

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)



Audit Number: AO-001160

SITE DETAILS

Site: **Ceylon Tobacco Company PLC - Colombo Plant**
Address: Srimath Ramanathan Mawatha, 01500, Colombo 15, SRI LANKA
Contact Person: Dimuthu Tharanga
AWS Reference Number: AWS-000524
Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Core
Date of certification decision: 2024-Sep-18
Validity of certificate: 2027-Sep-17

AUDIT DETAILS

Audited Service(s): AWS Standard v2.0 (2019)
Audit Type(s): Initial Audit
Audit Start Date: 2024-Jun-24
Lead Auditor: Amit Singh

Site Participants:

Jithmi Bandara, Other
Yeshitha Jayasinghe, Other
Mathisha De Silva, Other
Sadhini Navaratne, Other
Lakshitha Rajendran, Other
Shakeel Latiff, Other
Richard Taylor, Other
Zahrah Cader, Other
Supun Chamara, Other

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ADDITIONAL INFO

Summary of Audit Findings: A total of 33 findings were raised during the certification audit, 0 major non-conformities, 15 minor non-conformities, 18 observations.

The Client is requested to perform a root cause analysis and define corrective actions for each of the non-conformities and to submit these to WSAS within 30 days of receipt of the audit report by 02 October 2024.

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

The audit team recommends certification of Ceylon Tobacco Company at Core level pending approval of the corrective actions plans for the non-conformities.

CLOSURE OF FINDINGS AND CORRECTIVE ACTION PLAN:

The Client has successfully submitted the corrective action plans addressing all findings. Proof of implementation has been requested for the Minors and this will be evaluated during the Surveillance Audit. The client is requested to upload evidence of implementation prior to the Surveillance Audit.

Scope of Assessment: The scope of services covers the Initial certification audit for assessing conformity of Ceylon Tobacco Company PLC - Colombo Plant against the AWS International Water Stewardship Standard Version 2.

Site is located in in Kotahena, next to the Colombo Port, about 12 km away from Sri Jayawardenepura Kotte, the capital city of Sri Lanka. The site address is No. 178 Srimath Ramanathan Mawatha, Colombo 15. The site is spread across 7.118 acres of land. The manufacturing process of site includes the following:

- The Primary Manufacturing Department (PMD) - where the threshed tobacco from GLTP is received, conditioned, cut, dried and filled.
• The Secondary Manufacturing Department (SMD) - where the cigarette making and packing is done.

The water at site is obtained from the Kelani river through the Ambatale Treatment Plant of National Water Supply & Drainage Board. The Ambatale intake point is located about 9.8 km away from the site.

The audit was conducted onsite from 24th to 26th June 2024.

The onsite site visit included the assessment of water intake points from NWSDB, effluent treatment plant along with RO plant (installed at discharge of ETP), boiler, steam used in process, rain water collection tanks, water storage tanks, water used in utilities, etc. that were visited onsite as part of the audit.

FINDINGS

NUMBER OF FINDINGS PER LEVEL

Table with 2 columns: Finding Level, Number of Findings. Rows: Observation (18), Minor (15).

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FINDING DETAILS

Finding No:	TNR-011005
Checklist Item No:	1.2.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Jun-24
Checklist item:	<p>Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall:</p> <ul style="list-style-type: none">- Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people;- Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies;- Provide evidence of stakeholder consultation on water-related interests and challenges;- Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups;- Identify the degree of stakeholder engagement based on their level of interest and influence.
Findings:	<p>There is no documentary evidence of stakeholder consultation on water-related interests and challenges.</p>
Corrective action:	<p>Prior to any meetings ensure that an agenda is sent out to the relevant stakeholders highlighting all purposes of the meeting.</p> <p>After any physical or verbal meetings, share a detailed meeting minutes report.</p> <p>When engaging with multiple stakeholders at once (communities) to consult and identify challenges, share a physical or online questionnaire.</p>
Finding No:	TNR-011028
Checklist Item No:	1.2.2
Status:	Open
Finding level:	Observation
Checklist item:	<p>Current and potential degree of influence between site and stakeholder shall be identified, within the catchment and considering the site's ultimate water source and ultimate receiving water body for wastewater.</p>
Findings:	<p>The site needs to review the degree of stakeholder engagement based on their level of interest and influence. E.g.: level of interest of NWSDB (water supplier) & Grama Niladari officers are identified as low whereas based on discussion it was observed that the interest of these stakeholders is high.</p>

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Finding No: TNR-011029
Checklist Item No: 1.3.2
Status: Open
Finding level: Observation
Checklist item: Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped
Findings: Site should consider identifying and mapping the storm water flow.

Finding No: TNR-011031
Checklist Item No: 1.3.3
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2025-Jun-24
Checklist item: Site water balance, inflows, losses, storage, and outflows, including indication of annual variance in water usage rates, shall be quantified. Where there is a water-related challenge that would be a threat to good water balance for people or environment, an indication of annual high and low variances shall be quantified.
Findings: The onsite water rainfall and storm water outflow are not being estimated / quantified. There is no variance of rainfall data.
Corrective action: Include the monthly rainfall data into the site water balance, estimate the water absorption to ground and surface runoff to stormwater.

Finding No: TNR-011823
Checklist Item No: 1.3.4
Status: Open
Finding level: Observation
Checklist item: Water quality of the site's water source(s), provided waters, effluent and receiving water bodies shall be quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be quantified.
Findings: The site has not gathered information related to the water quality of the ultimate receiving water body. It is required to quantify the water quality of the receiving body. The site may explore the possible ways to gather information related to water quality of receiving water body. Pumping raw sewage out to sea, while might be legal, is not good water stewardship, the site should consider making improvements to this current practice.

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Finding No:	TNR-011034
Checklist Item No:	1.3.5
Status:	Open
Finding level:	Observation
Checklist item:	Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.
Findings:	Site to consider mapping the potential sources of pollution.
Finding No:	TNR-011726
Checklist Item No:	1.3.6
Status:	Open
Finding level:	Observation
Checklist item:	On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.
Findings:	The identified Important Water Related Areas are not IWRAs, rather these are Water related infrastructures. There is a need to understand the difference between IWRA and water related infrastructures.
Finding No:	TNR-011036
Checklist Item No:	1.3.7
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Jun-24
Checklist item:	Annual water-related costs, revenues, and a description or quantification of the social, cultural, environmental, or economic water-related value generated by the site shall be identified and used to inform the evaluation of the plan in 4.1.2.
Findings:	There is no identification of Water related revenues / value generated by site other than economical savings. The site is required to quantify the social, cultural, and environmental water-related value
Corrective action:	Obtain feedback from stakeholders with regards to the initiatives conducted. Maintain a document to show the social, cultural, environmental, or economic water-related value of all the initiatives.

