater management shall be identified, including:
- Identification of responsible persons/positions within facility organizational structure
- Process for submissions to regulatory agencies.
Findings: The process for submissions to regulatory agencies was not documented.
Corrective action: 1. The process for submissions to regulatory agencies to be documented and provided.
2. The only submission made to regulatory agency are Government agencies through a form and mandated fees submitted prior to expiry of permits

Finding No: TNR-005239
Checklist Item No: 2.3.2
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Jul-30
Checklist item: A water stewardship plan shall be identified, including for each target:
- How it will be measured and monitored
- Actions to achieve and maintain (or exceed) it
- Planned timeframes to achieve it
- Financial budgets allocated for actions
- Positions of persons responsible for actions and achieving targets
- Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.
Findings: Financial Budgets do not specify the actual financial budgets (e.g., in FJD, AUD, USD etc.) allocated for actions, but rather which budget these actions will be funded from (e.g., site annual budget, BAT corporate annual budget, government funding, or foreign aid). Lastly, some targets are not sufficiently quantified or described to enable effective monitoring of performance
Corrective action: 1. Update the document on which currency is used to estimate budget as well as from which budgets will this funds come from.
2. Quantified targets described to enable effective monitoring of performance of AWS outcomes.
3. Monitor performances of the actions items to the targets

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Alliance for Water Stewardship (AWS)

Audit Number: AO-000612

Finding No:	TNR-005289
Checklist Item No:	2.3.2
Status:	Open
Finding level:	Observation
Due date:	2024-Aug-03
Checklist item:	A water stewardship plan shall be identified, including for each target: - How it will be measured and monitored - Actions to achieve and maintain (or exceed) it - Planned timeframes to achieve it - Financial budgets allocated for actions - Positions of persons responsible for actions and achieving targets - Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.
Findings:	Once the off-site crop trials have been completed and associated indirect water-use reduction targets set (currently under target and action no. 11 in the 2022/23 WSP), this/these targets need to be quantified or sufficiently described in the future revisions/s of the WSP to enable evaluation of performance. However, target and action no. 11 under site in the 2022/23 WSP should be reflected under catchment actions (i.e., in the catchment Workbook). Also, Catchment Actions 7 and 8 are not actually best practices, but rather standard industry practice.
Corrective action:	1. Quantify target and the achievement of best practice to help address shared water challenges and the AWS outcomes 2. Add action no. 11 under site in the 2022/23 WSP s to catchment actions (i.e., in the catchment Workbook). 3. Change Catchment Actions 7 and 8 to standard industry practice.

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Alliance for Water Stewardship (AWS)

Audit Number: AO-000612

Finding No:	TNR-005240
Checklist Item No:	2.4.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Jul-30
Checklist item:	A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.
Findings:	2.4.1 Shared Water Challenges.xlsx is largely the same as 2.3.2 Water Stewardship Plan_Version 1.xlsx (i.e., is the site's WSP) and does not reflect a plan specifically to mitigate or adapt to identified water risks. The WSP was developed following consultation with public section agencies. No water risk within the site's catchment via embedded water use of primary inputs were identified, which needs to be addressed. 2.4.1 Site Risk Mitigation Plan.xlsx reflects the plan the site has developed to mitigation its site risks.
Corrective action:	1.Update the Water Stewardship Plan to include Shared Water Challenges specifically to mitigate or adapt to identified water risks. 2. Review water related risks on site and include additional maintenance and control for areas such a fuel dispensing and high risk areas 3. Provide evidences that the Site Risk Mitigation Plan to demonstrate that this plan was developed in co-ordination with relevant public-sector and infrastructure agencies. 4. Target 11 in the water stewardship plan should be quantified and analyzed once in place and the target 11 should also be moved to catchment and not on site.

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Alliance for Water Stewardship (AWS)

Audit Number: AO-000612

Finding No: TNR-005270
Checklist Item No: 3.1.2
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Jul-30
Checklist item: Measures identified to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be implemented.
Findings: Additional maintenance and controls are required to appropriate mitigate potential contamination events.

Monitoring of site stormwater and potential catchment receptors (e.g., Nadi River) should be considered, to support improved monitoring of potential impacts.

Corrective action:

1. Water quality testing to be carried out in all catchment area such as the Nadi river
2. Monitoring of site stormwater and potential catchment receptors through water testing as the stormwater leaves the site through the drainage system
3. After the risk assessment implement appropriate maintenance and controls for potential contamination events.

Finding No: TNR-005498
Checklist Item No: 3.2.1
Status: Closed
Finding level: Major
Due date: 2023-Dec-18
Checklist item: A process to verify full legal and regulatory compliance shall be implemented.
Findings: The only legal requirement applicable to the site is a waste permit, as currently no legal requirements exist in Fiji regarding groundwater abstraction, only approval for water abstraction from rivers under The Rivers and Streams Act. This Act has been identified as requiring revision to include groundwater abstraction.
Corrective action:

- Follow up was done and site received valid copy of the permit from Ministry of Environment.
- Since there are no current regulations around ground water extraction in Fiji, this will become part of discussion and action item during stakeholder engagements to look at revision of the river and stream act to accommodate governance around ground water extraction.

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Alliance for Water Stewardship (AWS)

Audit Number: AO-000612

Finding No:	TNR-005272
Checklist Item No:	3.3.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Jul-30
Checklist item:	Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.
Findings:	3.3ESG_Fiji_Leaf.pptx reflects the results achieved and the actions implemented in relation to the actions and targets in the WSP, which have been documented in 2.3.2 Water Stewardship Plan_Version 1.xlsx. However, for many of the catchment related actions the status has not been documented beyond stating "Ongoing".
Corrective action:	1. Amend and review catchment related actions the status has not been documented beyond stating "Ongoing" and update according to the current progress. 2. Certain projects are noted as ongoing as these action items are in progress.
Finding No:	TNR-005290
Checklist Item No:	4.1.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Aug-03
Checklist item:	Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.
Findings:	4.1Water Stewardship Plan Evaluation.xlsx (in column M for site only; none for the catchment) reflects actions implemented and comments on performance against targets. However, this is not sufficiently detailed and requires evaluation against all the targets set (for site and catchment) in the WSP (as per the latest version, namely 2.3.2 Water Stewardship Plan_Version 1.xlsx). The site should update the implementation and evaluation information once the site has completed a full year of implementation since the WSP was finalised and implementation commenced. The contribution of each to achieving water stewardship outcomes should be evaluated at the end of the full year of implementation. A Major nor a Minor finding was not raised, as the site has not yet completed a full year of implementation, at which point such evaluation would be required).
Corrective action:	1. BAT will update WSP interms of the implementation and evaluation information once the site has completed a full year of implementation since the WSP was finalized and implementation commenced later of 2022 2. Implement action items on the WSP as per the guidelines 3. Formulate evaluation guidelines for WSP completion and implementation against each action item to achieving water stewardship outcomes

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Alliance for Water Stewardship (AWS)

Audit Number: AO-000612

Finding No:	TNR-005291
Checklist Item No:	4.1.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Aug-03
Checklist item:	Value creation resulting from the water stewardship plan shall be evaluated.
Findings:	A comprehensive evaluation needs to be conducted at the end of a full year of implementation.
Corrective action:	1. A comprehensive evaluation will be conducted at the end of a full year of implementation of AWS in consultation with all stakeholder and relevant communities. 2. Quantify the value change and benefits for the business since AWS implementation 3. Review WSP 4. Update WSP accordingly to each to achieving water stewardship outcomes
Finding No:	TNR-005292
Checklist Item No:	4.1.3
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Jul-30
Checklist item:	The shared value benefits in the catchment shall be identified and where applicable, quantified.
Findings:	Shared value benefits from all actions in the WSP need to be identified, and quantified where possible.
Corrective action:	1. The shared value benefits from all actions in the WSP will be identified and quantified through consultation and value streaming of the saving from the WSP and AWS implementation on site and in the relevant communities as well as on a stakeholder level. 2. Shared value benefits will be analyzed in the catchment area through implementation of projects (new and existing) and identifying the potential opportunities

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Audit Number: AO-000612

Finding No:

TNR-005293

Checklist Item No:

4.3.1

Status:

In Progress - CA plan approved

Finding level:

Minor

Due date:

2024-Aug-03

Checklist item:

Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.

Findings:

The site has provided feedback to its stakeholders on what they have achieved to date. However, after a full year of implementation the site's water stewardship performance in relation to its WSP should be communicated to its stakeholders.

Corrective action:

BAT will conduct a series of stakeholder consultations after full year of implementation to communicate the site's water stewardship performance in relation to its WSP and quantify the value added to its operations after the implementation of the WSP and AWS journey against the outcomes.

Finding No:

TNR-005294

Checklist Item No:

4.4.1

Status:

Open

Finding level:

Observation

Due date:

2024-Aug-03

Checklist item:

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

Findings:

The site has not reached a full year of implementation and should modify and adapt the WSP once a full year has passed, to incorporate any relevant information and lessons learned from the evaluations, and these changes identified.

Corrective action:

1. Update and modify the Water Stewardship Plan after the initial audit process and 1 year of implementation

2. Incorporate the learnings from the Audit process into the WSP

3. Review and evaluate the outcomes of the WSP

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Audit Number: AO-000612

Finding No:	TNR-005276
Checklist Item No:	5.2.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Jul-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:	The site shared an AWS overview 2-pager with its stakeholders (as per the evidence above) and a summary of key WSP actions with a subset of its stakeholders (see Final Stakeholder Engagement Minutes (5.2.1).docx and AWS Presentation to Stakeholders_Final.pptx), but how the water stewardship plan contributes to AWS Standard outcomes has not been shared with stakeholders to date.
Corrective action:	1. During stakeholder consultations share the impact of the water stewardship plan to the AWS Standard outcomes 2. Quantify the potential opportunities associated with the water stewardship plan to the AWS Standard outcomes 3. Stakeholder consultation to be carried out for middle, upper and lower catchment areas and communities and sectoral engagement.
Finding No:	TNR-005277
Checklist Item No:	5.3.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Aug-02
Checklist item:	A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.
Findings:	The WSP was only completed in late 2022. Consequently, the Plan has not been implemented yet for a full year and it is too early to develop and share a summary of annual actions. The site must develop and disclose a summary of the site's water stewardship performance, including quantified performance against targets, once a full year of implementation has been completed.
Corrective action:	1. Carry out an assessment of the site's water stewardship performance 2. Disclose a summary of the site's water stewardship performance, including quantified performance against targets, after a full year of implementation

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Report Details

Report	Value
Report prepared by	Warrick Stewart
Report approved by	Lurdes Guerra
Report approved on (Date)	18/09/2023

Surveillance

Proposed date for next audit 2024-Jul-30	
Comment	Surveillance audits must be conducted annually. That is, one year from the initial audit date and one year from the first surveillance audit. A re-certification audit is required three (3) years from the initial audit date.

Stakeholder Announcements

Date of publication	Location
24/06/2023	The Fiji Times newspaper
05/06/2023	WSAS website (https://watersas.org/stakeholder-announcements/)
05/06/2023	AWS website (https://a4ws.org/certification/stakeholder-announcements/)
05/06/2023	The Fiji Sun
Comment	The audit was announced on the AWS and WSAS websites on 5 June 2023 (see https://a4ws.org/certification/stakeholder-announcements/ and WSAS website (https://watersas.org/stakeholder-announcements/)). The audit stakeholder announcement was also published in The Fiji Times newspaper on 24 June 2023 and The Fiji Sun on 17 June 2023. However, this was not published at least eight (8) weeks prior to the audit as per the AWS Certification Requirements version 3.0 that came into effect on 30 June 2023.
Comment	Stakeholder interviews were conducted with four (4) external stakeholders, including an upstream community that the site is collaborating with, the water utility providing water to the site, and two key government departments.

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Catchment Information

Catchment Information

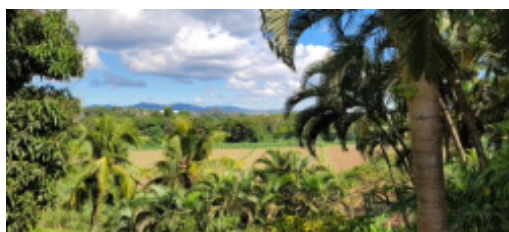
The facility is located in the Vaturu catchment. The catchment is characterised by the Nadi River with various tributaries, forest in the upper reaches of the catchment, and mangroves in the estuarine part of the system. The Vaturu dam is located in the upper reaches of the catchment. The forest at Vaturu is protected to conserve the water supply for Nadi. There is a 900 millimetre high-pressure pipeline that transports raw water from the Vaturu Dam to the Nagado water treatment plant. The raw water is treated and transported into the mainlines of the Water Authority of Fiji (WAF), which eventually reaches Nadi town and the BAT Nadi site.



