

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-001217

SITE DETAILS

Site: **GlaxoSmithKline (Haleon) - Nairobi**
Address: Likoni Road - Industrial Area, 00507, Nairobi, KENYA
Contact Person: James Maingi
AWS Reference Number: AWS-000702
Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Core
Date of certification decision: 2025-Feb-06
Validity of certificate: 2028-Feb-05

AUDIT DETAILS

Audited Service(s): AWS Standard v2.0 (2019)
Audit Type(s): Initial Audit
Audit Start Date: 2024-Jul-30
Lead Auditor: Anasse Ait Lemkademe

Audit team participants:

Ruth Wandera
Anasse AIT LEMKADEME, Lead Auditor

Site Participants:

JAMES MAINGI, SUSTAINABILITY ENGINEER
WILLY NJERU, SITE EHS, SECURITY AND ENGINEERING (acting) LEAD
PAUL ARUNGA, SITE DIRECTOR
AMOS MWANGANGI, MECHANICAL TECHNICIAN LVS
ALEX MWANGI, CHEMICAL LABORATORY MANAGER
JENIFFER MABYE, SITE LOGISTICS LEAD
MOSES KISOVI, EHS DOCUMENTATION CHAMPION
JAMES GICHANGA, VALUE STREAM AND COMPLIANCE LEAD
BRIAN NYABERA, MAINTENANCE AND SITE SERVICES MANAGER
STEVE MBUGUA, MEA BU REGIONAL ENGINEERING LEAD (Acting)
CATHERINE RAUTTA, HR BUSINESS PARTNER
LINET INDIAZI, SITE PROCUREMENT MANAGER
GILBERT IMBUYE, WAREHOUSE MANAGER
TOM ONYANGO, EHS COMPLIANCE CHAMPION
FRED MUIRURI, EHS COORDINATOR
DIANA WATI, PROCESS CAPABILITY TECHNOLOGIST
FELIX MAINGI, VALUE STREAM LEAD
KENNEDY MBABU, TECH BUSINESS PARTNER
COSMAS LANGAT, PROJECTS MANAGER

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ADDITIONAL INFO

Summary of Audit Findings: A total of 41 findings were raised during the certification audit: 9 major non-conformities, 28 minor non-conformities, 4 observations. The major non-conformities were of sufficient concern to warrant the categorization of the non-conformity as major and related to the 5 AWS outcomes.

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 30 November 2024.

The major non-conformities must be closed within 90 days of receipt of the report. In order to meet this timeline evidence is to be submitted to WSAS (within 75 days) by 14 January 2025.

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

The audit team recommends certification of Haleon Nairobi at Core level pending approval of the corrective actions plan for all non-conformities and closure of the major non-conformities.

CLOSURE OF FINDINGS AND CORRECTIVE ACTION PLAN:

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

Scope of Assessment: The scope of services covers the Initial certification audit for assessing conformity of Haleon Nairobi against the AWS International Water Stewardship Standard Version 2.

The Haleon Nairobi site, located in Kenya, is a key facility within the Haleon group, primarily focused on consumer healthcare manufacturing. The site includes a variety of operational areas such as the Nutritional Manufacturing and Packaging unit, Tablet Packaging Dome, Raw Materials Warehouse, Quality Laboratory, Finished Goods Warehouse, and specialized stores for dangerous goods. The facility is located in the industrial area of Nairobi, covering approximately 8 acres, with specific coordinates at -1.310211 / 36.857289 within Nairobi river catchment. It is bordered by Lunga Lunga Road to the north, Likoni Road to the west, and various industries and facilities to the east and southwest.

The audit was conducted onsite on 29/07/2004-31/07/2024. The onsite site visit included the assessment of water supply boreholes, water reservoirs, water treatment plant, water purification plant, Quality laboratory, Nutritional Manufacturing and Packaging unit, site storm water discharge points, and chemicals warehouse as part of the audit.

FINDINGS

Table with 2 columns: Finding Type, Count. Rows: Observation (4), Minor (28), Major (9).

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FINDING DETAILS

Finding No:	TNR-011793
Checklist Item No:	1.1.1
Status:	Open
Finding level:	Observation
Checklist item:	<p>The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including:</p> <ul style="list-style-type: none">- Site boundaries;- Water-related infrastructure, including piping network, owned or managed by the site or its parent organization;- Any water sources providing water to the site that are owned or managed by the site or its parent organization;- Water service provider (if applicable) and its ultimate water source;- Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies;- Catchment(s) that the site affect(s) and is reliant upon for water.
Findings:	<p>While the site provides extensive details about water-related infrastructure and catchments, a clear and concise delineation of the catchment is still missing.</p>
Corrective action:	<p>Review the site scope concerning the catchment and align it with the recommendation, ensuring a clear delineation of the extent of the catchment.</p>

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Finding No:	TNR-011790
Checklist Item No:	1.2.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-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: <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>While the document lists the stakeholders, the stakeholders list is not exhaustive and representative. It does not explicitly describe the process used for their identification. It's unclear whether the process was inclusive of vulnerable, women, minority, and Indigenous people, or if it considered stakeholders representing the ultimate water source and receiving water bodies.</p> <p>It lacks clear evidence of how these consultations have addressed the water-related interests and challenges of the stakeholders.</p>
Corrective action:	<p>Revise the water stewardship stakeholders list to include the following:</p> <ol style="list-style-type: none">1. Process used for identification of stakeholders.2. Inclusion of women, minority and indigenous people through community-based organisation3. Stakeholders representing ultimate water source and receiving water bodies4. Narrative on how the consultations address water-related interests and challenges
Finding No:	TNR-011794
Checklist Item No:	1.2.2
Status:	Open
Finding level:	Observation
Checklist item:	Current and potential degree of influence between site and stakeholder shall be identified, within the catchment and considering the site's ultimate water source and ultimate receiving water body for wastewater.
Findings:	Although the site mentions the stakeholders' impact and interest levels, the site didn't explicitly address the bidirectional influence between the site and the stakeholders.
Corrective action:	The site understanding of the extend of the scope, particular to the delineation of the catchment, was unclear.

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Finding No:	TNR-011797
Checklist Item No:	1.3.3
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Jul-30
Checklist item:	Site water balance, inflows, losses, storage, and outflows, including indication of annual variance in water usage rates, shall be quantified. Where there is a water-related challenge that would be a threat to good water balance for people or environment, an indication of annual high and low variances shall be quantified.
Findings:	<p>The standards require analysis of annual trends and seasonal variations, which is not possible with the current four-month data set.</p> <p>Furthermore, the site's substantial water storage capacity has not been factored into the existing water balance calculations. It is currently assumed to remain constant, but this assumption lacks supporting documentation or data.</p>
Corrective action:	<p>Provide a water balance for Jan-Dec 2024</p> <p>Develop a schedule to update the water balance annually tracked in the EHS Council</p> <p>Show the variation in the water storage capacity within the site water balance.</p>
Finding No:	TNR-011798
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:	<p>The site has demonstrated a comprehensive approach to monitoring and reporting water quality. However, the following areas require further attention:</p> <p>The Standard requires water quality data for the receiving water body, not just the effluent discharge point.</p> <p>While the site has provided annual test reports, the Standard requires an indication of annual and, where appropriate, seasonal, high and low variances in water quality.</p> <p>Not all quality data was provided for 2024.</p>
Corrective action:	Identify updated local/government report on current water quality and update information gap.