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Finding No:	TNR-011099
Checklist Item No:	1.4.1
Status:	Open
Finding level:	Observation
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:	<p>As the supplier is also located in the same catchment and also receives water from NWSDB, the water related risks shall also be common to the supplier.</p> <p>Also, There is no evidence of engagement with the supplier for identifying the water risks.</p>
Finding No:	TNR-011100
Checklist Item No:	1.4.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Jun-24
Checklist item:	The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.
Findings:	<p>There is lack of evidence that all outsourced services have been screened. E.g. transport services have not been identified. The site shall consider identifying other outsourced services, e.g. transport services and then identify the embedded water use of outsourced services</p>
Corrective action:	Expand the number of outsourced services identified to cover all different types of outsourced services.
Finding No:	TNR-010596
Checklist Item No:	1.5.3
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Jun-24
Checklist item:	The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.
Findings:	<p>The values estimated in catchment water balance does not seems to be practical and could not be considered as catchment water balance.</p> <p>The site needs to engage with relevant stakeholders / conduct a study to actually know the existing catchment water balance as there are a no. of projects being implemented to ensure the water demand so as to minimise the deficit considering increase in future requirements.</p>
Corrective action:	Reach out to external subject matter experts or consultants to research and obtain the relevant data to carryout a catchment water balance.

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Finding No:	TNR-010597
Checklist Item No:	1.5.5
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Jun-24
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:	Site has identified the categories of Important Water-Related Areas and stated the status of the identified IWRA categories but has not identified the specific IWRA's and their status
Corrective action:	Mention all the IWRA's individually and mention their status.
Finding No:	TNR-011101
Checklist Item No:	1.5.7
Status:	Open
Finding level:	Observation
Checklist item:	The adequacy of available WASH services within the catchment shall be identified.
Findings:	Site should consider identifying the current data to assess the current adequacy of WASH services within the catchment.
Finding No:	TNR-011102
Checklist Item No:	1.6.1
Status:	Open
Finding level:	Observation
Checklist item:	Shared water challenges shall be identified and prioritized from the information gathered.
Findings:	There is no evidence of site's engagement with stakeholder to identify the shared water challenge.
Finding No:	TNR-011103
Checklist Item No:	1.6.2
Status:	Open
Finding level:	Observation
Checklist item:	Initiatives to address shared water challenges shall be identified.
Findings:	Site should engage with the stakeholder to plan the relevant actions to address the identified shared water chall

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Finding No: TNR-011104
Checklist Item No: 1.7.1
Status: Open
Finding level: Observation
Checklist item: Water risks faced by the site shall be identified, and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.
Findings: Site has mentioned about the project completion deadlines to mitigate the identified risks. The requirement of the indicator is to identify the timeframe for the identified water risks.

Finding No: TNR-011105
Checklist Item No: 1.7.2
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2025-Jun-24
Checklist item: Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.
Findings: In the identification of opportunities, the site has only identified actions to be implemented for mitigation of identified water risks, but has not looked at opportunities as options for improvement that would be not risk-driven. Site needs to review and identify the relevant water related opportunities and include a description of how the site would participate in those opportunities.
Corrective action: Identify and include water related opportunities that can improve and provide social, cultural, environmental and economical values.

Finding No: TNR-011106
Checklist Item No: 1.8.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2025-Jun-24
Checklist item: Relevant catchment best practice for water governance shall be identified.
Findings: Catchment best practices identified for water governance are really not the best practices for water governance. Site needs to identify the relevant catchment Water Governance.
Corrective action: Research and reach out to stakeholder and identify catchment related water governance best practices.

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Finding No:	TNR-011107
Checklist Item No:	1.8.2
Status:	Open
Finding level:	Observation
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:	Site should also consider identifying best practices related to catchment. Most of the identified best practices are the ones which the site has already implemented.
Finding No:	TNR-011740
Checklist Item No:	1.8.4
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Jun-24
Checklist item:	Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.
Findings:	The site has not identified or implemented best practices for maintenance of Important Water-Related Areas as it considered this requirement to be applicable only for on-site IWRAs. However, if there are no on-site IWRAs, best practices for maintenance of catchment Important Water-Related Areas should be identified.
Corrective action:	Visit IWRAs at catchment area individually and identify best practices after consultation and engagement and see how the site can support them.

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Finding No:	TNR-011111
Checklist Item No:	2.3.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Jun-24
Checklist item:	A water stewardship plan shall be identified, including for each target: <ul style="list-style-type: none">- How it will be measured and monitored- Actions to achieve and maintain (or exceed) it- Planned timeframes to achieve it- Financial budgets allocated for actions- Positions of persons responsible for actions and achieving targets- Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.
Findings:	For Water Quality and IWRAs, most of the actions mentioned are regular practice, there are no specific targets defined. Site should consider identifying the targets by linking them with the identified best practices. There are no indirect water use targets identified and set by the site.
Corrective action:	Set clear yearly and monthly water related targets for primary indirect water user and maintain evidence of the communication. Set qualitative and wherever possible quantitative targets to improve the IWRAs and water quality aligned to the initiative and best practices planned.
Finding No:	TNR-011113
Checklist Item No:	3.1.1
Status:	Open
Finding level:	Observation
Checklist item:	Evidence that the site has supported good catchment governance shall be identified.
Findings:	All the identified initiatives cannot be linked as initiatives supporting good catchment governance as some of those are mandatory compliance conditions which the site has to anyhow maintain.
Finding No:	TNR-011115
Checklist Item No:	3.1.2
Status:	Open
Finding level:	Observation
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:	Site should make an effort to understand if there are any other water rights not captured by legal and regulatory requirements.

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Finding No: TNR-011116
Checklist Item No: 3.5.1
Status: Open
Finding level: Observation
Checklist item: Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.
Findings: Site should identify the relevant IWRA's in the catchment and develop a plan to maintain / enhance the Important Water-Related Areas.

Finding No: TNR-010603
Checklist Item No: 3.7.1
Status: Open
Finding level: Observation
Checklist item: Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.
Findings: There are no indirect use targets set in the water stewardship plan. Site has gathered information about the indirect use through suppliers / service providers.
Site should consider setting up feasible indirect water use targets.

