

Alliance for Water Stewardship (AWS)

Audit Number: AO-001215

SITE DETAILS

Site: Haleon - Colombo, Sri Lanka

Address: Smithkline Beecham (Pvt) Ltd,121,Kaldemulla,Moratuwa,Sri Lanka, 10400, Colombo, SRI

LANKA

Contact Person: Ruichao Zhou

AWS Reference Number: AWS-000734

Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Core

Date of certification decision: 2025-Jan-07

Validity of certificate: 2028-Jan-06

AUDIT DETAILS

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

Audit Type(s): Initial Audit Audit Start Date: 2024-Aug-07 Lead Auditor: Amit Singh

Site Participants:

Kusal Peiris, Other

Thilak Kulasuriya, Other

Isanka Silva, Other

Chanaka Wanniarachchi, Other

Piyumi Hewawasam, Other

Ayesha Hathamunage, Other

Mihindu Ekanayake, Other

Kushani Amupitiya, Other

Manjula Devasinghe, Other

Yogi Rathnayake, Other

Aashana Jurangpathy, Other

Suranga Guruge, Other

Vidura Holiyabandara, Other

Dilantha Warnasooriya, Other

Priyantha Weerasekara, Other

Ruichao Zhou, Other

Harish Kadavannur, Other

Chuen Hui, Other

Chathurika Ranasinghe, Other

Uditha Karunaratne, Other

WSAS



Alliance for Water Stewardship (AWS)

Audit Number: AO-001215

ADDITIONAL INFO

Summary of Audit Findings: A total of 42 issues were identified during the certification audit: 5 major non-conformities, 27 minor non-conformities and 10 observations. The major non-conformities were of sufficient concern to justify the categorisation of the non-conformity as major and related to all water stewardship outcomes.

The Client is requested to perform a root cause analysis and define corrective actions for each of the non-conformities and submit them to WSAS within 30 days of receipt of the audit report by 22/10/2024.

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 05 January 2024..

Minor non-conformities must be closed before the next annual audit.

The audit team recommends certification of Haleon - Colombo, Sri Lanka at the Basic level pending approval of the corrective action plans 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 - Colombo, Sri Lanka against the AWS International Water Stewardship Standard Version 2.

Haleon - Colombo, is a consumer healthcare product manufacturing factory with its products in the areas of pain relief, respiratory, oral health, nutrition/ gastrointestinal and skin health. The factory is located in the Moratuwa Divisional Secretariat of Colombo District in the Western Province of Sri Lanka.

The water requirement of the site is catered through surface water from Kalu river and Kelani river. The wastewater from the Site (effluent as well as sewage) is discharged through two wastewater discharge outlets located on the east and south of the Site into the underground municipal drain. This drain connects to Ratmalana/Moratuwa wastewater treatment plant (WWTP) (operated by NWSDB) from where treated water is discharged into the Indian Ocean.

The audit was conducted onsite from 7th to 9th August 2024.

The onsite visit included the assessment of input water supply meter & piping, chemical storage area, Diesel Storage Tank, Effluent Pit, RO Plant, Boiler, Storm Water Outlets and other utility facilities that were visited onsite as part of the audit.

FINDINGS

NUMBER OF FINDINGS PER LEVEL

Observation10Minor27Major5

WSAS



Alliance for Water Stewardship (AWS)

Audit Number: AO-001215



Alliance for Water Stewardship (AWS)

Audit Number: AO-001215

FINDING DETAILS

Finding No: TNR-011340

Checklist Item No: 1.2.1

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2025-Aug-09

Checklist item: Stakeholders and their water-related challenges shall be identified. The

process used for stakeholder identification shall be identified. This

process shall:

- Inclusively cover all relevant stakeholder groups including vulnerable.

women, minority, and Indigenous people;

- Consider the physical scope identified, including stakeholders,

representative of the site's ultimate water source and ultimate receiving

water body or bodies;

- Provide evidence of stakeholder consultation on water-related interests

and challenges;

- Note that the ability and/or willingness of stakeholders to participate

may vary across the relevant stakeholder groups;

- Identify the degree of stakeholder engagement based on their level of

interest and influence.