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Finding No:	TNR-011799
Checklist Item No:	1.3.7
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Jul-30
Checklist item:	Annual water-related costs, revenues, and a description or quantification of the social, cultural, environmental, or economic water-related value generated by the site shall be identified and used to inform the evaluation of the plan in 4.1.2.
Findings:	The site described the social, cultural and environmental value generated by the site however no quantification of social, cultural, environmental, or economic water-related value generated by the site was made.
Corrective action:	Develop quantification of social, cultural, environmental, and economic water-related value generated by the site in the water cost analysis
Finding No:	TNR-011801
Checklist Item No:	1.4.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Jul-30
Checklist item:	The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.
Findings:	The site didn't include all relevant service providers. For example Goods transport and G4S were not included in the list of outsourced services.
Corrective action:	Include the following service providers initially excluded from the list in 1.4.2 and indicate applicability for volume of water consumed for the service 1. G4S 2. Outsourced transporters
Finding No:	TNR-011813
Checklist Item No:	1.5.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Jul-30
Checklist item:	Water governance initiatives shall be identified, including catchment plan(s), water-related public policies, major publicly-led initiatives under way, and relevant goals to help inform site of possible opportunities for water stewardship collective action.
Findings:	The Site didn't extract Specific Initiatives related to their catchment from the provided documentation to inform their WSP. The sited links to the site are vague and generic and not specific.
Corrective action:	Aquire documentation and articles stipulating catchment plan(s), water-related public policies, major publicly led initiatives under way, and relevant goals.

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Finding No:	TNR-011814
Checklist Item No:	1.5.3
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Jul-30
Checklist item:	The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.
Findings:	The provided water balance document does not present a clear and complete water balance equation. While it discusses individual components, it does not explicitly link them together in a mathematical expression.
Corrective action:	Link all the inflows, outflows and change in storage volume figures in one mathematical expression

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Finding No:	TNR-011815
Checklist Item No:	1.5.4
Status:	Closed
Finding level:	Major
Due date:	2025-Jan-29
Checklist item:	Water quality, including physical, chemical, and biological status, of the catchment shall be identified, and where possible, quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be identified.
Findings:	<p>The provided data is not relevant to the catchment, it lacks specific quantitative data for most of them. It does not provide numerical values for concentrations of pollutants, biological indicators. The standard requires an indication of seasonal variations in water quality where appropriate. The document does not provide any seasonal data. The evidence does not focus on the water quality of specific water bodies that are water sources, receiving water bodies, or important for IWRAs.</p> <p>The document does not address the potential impacts of modifications of water courses on water quality, given the presence of dams and reservoirs in the catchment.</p>
Corrective action:	<p>Acquire a current water quality report from the Water Resource Authority relevance to the specific catchment the site lies in.</p> <p>Provide a summary on numerical values for concentrations of pollutants and biological indicators, as well as detail on seasonal variations, and potential impacts of modifications of water courses on water quality where applicable.</p> <p>From the water quality report, single out the water quality of specific water bodies that are water sources, receiving water bodies, or important for IWRAs</p>
Evidence of implementation:	Summary provided on numerical values for concentrations of pollutants and biological indicators, as well as detail on seasonal variations, and potential impacts of modifications of water courses on water quality using the latest water quality reports available from relevant authorities. References provided.

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Finding No: TNR-011822
Checklist Item No: 1.5.7
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2025-Jul-30
Checklist item: The adequacy of available WASH services within the catchment shall be identified.
Findings: The site did not provide specific data on the percentage of the catchment population with access to good WASH services. the document does not mention any consultation with social or health-related NGOs working on WASH issues in the catchment. The provided document does not mention any public health education programs related to WASH issues within the catchment.
Corrective action: Provide specific data on the percentage of the catchment population with access to good WASH services.
Provide evidence on consultation with social or health-related NGOs working on WASH issues in the catchment.
Provide evidence of any public health education programs related to WASH issues within the catchment.

Finding No: TNR-011824
Checklist Item No: 1.6.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2025-Jul-30
Checklist item: Shared water challenges shall be identified and prioritized from the information gathered.
Findings: - The Site primarily focuses on its perspective on the challenges and their prioritization. However, the standard requires an explicit consideration of stakeholder perspectives on the challenges and their relative importance.
- While the challenges are prioritized, the evidence lacks a clear explanation and justification for the chosen prioritization.
- While the challenges are generally understandable, some could be more clearly and specifically defined. For example, "degradation in swamps and surface waters" could be more specific about the types of degradation (e.g., pollution, habitat loss) and their impacts. Similarly, "maintaining green infrastructure" could be more specific about the types of infrastructure and their benefits.
Corrective action: Schedule and conduct a joint stakeholder engagement session with the following objectives:
1. Shared challenges in the catchment and
2. Prioritisation of shared challenges
3. Drill down on each challenge to increase specificity and impacts as well as possible initiatives to address these challenges

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Finding No:	TNR-011825
Checklist Item No:	1.6.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Jul-30
Checklist item:	Initiatives to address shared water challenges shall be identified.
Findings:	The evidence lacks information on initiatives led by other stakeholders in the catchment. While the site's actions are important, it's equally crucial to acknowledge and potentially participate in broader efforts by government agencies, NGOs, or community organizations.
Corrective action:	Hold a joint stakeholder engagement session covering the following: 1. Shared challenges in the catchment and prioritisation as determined by the present representatives of the catchment. 2. Contributors and impacts to each challenge 3. Possible initiatives to address the shared challenges 4. Water related opportunities (Where the site can participate and those that require collaborative effort)
Finding No:	TNR-011826
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:	The site has not specified the period within which the likelihood and severity of the impact have been established
Corrective action:	Review the Water Risk plan and align risk evaluation to include the specified period for like hood and severity impact