Finding No: TNR-011117
Checklist Item No: 3.7.2
Status: Open
Finding level: Observation
Checklist item: Evidence of engagement with suppliers and service providers, as well as, when applicable, actions they have taken in the catchment as a result of the site's engagement related to indirect water use, shall be identified.
Findings: Site should consider engagement with suppliers and service providers and further plan for indirect water use reduction targets.

Finding No: TNR-010604
Checklist Item No: 3.8.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2025-Jun-24
Checklist item: Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.
Findings: There are no relevant document / evidence of engagement with owners of shared water related infrastructure.
Corrective action: Maintain evidences for communication in the form of letters and emails (whenever possible). For all physical meetings and telecommunications share meeting minutes in the form of letters or emails.

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Finding No:	TNR-011121
Checklist Item No:	3.9.1
Status:	Open
Finding level:	Observation
Checklist item:	Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.
Findings:	Site should present evidence of more actions taken towards achieving best practice, related to water governance.
Finding No:	TNR-011122
Checklist Item No:	3.9.4
Status:	Open
Finding level:	Observation
Checklist item:	Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.
Findings:	Site needs to identify and implement best practices for maintenance / improvement of Important Water-Related Areas, wherever applicable.
Finding No:	TNR-011123
Checklist Item No:	4.1.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Jun-24
Checklist item:	Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.
Findings:	Initial water stewardship plan is not available with site. Site should set a frequency of updating the water stewardship plan so that site is able to evaluate the performance against the target set in the water stewardship plan.
Corrective action:	Set the water stewardship plan for each year. Set up a quarterly drumbeat meeting to update the status of the water stewardship plan. Evaluate performance against the targets set in the water stewardship plan.

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Finding No: TNR-010605
Checklist Item No: 4.1.2
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2025-Jun-24
Checklist item: Value creation resulting from the water stewardship plan shall be evaluated.
Findings: Value creation resulting from the water stewardship plan have not been evaluated. Site shall consider identifying the value creation resulting from implementation of water stewardship plan such as improved water efficiency will result in some costs savings, such as on water supply fees or reduced overall costs of water.
Corrective action: Create file showing all the completed actions from the water stewardship plan and show the value created from the actions.

Finding No: TNR-011749
Checklist Item No: 5.1.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2025-Jun-24
Checklist item: The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.
Findings: The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations, is available with site but is not being disclosed beyond the site.
Corrective action: Share the water related internal governance structure on the company website.

Finding No: TNR-011126
Checklist Item No: 5.2.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2025-Jun-24
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 requirement of the indicator is to communicate water stewardship plan with the stakeholders and how it contributes to AWS standard outcomes.
There is no evidence provided for the same.
Corrective action: Share the water stewardship plan along with how it contributes to the AWS outcomes in the company website.

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Report Details

Report	Value
Report prepared by	Amit Singh
Report approved by	Mia Antoni-Naidoo
Report approved on (Date)	29 August 2024

Surveillance

Proposed date for next audit
2025-Jun-23

Comment The proposed date for next audit, i.e. Surveillance audit is before 24.06.2025.

Stakeholder Announcements

Date of publication	Location
19/04/2024	CTC website
23/04/2024	AWS Website
23/04/2024	WSAS Website
Comment	<p>The stakeholder announcements were done at CTC website, AWS website and WSAS website. The links for stakeholder announcement at CTC, AWS and WSAS website are given below:</p> <p>CTC website - https://www.ceylontobaccocompany.com/attachments/medMDD52BJX.pdf</p> <p>AWS website - https://a4ws.org/wp-content/uploads/2024/04/AWS-000524-BAT-SriLanka-Colombo-StakeAnn.pdf</p> <p>WSAS website - https://watersas.org/wp-content/uploads/2024/04/AWS-000524-BAT-SriLanka-Colombo-StakeAnn-.pdf</p>

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Catchment Information



Catchment.png



Catchment 1.png

Catchment Information

The site receives water from the Ambatale water intake point from Kelani river through NWSDB which is located about 9.8 km away from the site. The Kelani river spans for about 145 km and has a catchment area of approximately 2732 square kilometers. This catchment area includes the mountainous terrain where the river originates, and it plays a crucial role in the hydrology of the region. The Kelani River basin encompasses various ecosystems, including forested areas, agricultural lands, and urbanized zones. The Kelani River, spanning 145 kilometers through Sri Lanka, is a vital waterway originating from the central highlands and flowing south-westward to the Indian Ocean. This significant river basin sustains diverse ecosystems crucial for agriculture, hydroelectric power generation, and domestic water supply.

The Kelani River in Sri Lanka flows through the following districts:

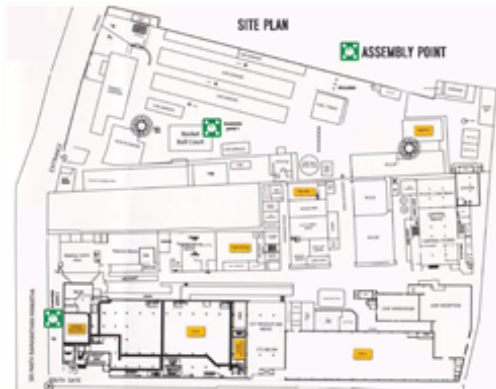
1. Nuwara Eliya District
2. Kandy District
3. Colombo District
4. Gampaha District
5. Kaluthara District

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Client Description and Site Details



Site Plan.png

Client/Site Background

Site is located in Kotahena suburb, next to the Colombo Port, about 12 km away from Sri Jayawardenepura Kotte, the capital city of Sri Lanka. The site address is No. 178 Srimath Ramanathan Mawatha, Colombo 15. The site is spread across 7.118 acres of land. The manufacturing process of site includes the following:

- The Primary Manufacturing Department (PMD) - where the threshed tobacco from GLTP is received, conditioned, cut, dried and filled.
- The Secondary Manufacturing Department (SMD) - where the cigarette making and packing is done.