Vaturu Catchment looking upstream towards Vaturu Dam.jpg



Nadi River downstream of the site just outside Nadi Town.jpg



Nadi River next to a field as seen from the site.jpg



Catchment map and river.jpg

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Catchment map.jpg

Client Description and Site Details



Site boundary and layout.jpg

Client/Site Background

The site is located in Votualevu, approximately 8km due east of Nadi in the south-west of Viti Levu, Fiji. Site operations include a nursery with multiple green houses, tobacco curing barns (including driers), Green Leaf Threshing (GLT) plant, offices, stores, residences, a borehole with on-site metering, input water supplied by the Water Authority of Fiji, water tanks and pumphouses, a boiler, a chemical store, fuel storage tanks, a mechanical maintenance workshop, septic tanks, a soak pit, and a storm water system.

Summary of Shared Water Challenges

Summary of Shared Water Challenges

Key Shared Water Challenges in the Vaturu catchment include:

- Wash facilities in villages and schools.
- Water Management Governance.
- Flooding and siltation.
- Gravel extraction causing riverbank erosion..
- Loss of rich soil due to erosion.
- Deforestation
- Ageing of WAF infrastructure and leakages (pipelines).
- Lack of environmental and biodiversity data.
- Water cut-offs (interruptions) in communities and schools.
- Chemical and fertilizer runoff into the major rivers.
- Throwing rubbish into the rivers and drains.

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

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1 STEP 1: GATHER AND UNDERSTAND

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

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

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



Yes

Comment

Evidence:
 AWS_V3 (003).pptx
 Site Layout & Technicalities.pdf
 1.1 3893-Hydraulics Services-V4_2023.07.18.pdf
 1.1.2WATER RELATED FACILITIES ON SITE.docx
 1.1.3 SITES WATER SOURCE.pptx
 1.1.4 WATER SERVICE PROVIDER.pptm
 1.1Lease No 12902.pdf
 1.1Lease No 12971.pdf
 1.1Lease No 18163.pdf
 1.1Lease No 40729 Bilapdf.pdf
 1.1Lease No CT11023.pdf
 1.1Lease No CT12902.pdf
 1.1.4 WASTEWATER SERVICE PROVIDER.pptm

Findings:
 AWS_V3 (003).pptx, Site Layout & Technicalities.pdf, and 1.1 3893-Hydraulics Services-V4_2023.07.18.pdf reflect the site boundaries, and water-related infrastructure including the piping network of the site such as input water, waste water, and stormwater outlets, amongst others (e.g., pump house, borehole, water meter, valve box, septic tanks etc); and discharge points from the site.

1.1Lease_No_12902.pdf to 1.1Lease No CT12902.pdf further confirm the site boundaries.

1.1.3_SITES_WATER_SOURCE.pptx and 1.1.4 WASTEWATER SERVICE PROVIDER.pptm reflects the WAF dams and potable water treatment plant from which the site obtains its water.

AWS_V3.pptx reflects the catchment and sub-catchment that the site affects and is reliant upon for water.

1.1.4 WASTEWATER SERVICE PROVIDER.pptm includes a description and an aerial image of the WAF wastewater treatment plan and its co-ordinates, including a map of the treatment plan and its location in relation to the ultimate receiving water body or bodies (the marine environment).

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.*



No

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Comment

Evidence:

1.2.1Stakeholder_Selection.pptx
1.2.1AWS_Stakeholder_Mapping.xlsm
Afforestation project.jpg

1.2.1Stakeholder_Selection.pptx reflects the stakeholders identified and their respective roles and responsibilities. However, the process used to identify stakeholders has not been documented.

1.2.1AWS_Stakeholder_Mapping.xlsm reflects the process to identify stakeholders, the identified stakeholders, a local issues analysis, the identification of influence and interest, the site's plan for stakeholder engagement, the history of relations with stakeholders, and the contact details of the stakeholders. This includes a description of the stakeholder mapping process applied and a list of general challenges, but not the identification of individual water-related challenges (where relevant). The analysis identified the degree of stakeholder engagement proposed, based on interest and influence.

Vulnerable groups include women in certain contexts, as men have a more prominent role in Fijian culture and women may not always feel comfortable speaking in public forums. Individual stakeholder engagement was undertaken by the site with women that the site works with. People with special needs (a special needs school) were also engaged and they have certain water-related needs. Afforestation project.jpg reflects the engaged of the site with an economically vulnerable community. Red Cross was engaged regarding WASH facilities training. Some communities are also vulnerable from a clean water access perspective. However, not all these vulnerable groups (or their proxies e.g., Red Cross) are reflected in the site's stakeholder mapping database, including their interest and influence, and individual water-related challenges. These vulnerable groups have been specifically identified in the site's stakeholder mapping process.

1.2.2Fiji_Red_Cross_Society_Stakeholder_Engagement_27.06.23.docx,
1.2.2Nagado_Flyer.pdf, 1.2.2Stakeholder_Engagement_Fiji_Met.docx,
1.2.2Stakeholder_Engagement_women.docx etc. are summaries of stakeholder engagement meetings including the associated attendance registers and serve as evidence of stakeholder consultation on water-related interests and challenges.

The site explained that they considered who the stakeholders are in the catchment from a water use perspective, as well as the service providers, around the site, as well as upstream and downstream. They then considered regulatory bodies. The BAT Lex (Legal) Department also provided guidance in this process. The site engaged with local and national government bodies and held a stakeholder workshop to explain their AWS journey. They then held a working group session with external stakeholders to collectively identify their water-related challenges. In instances where stakeholders were not available to participate in the workshop, the site then engaged one-on-one with these stakeholders.

The site consulted collectively but also separately with the upper, middle, and lower Nadi catchment. Some of the stakeholders in the lower catchment could be impacted if the WAF treatment plant was to release poor quality treated waste water, but none of these stakeholders have raised this as a potential issue of concern. Future consultations and stakeholder identification should consider impacts on fishing communities/stakeholders, and the stakeholder mapping document should be updated to more comprehensively reflect lower catchment stakeholders.

Finding No: TNR-005225

Finding No: TNR-005501

1.2.2

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



Yes

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Comment	Evidence: 1.2.2 Stakeholder engagement meeting minutes (Fiji Met, Women, Careerars rd Votualevu, nagado village awareness, awareness minuts qeleloa farmers) 1.2.2 Stakeholder engagement minutes and actions 1.2.2 stakeholder engagement minutes and actions vendors 1.2.2 stakeholder engagement 01.2.23 minutes and actions 1.2.2 stakeholder engagement 20.02.23 MOE minutes and actions 1.2.2 stakeholder engagement 20.2.23 WAF 1.2.2 stakeholder engagement 26.4.23 minutes and actions 1.2.2 stakeholder engagement 27.2.23 waterways 1.2.2 Nagado flyer 1.2.2 AWS presentation 1.2.1AWS_Stakeholder_Mapping.xlsm 1.2.2Fiji_Red_Cross_Society_Stakeholder_Engagement_27.06.23.docx 1.2.2Stakeholder_Engagement_Fiji_Met.docx 1.2.2Stakeholder_Engagement_women.docx etc. to 1.2.2Stakeholder_Engagement_27.2.23_Waterways_Meeting_Minutes.docx Findings: 1.2.1AWS_Stakeholder_Mapping.xlsm reflects the process to identify stakeholders, the identified stakeholders, a local issues analysis, the degree of influence and interest of the stakeholders in the site, the site's plan for stakeholder engagement, the history of relations with stakeholders, and the contact details of the stakeholders. This includes a description of the stakeholder mapping process applied. 1.2.2_aws_presentation.pptx is a summary of the engagement undertaken with the village in each of the upper, middle, and lower catchments, including awareness raising regarding AWS and an afforestation initiative with the Nagado community. 1.2.2Fiji_Red_Cross_Society_Stakeholder_Engagement_27.06.23.docx, 1.2.2Nagado_Flyer.pdf, 1.2.2Stakeholder_Engagement_Fiji_Met.docx, 1.2.2Stakeholder_Engagement_women.docx etc. are summaries of stakeholder engagement meetings including the associated attendance registers. The Stakeholder mapping list identified the stakeholders that may have influence at various degrees. The list covers authorities, regulators, businesses, and civil society groups (see 1.2.1). The influence of and engagement level required for each stakeholder was identified. The site conducted AWS awareness at Nagado village on 22/3/23 with the communities (stakeholders) in the upper catchment and mid catchment, and on 24/3/23 in the lower catchment to engage with those stakeholders and discuss their water-related issues. Meeting minutes for stakeholders engagement with several stakeholders such as women farmers, Fiji Meteorological Services, Nadi, school managers, farmers, villagers, Energy Ltd, Ministry of Environment, Water Authority of Fiji, etc were documented. 1.3 <i>Gather water-related data for the site, including: water balance; water quality, Important Water-Related Areas, water governance, WASH; water-related costs, revenues, and shared value creation.</i> 1.3.1 <i>Existing water-related incident response plans shall be identified.</i>
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 in progress

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Audit Number: AO-000612

Comment Evidence:
1.3.1Factory_Contingency_Plan_2022.pdf
1.3.1Resilience_to_Risk_Response.docx
1.3.1 spill management

Comment:
At the community level in the mid catchment, the major issues are pipe leaks, riverbank erosion, and fertilizer run off into rivers. In the lower catchment, flooding is the main issue for farmers. The AWS team supplied 200 pine tree saplings to the villagers to address afforestation at Nagado Village in the upper catchment. For the Factory, an Operations Production Recovery Plan is in place. The site's Resilience to Risk Response document lists various water related risks, with a corresponding response plan.

1.3.1Factory_Contingency_Plan_2022.pdf is a Production Recovery Plan that covers the actions required in the event of loss of one of the site utilities. However, the Plan does not address water-related incidents and responses beyond input water and effluent discharge. The plan includes flooding (under earthquakes and tsunamis) but not drought beyond a lack of water supplied to the site.

1.3.1Resilience_to_Risk_Response.docx includes a suite of Water Related Risks, including flooding.

WAF explained during one of the external stakeholder interviews that severe drought is currently being experienced in Suva, which has required water rationing. In 2015, a drought was experienced in the western region, which had impacts on farmers. The site does not believe drought to be risk, which resulted in the site not including drought in any of its incident response plans. However, it clearly is an emerging that requires inclusion in the site's incident response plan/s.

Finding No: TNR-005243

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

Comment Evidence:
1.3.2GLT_FACTORY_WATER_FLOW.pptx
1.3.2greenhouse_water_flow.pptx
1.3.2Copy_of_Site_Water_Balance_2022_(version_1)_GLT_(003).xlsb

Findings:
1.3.2GLT_FACTORY_WATER_FLOW.pptx maps the GLT Factory water inflows (2 points), use, losses, and outflows, including stormwater and wastewater.
1.3.2greenhouse_water_flow.pptx maps the GLT Factory water inflow (1 point), use, losses, and outflows, including stormwater and wastewater.
1.3.2Copy_of_Site_Water_Balance_2022_(version_1)_GLT_(003).xlsb maps and quantifies the site's inflows (3 points), use, losses, 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.*  **Yes**

Audit Number: AO-000612

Comment	Evidence: 1.3.2Copy_of_Site_Water_Balance_2022_(version_1)_GLT_(003).xlsb 1.3.3Water_Usage_Tracker.xlsx
	Findings: 1.3.2Copy_of_Site_Water_Balance_2022_(version_1)_GLT_(003).xlsb maps and quantifies the site's inflows (3 points), use, losses, and outflows. 1.3.3Water_Usage_Tracker.xlsx reflects the site's water use from 2019 to May 2023.
	Sewer Discharge is wastewater from cleaning of production areas, whereas Effluent Water Discharge is the wastewater from bathrooms/restrooms.
	1.3.2Copy_of_Site_Water_Balance_2022_(version_1)_GLT_(003).xlsb includes a table titled Input. The sub-totals and total are stated as "Best Estimated Usage", as this had to be based on estimates from previous data based on production levels, as the WAF flow meters were faulty, which the site does not have any legal jurisdiction to repair. The site however consequently installed their own flow meters, to enable effective metering.
	Water use efficiencies achieved from 2020 to 2022 relate to improved production processes at the nursery/greenhouses, as reflected in the improved yield achieved per hectare.
1.3.4	<i>Water quality of the site's water source(s), provided waters, effluent and receiving water bodies shall be quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be quantified.</i>



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Alliance for Water Stewardship (AWS)

Audit Number: AO-000612

Comment Evidence:
1.3.4 2021 water quality results
1.3.4 2022 water quality results
1.3.4 analysis
1.3.4 Drinking water quality
1.3.4 water policies and acts
1.3.4 WHO STD
1.3.4 water analysis sample location.pptx

Comment:

Drinking water has been tested at designated water drinking points on site. The water tests are done at The University of South Pacific, with no significant contamination detected. However these test results don't show where the water samples were taken from.