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Finding No:	TNR-011827
Checklist Item No:	1.7.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Jul-30
Checklist item:	Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.
Findings:	<p>Prioritization of the identified opportunities is unclear.</p> <p>In addition, the site is focused primarily on its own initiatives. The Site does not explore broader opportunities within the catchment where the site could participate.</p>
Corrective action:	<p>Hold a joint stakeholder engagement session covering the following:</p> <ol style="list-style-type: none">1. Shared challenges in the catchment and prioritisation as determined by the present representatives of the catchment.2. Contributors and impacts to each challenge3. Possible initiatives to address the shared challenges4. Water related opportunities (Where the site can participate and those that require collaborative effort)
Finding No:	TNR-011828
Checklist Item No:	1.8.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Jul-30
Checklist item:	Relevant catchment best practice for water governance shall be identified.
Findings:	<p>The document does not provide evidence that the site has researched best practices for water governance specific to their catchment. It primarily focuses on internal water stewardship practices within the plant itself, rather than broader catchment-level governance.</p>
Corrective action:	<p>Identify best practices for water governance within Nairobi river catchment backed by information sources e.g articles, implemented projects and consultation with NGOs and other relevant organisations.</p>

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Finding No:	TNR-011830
Checklist Item No:	1.8.3
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Jul-30
Checklist item:	Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.
Findings:	The document does not provide evidence of a comprehensive assessment of water quality best practices in the catchment.
Corrective action:	Identify best practices for water quality within Nairobi River catchment backed by information sources e.g. articles, implemented projects and consultation with NGOs and other relevant organisations.
Finding No:	TNR-011831
Checklist Item No:	1.8.4
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Jul-30
Checklist item:	Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.
Findings:	While the provided document acknowledges the importance of catchment best practices for IWRA's maintenance and lists several potential practices, these practices still generic and lack of specificity. In addition, it's unclear how these practices are considered "best practices"
Corrective action:	Identify best practices for IWRAs within Nairobi River catchment backed by information sources e.g. articles, implemented projects and consultation with NGOs and other relevant organisations.

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Finding No:	TNR-011832
Checklist Item No:	1.8.5
Status:	Closed
Finding level:	Major
Due date:	2025-Jan-29
Checklist item:	Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.
Findings:	The site didn't identify best practices for WASH provision that go above and beyond the legal requirements.
Corrective action:	Identify best practices for WASH provision on site that are beyond legal requirements.. Develop and implement plan for the identified best practices. The plan should include: Action, action owner, resources required and milestones
Evidence of implementation:	Re-assess site WASH compliance against OSHA 2007 legislation requirements. -Audit completed by OSHA verifying compliance. WASH best practices identified above legal requirements. Plan included in WSP with the relevant implementation details.

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Finding No:	TNR-011834
Checklist Item No:	2.3.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Jul-30
Checklist item:	<p>A water stewardship plan shall be identified, including for each target:</p> <ul style="list-style-type: none">- How it will be measured and monitored- Actions to achieve and maintain (or exceed) it- Planned timeframes to achieve it- Financial budgets allocated for actions- Positions of persons responsible for actions and achieving targets- Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.
Findings:	<p>While actions and deadlines are present, the targets were not clear, measurable and separated from KPI's.</p> <p>While the plan addresses water availability and quality concerns, a more explicit link between the targets and the shared water challenges and initiatives identified in Step 1 is missing.</p> <p>The WSP is mainly focused on addressing site challenges and does not include catchment shared water challenges.</p>
Corrective action:	<p>Review the WSP to include the following:</p> <ol style="list-style-type: none">1. Targets that are clear, measureable and separate from the KPIs2. A review of the actions to show a clear link between the targets and the shared water challenges identified in step 13. Additional actions that address catchment shared water challenges4. An indication of clear involvement of public-sector and infrastructure agencies in developing the plan. <p>Provide evidence of communication of the WSP to the agencies</p>

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Finding No:	TNR-011835
Checklist Item No:	2.4.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-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:	The provided documentation does not show the involvement of public-sector and infrastructure agencies in developing the plan or communicating it to the agencies.
Corrective action:	Review the WSP to include the following: 1. Targets that are clear, measureable and separate from the KPIs 2. A review of the actions to show a clear link between the targets and the shared water challenges identified in step 1 3. Additional actions that address catchment shared water challenges 4. An indication of clear involvement of public-sector and infrastructure agencies in developing the plan.
Evidence of implementation:	Provide evidence of communication of the WSP to the agencies Root cause analysis reviewed to match finding.
Finding No:	TNR-011838
Checklist Item No:	3.1.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-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:	The organization has not provided documentation to confirm that an analysis has been conducted to determine that no water rights exist beyond those specified by relevant legal and regulatory requirements. This is considered a minor non-conformance, as the local auditor's experience shows that other companies in the region have also not identified any rights beyond the legally mandated ones.
Corrective action:	Acquire documentation from the community-based organisation (Kirichwa RUA) indicating that no water rights exist beyond those specified by relevant legal and regulatory requirements.

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Finding No:	TNR-011840
Checklist Item No:	3.3.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Jul-30
Checklist item:	Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.
Findings:	The evidence lacks concrete data to demonstrate current performance against the targets. While it mentions tracking progress and measuring water consumption, it doesn't provide specific figures or metrics to assess whether the targets are being met.
Corrective action:	Provide specific figures and metrics against set targets in the WSP to show current progress against all actions.
Finding No:	TNR-011841
Checklist Item No:	3.3.2
Status:	Closed
Finding level:	Major
Due date:	2025-Jan-29
Checklist item:	Where water scarcity is a shared water challenge, annual targets to improve the site's water use efficiency, or if practical and applicable, reduce volumetric total use shall be implemented.
Findings:	Evidence of actions implemented towards addressing water scarcity was not provided. And data on performance against the target was not provided.
Corrective action:	Provide evidence of implementation of all site water reduction initiatives. Trend and share site performance against annual water targets. Share BCP for water.
Evidence of implementation:	Evidence of implementations of actions to address water scarcity provided. (Use attachment uploaded on 28th. Other attachment to be deleted)

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Finding No: TNR-011842
Checklist Item No: 3.4.1
Status: Closed
Finding level: Major
Due date: 2025-Jan-29
Checklist item: Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.
Findings: No evidence was provided demonstrating the status of progress towards meeting water quality targets set in the water stewardship plan.
Corrective action: Provide evidence on the progress and/or closure of actions related to water quality.
1. Implement of municipal water in place of borehole water to leverage use of better-quality water. Conduct quarterly sampling of the municipal water as per KEBs quality parameters to demonstrate quality improvement.
2. Implement storm water sampling and analysis at a quarterly frequency against parameters of 4th schedule.
Evidence of implementation: Actions towards meeting water quality targets in progress/completed. Additional actions being developed to enhance quality further both at catchment level and site.