Findings: The stakeholder identification does not cover vulnerable / minority

communities.

There is no documentary evidence of stakeholder consultation on

identifying their water-related interests and challenges.

Corrective action: 01.Include vulnerable / minority communities into stakeholder

prioritization document. (30- June-2025)

02. Provide the evidence for identifying stakeholder water-related interest

and challenges. (30- June-2025)

Finding No: TNR-012229

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: The site needs to review the degree of stakeholder engagement based

on their level of interest and influence as the site has not identified the

degree of influence of site on stakeholders.



Alliance for Water Stewardship (AWS)

Audit Number: AO-001215

Finding No: TNR-012230

Checklist Item No: 1.3.1 Status: Open

Finding level: Observation

Checklist item: Existing water-related incident response plans shall be identified.

Findings: There could be other water related incidents which needs to be identified

along with the response plans.

Finding No: TNR-012231

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 has not identified the losses from various process and / or utilities,

e.g. losses from cooling towers, etc.

Finding No: TNR-011349

Checklist Item No: 1.3.3

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2025-Aug-09

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: Site water balance is incomplete:

- Evaporation, losses and changes in storage have not been quantified - For the wastewater outflow, the site has simply considered 80% of intake water as wastewater, without any methodology or justification.

Corrective action: 01.Calculate site evaporation losses in storage.

02. Calculate wastewater out flow after installation of the new

wastewater meters.

Evidence of implementation: Thank you for the valuable comments regarding the CAPA. Based on

the feedbacks, I have changed the CAPA.

After the new water meter installation, wastewater discharge is able to measure without any assumption (Previously, site has considered the

80% of intake as wastewater).

To measure the wastewater discharge, water meter was installed for below area ENO/IODEX, OTC, EMPIRE, QA& LMD, Washroom &

cloak rooms.

According to the meter readings take from 23rd Dec 2024 to up to date,

site water balance has calculated.

In the new evaluation, evaporation, losses and the changes in storage

have been quantified.

WSAS



Alliance for Water Stewardship (AWS)

Audit Number: AO-001215

Finding No: TNR-012237

Checklist Item No: 1.3.4

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2025-Aug-09

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.

Corrective action: Request the water quality of the ultimate receiving water body from the

NWSDB. (31- Jan -2025)

Finding No: TNR-012232

Checklist Item No: 1.3.7 Status: Open

Finding level: Observation

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 identified water related revenues are not related to water as the site

has mentioned revenues generated from the final product.

Finding No: TNR-012233

Checklist Item No: 1.3.8

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2025-Aug-09

Checklist item: Levels of access and adequacy of WASH at the site shall be identified.

Findings: The site has conducted an analysis of its water, sanitation, and hygiene

(WASH) facilities, considering aspects such as the availability of

adequate services. However, this analysis has not been carried out from

the perspective of local legislation or based on the number of

employees.

Corrective action: Conduct and record WASH Analysis in the perspective of local

legislation or based on the number of employees. (31- Jan-2025)

WSAS WATER STEWARDSHIP ASSURANCE SERVICES

Alliance for Water Stewardship (AWS)

Audit Number: AO-001215

Finding No: TNR-012234

Checklist Item No: 1.4.1
Status: Closed
Finding level: Major

Due date: 2025-Jan-20

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: Site has not identified the major primary input suppliers and the quantity

quality and level of water risk of the primary inputs.

Corrective action: Identify major primary input suppliers and gather Quality, Quantity and

water risk of the primary inputs of them.

Evidence of implementation: Thank you for the comments. Water quantitative quality, risk level and

primary inputs of the main suppliers have been identified in the catchment area in those reports has contained the water test reports, water consumption and risk assessment. Under the risk assessment aspects, impact and the causes and what are the current controls and recommended actions has been identified. water has been tested for

the parameters according to the national regulation.