Summary of Shared Water Challenges

Summary of Shared Water Challenges








Based on the site identified shared water challenges, following can be summarised as shared water challenges:

- Flooding
- Drought and water scarcity (due to increasing water demand for industrial purpose and increase of population / high domestic water consumption)
- Surface water pollution due to industries (Accidental Spills including hazardous material from the industries) & sewage
- Salt water intrusion into the rivers
- Unlawful encroachment of riverbank
- Soil erosion along the Kelani river bank
- Pollutants entering groundwater
- Climatic and weather pattern changes
- High cost of water
- Water supply system breakdowns / Unavailability of established water supply systems
- Poor quality of supply water
- Inadequate access to WASH services in public places
- Garbage dump at beaches
- Degrading water retention capacity of water catchment areas

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0.1	General Requirements for Single Sites, Multi-Sites and Groups	
0.1.1	Eligibility Criteria	
0.1.1.1	The site(s) occupy one catchment OR an exception has been granted.	 Yes
0.1.1.2	The scope of the proposed certification shall be under the control of a single management system.	 Yes
0.1.1.3	The scope of the proposed certification shall be homogeneous with respect to primary production system, water management, product or service range, and the main market structures.	 Yes
0.2	Requirements for Multisite Operations	
0.2.1	Multisite Management Requirements	
0.2.1.1	The Multisite operation shall nominate an "AWS Group Representative".	 N/A
0.2.1.2	The name and location of each site within the proposed scope for certification of the Multisite operation shall be clearly defined.	 N/A
0.2.1.3	Where a new site has been added to the multisite certificate, an onsite audit of the site was conducted prior to it being added to the certificate register.	 N/A
0.2.1.4	All AWS claims made by the client are managed through the "AWS Group Representative".	 N/A

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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.



Comment The site has defined the plant boundaries. The plant is spread over an area of 7.118 acres. The treated water supply to the site is provided from Colombo Municipal Council (CMC) which gets the water from the NWSDB and an approximate water quantity of 7000 L is used for drinking purpose. The site water network starts from the water supply from 3 CMC lines from which water is supplied to the site. CMC 1 and CMC 2 are used for production and general consumption while CMC 3 and CMC 4 is used as a backup in case of emergencies to supply water for the sprinkler and hydrant water storage tanks. The key elements of internal water distribution networks including the main consumption points and storage points have been mapped. The rain water harvesting plant is of 40000 liter capacity and is connected to the canteen and MSW roof. The collected water is then pumped to the RO plant. The RO plant receives waste water from the ETP plant. The treated RO water is to be used for chillers (SMD, NAB and CTS chillers). The reject RO water is then used for flushing and gardening.

The site is located in a strategic location neighboring the Colombo port and fire brigade at Colombo 15 (Kotahena), Sri Lanka. Although the site is located in Colombo, the water is obtained from the Kelani river through NWSDB. The intake point from Kelani river (Ambatale intake) is located about 9.8 km away from the site. The Kelani river spans for about 145 km and has a catchment area of approximately 2732 square kilometers.

Site has considered two separate areas as the physical scope :
Scope 1 - an area of radius 1 km from CTC Colombo site
Scope 2 - the Kelani river catchment area, 1 km towards right side bank and left side bank of Kelani river from Ambatale intake point to upstream till Biyagama.





The storm water accumulated at the site passes through the site drainage system and end up in the public storm water drainage system. Both storm water and waste water collected through the CMC storm water drainage system and the CMC sewage network is separately discharged to the sea at different locations 4km away from the coastal line.

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	<p><i>Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall:</i></p> <ul style="list-style-type: none"> - Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people; - Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies; - Provide evidence of stakeholder consultation on water-related interests and challenges; - Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups; - Identify the degree of stakeholder engagement based on their level of interest and influence. 	 in progress
Comment	<p>The site has identified internal and external stakeholders covering different stakeholder groups. The following external stakeholders have been listed based on their level of interest and influence:</p> <ul style="list-style-type: none"> - National Water Supply and Drainage Board - Central Environmental Authority - Coastal conservation authority - Municipal Councils/ AGA officers - Environmental Police - Grama Niladari officers - Development Officers - Research institutes - Educational Institutes - Large scale Industries and factories - Small scale industries and factories - Religious Organizations - Local societies including Women societies - NGOs - Villagers living near riverbank and villages 	
		Finding No: TNR-011005
1.2.2	<p><i>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.</i></p>	 Obs.
Comment	<p>The stakeholders have been identified and prioritised considering the influence and interest levels of stakeholders.</p>	
1.3	<p><i>Gather water-related data for the site, including: water balance; water quality, Important Water-Related Areas, water governance, WASH; water-related costs, revenues, and shared value creation.</i></p>	
1.3.1	<p><i>Existing water-related incident response plans shall be identified.</i></p>	 Yes
Comment	<p>Site has onsite water related emergency response plans and have presented the following water related incident response plans:</p> <ul style="list-style-type: none"> - Emergency Response Procedure in the case of Contaminated Storm Water entering Drain Lines - Emergency response procedure for chemical spillage - Emergency response procedure for flood at CTC Colombo site - Emergency response procedure for large scale food poisoning 	
1.3.2	<p><i>Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped</i></p>	 Obs.

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Comment	In the site water balance, site has mapped the water inflows to site through NWSDB / CMC, water storage at plant, consumption at different sections of plant, treated wastewater and various losses (such as Boiler loss, Chiller evaporation, PMD evaporation, Food Preparation, Storm water discharge and CMC Sewer line discharge). Site has mentioned that Rainfall is not considered as rainwater is not utilized.	
1.3.3	<i>Site water balance, inflows, losses, storage, and outflows, including indication of annual variance in water usage rates, shall be quantified. Where there is a water-related challenge that would be a threat to good water balance for people or environment, an indication of annual high and low variances shall be quantified.</i>	 in progress
Comment	The site has prepared water balance based on monthwise water inflow from various CMC connections, drinking water, ETP recycled water, water usage at different locations, water outflows. Site has compared water withdrawn for year 2023 and for year 2024 (upto April). Finding No: TNR-011031	
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>	 Obs.
Comment	The site has prepared a Water Quality testing schedule based on which site understands the water quality status from infeed water to discharge water quality. Following is the water quality testing schedule of - Municipal Water is being tested annually - Municipal Water (Biological testing) is done monthly - Storage Water (Legionella) testing of 2 nos. of Overhead tanks & 3 nos. of Cooling towers - ETP treated water and Storm Water is being tested annually	
1.3.5	<i>Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.</i>	 Obs.
Comment	Site has identified the locations of potential sources of pollution.	
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>	 Obs.
Comment	The site has identified the following Important Water Related Areas at site: - Drinking water storage and facilities - Boiler - Effluent treatment plant - Garden - Canteen - Kitchen - Washroom facilities - Water storage tanks - Water circulation pipes - Fire hydrant pipes - Chiller and cooling towers - RO plant - Rain water harvesting	
1.3.7	<i>Annual water-related costs, revenues, and a description or quantification of the social, cultural, environmental, or economic water-related value generated by the site shall be identified and used to inform the evaluation of the plan in 4.1.2.</i>	 in progress

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Comment Site has quantified water related costs incurred by site consisting of the following:

- Direct water cost
- Hygiene and sanitation
- Maintenance and repair
- Testing and inspection
- Chemical purchase
- Cleaning (tank, oil traps)

Site has also listed the cost savings resulting from water savings.