Finding No: TNR-011844
Checklist Item No: 3.5.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2025-Jul-30
Checklist item: Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.
Findings: The site does not have clear actions and targets for maintaining and enhancing IWRA's in its WSP.
Corrective action: Include actions around enhancing IWRA's in the WSP. Involve stakeholders in actions development and prioritisation. Draw actions from shared water challenges around IWRAs identified in step 1

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Finding No:	TNR-011846
Checklist Item No:	3.7.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Jul-30
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:	No evidence of learning sessions with service providers was provided.
Corrective action:	Hold an engagement session with suppliers and service providers who fall under the category of indirect water users. Develop an action plan for reduction, improvement elimination of water use where applicable during these sessions
Finding No:	TNR-011847
Checklist Item No:	3.8.1
Status:	Closed
Finding level:	Major
Due date:	2025-Jan-29
Checklist item:	Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.
Findings:	The Site didn't provide evidence of communication /engagement
Corrective action:	Develop and execute a stakeholder communication plan. The plan should contain the following: 1. List of stakeholders to be engaged 2. Frequency of stakeholder engagement (monthly, quarterly, half yearly annual) 3. Form of engagement - Email, letters, virtual, face to face
Evidence of implementation:	Stakeholder engagement and communication plan in place, with a list of stakeholders, mode of engagement and evidence of engagement for the stakeholders the site has engaged thus far.
Finding No:	TNR-011848
Checklist Item No:	3.9.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Jul-30
Checklist item:	Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.
Findings:	The actions are not related to water governance best practices identified in section 1.8.1.
Corrective action:	Develop actions that align to the best practices in section 1.8.1. Include an action for each best practice to be implemented.

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Finding No: TNR-011850
Checklist Item No: 3.9.2
Status: Closed
Finding level: Major
Due date: 2025-Jan-29
Checklist item: Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.
Findings: No evidence of actions towards achieving best practice (Identified in 1.8.2), related to targets in terms of water balance was provided
Corrective action: Develop and implement plan for achieving the best practices identified e.g :
1. Installation of rainwater capture
2. Basin water replenishment
3. Use of vacuum suction for toilets
4. Low water usage urinal flush

The plan should include: Action, action owner, resources required and milestones

Track progress of action plan in site EHS governance forum
Evidence of implementation: Catchment best practices related to water balance updated and evidence provided on going implementation.

Finding No: TNR-011851
Checklist Item No: 3.9.3
Status: Closed
Finding level: Major
Due date: 2025-Jan-29
Checklist item: Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.
Findings: No evidence of actions towards achieving best practice (Identified in 1.8.3), related to targets in terms of water quality was provided
Corrective action: Develop and implement plan for achieving best practices relating to water quality

The plan should include: Action, action owner, resources required and milestones

Track progress of action plan in site EHS governance forum
Evidence of implementation: Evidence of implementation of best practices related to water quality attached. WSP updated with action owners, resources required and milestones

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Finding No: TNR-011852
Checklist Item No: 3.9.4
Status: Closed
Finding level: Major
Due date: 2025-Jan-29
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: No evidence of actions towards achieving best practice (Identified in 1.8.4), related to targets in terms of the site's maintenance of Important Water-Related Areas was provided
Corrective action: Develop and implement plan for achieving best practices relating to IWRAs

The plan should include: Action, action owner, resources required and milestones

Track progress of action plan in site EHS governance forum
Evidence of implementation: Action related to IWRAs included. WSP updated with action owner, resources required and timelines

Finding No: TNR-011853
Checklist Item No: 3.9.5
Status: Closed
Finding level: Major
Due date: 2025-Jan-29
Checklist item: Actions towards achieving best practice related to targets in terms of WASH shall be implemented.
Findings: No evidence of actions towards achieving best practice (Identified in 1.8.5), related to targets in terms of WASH was provided
Corrective action: Develop and implement plan for achieving best practices relating to WASH on site that are above and beyond legal requirements.

The plan should include: Action, action owner, resources required and milestones

Track progress of action plan in site EHS governance forum
Evidence of implementation: Evidence of implementation of WASH best practices in the WSP provided.

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Finding No:	TNR-011854
Checklist Item No:	4.1.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Jul-30
Checklist item:	Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.
Findings:	No evidence was provided of the evaluation of performance against targets in the site's water stewardship plan or of the contribution to achieving water stewardship outcomes.
Corrective action:	Demonstrate performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes.
Finding No:	TNR-011855
Checklist Item No:	4.1.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Jul-30
Checklist item:	Value creation resulting from the water stewardship plan shall be evaluated.
Findings:	No evidence was provided of the evaluation of value creation resulting from the water stewardship plan
Corrective action:	Demonstrate water cost-benefit component and report on its financial investment in water stewardship and the services and benefits achieved.
Finding No:	TNR-011856
Checklist Item No:	4.1.3
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Jul-30
Checklist item:	The shared value benefits in the catchment shall be identified and where applicable, quantified.
Findings:	No evidence was provided on the evaluation of shared value benefits in the catchment.
Corrective action:	Demonstrate the shared value benefits of WSP implementation and for the applicable benefits provide a quantification.

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Finding No: TNR-011857
Checklist Item No: 4.3.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2025-Jul-30
Checklist item: Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.
Findings: No evidence of consultation efforts with stakeholders on the site's water stewardship performance was provided.
Corrective action: Hold a collective stakeholder engagement session focused on evaluation of performance of the WSP and modify the WSP plan based on the outcome of this performance review with stakeholders

Finding No: TNR-011858
Checklist Item No: 4.4.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2025-Jul-30
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: No evidence for the site's modified water stewardship plan was provided
Corrective action: Modify the WSP plan based on the following:
1. Feedback from stakeholders on the WSP implementation.
2. Actions from the site evaluation of the actions implemented.
Evidence of implementation: Action plan modified to fit the requirements of 4.4.1

Finding No: TNR-011862
Checklist Item No: 5.3.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2025-Jul-30
Checklist item: A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.
Findings: the site didn't disclose quantified performance against specific water stewardship plan targets and provide evidence of how this information was communicated to stakeholders.
Corrective action: Provide a summary of the site's water stewardship performance, including quantified performance against targets, water-related challenges and efforts made to address these challenges and disclose to all stakeholders through email communications and subsequent stakeholder engagement sessions.

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Finding No:	TNR-011863
Checklist Item No:	5.4.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Jul-30
Checklist item:	The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.
Findings:	The site's shared water-related challenges and efforts made to address these challenges were not disclosed
Corrective action:	Provide a summary of the site's water stewardship performance, including quantified performance against targets, water-related challenges and efforts made to address these challenges and disclose to all stakeholders through email communications and subsequent stakeholder engagement sessions.
Evidence of implementation:	Root cause statement modified to address the finding in 5.4.1

Finding No:	TNR-011864
Checklist Item No:	5.4.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Jul-30
Checklist item:	Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.
Findings:	Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies were not disclosed.
Corrective action:	Disclose efforts to address shared water challenges in the following ways: <div><div>1. During joint stakeholder engagement sessions.</div><div>2. Public notice boards outside the premises</div><div>3. Email communications with follow up on feedback</div><div>4. Recorded online meeting correspondences.</div></div>

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Report Details

Report	Value
Report prepared by	Anasse Ait Lemkademe
Report approved by	Gregorio Crespo
Report approved on (Date)	30 October 2024