Finding No: TNR-012235

Checklist Item No: 1.4.2

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2025-Aug-09

Checklist item: The embedded water use of outsourced services shall be identified, and

where those services originate within the site's catchment, quantified.

Findings: Site has not identified the outsourced services (those services which are

outside site's premises, but which originate within the site's catchment)

such as laundry, transportation, etc.

Corrective action: Identify the outsource services and include in to embedded water use of

outsource services (31- Jan -2025)



Alliance for Water Stewardship (AWS)

Audit Number: AO-001215

Finding No: TNR-012236

Checklist Item No: 1.5.3

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2025-Aug-09

Checklist item: The catchment water-balance, and where applicable, scarcity, shall be

quantified, including indication of annual, and where appropriate,

seasonal, variance.

Findings: The site has gathered partial information related to precipitation in the

catchment, water production at various water treatment plants.

However, the catchment water balance is not assessed.

Corrective action: 01.Take a discussion with NWSDB regarding the catchment water

balance. (28- Feb-2025)

02. Take the decision on catchment water balance whether assessed it

by internally or external party. (31- Mar-2025)

Finding No: TNR-012256

Checklist Item No: 1.5.6

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2025-Aug-09

Checklist item: Existing and planned water-related infrastructure shall be identified,

including condition and potential exposure to extreme events.

Findings: Site has not engaged with the owners of water related infrastructure to

know the existing condition of water related infrastructure along with the

potential exposure to extreme events.

Corrective action: Discuss with owners of water related infrastructure and update the BCP

for the extreme water event.(31- Jan -2025)

Finding No: TNR-011353

Checklist Item No: 1.5.7

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2025-Aug-09

Checklist item: The adequacy of available WASH services within the catchment shall be

dentified.

Findings: There is no indication of the current WASH status / availability of WASH

services in the catchment. Site needs to engage with the relevant

authorities and identify the current status.

Corrective action: Engage with relevant authority and gather the data regarding the current

WASH status and availability of WASH services in the catchment. (28-

Feb-2025)

WSAS STEWARDSHIP ASSURANCE SERVICES

Alliance for Water Stewardship (AWS)

Audit Number: AO-001215

Finding No: TNR-011376

Checklist Item No: 1.6.1
Status: Closed
Finding level: Major

Due date: 2025-Jan-20

Checklist item: Shared water challenges shall be identified and prioritized from the

information gathered.

Findings: There is no evidence of engagement with stakeholders to consult and

identify the water related challenges. Only generic shared water challenge topics have been identified such as Water availability, Water Quality, etc. It is not clear what are the challenges in Water Quality, quality etc at this catchment. All identified Shared water challenges have

been categorised as High priority, without real prioritisation.

Corrective action: 01.Provide evidence of engagement with stakeholders to consult and

identify the water related challenges

02.Identify specific water challenges and reassess the prioritization

criteria.

Evidence of implementation: Thank you for the comments. Eco System Degradation has identified

under the shared water challenges and take a discussion on that with stakeholders, as a result of that tree planting program in the main catchment areas has carried out. As evidences the letter of NWSDB has

attached.

Under the shared water challenges, both generic and specific shared

water challenges have been identified.

And the identified challenges have been prioritized as low, medium and

high base on the real prioritization.

Finding No: TNR-011378

Checklist Item No: 1.6.2

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2025-Aug-09

Checklist item: Initiatives to address shared water challenges shall be identified.

Findings: The site has not identified specific initiatives that the site or other

organisations are implementing or planning to implement to address the

identified shared water challenges.

Corrective action: Develop a plan to discuss with stakeholders to Identify the initiatives

implemented to address the shared water challenges. (28- Feb-2025)



Alliance for Water Stewardship (AWS)

Audit Number: AO-001215

Finding No: TNR-011379

Checklist Item No: 1.7.1

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2025-Aug-09

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 identified the water risks faced by site but did not priortise the

risks

Corrective action: Reevaluate the identified water related risk and prioritize the identified

water risk face by site. (28- Feb -2025)

Finding No: TNR-012238

Checklist Item No: 1.7.2

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2025-Aug-09

Checklist item: Water-related opportunities shall be identified, including how the site

may participate, assessment and prioritization of potential savings, and

business opportunities.