The site started assessing its water quality results against the WHO Standard at the end of 2022.

The site has been sampling annually, but has proposed bi-annual or quarterly sampling to quantify any seasonal and/or high/low flow variances.

1.3.4_2021_Water_Quality_Results.pdf and 1.3.4_2022_Water_Quality_Results.pdf reflects the site's on-site drinking water quality.

1.3.4_analysis.xlsx reflects the on-site and some off-site drinking water quality data, but does not specify exactly where these samples were taken (and why) in relation to the site's water source/s, provided waters, and receiving water bodies.

1.3.4_Drinking_Water_Quality.docx reflects the quality of received potable water, but does not specify where this was sampled.

The site's effluent sampling has been of the actual effluent before it was removed from site for treatment. This was undertaken as it was the best that the site could implement. WAF does not make data of the quality of its treated effluent available.

No data was provided for receiving water bodies.

1.3.4 water analysis sample location.pptx reflects the site's water sampling locations on-site and in the catchment, but this is only for drinking water, not freshwater (e.g., Nadi River) or estuarine water quality in the catchment. The site's middle catchment sampling point (for drinking water) is just downstream of where the site's stormwater enters the Nadi river, but is taken at a staff member's house from their domestic drinking water source.

The site now has data for the pond and GLT pit, but not the receiving water body (Nadi river).

The site should map the locations of its sampling sites, both on-site and in the catchment, to ensure future consistency in sampling locations. This hasn't been problematic, but could result in future inconsistencies.

Finding No: TNR-005244

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



in progress

Comment Evidence:
1.3.5Potential_Sources_of_Pollution.pptx

Findings:

1.3.5Potential_Sources_of_Pollution.pptx maps the site's potential sources of pollution, including a description of each, related risks, and proposed mitigation.

The settling pond is simply a stormwater retention pond, not as a body to facilitate any form of passive treatment.

Finding No: TNR-005227

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Alliance for Water Stewardship (AWS)

Audit Number: AO-000612

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	Evidence: 1.3.6 IWR infrastructure 1.3.6_IWR_INFRASTRUCTURE1.3.6.docx 1.3.6 Tank inspection checklist 2023 Findings: The site documented in 1.3.6_IWR_INFRASTRUCTURE1.3.6.docx that "The BAT Nadi leaf division does not have any cultural, ancient, heritage or sacred cultural significance on site therefore the social aspect of this factor was considered when identifying important water related areas". The site identified a suite of Important Water Related Infrastructure (see 11.3.6 IWR infrastructure and 1.3.6 Tank inspection checklist 2023), but there are not any IWRAs on site. Importantly, the onsite borehole is only for site use and isn't available and/or valuable to any community/ies (as per the IWRA Guidance in the AWS Standard v2 pg. 47 and 48) and therefore does not qualify as an IWRA.	
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>	 Yes
Comment	Evidence: 1.3.7 Project aspects.pptx 1.3.7 216016495 1.3.7 216016495 (1) 1.3.7 216016495 (4) 1.3.7 216016495 (7) 1.3.7 216016495 (9) 1.3.7. 200000011954 1.3.7. 200000011954(5) 1.3.7. 200000011954(10) 1.3.7.7500051928011 1.3.7.7500051928011(3) 1.3.7.7500051928011(6) 1.3.7.7500051928011(8) 1.3.7 AWS Related cost 1.3.7 WAF Findings: Water-related Capex and Opex has been captured in 1.3.7 AWS Related cost. Project Aqua, Afforestation, Grow-Plus, Financial Literacy and other training (as reflected in 1.3.7 Project aspects.pptx) was described by the site as social, cultural, environmental, or economic water-related value generated by the site, including an explanation as to how the related value was generated.	
1.3.8	<i>Levels of access and adequacy of WASH at the site shall be identified.</i>	 Obs.

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Alliance for Water Stewardship (AWS)

Audit Number: AO-000612

Comment	Evidence: 1.3.8 access to WASH 3.6.1 Provision of adequate sanitation facilities.docx 1.3.8 Daily washroom cleaning checklist updated 1.3.8 Fiji national building code 1.3.8 rest room audit checks 1.3.8 WASH checklist 1.3.8 WASH maintenance and monitoring Findings: The total numbers of different WASH facilities are reflected in 1.3.8 access to WASH and 3.6.1 Provision of adequate sanitation facilities.docx. Importantly, there is no restrictions to any WASH facilities on site (e.g., casual staff can access any WASH facilities on site). The number of staff per gender type and the number of toilets has been quantified per site building. However, the site should quantify other WASH facilities per building and per gender in the future.	
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>	 in progress
Comment	Evidence: 1.4.1 sites indirect water use 1.4.1 Reference Document STP Risk assessment Findings: In 1.4.1 sites indirect water use, the site has determined the quantity and types of water risk of the embedded water in the green leaf tobacco it receives. 1.4.1 Reference Document_STP Risk Assessment 2017_BATFJ.xlxb reflects the types and levels of water risk of the embedded water in the green leaf tobacco it receives, under the Environmental and Waste Management Sections of this evidence. However, the quality of the embedded water in the green leaf tobacco it receives has not been documented.	
		Finding No: TNR-005231
1.4.2	<i>The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.</i>	 Yes

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Alliance for Water Stewardship (AWS)

Audit Number: AO-000612

Comment	Evidence: 1.4.2 FJ11 latest vendor listing June 2022 1.4.2 BAT vendor list updated.XLSX 1.4.2 outsource services 1.4.2 BAT vendor list updated.XLSX Comment: One of the outsourced activities identified is washing of company vehicles. From research it takes about on average 0.24m3 - 0.30m3 of water to wash a vehicle. Considering the size of BAT vehicles, an average of .27m3 is being used for the calculation. There are 20 vehicles (excluding vehicles at other BAT sites) which if washed on average once per month, the total yearly water consumption would be 64.8 m3. BAT does not have a specific vendor for car washing and the drivers either wash it themselves or take it to a car wash at their own discretion. The site estimated that more than 96% of the washing is done using water drawn from the Vaturu catchment. The second primary outsourced service with embedded water is fuel, which is listed. However, the fuel does not originate from the catchment as it is imported into Fiji.	
1.5	<i>Gather water-related data for the catchment, including water governance, water balance, water quality, Important Water-Related Areas, infrastructure, and WASH</i>	
1.5.1	<i>Water governance initiatives shall be identified, including catchment plan(s), water-related public policies, major publicly-led initiatives under way, and relevant goals to help inform site of possible opportunities for water stewardship collective action.</i>	Q Obs.
Comment	Evidence: 1.5.1 Fiji water policy draft 1.5.1 Updated Acts and policy formulation 1.5.1 WAF strategic plan 2020-2025 1.5.1 water governance (2) Comment: The site compiled a list of relevant policies, laws, regulations, and strategies, and governance initiatives in 1.5.1 water governance (2) in 1.5.1 Fiji water policy draft, 1.5.1 Updated Acts and policy formulation, 1.5.1 WAF strategic plan 2020-2025, and 1.5.1 water governance (2). 1.5.1_Updated_Acts_and_Policy_Formulation.xlsx reflects all the relevant policies, laws, regulations, and strategies, as well as the applicability of each to BAT Fiji and site operations. A few catchment governance initiatives/project are also being undertaken that the site is aware of that are not yet reflected in 1.5.1 water governance (2), for example Afforestation project, JIKA project for flood alleviation etc.	
1.5.2	<i>Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.</i>	Q Obs.

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Comment	Evidence: 1.5.1 Fiji water policy draft 1.5.1 Updated Acts and policy formulation 1.5.1 WAF strategic plan 2020-2025 1.5.1 water governance (2) 1.5.2 Catchment related laws and regulations 1.5.2 water policies and acts Comment: The site compiled a list of relevant policies, laws, regulations, and strategies, and governance initiatives in 1.5.1 water governance (2) in 1.5.1 Fiji water policy draft, 1.5.1 Updated Acts and policy formulation, 1.5.1 WAF strategic plan 2020-2025, and 1.5.1 water governance (2). 1.5.1_Updated_Acts_and_Policy_Formulation.xlsx reflects all the relevant policies, laws, regulations, and strategies, as well as the applicability of each to BAT Fiji and site operations. Access to water is a basic human right in Fiji. Local communities have specific rights with regard to land, which has bearing on fishing for example, but none of this is directly to BAT. The site should include the Qoliqoli Bill (not enacted yet) to its current legal register, due to its potential future implications.	
1.5.3	<i>The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.</i>	Q Obs.
Comment	Evidence: 1.5.3_Availability_of_clean_drinking_water_and_Areas_with_drought.docx Findings: 1.5.3_Availability_of_clean_drinking_water_and_Areas_with_drought.docx reflects a summary of available climate data for the country of Fiji, including flood and drought events from 1980 to 2020, but not for the Nadi Basin Catchment. The site has documented that "There is not much information on the catchment water balance, inflows, outflows & consumption. This is one of action items which is under the National Development Plan for 2030 and WAF 2020 – 2025 WAF 5 year Strategic Plan. Nevertheless, we did our own research and we managed to find information of the water balance for the entire Fiji. This was an exercise conducted by GHD "Project Preparatory Work and Capacity Building Contract no. CS01A between the Water Authority of Fiji and GHD Pty Ltd ...". The National Water Balance from 2012 to 2015 was calculated, as well as for the Vaturu catchment that is essentially the Nadi Basin Catchment, but this data only relates to inflows and outflows to and from water treatment plants, not the catchment as a whole (i.e., streams, rivers, dams, use, ecological reserve etc.). Also, the data does not extend beyond 2015. The need therefore exists for a catchment water balance to be quantified, including scarcity and an indication of annual, and where appropriate, seasonal, variance. However, this is beyond BAT Fiji's legal mandate, which falls under the National Development Plan for 2030 and the WAF 2020 – 2025 WAF 5 year Strategic Plan. This evidence should be included by the site once it has been completed.	
1.5.4	<i>Water quality, including physical, chemical, and biological status, of the catchment shall be identified, and where possible, quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be identified.</i>	in progress

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Alliance for Water Stewardship (AWS)

Audit Number: AO-000612

Comment	Evidence: 1.5.4.docx 1.5.4 risks on water quality 1.5.5_catchment_IWRA.pptm 1.5.4 biological data.pptm 1.3.4 water analysis sample location.pptx Findings: 1.5.4.docx and 1.5.5_catchment_IWRA.pptm reflect very general physico-chemical and biological descriptions for the catchment. 1.5.4 biological data.pptm reflects detailed biological information from the upper, middle, and lower catchment, but this is only for drinking water supplied by WAF. Importantly, the site has physico-chemical and bacteriological data it collects for drinking water (supplied by WAF) for the upper, middle and lower catchment, which it collected for the first time in July 2023, as reflected in 1.3.4 water analysis sample location.pptx. This reflects the results of the site's first round of drinking water quality sampling in the catchment. The "3 sites are chosen by the site to determine if the drinking water travelling along WAF's infrastructure have any significant impacts on the water quality within the catchment". The site has not been implementing AWS and undertaking catchment water quality sampling long enough to have data to reflect an indication of annual and/or seasonal high and low variances. However, the site's future catchment water quality sampling will enable the determination of annual and/or seasonal high and low variances. These variances must be determined going forward. However, all this data is for drinking water, not the water quality of the freshwater and/or estuarine environment within the catchment.	
		Finding No: TNR-005495
1.5.5	<i>Important Water-Related Areas shall be identified, and where appropriate, mapped, and their status assessed including any threats to people or the natural environment, using scientific information and through stakeholder engagement.</i>	 Obs.
Comment	Evidence: 1.5.5_catchment_IWRA.pptm 1.5.5 the Nadi basin catchment committee Comment: 1.5.5_catchment_IWRA.pptm reflects the IWRAs identified in the catchment at the Upper Vaturu catchment (forest), Mid (river) and Lower (mangrove), including global, national, and/or local designated areas (e.g., IBAs). They were mapped and assessed for the threats based on the scientific information. The site should consider information on ProtectedPlanet.net regarding the protected area status of the Vaturu dam. NBCC (Nadi Basin Catchment Committee) reflects the Committee formed with various stakeholders in 2018 and having quarterly meetings. However, the Committee does not appear to be active since 2019.	
1.5.6	<i>Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.</i>	 in progress