Surveillance

Proposed date for next audit
2025-Jul-29

Stakeholder Announcements

Date of publication	Location
30/05/2024	Haleon Website: https://www.haleon.com/content/dam/haleon/corporate/documents/our-impact/environment/integrating-water-stewardship/stakeholder-announcement-kenya-nairobi.pdf
20/05/2024	AWS Website: https://a4ws.org/wp-content/uploads/2024/05/20240520_SA-AWS-000702-Haleon-Kenya-Nairobi.pdf
20/05/2024	WSAS Website: https://watersas.org/wp-content/uploads/2024/05/20240424-SA-AWS-000702-Haleon-Kenya-Nairobi.pdf
Comment	Haelon published the Stakeholder Announcement on its website.
Comment	Three stakeholder interviews were conducted. The interviews with Scholastica Ngari from The Nairobi City Water and Sewerage Company (NCWSC) and Julius Millimu from Kirichwa WRUA (Water Resource Users Association) were held onsite. The interview with Maryanne Munyao, the Sustainability Executive at BAT, was conducted online via Microsoft Teams.

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Catchment Information

Catchment Information

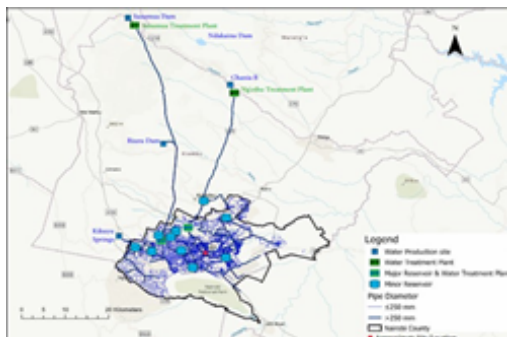
The site is located in Upper Athi Catchment. The catchment area associated with the site includes both groundwater and surface water sources that are essential for its operations.

Groundwater
The site relies heavily on the Nairobi Aquifer Suite (NAS) for its water needs. This aquifer spans an area of 5,816 km² and covers parts of Nairobi, Kajiado, Machakos, and Kiambu counties. The site has two groundwater abstraction wells—one 200 meters deep and the other 291 meters deep, both of which have valid permits. These wells are critical for maintaining water supply, especially given the unreliability of municipal water.

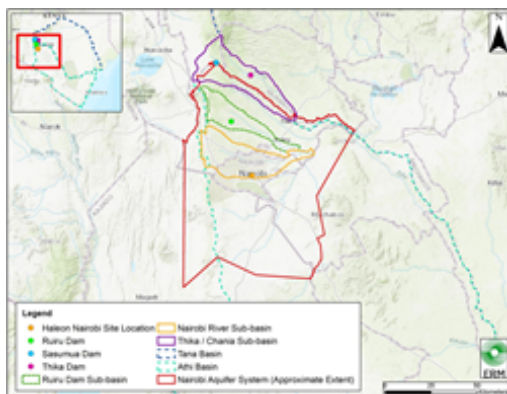
Surface Water

Surface water is supplied by the Nairobi City Water and Sewerage Company (NCWSC), which sources water from several key reservoirs: Thika/Ndakaini Dam, Sasumua Dam, Ruiru Dam, and Kikuyu Springs. These water sources are primarily fed by rivers originating from the Aberdare Range. Thika/Ndakaini Dam is the largest contributor, providing 84% of Nairobi's water supply.

Overall, the site is reliant on both groundwater from the Nairobi Aquifer and surface water from multiple reservoirs managed by NCWSC, making water management and infrastructure critical for its operations.



Map Showing Nairobi City Water Sources.jpg



Catchment Nairobi.jpg

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Client Description and Site Details

Client/Site Background

The site is located in the industrial area of Nairobi, covering approximately 8 acres, with specific coordinates at -1.310211 / 36.857289. It is bordered by Lunga Lunga Road to the north, Likoni Road to the west, and various industries and facilities to the east and southwest.

The site boasts a comprehensive water management system. This includes two boreholes providing a reliable water source, a dedicated water treatment plant ensuring high-quality water for manufacturing processes, and elevated water pipes facilitating easy maintenance and minimizing potential leaks. The site has Water storage facilities, and a comprehensive stormwater drain network to effectively manages runoff.

Effluent from the site is discharged to the Ruai Sewage Treatment Plant, which handles the majority of Nairobi's industrial wastewater. This plant eventually discharges treated water into the Nairobi River, which flows into the Athi River and finally into the Indian Ocean.



Site Map.jpg

Summary of Shared Water Challenges

Summary of Shared Water Challenges




The shared water challenges are:

- **Pollution:** This can come from point sources (like poorly managed industrial effluent) or non-point sources (like farming activities). It leads to high water treatment costs and waterborne diseases.
- **Over-abstraction and illegal abstraction:** This contributes to water scarcity, resulting in water rationing and the depletion of groundwater resources.
- **Lack of access to proper sanitation:** This leads to water pollution and potential contamination of water sources.
- **Lack of enforcement of water laws:** This can result in over-abstraction, pollution, and water catchment degradation, indirectly affecting water availability.
- **Encroachment:** Both encroachment into water catchment areas and encroachment of riparian reserves contribute to water scarcity and pollution.
- **Deforestation:** This leads to water catchment degradation and soil erosion, indirectly affecting water availability.
- **Flooding:** This can damage water infrastructure, leading to water scarcity.
- **Poor water infrastructure:** This can cause pollution (e.g., through sewage leakages) and reduce water supply capability.
- **Inequitable water distribution:** This can be caused by upstream damming of rivers for farming, leading to water scarcity.
- **Solid and liquid waste pollution:** This contaminates water sources and increases water treatment costs.
- **Silting of water bodies:** This contributes to both water pollution and water scarcity.
- **River diversion and blocking:** This can lead to water scarcity.
- **Non-native trees:** These can cause degradation and contribute to water scarcity.

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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 one 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 scope of the proposed certification is under the control of a single management system.
0.1.1.3	<i>The scope of the proposed certification shall be homogeneous with respect to primary production system, water management, product or service range, and the main market structures.</i>
	 Yes
Comment	The scope of the proposed certification is homogeneous with respect to primary production system, water management, product or service range, and the main market structures.

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1 STEP 1: GATHER AND UNDERSTAND

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

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

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

 Obs.

Comment The site provided a map outlining the site boundaries and on-site water-related infrastructure, including the piping network (schematic diagram). The map details the location of the municipal water inlet, extraction wells, storage tanks, waste disposal areas, and discharge points.
The site identified its water sources, the water service provider and the ultimate water The site, also, identify the wastewater discharge point and the service provider. It also specifies the ultimate receiving water bodies.
The site provided maps of the catchments that the site affects. It also identifies the groundwater aquifer (Nairobi Aquifer System) that the site's wells tap into.