Findings: Water related opportunities have not been identified and how the site

may participate with other stakeholders or can implement themselves.

Corrective action: 01.Identify the water related opportunities through an assessment. (28-

Feb-2025)

02. Engage with the CTC and arrange a session to identify the water

related opportunities . (31- mar-2025)

Finding No: TNR-012245

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 has not identified the best practice that is relevant to sector and / or

catchment.



Alliance for Water Stewardship (AWS)

Audit Number: AO-001215

Finding No: TNR-011380

Checklist Item No: 1.8.4

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2025-Aug-09

Checklist item: Relevant catchment best practice for site maintenance of Important

Water-Related Areas shall be identified.

Findings: The provided evidence does not include relevant best practice for

maintenance of Important Water-Related Areas.

Corrective action: Request the details relevant to the best practice for maintenance of

Important Water-Related Areas from NWSDB.(30- June-2025)

Finding No: TNR-011381

Checklist Item No: 1.8.5 Status: Open

Finding level: Observation

Checklist item: Relevant sector and/or catchment best practice for site provision of

equitable and adequate WASH services shall be identified.

Findings: Site should also focus on identifying the catchment best practices in

terms of WASH services.



Alliance for Water Stewardship (AWS)

Audit Number: AO-001215

Finding No: TNR-012248

Checklist Item No: 2.3.2
Status: Closed
Finding level: Major

Due date: 2025-Jan-20

Checklist item: A water stewardship plan shall be identified, including for each target:

- How it will be measured and monitored

- Actions to achieve and maintain (or exceed) it

Planned timeframes to achieve itFinancial 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: The Water stewardship plan does not have measurable targets with

specific planned actions that should help the site achieve the targets, linking them with the relevant AWS outcomes. The plan prepared by site mentions a no. of actions points which are mainly steps needed to

implement the standard's requirements, such as engage with

stakeholder, gather information about catchment, identification of best

practices.

Corrective action: 01.AWS targets should be linked with the AWS outcomes in the action

plan (31-Dec-2024)

02.AWS targets should be measurable in the water stewardship plan.

(31-Dec-2024)

03. Monitor the AWS action plan in the monthly EHS council.

(31-Dec-2024)

04.Identify the best practices of the catchment area and link with the

AWS (31-Dec-2024)

Evidence of implementation: Document 01 represents the AWS targets linked with the AWS

outcomes in the action plan which marked in red color. It ensures that how AWS targets are related to 5 AWS outcomes like good water governance, sustainable Water Balance. good water quality, Important water related areas and safe water sanitation and hygiene for all.

Document 02 represents the AWS targets that can be measurable in the water stewardship plan which marked in red color. It stated that budget in monitory value and the time frame which can be consider as the

measurable target related to the AWS actions.

Document 03 represents the evidence for the AWS action plan

monitored in monthly EHS Council slides and the minutes and it proved

the progress of actions.

Document 04 represents the identified three best practices and how they

are linked with AWS outcomes which marked in red color.

WSAS WATER STEWARDSHIP ASSURANCE SERVICES

Alliance for Water Stewardship (AWS)

Audit Number: AO-001215

Finding No: TNR-011385

Checklist Item No: 2.4.1

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2025-Aug-09

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: Site has not prepared a plan in co-ordination / consultation with public

sector and / or infrastructure agencies.

Corrective action: Develop a plan to address water risks in coordination with public-sector

and infrastructure agencies and share with relevant authorities

Finding No: TNR-012249

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: There is weak engagement of site in the catchment Governance

activities. This needs to be strengthened

Finding No: TNR-012250

Checklist Item No: 3.3.1
Status: Closed
Finding level: Major

Due date: 2025-Jan-20

Checklist item: Status of progress towards meeting water balance targets set in the

water stewardship plan shall be identified.