Finding No: TNR-011036

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


Yes

Comment Site has identified the adequacy of WASH services at site and tabulated the existing WASH facilities. The existing WASH facilities are adequate and more than the required facilities.

1.4 Gather data on the site's indirect water use, including: its primary inputs; the water use embedded in the production of those primary inputs the status of the waters at the origin of the inputs (where they can be identified); and water used in out-sourced water-related services.

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


Obs.

Comment Site has identified the embedded water use of primary inputs (both within the catchment and outside the catchment). Out of the identified primary input suppliers, one of the suppliers - Cigarette blanks (Printcare) is within the catchment. Site has mentioned that based on nature of the business, water quality is not a risk to the business and hence not a risk to the site.

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


in progress

Comment Site has identified two of the outsourced services. But, both of the identified service providers are located outside the catchment.

Finding No: TNR-011100

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

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


Yes

Comment Site has identified the respective ministries and significant institutions involved in water resources management in Sri Lanka.

Site has identified the following public related policies :

- National Policy, Strategies and Institutional Framework for Water Resources Development, Conservation and Management (2019)
- National Drinking Water Policy
- SAFE, DISASTER-RESILIENT DRINKING WATER TO FLOOD AND DROUGHT PRONE AREA (USAID)
- Water Supply and Sanitation Improvement Project (WaSSIP)

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


Yes

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Comment	<p>Site has a defined procedure for Identification of Legal Requirements including those related to water.</p> <p>The responsibilities of Legal Counsel and ESS&S Manager have been defined to identify any instances of non-compliance with legislation, regulations, HSE MS policies, procedures and standards and propose mitigatory and rectification steps to be taken.</p> <p>The Legal Counsel and ESS&S Manager ensure that periodic reviews of the database are studied to identify any new applicable requirements.</p> <p>Site has mentioned that Water rights include formal rights embodied in official titles, permits, entitlements, and seasonal irrigation schedules, while fewer formal rights are based on customary patterns and rights implicit in social norms and practices.</p>	
1.5.3	<p><i>The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.</i></p>	<p>in progress</p>
Comment	<p>Site has presented a catchment water balance which is based on the demand study conducted by NWSDB for Ambatale water treatment plant in 2017. The study itself is based on estimation of maximum raw water abstractions based on the following two projects that were proposed during 2016</p> <ol style="list-style-type: none"> 1. Capital city development project at Sri Jayewardenepura Kotte - the project was not carried out 2. Port city project - the project is still in progress <p>The above projects would have had the largest water withdrawn.</p> <p>Based on the above assumption's catchment water balance for Kelani River was estimated for 2020. And Catchment water balance was also projected for 2030 and 2040.</p> <p>Finding No: TNR-010596</p>	
1.5.4	<p><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></p>	<p>Yes</p>
Comment	<p>Site has mentioned about the following studies conducted by different institutes to analyse the surface water and ground water quality of Kelaniya River Basin:</p> <p>Study 1- Evaluation of water quality in the upper and lower catchments of the Kelani River Basin, Sri Lanka</p> <p>Study 2 - ASSESSMENT OF WATER QUALITY INDEX FOR GROUNDWATER IN THE KELANI RIVER BASIN, SRI LANKA</p> <p>Study 3- A Simplified Mathematical Formulation for Water Quality Index (WQI): A Case Study in the Kelani River Basin, Sri Lanka</p> <p>Study 4- Preliminary Perception Survey on Water safety in the Kelani River Basin</p> <p>Study 5 Ambathale - Real Time Water Quality Monitoring Station</p>	
1.5.5	<p><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></p>	<p>in progress</p>
Comment	<p>Site has identified the categories of Important Water-Related Areas and stated the status of the identified IWRA categories but has not identified the specific IWRA's.</p> <p>Finding No: TNR-010597</p>	
1.5.6	<p><i>Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.</i></p>	<p>Yes</p>

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Comment	<p>Site has identified the following water-related infrastructure in the catchment:</p> <ul style="list-style-type: none"> - Ambatale Water Treatment plant - Biyagama water treatment plant - Nawagamuwa (Chico) water treatment plant - Eli house water reservoir - Kotahena sewage water pump house <p>The condition of the water related infrastructures are also tabulated against the identified water related infrastructures.</p>	
1.5.7	<i>The adequacy of available WASH services within the catchment shall be identified.</i>	Q Obs.
Comment	<p>Site has gathered information for WASH referring to a report by UNDP in 2005, the percentage access to improved water sources and improved sanitation in Sri Lanka at the districts falling under the Kelani river catchment area.</p> <p>Site has also shared a 2020 survey data by the department of census and statistics about the availability of pipe borne water in the Colombo district.</p> <p>Site has presented data based on survey done by department of statistics in 2012 about the type of toilet used by the DS divisions under the scope considered in the catchment.</p> <p>Site should consider gathering current information as well.</p>	
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>	Q Obs.
Comment	<p>Site has identified the following shared water challenges:</p> <ul style="list-style-type: none"> - Flooding of areas surrounding Kelani river - Drought and water scarcity - Surface water pollution: Contamination due to lack of infrastructure related to sewage discharge and solid waste management - Industrial pollution: Discharge of poorly treated water and other pollutants to the water body - Salt water intrusion into the rivers - Poor human behavior - Unlawful encroachment of riverbank - Accidental Spills including hazardous material from the industries in the catchment - Pollutants entering groundwater - Increasing in the water demand for industrial purpose - Increase of population density and increasing demand for water due to high consumption of water at households. - High wastage of water due to inefficient plumbing systems and old infrastructure - Climatic and weather pattern changes - High cost of water - Water supply system breakdowns - Poor quality of supply water - Consumer misconceptions and lack of trust on quality of water supply - Unavailability of established water supply systems - Social and cultural establishments leading to substandard living and behaviors - Inadequate access to toilets and washing facilities - Degrading water retention capacity of water catchment areas - Lack of data and studies conducted on catchment water inflows, peak-off-peak availability and water balance - Lack of presence of WASH services in public places - Soil erosion along the Kelani river bank - Garbage dumped at beaches <p>Site has also mentioned the stakeholder involved, stakeholder impacted and which stakeholder highlighted the challenge.</p>	