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

1.2.1 *Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall:*

- Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people;
- Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies;
- Provide evidence of stakeholder consultation on water-related interests and challenges;
- Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups;
- Identify the degree of stakeholder engagement based on their level of interest and influence.

 in progress

Comment The site identified 14 stakeholders from various sectors, including government agencies, water utility suppliers, industries, community organizations, and service providers. Each stakeholder's impact and level of interest in water-related issues are defined and assessed, with a clear distinction between those with high, moderate, and low influence and interest The Site identified specific water-related interests, concerns, and challenges for each stakeholder.

Finding No: TNR-011790





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.*

 Obs.

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Comment	The site assessed the current and potential degree of influence between the site and each stakeholder within the catchment.	
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>	 Yes
Comment	<p>The Nairobi site has several plans that address water-related incidents, including spills, leaks, and loss of water:</p> <ul style="list-style-type: none"> The site provided procedure that outlines steps to be taken in the event of chemical, oil, or biohazardous spills, with specific instructions for containment, personnel safety, and environmental protection. It also details the location of spill kits and the response procedures for ammonia spills. The site provides an inventory of bunded areas on site, the materials stored in them, and the procedures for draining and managing spills within these bunds. The provided Business Continuity Plan identifies potential water-related incidents such as loss of potable or purified water, loss of steam supply, and failure of critical water infrastructure. It outlines contingency and recovery plans for each scenario, including the use of backup systems, reduced usage plans, and procurement of new equipment if necessary. The site provided a What if Analysis that identified the risks associated with the handling and storage of AGO (diesel fuel). It, also, identifies potential deviations in the process, their causes and consequences, and the existing control measures in place to mitigate these risks. It also includes recommendations for further risk reduction. <p>These plans appear to be comprehensive and well-structured, providing clear guidance on what actions to take in the event of various water-related incidents.</p> <p>During the site visit a solvent was observed in stormwater drain. However, the site provided immediately a route cause analysis and a corrective action plan.</p>	
1.3.2	<i>Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped</i>	 Yes
Comment	<p>The site is fully compliant with the water management requirements. A comprehensive map has been developed that meticulously identifies and traces all onsite water flows. This includes incoming water sources, water used in production, water treatment facilities, water storage components, and all wastewater treatment processes and flows.</p> <p>Furthermore, the map clearly illustrates any water recycling or reuse initiatives on site, explicitly showing which water flows are recycled and their subsequent destinations. Losses and discharge points have also been identified and mapped.</p>	
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	<p>The water balance assessment, conducted only for the period from January 2024 to June 2024, should be extended to cover a full year once data becomes available. The site currently presents an annual water balance.</p>	
Finding No: TNR-011797		
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.

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Comment	<p>The Nairobi site has provided test reports on the water quality of various sources: Incoming Water: The site sources its water from the Nairobi City Water and Sewerage Company (NCWSC). Test reports from NCWSC for the period January to December 2022 show that the water quality meets the Kenyan standards for drinking water (KS EAS 1-2:2019). Outgoing Effluent: The site does not have its own wastewater treatment plant (WWTP). Wastewater is discharged into the municipal sewer system after pre-treatment on site. Test reports from the pre-treatment plant show that the effluent quality consistently meets the Kenyan standards for effluent discharge into sewers (KS EAS 21-1:2019). Stormwater: The site also provided stormwater quality test reports for the year 2022. The results show that stormwater quality meets the Kenyan standards for discharge into surface waters (KS EAS 21-2:2019). The Nairobi site has provided test reports on the water quality of various sources: Incoming Water, Outgoing Effluent, Stormwater. The site does not have its own wastewater treatment plant (WWTP). Wastewater is discharged into the municipal sewer system after pre-treatment on site. Test reports from the pre-treatment plant show that the effluent quality consistently meets the Kenyan standards for effluent discharge. A purchase order was presented by the site to engage services for a stormwater analysis.</p>	
1.3.5	<p><i>Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.</i></p>	 Yes
Comment	<p>The site has identified and mapped potential sources of pollution such as Chemical Storage Area, Diesel Tanks, Waste Disposal Area, Laboratory and Maintenance Areas. It is designed to contain spills and leaks, with secondary containment measures in place. The two first areas were designed to contain and prevent spills and leaks, with secondary containment measures in place. The site has implemented specific procedures for handling and disposing of chemicals and solvents might pollute due to their usage in the laboratory and maintenance areas. I General The site has demonstrated a good understanding of the importance of identifying and managing potential sources of pollution.</p>	
1.3.6	<p><i>On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.</i></p>	 Yes
Comment	<p>No IWRA's were identified on site.</p>	
1.3.7	<p><i>Annual water-related costs, revenues, and a description or quantification of the social, cultural, environmental, or economic water-related value generated by the site shall be identified and used to inform the evaluation of the plan in 4.1.2.</i></p>	 in progress
Comment	<p>The site provided identify several water-related costs, including municipal water costs, groundwater abstraction costs (energy and maintenance), wastewater treatment costs (chemicals, energy, maintenance) and effluent discharge fees.</p>	
		Finding No: TNR-011799
1.3.8	<p><i>Levels of access and adequacy of WASH at the site shall be identified.</i></p>	 Yes
Comment	<p>The site has made several WASH facilities available for employees, including safe drinking water (filtered and monitored daily), toilets, handwashing stations (with soap, water, and drying tools), and feminine hygiene disposal units. The WASH facilities are adequate and managed as per JMP Water and Sanitation Ladders. Hygiene education is provided on site.</p>	
1.4	<p><i>Gather data on the site's indirect water use, including: its primary inputs; the water use embedded in the production of those primary inputs the status of the waters at the origin of the inputs (where they can be identified); and water used in out-sourced water-related services.</i></p>	

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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>	 Yes
Comment	The site provided a comprehensive list of the top 10 raw materials by spend, along with the corresponding vendors, annual volume consumed, and the location of each vendor. It explicitly mentions that all suppliers are located outside the site's catchment area. This is clearly documented with each vendor's country.	
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>	 in progress
Comment	The site has provided a list of outsourced services and indicated whether they are located within the catchment. The site has attempted to record annual water use. The water use of uniform cleaning service is unknown. However the site has included an assessment of the supplier's consumption in their action plan, indicating an attempt to address this gap.	
Finding No: TNR-011801		
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>	 in progress
Comment	The provided evidence showed a comprehensive list of water governance initiatives relevant to the site. It provides key water topics/issues that are of concern in the catchment and summaries of the main elements these initiatives. The site demonstrates how understanding these initiatives can inform the site's water stewardship actions. For example, it mentions that the site's action plan includes: <ul style="list-style-type: none">• Groundwater management and aquifer water level monitoring• Water quality management and collaboration with NCWSC in a tree planting initiative• Water resource conservation through water reduction projects and a water neutrality target• Engagement with NCWSC for collaboration on resolving water and sanitation challenges	
Finding No: TNR-011813		
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>	 Yes
Comment	The Site provided list of applicable water-related legal and regulatory requirements that apply to the site. It covers various aspects of water governance, including water use rights, quality regulations, waste management, groundwater abstraction, and drinking water standards.	
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>	 in progress
Comment	The evidence provides as estimates of recharge, which is a key component of the water balance. It also discusses precipitation, evapotranspiration, and runoff, water demand and groundwater abstractions which are other essential elements of the water balance equation. The document presents annual precipitation data, acknowledging the variability in rainfall across the catchment.	
Finding No: TNR-011814		
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>	 closed