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Comment	Evidence: 1.5.6 important water related infrastructure in the catchment.pptx 1.5.6 Jica 1.5.6 Infrastructure.pptx Comments: 1.5.6 important water related infrastructure in the catchment and 1.5.6 Jica reflects the various water-related infrastructure in the catchment. 1.5.6 Infrastructure.pptx reflects the list and associated the condition and exposure to extreme events for all relevant infrastructure. However, some of this infrastructure has been identified by the site and stakeholders as currently impacted by or exposed to extreme events (e.g., Vaturu dam, Nadi Town Bridge Water Gauge, scouring of Magunia Bridge etc.), but this is not reflected in 1.5.6 Infrastructure.pptx where no exposure to extreme events were specified. Proposed future infrastructure should be added going forward.	
		Finding No: TNR-005286
1.5.7	<i>The adequacy of available WASH services within the catchment shall be identified.</i>	 Obs.
Comment	Evidence: WASH adequacy.docx Findings: Issues and challenges of WASH within the area were identified in WASH adequacy.docx. According to the submitted document, the Fiji government has a committee that sets the plan to aim for 100% access to safe drinking water and 70% access to improved sanitation systems by 2030. However, the site identified a number of WASH access and adequacy challenges in the country, including 100 villages without access to a potable water main. The site should identify which of the 100 villages without access to a potable water main are located in the Nadi catchment.	
1.6	<i>Understand current and future shared water challenges in the catchment, by linking the water challenges identified by stakeholders with the site's water challenges.</i>	
1.6.1	<i>Shared water challenges shall be identified and prioritized from the information gathered.</i>	 Yes
Comment	Evidence: 1.6.1 Shared water challenges Comment: 1.6.1 Shared water challenges reflects the identified challenges and their priorities. In particular, flooding and riverbank erosion were raised as high priorities by all stakeholders.	
1.6.2	<i>Initiatives to address shared water challenges shall be identified.</i>	 Obs.

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Comment	Evidence: 1.6.2 Best practises by WAF 1.6.2 initiatives on shared water challenge.docx 1.6.2 shared challenges final Comment: 1.6.2 Best practises by WAF, 1.6.2 initiatives on shared water challenge, and 1.6.2 shared challenges final all reflect initiatives to address shared water challenges. The various projects being implemented and/or proposed, which the site is already aware of, should be added to the current lists (e.g., Afforestation, Mangrove Planting, Jica projects).	
1.7	<i>Understand the site's water risks and opportunities: Assess and prioritize the water risks and opportunities affecting the site based upon the status of the site, existing risk management plans and/or the issues and future risk trends identified in 1.6.</i>	
1.7.1	<i>Water risks faced by the site shall be identified, and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.</i>	 in progress
Comment	Evidence: 1.7.1 water related risks 1.7.1 Water related Risk onsite.xlsx Comment: 1.7.1 water related risk onsite reflects all key water-related risks, including the likelihood of occurrence, severity, time-frame, risk rating, potential cost and associated quantification in FJD, and business impact. There are a few site operational and/or maintenance aspects that pose risks, which should be included in the site's risk assessment	
		Finding No: TNR-005267
1.7.2	<i>Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.</i>	 Obs.
Comment	Evidence: 1.7.2 water related opportunities (word) 1.7.2 water related opportunities (excel) Comment: 1.7.2 water related opportunities (word) and 1.7.2 water related opportunities (excel) reflects various site opportunities at the site and catchment level. The site should continue to consider additional opportunities in the future.	
1.8	<i>Understand best practice towards achieving AWS outcomes: Determining sectoral best practices having a local/catchment, regional, or national relevance.</i>	
1.8.1	<i>Relevant catchment best practice for water governance shall be identified.</i>	 Obs.

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Comment	Evidence: 1.8.1 Best practice for water governance (Catchment) Final.docx 1.8.1 Catchment best practices for water governance.docx Findings: 1.8.1 Best practice for water governance (Catchment) Final.docx reflects a suite of water governance related initiatives currently underway in or proposed for Fiji and/or Viti Levu. 1.8.1 Catchment best practices for water governance.docx reflects a suite of water governance related initiatives being implemented by not-for-profit, private, and public sector organisations in Fiji, as well as BAT (British American Tobacco) Fiji legal requirements (although these do not constitute best practice). Opportunity exists for the site to identified best practice water governance initiatives outside of Fiji and/or within the tobacco sector. Also, importantly the legal requirements specified do not constitute best 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>	 in progress
Comment	Evidence: 1.8.2 best practise for water efficiency.docx Findings: 1.8.2 best practise for water efficiency.docx reflects various proposed, current and recent past initiatives by The Water Authority of Fiji (WAF). However, some of these initiatives constitute good practice, but not best practice. In addition, opportunity exists for the identification of additional relevant sector and/or catchment best practice for water balance beyond these initiatives by WAF.	
		Finding No: TNR-005228
1.8.3	<i>Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.</i>	 in progress
Comment	Evidence: 1.8.3 Sectors and Catchment Best Practices.docx 1.8.3 best practise for water quality.docx 1.8.3 British American Tobacco [Nadi] 05 07 23.pdf 1.8.3 British American Tobacco [Leaf Division] 18 05 23.pdf 1.8.3 2021 Water Quality Results.pdf 1.8.3 2022 Water Quality Results.pdf Comments: 1.8.3 Sectors and Catchment Best Practices.docx and 1.8.3 best practise for water quality.docx reflect various proposed, current and recent past water quality initiatives by The Water Authority of Fiji (WAF) and the Ministry of Infrastructure and Meteorological Services. However, some of these initiatives constitute standard or good practice, and not all are best practice. In addition, opportunity exists for the identification of additional relevant sector and/or catchment best practice for water quality beyond these initiatives. 1.8.3_2021_Water_Quality_Results.pdf and 1.8.3_2022_Water_Quality_Results.pdf reflect water quality results for chemical, physical, and bacteriological parameters for water from the BAT site (Admin Office, Residence, Green House, Field Office, and GLT), but it is not specified how these data relate to sectoral and/or catchment best practices. 1.8.3 British American Tobacco [Nadi] 05 07 23.pdf and 1.8.3 British American Tobacco [Leaf Division] 18 05 23.pdf reflect water quality results for chemical, physical, and bacteriological parameters for water from a total of ten (10) sampling points within the site and the catchment, but it is not specified how these data relate to sectoral and/or catchment best practices for water quality.	
		Finding No: TNR-005230

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Audit Number: AO-000612

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

Comment Evidence:
1.8.4 IWRA Best practice (Catchment).docx
1.8.4_British_American_Tobacco_[Leaf_Division]_18_05_23
1.8.4_British_American_Tobacco_[Nadi]_05_07_23

Comments:
1.8.4 IWRA Best practice (Catchment).docx reflects a wide range of initiatives in Fiji related to IWRAs (e.g., United Nations Ridge to Reef Project, My Mangroves, My Livelihood project by the Ministry of Forestry, Fiji Forest Emission Reductions Program etc.). However, it is not clearly documented how these initiatives could relate to site maintenance of Important Water-Related Areas.

1.8.4_British_American_Tobacco_[Leaf_Division]_18_05_23 and
1.8.4_British_American_Tobacco_[Nadi]_05_07_23 reflect water quality results for chemical, physical, and bacteriological parameters for water from a total of ten (10) sampling points within the site and the catchment (for drinking water quality), but it is not specified how these data relate to sectoral and catchment best practices for IWRAs.

Finding No: TNR-005232
Finding No: TNR-006293

1.8.5 *Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.*  in progress

Comment Evidence:
1.8.5access to WASH.docx
1.8.5 best practise for WASH.docx

Findings:
1.8.5 best practise for WASH.docx reflects various WASH initiatives in Fiji, including efforts by BAT to raise awareness of the importance of WASH. However, some of this information is more than three (3) years old and/or does not constitute best practice.

1.8.5access to WASH.docx reflects WASH practices by the site, some of which constitute best practice (e.g., standalone water filtration unit for each drinking station, analysis of drinking water against World Health Organization (WHO) standards, not just local legal requirements). However, some of the initiatives specified only constitute standard or good practice. Opportunity exists to identify additional relevant sector best practices for site provision of equitable and adequate WASH services.

Finding No: TNR-005497

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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> - That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes - That the site implementation will be aligned to and in support of existing catchment sustainability plans - That the site's stakeholders will be engaged in an open and transparent way - That the site will allocate resources to implement the Standard.	 in progress
Comment	Evidence: 2.3.1AWS_Signed_Policy.pdf 2.1AWS Fiji.pdf 2.1 Fiji Times AWS advert 24.06.23.pdf 2.1SIGA RARAMA_page 59 final.pdf 2.1EHS Policy Manual V10.0.pdf 2.1BAT Fiji (Nadi) - StakeAnn.docx Comments: 2.3.1AWS_Signed_Policy.pdf is the site's signed AWS Policy, which includes three of the four key requirements of this indicator (amongst other commitments), namely that: - Site implementation will be aligned to and in support of existing catchment sustainability plans - The site's stakeholders will be engaged in an open and transparent way - The site will allocate resources to implement the Standard. However, this commitment does not include the requirement that "The site implements and discloses progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes". Evidence was shown on site that this commitment is publicly disclosed via a public noticeboard outside the site. 2.1BAT_Fiji_(Nadi)_-_StakeAnn.docx and 2.1SIGA RARAMA_page 59 final.pdf reflects the site's certification audit announcements in The Fiji Sun and The Fiji Times. 2.1AWS_Fiji.pdf reflects a general commitment by the site to Water Stewardship and 2.1EHS Policy Manual V10.0.pdf is the BAT Corporate EHS Policy (2015). However this general commitment and the EHS Policy do not explicitly address the requirements of this indicator. Finding No: TNR-005237	
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> - Identification of responsible persons/positions within facility organizational structure - Process for submissions to regulatory agencies.	 in progress

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Comment	Evidence: 2.2 scanned-85034990-2023-01-11_15-49-06-285.pdf 2.2 OHS CF1 Form pdf.pdf 2.2 first aid Avinash.pdf 2.2 Chemical Registration Reminder Letter -2023.pdf 2.2 bat nadi boiler.pdf 2.2 permits.xlsx 2.2 Governance Structure.docx 2.2 Fiji ToR 2023.docx Findings: 2.2 permits.xlsx is a Legal Register for the site that includes details of the Authority, Legal Requirement, BAT Requirement, Type of Certification, Renewed Date, Expiry Date, and a Link/Attachment of the Permit/License/Approval, amongst other information. 2.2_Governance_Structure.docx reflects the persons in charge of compliance obligations for water and wastewater management for the site. For water-related legal compliance, it is only waste disposal that is applicable. Renewal application are submitted every 3 years, and renewals are submitted prior to expiry. The Ministry conducts inspections and advises the site what requirements need to be met. Most of the site's waste is recycled and the balance is disposed of via service providers, and both are fully traceable to end use/disposal. MoUs are in place between the site and vendors regarding waste disposal requirements. The process for submissions to regulatory agencies was not documented. The site does not have any effluent & drinking water testing legal/permitting legal requirements, these are only internal standards related (e.g., USP lab testing). Finding No: TNR-005238
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>
Comment	Evidence: 2.3.1 EHS Policy Manual V10.0.pdf 2.3.1BAT FIJI AWS Policy V2.0.docx 2.3.1Governance Structure.docx 2.3.1EHS & REHAB POLICY 2021.pdf 2.3.1AWS Signed Policy.pdf 2.3.1 Mission, Vision & Goals.docx 2.3.1 Fiji ToR 2023.docx Findings: 2.3.1 Mission, Vision & Goals.docx reflects the site's Water Stewardship Strategy that defines the overarching mission, vision, and (six) goals of the organization (BAT Fiji) towards good water stewardship in line with the AWS standard.