Findings: Site has some water related targets in the Water stewardship plan but

those are not directly related to water balance. There is no clarity on

what the actual Water Balance targets are.

Corrective action: 01.Install wastewater meters to measure site wastewater (31-Dec2024)

02. Recalculate site water balance targets by considering water intake,

water discharge. (03-Jan-2024)

Evidence of implementation: After the new water meter implementation(as per the CAPA

TNR-011349), monthly water balance target would be 653.42m3. This target has been set according to the 2025 period weight forecast (m3). Before implementation, Haleon MT. Lavinia has calculated the water balance without considering the waste-water discharge amount (as

assumption of 80% of Intake).

After the new water meter installation, site has calculated the water

balance considering the actual wastewater discharge.

WSAS



Alliance for Water Stewardship (AWS)

Audit Number: AO-001215

Finding No: TNR-012251

Checklist Item No: 3.3.2

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2025-Aug-09

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: Water availability is identified as a shared water challenge, but targets to

reduce volumetric total use or improve site's water use efficiency have not been set in the water stewardship plan and progress have not been

shown.

Corrective action: Include the water efficiency target into the water stewardship plan and

monitor the progress of the action. (28-Feb-2025)

Finding No: TNR-012253

Checklist Item No: 3.4.1
Status: Open

Finding level: Observation

Checklist item: Status of progress towards meeting water quality targets set in the water

stewardship plan shall be identified.

Findings: Site's targets on water quality should be specified.

Finding No: TNR-012254

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: Although some initial actions were done, it is not clear in the water

stewardship plan which IWRAs the site is aiming to maintain or enhance

and how

Finding No: TNR-011386

Checklist Item No: 3.7.1

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2025-Aug-09

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.

Corrective action: Set the indirect use targets in the water stewardship plan (31- Mar-2025)

WSAS

WSAS WATER STEWARDSHIP ASSURANCE SERVICES

Alliance for Water Stewardship (AWS)

Audit Number: AO-001215

Finding No: TNR-013209

Checklist Item No: 3.7.2

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2025-Aug-09

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: The site is currently in the process of establishing communication with

suppliers, developing a draft communication, and making initial contact with the laundry service. Although some evidence for this management has been provided, it is considered insufficient to fully comply with the

requirement of the indicator.

Corrective action: Request the details from the suppliers regarding their water usage and

action which taken in the catchment. (30-Jun-2025)

Finding No: TNR-011388

Checklist Item No: 3.8.1
Status: Closed
Finding level: Major

Due date: 2025-Jan-20

Checklist item: Evidence of engagement, and the key messages relayed with

confirmation of receipt, shall be identified.

Findings: No evidence was provided of communication with the owners of shared

water related infrastructure.

Corrective action: 1)Develop and implement a plan to communicate with owners of the

shared water infrastructure.

2)Keep records of communication with owners of the shared water

infrastructure

Evidence of implementation: Thank you for the valuable comments. Shared water infrastructures

within the catchment area which span the kalu and kelani river up to the Ratmalana Sewerage Treatment Plant has been requested from the NWSDB. That included water intake points, pumping stations, treatment

plants, distribution networks and related facilities.

In addition, shared water and wastewater infrastructure data has been gathered. The distribution of toilet facilities in the Colombo, Gampaha, and Kalutara districts has summarized, and the sources of drinking

water are categorized.



Alliance for Water Stewardship (AWS)

Audit Number: AO-001215

Finding No: TNR-013211

Checklist Item No: 3.9.1

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2025-Aug-09

Checklist item: Actions towards achieving best practice, related to water governance, as

applicable, shall be implemented.

Findings: Site has initiated actions related to water governance but not

implemented enough actions to achieve best practices related to water

governance.

Corrective action: Identify the best practices in the catchment and develop a plan to

implement them. (20 -Feb-2025)

Finding No: TNR-012258

Checklist Item No: 3.9.2 Status: Open

Finding level: Observation

Checklist item: Actions towards achieving best practice, related to targets in terms of

water balance shall be implemented.