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1.6.2	Initiatives to address shared water challenges shall be identified.	 Obs.
Comment	Site has listed the possible solutions to address the shared water challenges.	
1.7	Understand the site's water risks and opportunities: Assess and prioritize the water risks and opportunities affecting the site based upon the status of the site, existing risk management plans and/or the issues and future risk trends identified in 1.6.	
1.7.1	Water risks faced by the site shall be identified, and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.	 Obs.
Comment	Site has identified and listed a no. of Water risk events with severity & likelihood of events and possible business impact.	
1.7.2	Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.	 in progress
Comment	Site has listed the water related opportunities against the identified water risks. However, the mentioned opportunities are the actions to be implemented for mitigation of identified water risks.	
Finding No: TNR-011105		
1.8	Understand best practice towards achieving AWS outcomes: Determining sectoral best practices having a local/catchment, regional, or national relevance.	
1.8.1	Relevant catchment best practice for water governance shall be identified.	 in progress
Comment	Site has identified the following best practices for water governance: <ul style="list-style-type: none">- Establishment of AWS governance body to drive AWS Strategy for the site- Occupational environment management procedure- Annual Assessment of Water Road Map- Assessment of water related risks and opportunities- Establish ERPs for any water related incidents- Establishing water related KPI's and a glidepaths aligning with the BAT guidelines and targets- Obtaining the relevant licenses/legal clearance to operate the site (EPL)- Public disclosure of water related data and water related activities- Comprehensive water related stewardship plan that is monitored and reviewed	
Finding No: TNR-011106		
1.8.2	Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.	 Obs.
Comment	Site has identified the following Best Practices for site water balance: <ul style="list-style-type: none">- Water waste reduction through leak prevention- Enhance water metering points to identify losses and top losses- Installation of water efficient equipment- Increase water recycling and reuse and reduce water withdrawal from suppliers- Daily monitoring of water consumption patterns and performance against KPIs- Increase awareness and conduct training on water use efficiency- Installation of a BMS System- Installation of Rain water harvesting system	
1.8.3	Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.	 Yes
Comment	Site has identified the best practices for site and catchment water quality.	


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1.8.4

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


in progress


Comment

No best practices identified for maintenance of Important Water-Related Areas.

Finding No: TNR-011740

1.8.5

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


Yes

Comment




Best practices identified for site provision of adequate WASH services.

For catchment, site has mentioned about installation of adequate sanitation facilities for individual household toilets.

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2	STEP 2: COMMIT & PLAN - Commit to be a responsible water steward and develop a Water Stewardship Plan	
2.1	<i>Commit to water stewardship by having the senior-most manager in charge of water at the site, or if necessary, a suitable individual within the organization head office, sign and publicly disclose a commitment to water stewardship, the implementation of the AWS Standard and achieving its five outcomes, and the allocation of required resources.</i>	
2.1.1	<i>A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:</i> <ul style="list-style-type: none"> - That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes - That the site implementation will be aligned to and in support of existing catchment sustainability plans - That the site's stakeholders will be engaged in an open and transparent way - That the site will allocate resources to implement the Standard. 	 Yes
Comment	Site has prepared a Alliance for Water Stewardship (AWS) Policy signed by MD/CEO and Operations Director. The same is displayed within the site's premises and also at company's website. The link to access AWS policy at company's website is : https://www.ceylontobaccocompany.com/attachments/medMDD6JAF6.pdf	
2.2	<i>Develop and document a process to achieve and maintain legal and regulatory compliance.</i>	
2.2.1	<i>The system to maintain compliance obligations for water and wastewater management shall be identified, including:</i> <ul style="list-style-type: none"> - Identification of responsible persons/positions within facility organizational structure - Process for submissions to regulatory agencies. 	 Yes
Comment	Site has a defined process to track legal compliance in which they: <ul style="list-style-type: none"> - Connect with registered agencies to identify and map overall regulatory requirements - Review the compliance against the stipulated requirements - Identify the compliance gaps - Disclose and take actions to close the gaps - Monitor for changes to regulations and newly inducted regulations The responsibility of various executives are also defined in the same document.	
2.3	<i>Create a water stewardship strategy and plan including addressing risks (to and from the site), shared catchment water challenges, and opportunities.</i>	
2.3.1	<i>A water stewardship strategy shall be identified that defines the overarching mission, vision, and goals of the organization towards good water stewardship in line with this AWS Standard.</i>	 Yes

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Comment	<p>Site has presented AWS Masterplan which includes site 's Vision, Mission and Goals linked to AWS outcomes</p> <p>Vision - Water for a Better Tomorrow</p> <p>Mission - Drive a robust water stewardship agenda through scaled up partnerships and collaboration of stakeholders</p> <p>GOAL - Promoting the care for Water through systemic behavioral change by capability building and voluntary actions</p> <p>Goals for Good Water Governance - Drive strong water governance at site and support catchment water governance actions</p> <p>Goals for Sustainable Water Balance - Strengthening and promoting the efficiency in water use at site and beyond</p> <p>Goals for Good Water Quality Status - Assurance of water quality and contribution towards catchment water pollution control programmes</p> <p>Goals for Important Water Related Areas - Catchment areas and infrastructure maintenance and restoration for sustainable water resources</p> <p>Goals for WASH - Achieve safely managed water, sanitation and hygiene for workplace and communities</p>	
2.3.2	<p><i>A water stewardship plan shall be identified, including for each target:</i></p> <ul style="list-style-type: none"> - <i>How it will be measured and monitored</i> - <i>Actions to achieve and maintain (or exceed) it</i> - <i>Planned timeframes to achieve it</i> - <i>Financial budgets allocated for actions</i> - <i>Positions of persons responsible for actions and achieving targets</i> - <i>Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.</i> 	<p>in progress</p>
Comment	<p>The site has prepared water stewardship plan with the following Goals and mentioned about various actions to achieve the goals:</p> <p>GOAL - Promoting the care for Water through systemic behavioral change by capability building and voluntary actions</p> <p>Goals for Good Water Governance - Drive strong water governance at site and support catchment water governance actions</p> <p>Goals for Sustainable Water Balance - Strengthening and promoting the efficiency in water use at site and beyond</p> <p>Goals for Good Water Quality Status - Assurance of water quality and contribution towards catchment water pollution control programmes</p> <p>Goals for Important Water Related Areas - Catchment areas and infrastructure maintenance and restoration for sustainable water resources</p> <p>Goals for WASH - Achieve safely managed water, sanitation and hygiene for workplace and communities</p> <p>Site has also tabulated Measurement & Monitoring Action, persons responsible alongwith the Budget Allocation for 2023 and 2024.</p>	<p>Finding No: TNR-011111</p>
2.4	<p><i>Demonstrate the site's responsiveness and resilience to respond to water risks</i></p>	
2.4.1	<p><i>A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.</i></p>	<p>Yes</p>
Comment	<p>Site has presented a document of shared water challenges in which the possible actions to mitigate the water risks have been identified. Site has also mentioned about the stakeholders involved and the existing / planned activities already in place in the remarks section.</p>	