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Comment	The provided evidence discusses various water quality parameters, such as chemical pollutants, biological indicators, and physical factors. It acknowledges that the Nairobi River faces pollution challenges, particularly from untreated sewage and industrial effluent.	Finding No: TNR-011815
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>	Yes
Comment	The Site identified and mapped key IWRAs in the catchment, including Nairobi National Park, Ondiri Swamp, Ngong Hills Forest, and the Nairobi River. These areas are described briefly, and their importance for biodiversity and ecosystem services is acknowledged. The provided evidence also highlights the main water-related risks these areas face, such as pollution, over-abstraction, and degradation due to human activities. The status of the IWRA's was also defined.	
1.5.6	<i>Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.</i>	Yes
Comment	The the site provides a comprehensive breakdown of existing water-related infrastructure, including dams, wastewater treatment plants, water distribution networks, sewerage systems, and boreholes. Each infrastructure element's condition is described, highlighting issues/risks such as limited capacity, pollution, and aging infrastructure. It, also, discusses in general the potential exposure of infrastructure to extreme events, particularly floods and droughts, and the associated risks. the vulnerability of the water infrastructure to extreme events was also assessed.	
1.5.7	<i>The adequacy of available WASH services within the catchment shall be identified.</i>	in progress
Comment	The provided document identifies the key WASH services available within the catchment. It evaluates the adequacy of these services, highlighting significant gaps and challenges in providing reliable and safe WASH services to all communities.	Finding No: TNR-011822
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>	in progress
Comment	The site identified 16 shared water challenges: degradation of swamps and surface waters, siltation of dams, contamination of surface water... These challenges are relevant to the catchment and align with the water-related issues mentioned in other documents. The Site assigns a "Priority for Site" rating to each challenge, indicating an attempt to prioritize them based on their relevance and potential impact on the site.	Finding No: TNR-011824
1.6.2	<i>Initiatives to address shared water challenges shall be identified.</i>	in progress
Comment	The site Identify initiatives to address shared water challenges	Finding No: TNR-011825
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>	

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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	The site identified a range of water risks, including those related to water scarcity, water quality, infrastructure, and governance. It assesses the likelihood and severity of each risk, providing a basis for prioritization.	
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	The site identified several water-related opportunities including Water Efficiency , Water blance, Water Neutrality, River Cleaning.	
Finding No: TNR-011827		
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	The document lists several practices such as: Engaging with peer plants and stakeholders to promote water stewardship. Organizing and participating in multisectoral stakeholder sessions. Communicating the site's water stewardship commitment. Carrying out training for workers with water management responsibilities. Visiting key catchment areas to establish status, challenges, and opportunities	
Finding No: TNR-011828		
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.	 Yes
Comment	The site provided a list of several practices that can contribute to improve water balance, including: <ul style="list-style-type: none">• Rainwater capture and reuse• Basin water replenishment• Use of vacuum suction for toilets and low water usage urinal flush• Low water usage urinal flush	
1.8.3	Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.	 in progress
Comment	The site provided a list of several practices that can be considered relevant to improving water quality in the catchment: <ul style="list-style-type: none">• Sensitization campaigns on pollution prevention• Stormwater management to prevent pollution• Construction of traps in rivers to trap solid waste• Reducing influent load from non-point sources• Improving water treatment works infrastructure	
Finding No: TNR-011830		
1.8.4	Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.	 in progress
Comment	The document lists several practices that could contribute to the maintenance of IWRAs, such as forest and wetland restoration, swamp conservation and restoration, and the promotion of urban greening.	
Finding No: TNR-011831		

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1.8.5	Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.	 closed
Comment	The site didn't provide evidence of best practices for WASH that go above and beyond the minimum requirements.	Finding No: TNR-011832

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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	The Water Stewardship Statement outlines the site's commitment to water stewardship principles and actions. This statement addresses key aspects of the standard requirement. The statement is publicly disclosed.	
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	The provided evidence clearly identifies the persons responsible for water and wastewater compliance obligations. The evidence describes a process involving a register of regulations and annual reviews before license issuance. A site EHS Council is taking place monthly to ensure compliance regulations. The process of submission is mainly online	
2.3	<i>Create a water stewardship strategy and plan including addressing risks (to and from the site), shared catchment water challenges, and opportunities.</i>	
2.3.1	<i>A water stewardship strategy shall be identified that defines the overarching mission, vision, and goals of the organization towards good water stewardship in line with this AWS Standard.</i>	 Yes
Comment	The engagement document comprehensively describes the corporate mission, vision, and goals toward good water stewardship. It clearly aligns these with recognized global standards and initiatives.	
2.3.2	<i>A water stewardship plan shall be identified, including for each target:</i> <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. 	 in progress


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Comment The WSP Outlines various water-related issues and opportunities, identifying the type of issue (physical, reputational, regulatory), whether it's a shared challenge, and the potential negative impacts. It provides a context for data collection findings but doesn't include direct targets or specific actions.
It lists specific, actions, responsible positions, budgets, completion dates, and KPIs to track progress. The actions are also linked to the AWS outcomes.

Finding No: TNR-011834

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

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

 in progress

Comment The site has a documented plan to mitigate water risks, as evidenced by the water stewardship plan and the actions taken to address water scarcity. The plan includes relocating underground pipework, instituting water recycling, and collaborating with the Nairobi City Water and Sewerage Company on a tree-planting project.