Findings: Site needs to further focus on implementing actions related to water

balance.

Finding No: TNR-012260

Checklist Item No: 3.9.4

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2025-Aug-09

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: There are no activities implemented / supported by site to improve the

IWRA's other than the display boards near the Nchchimale catchment.

Corrective action: 01.Develop a plan to conduct the activities to improve Important

Water-Related Areas.(28- Feb-2025)

02. Monitor the plan adherence which include the activities to improve

Important Water-Related Areas(28- Jun-2025)



Alliance for Water Stewardship (AWS)

Audit Number: AO-001215

Finding No: TNR-012261

Checklist Item No: 4.1.1

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2025-Aug-09

Checklist item: Performance against targets in the site's water stewardship plan and the

contribution to achieving water stewardship outcomes shall be

evaluated.

Findings: There is no set frequency for evaluation of water stewardship plan. The

site is at initial stages and has not evaluated the performance against

targets.

Corrective action: 01.Define the frequency for evaluation of water stewardship plan.

(28-Feb-2025)

02. Monitor the water stewardship action plan in the EHS Council

(28-Feb-2025)

Finding No: TNR-012262

Checklist Item No: 4.1.2

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2025-Aug-09

Checklist item: Value creation resulting from the water stewardship plan shall be

evaluated.

Findings: Site has not set water saving targets in the water stewardship plan. But,

the value creation from water savings are listed. Site has not clearly

identified the value creation from various targets set in water

stewardship plan.

Corrective action: Identify the value creation from various targets set in the water

stewardship plan. (31-Mar-2025)

Finding No: TNR-012263

Checklist Item No: 4.1.3

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2025-Aug-09

Checklist item: The shared value benefits in the catchment shall be identified and where

applicable, quantified.

Findings: Shared value benefits in the catchment have not been identified by site

Corrective action: Assess and prepare a report on shared value benefits in the catchment

(28-Feb-2024)



Alliance for Water Stewardship (AWS)

Audit Number: AO-001215

Finding No: TNR-012264

Checklist Item No: 4.3.1

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2025-Aug-09

Checklist item: Consultation efforts with stakeholders on the site's water stewardship

performance shall be identified.

Findings: There are no discussion till now on the site's water stewardship

performance with the external stakeholders.

Corrective action: Arrange a stakeholder meeting to discuss about the site's Water

stewardship performance (30-Jun-2025)

Finding No: TNR-013213

Checklist Item No: 4.4.1

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2025-Aug-09

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: Site has not presented what modifications have been done in the water

stewardship plan by incorporating any information or any lessons

learned through their evaluation process.

Corrective action: Update the water stewardship plan according to the any information or

any lessons learned through their evaluation process.

Finding No: TNR-012266

Checklist Item No: 5.1.1

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2025-Aug-09

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 external stakeholders are not made aware of the internal

governance responsible for water related regulations

Corrective action: Communicate the external stakeholders regarding the internal

governance. (30-Jun-2025)



Alliance for Water Stewardship (AWS)

Audit Number: AO-001215

Finding No: TNR-012267

Checklist Item No: 5.2.1

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2025-Aug-09

Checklist item: The water stewardship plan, including how the water stewardship plan

contributes to AWS Standard outcomes, shall be communicated to

relevant stakeholders.

Findings: Site has plan to share the water stewardship plan with other

stakeholders in the catchment but it has not been done yet.

Corrective action: Share the water stewardship plan with the stakeholders

Finding No: TNR-012268

Checklist Item No: 5.3.1

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2025-Aug-09

Checklist item: A summary of the site's water stewardship performance, including

quantified performance against targets, shall be disclosed annually at a

minimum.

Findings: As the site in in initial stages of implementation of water stewardship

programs, site has not disclosed a summary of the site's water

stewardship performance against targets.