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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>	Q Obs.
Comment	<p>Site has mentioned about the following good catchment governance initiatives:</p> <ul style="list-style-type: none"> - Establish site water governance team with clear responsibilities - Stakeholder communication and strategy development - Tracking of regulatory compliance requirements and develop systems to adhere to them - Obtain and maintain required licenses and certificates - Develop water stewardship strategy, plan and negotiate with stakeholders for plan implementation <p>Site has also stated about 8 physical stakeholder meetings and 10+ virtual meetings conducted with stakeholders.</p>	
3.1.2	<i>Measures identified to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be implemented.</i>	Q Obs.
Comment	<p>There is no response from site on the indicator.</p> <p>However, the water supply to the population is through government authority, i.e. NWSDB.</p>	
3.2	<i>Implement system to comply with water-related legal and regulatory requirements and respect water rights.</i>	
3.2.1	<i>A process to verify full legal and regulatory compliance shall be implemented.</i>	✓ Yes
Comment	<p>Site has a defined process to track legal compliance in which they:</p> <ul style="list-style-type: none"> - Connect with registered agencies to identify and map overall regulatory requirements - Review the compliance against the stipulated requirements - Identify the compliance gaps - Disclose and take actions to close the gaps - Monitor for changes to regulations and newly inducted regulations <p>The responsibility of various executives are also defined in the same document as stated at indicator 2.2</p>	
3.2.2	<i>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.</i>	✓ Yes
Comment	<p>Site is providing adequate drinking water facilities to employees within site premises to respect the water rights of its employees.</p>	
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>	✓ Yes
Comment	<p>Site has set targets of 30% Water Recycling & 35% Water Reduction Targets for Colombo site by 2025.</p> <p>Water reduction of 29.7% and 40.3% of water recycling has been achieved.</p> <p>One of the initiatives by site is installation of 40,000 litre Rainwater Harvesting tanks to collect, filter and use rainwater – thereby reducing municipal water purchase.</p>	

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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
Comment	Site has presented monthly and annual water intensity for year 2023 and 2024. Site has implemented various water conservation initiatives to reduce the water consumption of plant.	
3.3.3	<i>Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.</i>	 Yes
Comment	There is no legal boundation on site for re-allocation of water to social, cultural or environmental needs. Rather, as per NATA Act - site is not allowed to involve in any social sponsorship / activities.	
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	Site has presented the implementation of various Water Quality Improvement initiatives which include the following projects: Site has conducted ETP operator training done together with BOI and facilitated by Water Lanka Pvt Ltd. which included 27 attendants from 19 factories in Kelani river catchment. Installation of a Reverse Osmosis Plant to further purify and recycle ETP treated water into the Chiller Plants.	
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	Site has prepared and compared the water quality data for October 2023 and March 2024. It is seen that there is improvement in water quality parameters such as TDS. However, both are within the permissible limits.	
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>	 Obs.
Comment	No IWRA's at site. Site has taken initiatives to improve the water related infrastructure at site. There have been some activities such as cleaning of garbage dumped near catchment areas at catchment to improve the condition of IWRA.	
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	The site provides treated water to its workers through the drinking water stations (54 stations including water dispensers and pantry sections) established within the site. Site also provides separate bathroom facilities (provided for male and female staff) for its workers and visitors within its operational facilities. The toilet facilities are provided to all staff working on site and male and female toilets are separately provided. (Urinals – 26, male comodones 45, female comodones 16, male squatting pans – 11, female squatting pans -2)	

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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	Site has been reducing its fresh water consumption. Compared to baseline year 2017, site has been able to achieve water reduction by 24% in 2023.	
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>	 Obs.
Comment	Indirect water use targets for GLTP (major raw material supplier for site, which is also within the same corporate structure but outside the catchment) are taken up by themselves and reported within the group themselves. GLTP being the major supplier, the indirect water use is being set separately by GLTP (as part of the BAT team) similar targets such as 30% recycle water.	
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>	 No
Comment	Site has gathered water related information such as water consumption, production, recycled water, water and wastewater treatment plant through a form. Site has also mentioned about repair & renovation work at Tobacco buying centers and depots.	
Finding No: TNR-011117		
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>	 in progress
Comment	However, the site has discussed with the authorities, i.e. NWSDB about some projects to improve the water quality. There was a issue identified with Sewage Pumping station. Site has mentioned of discussion with NWSDB for repair of the pumping station.	
Finding No: TNR-010604		
3.9	<i>Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.</i>	
3.9.1	<i>Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.</i>	 Obs.
Comment	Site has implemented actions for achieving best practices relate to water governance such as establishment of site water governance team; conducting physical stakeholder meetings and virtual meetings with stakeholders.	
3.9.2	<i>Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.</i>	 Yes
Comment	Site has been continuously engaged in implementing actions for achieving best practice, related to targets in terms of water balance.	