Finding No: TNR-011835

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3 STEP 3: IMPLEMENT - Implement the site's stewardship plan and improve impacts	
3.1	Implement plan to participate positively in catchment governance.
3.1.1	Evidence that the site has supported good catchment governance shall be identified. ✓ Yes
Comment	The site has participated in a tree planting activity in collaboration with Nairobi water and sewerage company which resulted in the planting of 100 trees in the Kikuyu Springs. The site provided as meeting minutes photos of joint actions, recorded video of a meeting as evidence to demonstrate active engagement in support of good catchment governance.
3.1.2	Measures identified to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be implemented. ✗ No
Comment	The site claimed that no water rights other than those captured by legal and regulatory requirements can be identified. Finding No: TNR-011838
3.2	Implement system to comply with water-related legal and regulatory requirements and respect water rights.
3.2.1	A process to verify full legal and regulatory compliance shall be implemented. ✓ Yes
Comment	For this indicator, a legislative register and Environmental compliance Calender were provided. The evidence is intended to assess legal and regulatory compliance and to evaluate its level. It allows for a gap analysis of the situation in relation to water, its quality, and the environment.
3.2.2	Where water rights are part of legal and regulatory requirements, measures identified to respect the water rights of others including Indigenous peoples, shall be implemented. ✓ Yes
Comment	Not applicable for this case
3.3	Implement plan to achieve site water balance targets.
3.3.1	Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified. ➤ in progress
Comment	The water stewardship plan outlines several water balance targets related to both the site and catchment. These targets include 5% reduction in site water consumption, supply of site with good quality rainwater and educe indirect water use by 10%. Finding No: TNR-011840
3.3.2	Where water scarcity is a shared water challenge, annual targets to improve the site's water use efficiency, or if practical and applicable, reduce volumetric total use shall be implemented. ✓ closed
Comment	No evidence of annual targets to improve the site's water use efficiency or actions implemented towards addressing water scarcity was provided. Finding No: TNR-011841
3.3.3	Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified. ✓ Yes

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Comment Not applicable on site; water is discharged to the sewer system and complies with discharge requirements.

3.4 Implement plan to achieve site water quality targets

3.4.1 Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.

 closed

Comment No evidence was provided demonstrating the status of progress towards meeting water quality targets set in the water stewardship plan

Finding No: TNR-011842


3.4.2 Where water quality is a shared water challenge, continual improvement to achieve best practice for the site's effluent shall be identified and where applicable, quantified.

 Yes

Comment Based on the 2023 and 2024 data provided, the site's effluent appears to be within legal limits.
The site initiated quarterly testing of stormwater against Water Quality Regulations 2006. A sampling pit was constructed to facilitate the process.

3.5 Implement plan to maintain or improve the site's and/or catchment's Important Water-Related Areas.

3.5.1 Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.

 in progress

Comment The WSP lacks explicit and clear targets for maintaining and enhancing IWRA's. However, the site has participated in a tree-planting activity in collaboration with the Nairobi Water and Sewerage Company, resulting in the planting of 100 trees in the Kikuyu Springs.

Finding No: TNR-011844

3.6 Implement plan to provide access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers at all premises under the site's control.

3.6.1 Evidence of the site's provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers onsite shall be identified and where applicable, quantified.

 Yes

Comment The site provided lists the types of WASH facilities available on-site and assessed the states of these facilities and stated that they are designed and operated in compliance with Kenyan regulations for WASH in workplaces. The evidence the number or capacity of each type of WASH facility. All was confirmed during the site visit.

3.6.2 Evidence that the site is not impinging on the human right to safe water and sanitation of communities through their operations, and that traditional access rights for indigenous and local communities are being respected, and that remedial actions are in place where this is not the case, and that these are effective.

 Yes


Comment Results from the public consultation on environmental impact was provided for this indicator as well as effluent analysis data (2023/2024). Effluent sampling data demonstrates that the site is not contaminating the public water supply. Additionally, no documented cases of site infringement or complaints related to water quality have been reported during stakeholder engagements public consultation. Verified during the stakeholder's interviews.

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

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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	There is no identified indirect water use within the catchment that is attributable to the site's activities.	
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>	 in progress
Comment	The site has included a target of 10% reduction of indirect water use in its WSP. Furthermore, the site has taken initiative to conduct learning sessions with service providers, likely to enhance understanding and implementation of water-saving practices. Finding No: TNR-011846	
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>	 closed
Comment	The Site didn't provide evidence of communication /engagement Finding No: TNR-011847	
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>	 in progress
Comment	Site has implemented 3 projects related to improvement of water governance. 1. Relocation of underground pipework to overhead 2. Water recirculation project 3. Water metering project - Improvement of metering on site Finding No: TNR-011848	
3.9.2	<i>Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.</i>	 closed
Comment	No evidence of actions towards achieving best practice (Identified in 1.8.2), related to targets in terms of water balance was provided Finding No: TNR-011850	
3.9.3	<i>Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.</i>	 closed
Comment	No evidence of actions towards achieving best practice (Identified in 1.8.3), related to targets in terms of water quality was provided Finding No: TNR-011851	
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>	 closed
Comment	No evidence of actions towards achieving best practice (Identified in 1.8.4), related to targets in terms of the site's maintenance of Important Water-Related Areas was provided Finding No: TNR-011852	
3.9.5	<i>Actions towards achieving best practice related to targets in terms of WASH shall be implemented.</i>	 closed

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Comment No evidence of actions towards achieving best practice (Identified in 1.8.5), related to targets in terms of WASH was provided

Finding No: TNR-011853

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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	No evidence was provided of the evaluation of performance against targets in the site's water stewardship plan, nor was there evidence of the contribution to achieving water stewardship outcomes.		
	Finding No: TNR-011854		
4.1.2	<i>Value creation resulting from the water stewardship plan shall be evaluated.</i>		in progress
Comment	No evidence was provided of Value creation resulting from the water stewardship plan		
	Finding No: TNR-011855		
4.1.3	<i>The shared value benefits in the catchment shall be identified and where applicable, quantified.</i>		in progress
Comment	No evidence was provided for the shared value benefits in the catchment.		
	Finding No: TNR-011856		
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	The site provided evidence that no emergency incidents related to water has happened the past year. However, during the site visit a water a water related incident was reported. The site has done a root-cause analysis of the incident and the site's response to the incident was established.		
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>		in progress
	Finding No: TNR-011857		
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>		in progress
	Finding No: TNR-011858		

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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.	✓ Yes
Comment	The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations was disclosed on site.	
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.	✓ Yes
Comment	Three documents were provided, showing emails in which the site shared the WSP and requested stakeholder perspectives on Important Water-Related Areas (IWRAs), water challenges, best practices, and opportunities for the site's water stewardship plan, rather than gathering feedback on performance against specific targets.	
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.	✗ No
Comment	the site didn't disclose quantified performance against specific water stewardship plan targets and provide evidence of how this information was communicated to stakeholders. Finding No: TNR-011862	
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's shared water-related challenges and efforts made to address these challenges were not disclosed Finding No: TNR-011863	
5.4.2	Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.	✗ No
	Finding No: TNR-011864	
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

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Comment	There has been no water related compliance violations as of the audit date . There are therefore no associated corrections to be disclosed.	
5.5.2	<i>Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.</i>	<div> Yes</div>
Comment	There has been no water related compliance violations as of the audit date . There are therefore no associated corrections to be disclosed.	
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>	<div> Yes</div>
Comment	There has been no water related compliance violations as of the audit date. There are therefore no associated corrections to be disclosed.	

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Photographic Evidence from Audit



Initial Certification Audit AWS-000702.jpg



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