Yes

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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

Evidence:

2.3.2 Water Stewardship Plan_Version 1.xlsx

Findings:

2.3.2 Water Stewardship Plan_Version 1.xlsx reflects the site's Water Stewardship Plan (WSP). The site's WSP is broken down into two sub-plans, namely Site and Catchment. Each sub-plan includes Objectives, Targets, Link to AWS Outcomes, Site/Catchment, Measurement Approach, Actions, Financial Budgets, Timeline (for implementation), the (Responsible) Person in Charge (PIC), Status (of progress), and Comments (on progress). The link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes was specified.

Financial Budgets do not specify the actual financial budgets (e.g., in FJD, AUD, USD etc.) allocated for actions, but rather which budget these actions will be funded from (e.g., site annual budget, BAT corporate annual budget, government funding, or foreign aid). Lastly, some targets are not sufficiently quantified or described to enable effective monitoring of performance.

Once the off-site crop trials have been completed and associated indirect water-use reduction targets set (currently under target and action no. 11 under site in the 2022/23 WSP), this/these targets need to be quantified or sufficiently described in the future revisions/s of the WSP to enable evaluation of performance. However, target and action no. 11 under site in the 2022/23 WSP should be reflected under catchment actions (i.e., in the catchment Workbook).

Also, Catchment Actions 7 and 8 are not actually best practices, but rather standard industry practice.

Finding No: TNR-005289

Finding No: TNR-005239

2.4

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

2.4.1

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



in progress

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Comment	Evidence: 2.4.1 Shared Water Challenges.xlsx 2.4.1 Site Risk Mitigation Plan.xlsx 1.7.1_Water_related_Risk_onsite.xlsx Findings: 2.4.1 Shared Water Challenges.xlsx is largely the same as 2.3.2 Water Stewardship Plan_Version 1.xlsx (i.e., is the site's WSP) and does not reflect a plan specifically to mitigate or adapt to identified water risks. The WSP was developed following consultation with public section agencies. No water risk within the site's catchment via embedded water use of primary inputs were identified, which needs to be addressed. 1.7.1 reflects a total of 11 site water risks. 2.4.1 Site Risk Mitigation Plan.xlsx reflects the plan the site has developed to mitigation its site risks. The plan addresses the majority of the 11 site water risks, but needs to also address operational equipment and processes. No evidence was provided to demonstrate that this plan was developed in co-ordination with relevant public-sector and infrastructure agencies.
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Finding No: TNR-005240

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3	STEP 3: IMPLEMENT - Implement the site's stewardship plan and improve impacts	
3.1	<i>Implement plan to participate positively in catchment governance.</i>	
3.1.1	<i>Evidence that the site has supported good catchment governance shall be identified.</i>	 Yes
Comment	Evidence: 2.3.2Water_Stewardship_Plan_Updated.xlsx column I (Site Level) and J (Catchment) 3.1.1 Good Governance.xlsx 3.1.1ESG Fiji Leaf.pptx 3.1.1BAT - MoA letter to FIRCA.pdf 3.1.1 RE BAT Fiji Composting of Tobacco Waste - Ministry of Agriculture Letter.msg 3.1.1 PROJECTs.pptx Comments: 2.3.2Water_Stewardship_Plan_Updated.xlsx column I (Site Level) and J (Catchment) and 3.1.1 Good Governance.xlsx reflect the actions undertaken by the site related to good water governance in relation to the actions and targets identified in the WSP.	
3.1.2	<i>Measures identified to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be implemented.</i>	 in progress
Comment	Evidence: 2.4.1 Site Risk Mitigation Plan.xlsx 1.7.1_Water_related_Risk_onsite.xlsx 3.3_2022_Water_Quality_Results.pdf 3.3_WATER_QUALITY_05_07_23.pdf 3.3_WATER_QUALITY18_05_23.pdf 3..3 2021 Water Quality Results.pdf Findings: The site undertakes various drinking water quality monitoring on site and in the catchment (3.3_2022_Water_Quality_Results.pdf, 3.3_WATER_QUALITY_05_07_23.pdf, 3.3_WATER_QUALITY18_05_23.pdf, 3..3 2021 Water Quality Results.pdf) to inform its management/mitigation, and avoid and mitigate impacts on the water rights of others. It also implements various controls as per 2.4.1 Site Risk Mitigation Plan.xlsx and 1.7.1_Water_related_Risk_onsite.xlsx. However, additional maintenance and controls are required to appropriate mitigate potential contamination events. Monitoring of site stormwater and potential catchment receptors (e.g., Nadi River) should be considered, to support improved monitoring of potential impacts. Finding No: TNR-005270	
3.2	<i>Implement system to comply with water-related legal and regulatory requirements and respect water rights.</i>	
3.2.1	<i>A process to verify full legal and regulatory compliance shall be implemented.</i>	 No

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Comment Evidence:

- 3.2..1Waste Disposal Permit.pdf
- 3.2.1 C12 Waste Management.pdf
- 3.2.1 Form-5-APPLICATION-TO-RENEW-WASTE-DISPOSAL-PERMIT Nadi.pdf
- RE Renewal Application for Waste Disposal Permit (BAT Nadi).msg
- 3.2.1 C12.1 Introduction to the Principles and Concepts of Waste Management_ (UK Open University).pdf
- 3.2.1 C12.2 Hazardous waste_ segregation and mixing - Detailed guidance - GOV.UK.pdf
- 3.2.1 C12.3 Waste Hierarchy Guidance (DEFRA - UK Agency).pdf
- 3.2.1 Form-5-APPLICATION-TO-RENEW-WASTE-DISPOSAL-PERMIT Nadi.pdf
- 3.2.1 Nadi Premises Plan - Waste Discharge.pdf
- 3.2.1 WMP FLOW CHART.docx
- 3.2.1 WMP for Leaf.doc
- 3.2.1Waste Recycling Plans.pptx
- 3,2scanned-85034990-2023-01-11_15-49-06-285.pdf
- 3,2Chemical Registration Reminder Letter -2023.pdf
- 3,2 OHS CF1 Form pdf.pdf
- 3,2 first aid Avinash.pdf
- 3,2 bat nadi boiler.pdf
- 3.2Constiitution of Fiji.xlsx
- 3.2Constiitution of Fiji.pdf
- 3.2Constiitution of Fiji.docx

Findings:

The only water-related legal requirement applicable to the site is a waste permit, as currently no legal requirements exist in Fiji regarding groundwater abstraction, only approval for water abstraction from rivers under The Rivers and Streams Act. This Act has been identified as requiring revision to include groundwater abstraction.

Finding No: TNR-005498

3.2.2 *Where water rights are part of legal and regulatory requirements, measures identified to respect the water rights of others including Indigenous peoples, shall be implemented.*



Yes

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Comment	Evidence: 3.2Constitution of Fiji.xlsx 3.2Constitution of Fiji.pdf 3.2Constitution of Fiji.docx 3.2Constitution_of_Fiji.docx reflects relevant water rights and environment-related Acts in the country, with specific emphasis on their applicability to BAT Fiji's operations. This document states that "In conclusion, British American Tobacco (BAT) has always been committed to upholding the policies and regulations set in place by the Fiji Nation. As an employer, we have prioritized the well-being of our employees by providing them with standard WASH (Water, Sanitation, and Hygiene) facilities and clean drinking water. As a sustainable business, we have diligently adhered to environmental regulations, obtaining trade liquid certificates from authorized bodies to ensure compliance with standard parameters. Moreover, we have taken proactive measures to address potential impacts on people's rights to water access. Our waste disposal practices have been revamped through our "Zero Waste to Landfill" project, which ensures that all waste is properly recycled, eliminating any negative impact on local landfills. Additionally, we practice responsible water conservation, avoiding excessive water usage in our operations to prevent water scarcity issues in the catchment areas where we operate. In summary, BAT is committed to being a responsible corporate citizen, abiding by policies, prioritizing employee well-being, complying with environmental regulations, and actively mitigating any potential impacts on water resources and local communities." The site does not have any legal agreements in place with external parties that require measures to respect the water rights of others. However, the site has engaged with farmers and communities to encourage them to implement responsible practices regarding water that support upholding constitutional rights regarding water (e.g., its Risk Assessment).	
3.3	<i>Implement plan to achieve site water balance targets.</i>	
3.3.1	<i>Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.</i>	 in progress
Comment	Evidence: 3.3ESG Fiji Leaf.pptx 3.3 WATER QUALITY18 05 23.pdf 3.3 WATER QUALITY 05 07 23.pdf 3.3 2022 Water Quality Results.pdf 3..3 2021 Water Quality Results.pdf Copy of Site Water Balance 2022 (version 1)_GLT (003).xlsb 2.3.2 Water Stewardship Plan_Version 1.xlsx Comments: 3.3ESG_Fiji_Leaf.pptx reflects the results achieved and the actions implemented in relation to the actions and targets in the WSP, which have been documented in 2.3.2 Water Stewardship Plan_Version 1.xlsx. However, for many of the catchment related actions the status has not been documented beyond stating "Ongoing".	
		Finding No: TNR-005272
3.3.2	<i>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.</i>	 Yes

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Comment	Evidence: 2.3.2 Water Stewardship Plan_Version 1.xlsx 3.3.2 annual targets ESG Fiji Leaf.pptx Findings: The site set water targets to improve its water use efficiency in its WSP (2.3.2 Water Stewardship Plan_Version 1.xlsx) in the very short term (until March 2023), annually, and medium-term (until 2025). These have been implemented, where relevant, from a timing perspective. Some of these targets have already been achieved ahead of the identified time-frames.	
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	No water has been allocated by the site to third parties.	
3.4	<i>Implement plan to achieve site water quality targets</i>	
3.4.1	<i>Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.</i>	 Yes
Comment	Evidence: 3.4BAT Water Infrastructure Inspection and Maintenance.docx 3.4.2 best practice for effluent discharge.xlsx 3.4Tank Inspection Checklist - 2023.pdf 3.4Other Areas.xlsx 3.4Important Water Quality Areas.xlsx 3.4Greenhouse.xlsx Various water quality lab analysis results as per Step 1 above. Comments: Water Filter Units have been installed and were observed by the auditors on site (see site photos). Water Quality Testing has been conducted annually, but will be quarterly by end 2023. UV filters were installed.	
3.4.2	<i>Where water quality is a shared water challenge, continual improvement to achieve best practice for the site's effluent shall be identified and where applicable, quantified.</i>	 Yes
Comment	Evidence: 3.4.2 best practice for effluent discharge.xlsx Comments: Water quality was not identified as a shared water challenge, except for borehole water to the school. Consequently, this indicator currently isn't applicable to the site, but could become relevant in the future.	
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	Evidence: 3.1.1_PROJECTs.pptx Comments: There are no IWRAs onsite, but the site implemented a range of actions regarding catchment IWRAs as per the Afforestation Project, Mangrove Restoration etc. (see 3.1.1_PROJECTs.pptx).	

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3.6	<i>Implement plan to provide access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers at all premises under the site's control.</i>	
3.6.1	<i>Evidence of the site's provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers onsite shall be identified and where applicable, quantified.</i>	Yes
Comment	Evidence: 3.6.1 Provision of adequate sanitation facilities.docx 1.3.8 access to WASH.docx 3.6.2 Human Rights.docx 3.6.2 Evidence No Violation.docx 3.6Rest Room Audit Checks.xlsx 3.6Daily Washroom Cleaning Checklist Updated.xlsx Comments: 1.3.8 access to WASH.docx reflects the access and adequacy of WASH facilities on site. 3.6.2 Human Rights.docx, 3.6.2 Evidence No Violation.docx, 3.6Rest Room Audit Checks.xlsx, 3.6Daily Washroom Cleaning Checklist Updated.xlsx, as well as the daily completed WASH facilities checklists reflect daily maintenance of these facilities. 3.6.1 Provision of adequate sanitation facilities.docx reflects the Fiji Building Code requirements for various WASH facilities, and the site's number of facilities for males and females in compliance with the Code.	
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	Evidence: 3.6.2 Human Rights.docx 3.6.2 Evidence No Violation.docx Comments: 3.6.2_Evidence_No_Violation.docx and 3.6.2_Human_Rights.docx reflect the site's actions to date do not impinge on the human right to safe water and sanitation of communities through their operations.	
3.7	<i>Implement plan to maintain or improve indirect water use within the catchment:</i>	
3.7.1	<i>Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.</i>	Yes
Comment	Evidence: 3.7FJ11 Latest Vendor Listing June 2022.XLSX 3.7 Stakeholder Engagement _vendors.docx 3.7 sites indirect water use.docx 3.7.1GX_Fiji Crop Plan.pptx Comments: The site did not set any targets in its WSP for indirect water use targets, as it is too early to do so. The site's Leaf Division off-site has set future targets for water reduction in the BAT Thrive Platform, but the trials (that will take 1 - 3 years) have not begun yet, which will inform future potential efficiency actions and targets. However, these targets can only be determined once the trials have been completed and future practical actions have been determined.	