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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	Site has presented data related to actions for achieving best practices in terms of water quality such as: <ul style="list-style-type: none">- Installation of spill kits- Installation of emergency storm water cutoff system- Waste bay revamping- ETP Operator training for factories in catchment area; etc.	
3.9.4	<i>Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.</i>	 Obs.
Comment	Site has mentioned about the following activities being performed by site related to Important Water-Related Areas: <ul style="list-style-type: none">- Cleaning of garbage dumped near catchment areas- Beach cleanups	
3.9.5	<i>Actions towards achieving best practice related to targets in terms of WASH shall be implemented.</i>	 Yes
Comment	Site has implemented following actions to achieve best practice related to targets in terms of WASH: <ul style="list-style-type: none">- Systematic maintenance and cleaning of WASH infrastructure- Construction of washroom facilities and septic tanks for vulnerable communities- Continuous improvement of WASH facilities onsite- Provision of dry rations for vulnerable communities during floods	

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4	STEP 4: EVALUATE - Evaluate the site's performance.	
4.1	<i>Evaluate the site's performance in light of its actions and targets from its water stewardship plan and demonstrate its contribution to achieving water stewardship outcomes.</i>	
4.1.1	<i>Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.</i>	 in progress
Comment	Site Water Stewardship Plan is being updated whenever target is completed. Initial water stewardship plan is not available with site. However, the targets mentioned in the water stewardship plan is either completed or is in progress and some are planned for future. Finding No: TNR-011123	
4.1.2	<i>Value creation resulting from the water stewardship plan shall be evaluated.</i>	 in progress
Comment	Value creation resulting from the water stewardship plan have not been evaluated. Finding No: TNR-010605	
4.1.3	<i>The shared value benefits in the catchment shall be identified and where applicable, quantified.</i>	 Yes
Comment	Benefits from water stewardship plan identified and mentioned in the evidence WSP implementation.	
4.2	<i>Evaluate the impacts of water-related emergency incidents (including extreme events), if any occurred, and determine the effectiveness of corrective and preventative measures.</i>	
4.2.1	<i>A written annual review and (where appropriate) root-cause analysis of the year's emergency incident(s) shall be prepared and the site's response to the incident(s) shall be evaluated and proposed preventative and corrective actions and mitigations against future incidents shall be identified.</i>	 Yes
Comment	There were no emergency incidents observed at site but the site reports the water leaks if any are observed.	
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>	 Yes
Comment	Site has presented communication with stakeholders on the plans & progress and future work. Evidence provided for consultation with other industries in the catchment. Site has mentioned about verbal discussion with NWSDB, CEA, AGA - but there is no evidence available for consultation on performance.	
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>	 Yes

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Comment	Site has provided a document with changes made in water stewardship plan based on lessons learnt by implementation of water stewardship plan.
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5 STEP 5: COMMUNICATE & DISCLOSE - Communicate about water stewardship and disclose the site's stewardship efforts	
5.1	Disclose water-related internal governance of the site's management, including the positions of those accountable for legal compliance with water-related local laws and regulations.
5.1.1	The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed. in progress
Comment	The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations is available with site but not being disclosed. The ESS&S Manager and Legal team are responsible for compliance with water-related laws and regulations. Finding No: TNR-011749
5.2	Communicate the water stewardship plan with relevant stakeholders.
5.2.1	The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders. in progress
Comment	Site has presented communication with stakeholders to engage with the site to address water related issues in the catchment such as to improve the water quality of the catchment and to improve the community living standards in the catchment. Finding No: TNR-011126
5.3	Disclose annual site water stewardship summary, including: the relevant information about the site's annual water stewardship performance and results against the site's targets.
5.3.1	A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum. Yes
Comment	CTC annual report partially covers the water stewardship performance that is being disclosed annually.
5.4	Disclose efforts to collectively address shared water challenges, including: associated efforts to address the challenges; engagement with stakeholders; and co-ordination with public-sector agencies.
5.4.1	The site's shared water-related challenges and efforts made to address these challenges shall be disclosed. in progress
Comment	The site is in the process of implementing actions to address the shared water challenges and have currently not disclosed the efforts made to shared water-related challenges and efforts made to address these challenges. However, site has presented evidence of meeting minutes with NWSDB on projects. Finding No: TNR-011807
5.4.2	Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified. Yes
Comment	Site has been continuously engaging with the government authority NWSDB - since January 2024 is shown, CEA since February 2024, AGA since March 2024, Industries: Haleon, Finalys, Ansell & Future Fibres since February 2024

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5.5	<i>Communicate transparency in water-related compliance: make any site water-related compliance violations available upon request as well as any corrective actions the site has taken to prevent future occurrences.</i>	
5.5.1	<i>Any site water-related compliance violations and associated corrections shall be disclosed.</i>	 Yes
Comment	There were no water related compliance violations observed at site.	
5.5.2	<i>Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.</i>	 Yes
Comment	No corrective actions as there were no water related compliance violations.	
5.5.3	<i>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.</i>	 Yes
Comment	There was no water related compliance violation that may pose significant risk and threat to human or ecosystem health.	

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Photographic Evidence from Audit

✓
Yes



Solvent Store Entrance 2-2024-06-26 at 9.39.18 AM.jpeg



Solvent Store-Aluminium Sulphate Storing with MSDS - 2024-06-26 at 9.39.24 AM (1).jpeg



ETP Side view2024-06-26 at 9.39.26 AM.jpeg

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Solvent Store Entrance 3-2024-06-26 at 9.39.22 AM (1).jpeg

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CMC 2- meter 2024-06-26 at 9.39.27 AM.jpeg

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Contaminated Storm Water Shut Off Point-1 2024-06-26 at 9.39.26 AM (2).jpeg



Solvent Store Maxol Long Life Coolant MSDS 2024-06-26 at 9.39.23 AM.jpeg

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CMC 2- 2024-06-26 at 9.39.27 AM (1).jpeg



Solvent Store-IPL storing with MSDS-2024-06-26 at 9.39.24 AM.jpeg



REcycled Water Tap Line - 2024-06-26 at 9.39.29 AM.jpeg

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RO Plant Control Panel- 2024-06-26 at 9.39.22 AM.jpeg

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CMC-1 Meter 2024-06-26 at 9.39.28 AM.jpeg

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ETP from Top View- 2024-06-26 at 9.39.25 AM.jpeg



ETP 2024-06-26 at 9.39.26 AM (1).jpeg



CMD Sump Tank No 1- 2024-06-26 at 9.39.28 AM (1).jpeg

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Solvent Store Entrance- 2024-06-24 at 1.49.37 PM.jpeg



Contaminated Storm Water Shut Off Point-22024-06-26 at 9.39.27 AM (2).jpeg

WSAS

2 Quality Street North Berwick, EH39 4HW, UNITED KINGDOM

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