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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	Evidence: 3.3.2 annual targets ESG Fiji Leaf.pptx 3.7.1GX_Fiji Crop Plan.pptx Findings: The site's indirect water use is principally from the Green Leaf tobacco it receives from farmers. The proposed efficiencies in indirect water use are being planned internally, so there is no available correspondence, as the site agronomy team responsible for AWS actions is also the same team that is about to begin rolling out the efficiency trials. Water saving has been achieved through the internal GX project (see 3.3.2 annual targets ESG Fiji Leaf.pptx) via support to famers, which resulted in a lesser number of Green House sowing required to achieve same production volume from fields, leading to less water consumption (Efficiency through process improvement). This action, combined with other direct-water use related projects, led to a decrease in total water reduction of 41% compared to 2020.	
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	Evidence: 3.8 AWARENESS WITH FARMERS'.docx 3.8 EVIDENCE.docx 1.5.6_important_water_related_infrastructure_in_the_catchment.pptx Comments: 1.5.6_important_water_related_infrastructure_in_the_catchment.pptx reflects shared water-related infrastructure in the catchment. Although there are some condition deficiencies for some of this infrastructure, none of this is of concern to the site and/or is current. Consequently, the site has not engaged with the owners of this infrastructure to date. The site did however engage with relevant farmers regarding flooding impacts on their crops and recommended mitigation actions (3.8_AWARENESS_WITH_FARMERS'.docx).	
3.9	<i>Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.</i>	
3.9.1	<i>Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.</i>	 Yes

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Comment	Evidence: 2.3.2 Water Stewardship Plan_Version 1.xlsx 3.9.4 IWRA Best Practice.docx 3.9.1 Actions Towards Good Water Governance (1).docx 3.9PROJECTs.pptx 3.9ORA CHECKLIST.xlsx 3.9ESG Fiji Leaf.pptx 3.9Action Towards Good Governance (excel data).xlsx Comments: 2.3.2 Water Stewardship Plan Updated reflects actions implemented (no site actions; catchment actions 5ii, 21, and 22). The following (at a catchment level) were identified as Good water Governance-related Best Practices for implementation: 5ii) Building in house technical Capabilities to manage IWRA's. 21) Stakeholder Mapping and inspection of plants as part of the Afforestation Project. 22) Stakeholder and weekly inspection of river bank erosion prevention. For 5ii), no evidence of commencement and progress was documented, but the timeline for completion is 2030. For 21), BAT has visited all the villages in the catchment and have created awareness on river bank erosion and its prevention, therefore planting nearby river banks is an initiative to help communities in preventing river bank erosion. For 22), BAT has chosen a nearby site as a demo plot to research and sample out plants which are best effective in preventing river bank erosion. The site chosen consists of half the river bank being eroded and therefore BAT came up with a solution to plant native trees and test if they are best suited in preventing erosion. if results are promising BAT Nadi will later share the information and the native plants to areas affected from river bank erosion. This is currently 60% complete.
3.9.2	<i>Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.</i>
 Yes	
Comment	Evidence: 2.3.2 Water Stewardship Plan_Version 1.xlsx Findings: 2.3.2 Water Stewardship Plan_Version 1.xlsx reflects actions implemented to date (site actions 1, 2, 3, 4, 7, 8, 10 and 11; catchment actions: none). The best practice actions identified relate to the following, with the progress to date specified: 1) 35% reduction in the water withdrawn from the baseline data of 2017: 90% complete via implementation of aspects of Project GX. 2) 10% reduction in the water withdrawn from last year (2022): 100% complete via setting of Glidepath, and associated monitoring and adaptive management. Installation of new more efficient boiler. 3) 1% water recycling through condense return line: 10% complete. Development of Maintenance Plan for steam line and associated implementation. 4) Water Balance: Permanently ongoing task being implemented via monthly simulation of the water balance, comparison with actual, and investigation if there is variance. 7) WASH onsite: 100% complete. 8) Wash Facilities On-site: Permanently ongoing implemented via daily, weekly, and monthly maintenance and monitoring via check-lists. 10) Water Conservation: 5% complete. Trial and prototype implemented to date. 11) Sustainable Farming Practise: 50% complete via implementation to date of Project GX (Growing Excellence).

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3.9.3	<i>Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.</i>	 Yes
Comment	Evidence: 2.3.2 Water Stewardship Plan_Version 1.xlsx Findings: 2.3.2 Water Stewardship Plan_Version 1.xlsx reflects actions implemented (catchment actions: 4ii). The best practice actions identified relate to the following, with the progress to date specified: 4ii, Stakeholder mapping of the local manufacturing Industry and creating awareness to share knowledge on the standalone portal water filtration unit placed at all drinking points: To date BAT Consultations carried out with stakeholders during 2023. However, the extent of progress was not specified.	
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	Evidence: 2.3.2 Water Stewardship Plan_Version 1.xlsx Findings: 2.3.2 Water Stewardship Plan_Version 1.xlsx reflects actions implemented (site actions: none; catchment actions: 14, 15, 18, 19). The best practice actions identified relate to the following, with the progress to date specified: 14) Planting of 200 hundred trees and maintaining it: - Engage with Ministry of Environment and Forestry to seek approval to carry out planting works near the river banks and reserved forestry: Completed - Engage with Hard Wood to be a vendor in carrying out the planting duties in the designated area and maintaining the trees: Completed - Mangrove planting for world environment day: Completed - BAT awareness and afforestation activity completed with communities in Nagado, Nausori Highland and Yako Villages. 15) Providing Seedling of Grow Plus program to the community - Providing 10 villages downstream with seedling under the grow Plus program; and Provide each village with 300 hundred seedling under Grow Plus program so they do not only dependant on the river for their livelihood: Seeds has been bought and is in the phase 2 of being planted and community has been informed about the activity from the Grow plus program and is well accepted by the elders in the village. 18) Mangrove Planting - Planting of Mangroves near Yako village: Consultation with stakeholders carried out with Yako village and Ministry of Forestry. 19) Coral propagation near Nadi or Lautoka: Local authority engagement is currently being carried out by the BAT Fiji LEX department (This presents an opportunity to raise awareness about the importance of coral reefs and promote sustainable practices, while also potentially mitigating the impacts of pollution on the local marine ecosystem. Thorough research and assessments will be conducted to ensure that the project is carried out in a responsible and sustainable manner).	
3.9.5	<i>Actions towards achieving best practice related to targets in terms of WASH shall be implemented.</i>	 Yes

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Comment

Evidence:

2.3.2 Water Stewardship Plan_Version 1.xlsx

Findings:

2.3.2 Water Stewardship Plan_Version 1.xlsx reflects actions implemented (site actions 7, 8; catchment actions 3v). However, Actions 7 and 8 are not actually best practices but rather standard practices (as already raised as a finding under 2.3.2 above).

The best practice actions identified relate to the following, with the progress to date specified:
7) Annually review the number of WASH at work place and match it with the Local Building Act to ensure we comply with it: Site ensures compliance with local building code and all relevant WASH facilities as required. Rosters for restroom cleaning implemented for all areas - 100% Complete, but ongoing maintenance implemented.

8) Ensure all WASH facilities have weekly, monthly maintenance checklist to ensure it is well maintained: Checklist for all WASH facilities available and maintained on a daily basis - 100% Complete, but ongoing maintenance implemented.

3v) Share knowledge in the best practices towards WASH: Knowledge sharing during stakeholder consultation in the catchment - 80% Complete.

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4 STEP 4: EVALUATE - Evaluate the site's performance.	
4.1	<i>Evaluate the site's performance in light of its actions and targets from its water stewardship plan and demonstrate its contribution to achieving water stewardship outcomes.</i>
4.1.1	<i>Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.</i>
Comment	Evidence: 2.3.2 Water Stewardship Plan_Version 1.xlsx 4.1Water Stewardship Plan Evaluation.xlsx 4.1Evaluation of Consultation Efforts with Stakeholder.docx 4.2.1 Water Related Emergency Incidents.docx 4.1WSP EVALUATION REPORT.docx 4.1Water Stewardship Management Review Meeting.doc Findings: 4.1Water Stewardship Plan Evaluation.xlsx (in column M for site only; none for the catchment) reflects actions implemented and comments on performance against targets. However, this is not sufficiently detailed and requires evaluation against all the targets set (for site and catchment) in the WSP (as per the latest version, namely 2.3.2 Water Stewardship Plan_Version 1.xlsx). The site should update the implementation and evaluation information once the site has completed a full year of implementation since the WSP was finalised and implementation commenced. The contribution of each to achieving water stewardship outcomes should be evaluated at the end of the full year of implementation. A Major nor a Minor finding was not raised, as the site has not yet completed a full year of implementation, at which point such evaluation would be required).
4.1.2	<i>Value creation resulting from the water stewardship plan shall be evaluated.</i>
Comment	Evidence: 2.3.2 Water Stewardship Plan_Version 1.xlsx Findings: 2.3.2 Water Stewardship Plan_Version 1.xlsx (in column Q of both the site and catchment worksheets) currently includes descriptive information on value creation from some actions in the WSP, resulting from implementation of the water stewardship plan, but this has not been evaluated. A comprehensive evaluation needs to be conducted at the end of a full year of implementation.
4.1.3	<i>The shared value benefits in the catchment shall be identified and where applicable, quantified.</i>
Comment	Evidence: 2.3.2 Water Stewardship Plan_Version 1.xlsx Findings: 2.3.2 Water Stewardship Plan_Version 1.xlsx (in column R of both the site and catchment worksheets) currently describes shared value benefits from some actions in the WSP, but this has not been quantified. Shared value benefits from all actions in the WSP need to be identified, and quantified where possible.
Finding No: TNR-005292	
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>

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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	Evidence: 4.2.1 Water Related Emergency Incidents.docx Findings: As per 4.2.1 Water Related Emergency Incidents.docx, the site advised that "To date there has not been a water-related emergency. BAT (British American Tobacco) Fiji has proactively taken some measures to provide WASH (Water, Sanitation and Hygiene) for Staff and continuity of the business. Some of the key ones include but not limited to ...".	
4.3	<i>Evaluate stakeholders' consultation feedback regarding the site's water stewardship performance, including the effectiveness of the site's engagement process.</i>	
4.3.1	<i>Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.</i>	 Obs.
Comment	Evidence: 4.3Alliance for Water Stewardship - stakeholder discussions 3 (1).msg 4.3Alliance for Water Stewardship - stakeholder discussions 2.msg 4.3Alliance for Water Stewardship - Stakeholder discussions 1.msg 4.3 RE AWS certification - Nadi information request.msg 4.3 PROJECTs.pptx 4.3Stakeholder Engagement- Evidence.pptx 4.3RE WASH Discussions Introduction to Manager Programs5.msg 4.3RE Financial Literacy Awareness - Nadi6.msg 4.3RE Alliance for Water Stewardship - request for discussions4.msg 4.3Alliance for Water Stewardship - stakeholder discussions 3.msg Comments: As per the evidence listed above, the site has provided feedback to its stakeholders on what they have achieved to date. However, after a full year of implementation the site's water stewardship performance in relation to its WSP should be communicated to its stakeholders.	
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>	 Obs.
Comment	Evidence: 4.4.1 Evaluation and Update of WSP.docx 2.3.2 Water Stewardship Plan_Version 1.xlsx Comments: The site has not reached a full year of implementation and should modify and adapt the WSP once a full year has passed, to incorporate any relevant information and lessons learned from the evaluations, and these changes identified.	

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5STEP 5: COMMUNICATE & DISCLOSE - Communicate about water stewardship and disclose the site's stewardship efforts	
5.1	Disclose water-related internal governance of the site's management, including the positions of those accountable for legal compliance with water-related local laws and regulations.
5.1.1	The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.
Comment	Evidence: 5.1 AWS POLICY.pptx 5.1YAMMER POSTS (1).docx 5.1 WATER CHALLENGES.docx 5.1 SUSTAINABILITY REPORT.pdf 5.1.1 Governance Structure.docx Site photos in this report of the public noticeboard outside the site Findings: 5.1_AWS_POLICY.pptx and 5.1.1 Governance Structure.docx reflects the site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations. This is displayed on the site's public noticeboard outside the site (see site photos in this report).
5.2	Communicate the water stewardship plan with relevant stakeholders.
5.2.1	The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.
Comment	Evidence: 5.2 RE Financial Literacy Awareness - Nadi6.msg 5.2 RE WASH Discussions Introduction to Manager Programs5.msg 5.2Stakeholder Engagement Minutes and Actions_vendors.docx 5.2 Alliance for Water Stewardship - Stakeholder discussions 1.msg 5.2 Alliance for Water Stewardship - stakeholder discussions 2.msg 5.2 Alliance for Water Stewardship - stakeholder discussions 3 (1).msg 5.2 Alliance for Water Stewardship - stakeholder discussions 3.msg 5.2 RE Alliance for Water Stewardship - request for discussions4.msg 5.2 RE AWS certification - Nadi information request.msg AWS Presentation to Stakeholders_Final.pptx Final Stakeholder Engagement Minutes (5.2.1).doc Comments: The site shared an AWS overview 2-pager with its stakeholders (as per the evidence above) and a summary of key WSP actions with a subset of its stakeholders (see Final Stakeholder Engagement Minutes (5.2.1).docx and AWS Presentation to Stakeholders_Final.pptx), but how the water stewardship plan contributes to AWS Standard outcomes has not been shared with stakeholders to date.
Finding No: TNR-005276	
5.3	Disclose annual site water stewardship summary, including: the relevant information about the site's annual water stewardship performance and results against the site's targets.
5.3.1	A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.

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Comment	Evidence: 5.3,4,5 RE Alliance for Water Stewardship - request for discussions4.msg 5.3,4,5 Alliance for Water Stewardship - stakeholder discussions 3.msg 5.3,4,5 Alliance for Water Stewardship - stakeholder discussions 2.msg 5.3,4,5Stakeholder Engagement Minutes and Actions_vendors.docx 5.3,4,5RE WASH Discussions Introduction to Manager Programs5.msg 5.3,4,5Alliance for Water Stewardship - stakeholder discussions 3 (1).msg 5.3,4,5 RE Financial Literacy Awareness - Nadi6.msg 5.3,4,5 RE AWS certification - Nadi information request.msg Findings: The WSP was only completed in late 2022. Consequently, the Plan has not been implemented yet for a full year and it is too early to develop and share a summary of annual actions. The site must develop and disclose a summary of the site's water stewardship performance, including quantified performance against targets, once a full year of implementation has been completed.	
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	Evidence: 5.3,4,5 RE Alliance for Water Stewardship - request for discussions4.msg 5.3,4,5 Alliance for Water Stewardship - stakeholder discussions 3.msg 5.3,4,5 Alliance for Water Stewardship - stakeholder discussions 2.msg 5.3,4,5Stakeholder Engagement Minutes and Actions_vendors.docx 5.3,4,5RE WASH Discussions Introduction to Manager Programs5.msg 5.3,4,5Alliance for Water Stewardship - Stakeholder discussions 1.msg 5.3,4,5 RE Financial Literacy Awareness - Nadi6.msg 5.3,4,5 RE AWS certification - Nadi information request.msg AWS Presentation to Stakeholders_Final.pptx Final Stakeholder Engagement Minutes (5.2.1).doc Comments: Flooding and soil erosion and response actions (e.g., Afforestation Project & Mangrove Planting Projects), as well as other shared water challenges (as reflected in 5.1_WATER_CHALLENGES.docx), were discussed with the site's neighbours and lower catchment stakeholders (see Final Stakeholder Engagement Minutes (5.2.1).docx and AWS Presentation to Stakeholders_Final.pptx).	
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	Evidence: AWS Presentation to Stakeholders_Final.pptx Final Stakeholder Engagement Minutes (5.2.1).doc Comments: Flooding and soil erosion and response actions (e.g., Afforestation Project & Mangrove Planting Projects), as well as other shared water challenges (as reflected in 5.1_WATER_CHALLENGES.docx) was discussed with the site's neighbours and lower catchment stakeholders (see Final Stakeholder Engagement Minutes (5.2.1).docx and AWS Presentation to Stakeholders_Final.pptx). This includes discussions with the Department of Forestry, Meteorological Office etc. to facilitate coordinate and support.	

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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

Evidence:

Re WDP - BAT Nadi.msg (shown on screen during the audit)
5.3,4,5 RE Alliance for Water Stewardship - request for discussions4.msg
5.3,4,5 Alliance for Water Stewardship - stakeholder discussions 3.msg
5.3,4,5 Alliance for Water Stewardship - stakeholder discussions 2.msg
5.3,4,5Stakeholder Engagement Minutes and Actions_vendors.docx
5.3,4,5RE WASH Discussions Introduction to Manager Programs5.msg
5.3,4,5Alliance for Water Stewardship - stakeholder discussions 3 (1).msg
5.3,4,5Alliance for Water Stewardship - Stakeholder discussions 1.msg
5.3,4,5 RE Financial Literacy Awareness - Nadi6.msg

Comments:

The only compliance obligations relate to waste management and the site has not had any non-compliance violations.

The Government of Fiji does not currently have any specific regulations regarding pollution events and related violations, but the site has not had any incidents related to water pollution.

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



Yes

Comment

Evidence:

Re WDP - BAT Nadi.msg (shown on screen during the audit)

Comments:

The only compliance obligations relate to waste management and the site has not had any non-compliance violations to date.

5.5.3 *Any site water-related violation that may pose significant risk and threat to human or ecosystem health shall be immediately communicated to relevant public agencies and disclosed.*



Yes

Comment

Evidence:

Re WDP - BAT Nadi.msg (shown on screen during the audit)

Comments:

The only compliance obligations relate to waste management and the site has not had any non-compliance violations to date. The waste permit requires notification to the Ministry within 24 hours.

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Photographic Evidence from Audit

✓
Yes



Eye wash station outside chemical store.jpg

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Toilet at marketing department bathroom.jpg

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New meter for input water.jpg



Spill kit at new boiler.jpg

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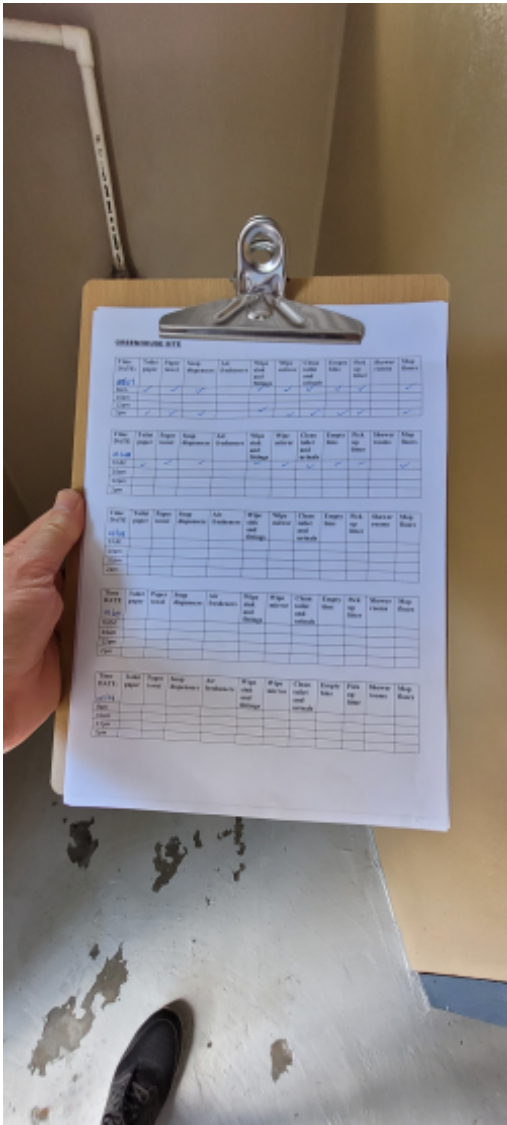


BAT AWS Strategy on BAT public notice board outside the site.jpg

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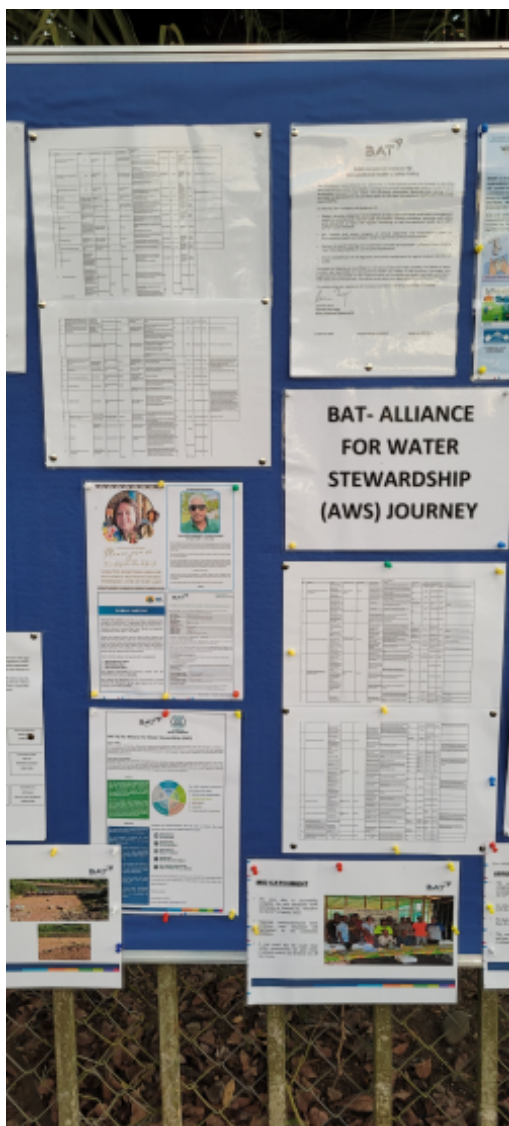


Maintenance checklist for bathroom near Water Storage Tanks.jpg

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BAT WSP on BAT public notice board outside the site..jpg

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Stormwater drain 2.jpg

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WAF meter for input water to the site.jpg

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Use oil storage container prior to disposal in Mechanical maintenance area.jpg



Diesel storage tank with bunding.jpg

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Fire extinguisher (non-water based).jpg



Site tractor with drip tray beneath it in Mechanical maintenance area.jpg

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Urinal and handwash basin in bathroom near Mechanical maintenance area.jpg



Water Storage Tanks.jpg

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Toilet in bathrooms next to GLT Platn.jpg

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Toilet in bathroom near greenleaf tobacco curing barn.jpg



Fuel Storage Tank and Water Storage Tank outside GLT plant.jpg

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Stormwater drain outside the site on western side.jpg

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Handwash basin in bathroom near mechanical maintenance area.j.jpg



On-site water filtration system.jpg

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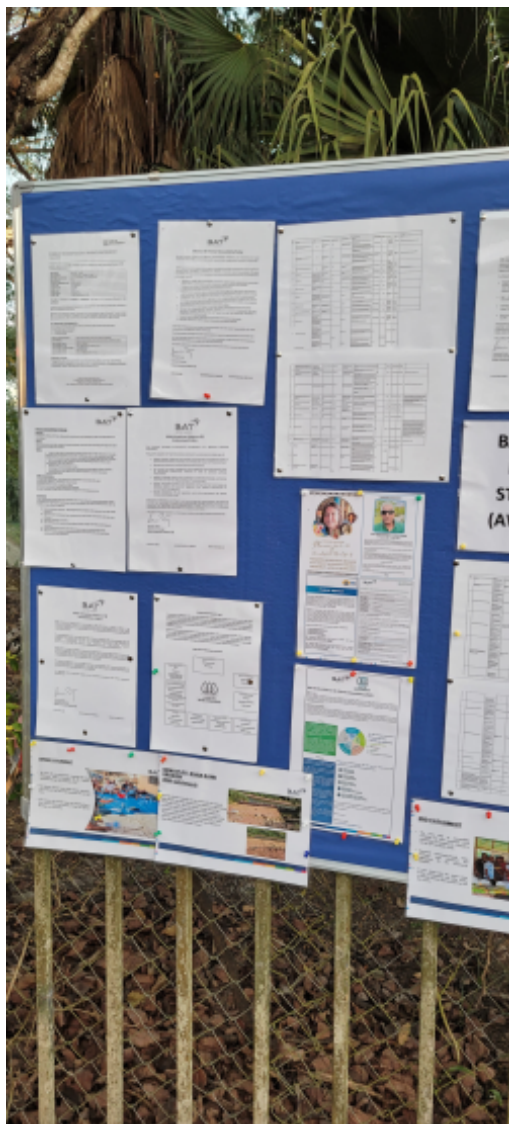


Handwash basin outside marketing offices requiring minor maintenance.jpg

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Site water stewardship governance structure disclosure on BAT public notice board outside the site.jpg

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Stormwater system near site entrance and exit point.jpg



Pond (very likely artificial) within the on-site stormwater system.jpg

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Nursery greenhouse irrigation system.jpg



Chemicals in chemical store.jpg

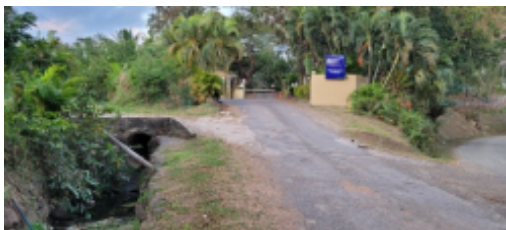
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Forklift on site.jpg

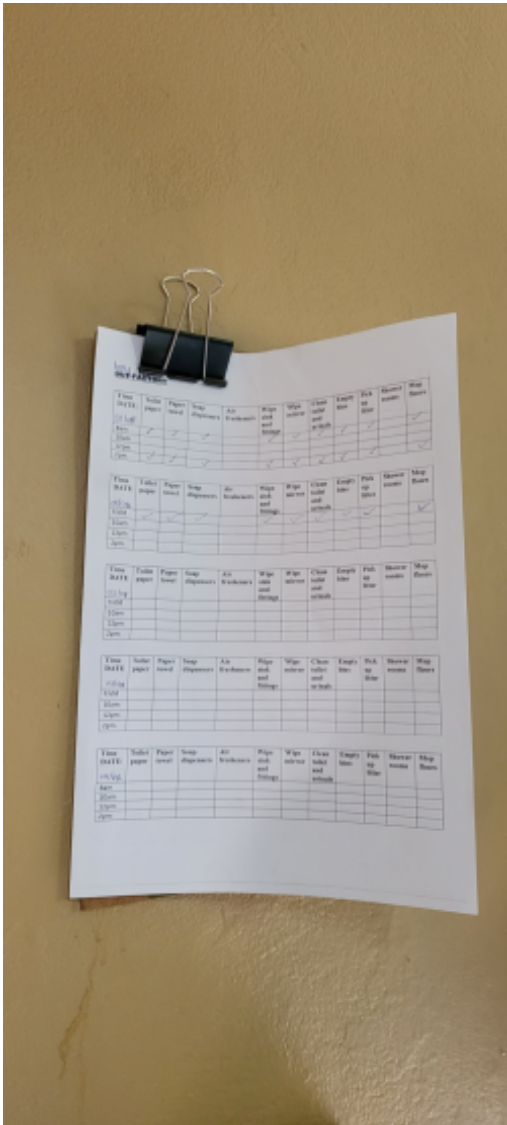


Stormwater drain outside the site on southern side.jpg

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Maintenance checklist for bathroom near Mechanical maintenance area.jpg

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Handwash basin in bathroom near greenleaf tobacco drier.jpg

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Semi-natural drainage line on site.jpg



Stormwater drains leaving the site on eastern side.jpg

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Mangroves along coast beyond Nadi Town.jpg



Mechanical maintenance area.jpg



Potting mix for nursery seedlings.jpg

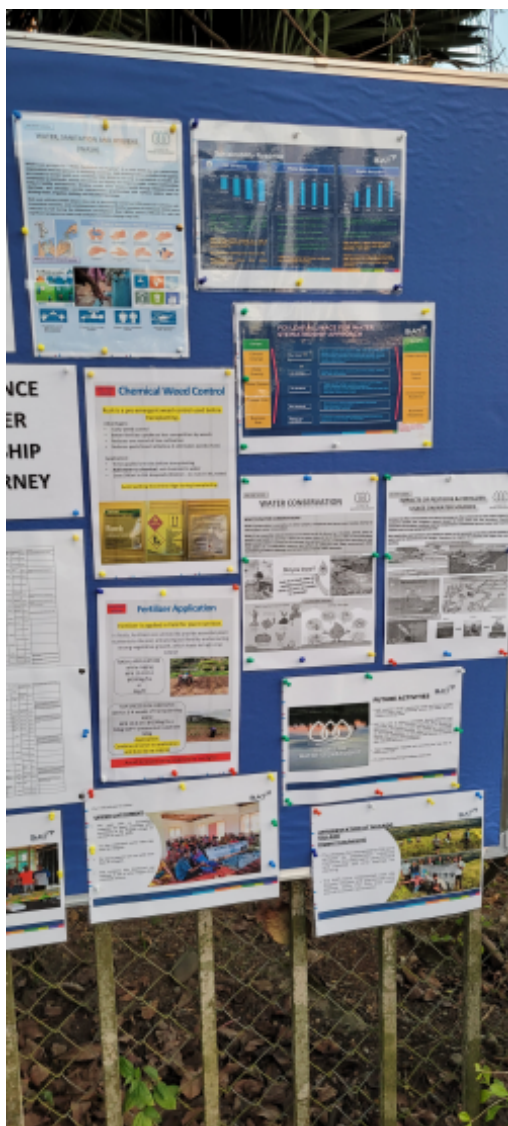


Use oil storage prior to disposal in mechanical maintenance area.jpg

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Site AWS information on BAT public notice board outside the site..jpg

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Boiler pipework.jpg



Nursery greenhouse.jpg

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Crates used on site.jpg



On-site borehole pump.jpg

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Stormwater drain.jpg



BAT public notice board outside the site.jpg

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Stormwater drain at new boiler.jpg



Kitchen at marketing department offices.jpg

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Kitchen near greenleaf tobacco curing barn.jpg



Chemicals on spill tray in chemical store.jpg

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Effluent Pit drain.jpg

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Oil store.jpg



Stormwater system leaving site on western site boundary.jpg

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Curing barn for greenleaf tobacco received on site 2.jpg

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Toilet near Water Storage Tanks.jpg



Mechanical maintenance area.jpg

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Drain in GLT Plant.jpg

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Fire suppression pump house.jpg

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Spill kits in Mechanical maintenance area.jpg

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Stormwater system.jpg

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Stormwater system adjacent to new boiler.jpg

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Toilet near Mechanical maintenance area.jpg

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Urinal near Water Storage Tanks.jpg

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Stormwater drain leaving site on eastern side.jpg



Nadi River next to a field as seen from the site.jpg

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Meter at new boiler.jpg

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Handwash basins at marketing department bathroom.jpg

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Metering for Water Storage Tanks.jpg



New boiler.jpg

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Bunded chemicals at GLT Plant.jpg

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Shower near mechanical maintenance area.jpg



Handwash basins in bathrooms next to GLT Plant.jpg

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Fire hydrant point on site.jpg

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Shower in bathrooms next to GLT Plant.jpg

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Bathroom near Water Storage Tanks.jpg

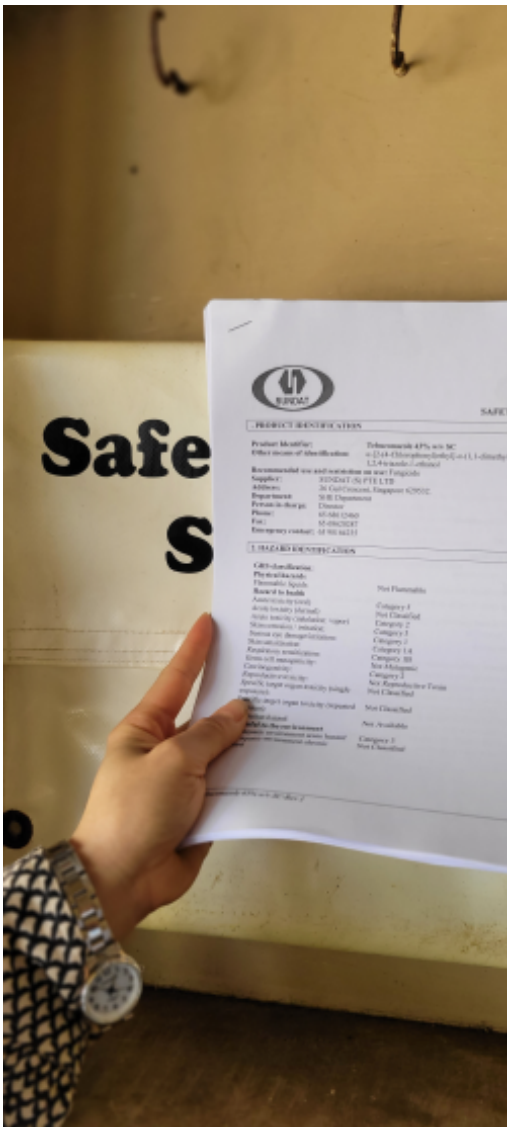


Drinking water dispenser near greenleaf tobacco curing barn.jpg

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Sample of Material Safety Data Sheets (MSDS) at chemical store.jpg

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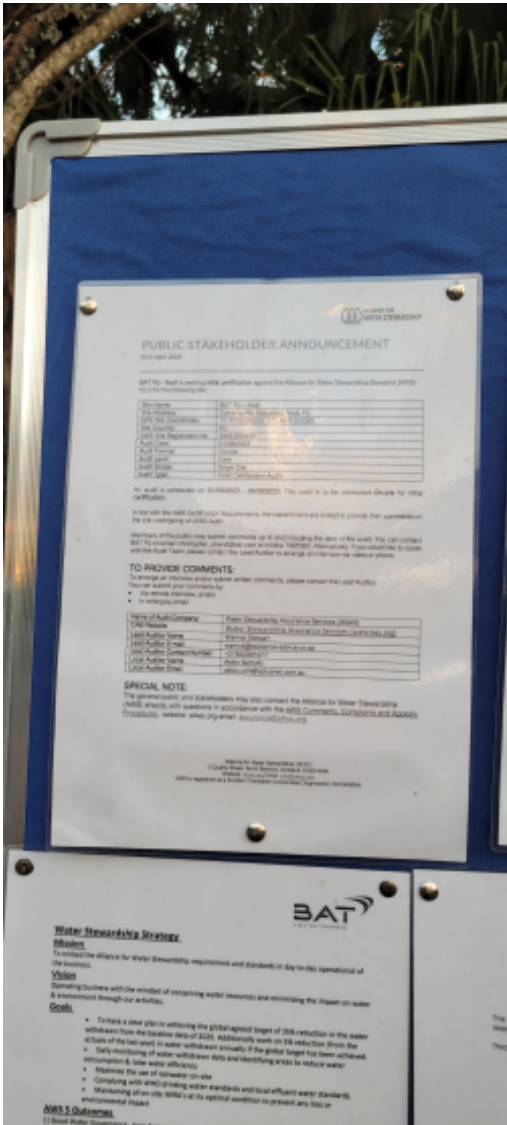
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Drier for curing barn for greenleaf tobacco received on site.jpg

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AWS Initial Certification Audit public announcement on BAT public notice board outside the site.jpg



Vaturu Catchment looking upstream towards Vaturu Dam.jpg

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Handwash basin outside GLT Plant.jpg



Nadi River downstream of the site just outside Nadi Town.jpg



Newly installed water filters.jpg

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BAT AWS Policy Commitment on BAT public notice board outside the site.jpg