Corrective action: Prepare a summary of the site's water stewardship performance against

targets (28-Feb-2028)

Finding No: TNR-012269

Checklist Item No: 5.4.1

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2025-Aug-09

Checklist item: The site's shared water-related challenges and efforts made to address

these challenges shall be disclosed.

Findings: Site has not disclosed their shared water-related challenges and efforts

made to address these challenges.

Corrective action: Identify the shared water-related challenges and efforts made to

address these challenges and include into the BCP



Alliance for Water Stewardship (AWS)

Audit Number: AO-001215

Re	port	De	tails
	P 0		

Report	Value
Report prepared by	Amit Singh
Report approved by	Gregorio Crespo
Report approved on (Date)	21/10/2024

Surveillance

Proposed date for next audit

2025-Aug-06

Comment The proposed date for next audit, i.e. Surveillance audit is before 07.08.2025.

Stakeholder Announcements

Date of publi	cation Location	
	AWS Website	
	WSAS Website	
	Security Gate	
06/06/2024	Email to Stakeholders	
Comment	The site has displayed stakeholder announcements within site premises at plant notice board	

and main entrance gate. Additionally, it was mailed to some of the stakeholders alongwith

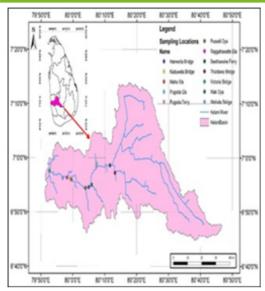
stakeholder interview letters.



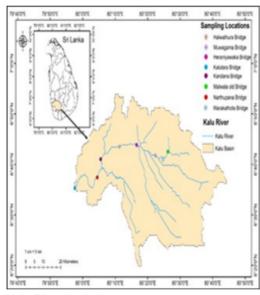
Alliance for Water Stewardship (AWS)

Audit Number: AO-001215

Catchment Information



Kelani River basin.jpg



Kalu River basin.jpg

Catchment Information

Site's water requirement is being catered by two water sources, i.e. Kalu River basin and Kelani River basin through the water treatment plants maintained by National Water Supply and Drainage Board (NWSDB).

The site is located at a distance of 15.24 km from Ambathale water treatment plant (receiving water from Kelani river) and at a distance of 26 km from Kandana water treatment plant (receiving water from Kalu river). The site is located in between both the rivers.



Alliance for Water Stewardship (AWS)

Audit Number: AO-001215

Client Description and Site Details



1.1.1 Site Boundry.jpg

Client/Site Background

Site is a consumer healthcare product manufacturing factory with its profile in the areas of pain relief, respiratory, oral health, nutrition/gastrointestinal and skin health. The factory is located in the Moratuwa Divisional Secretariat of Colombo District in the Western Province of Sri Lanka.

The water requirement of the site is catered through surface water from Kalu river and Kelani river. The wastewater from the Site (effluent as well as sewage) is discharged through two wastewater discharge outlets located on the east and south of the Site into the underground municipal drain. This drain connects to Ratmalana/Moratuwa wastewater treatment plant (WWTP) (operated by NWSDB) from where treated water is discharged into the Indian Ocean.

Summary of Shared Water Challenges

Summary of Shared Water Challenges

Site has identified the following shared water challenges:

- Water Availability
- Water Quality
- WASH in catchment and surrounding areas
- Water Infrastructure



Alliance for Water Stewardship (AWS)

Audit Number: AO-001215

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	s
Comment	The site receives water from two catchments, i.e. Kelani river basin and Kaluganga river basin	
0.1.1.2	The scope of the proposed certification shall be under the control of a single management system.	s
Comment	The scope of the proposed certification is under the control of a single management system.	
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.	s
Comment	El alcance de la certificación propuesta debe ser homogéneo con respecto al sistema de producción primaria, gestión del agua, gama de productos o servicios y las principales estructuras del mercado.	



Alliance for Water Stewardship (AWS)

Audit Number: AO-001215

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

Site has presented site layout drawing which defines the plant boundaries and also mentions location of various sections of the plant.

Water system layout shows the water related infrastructure of the plant covering the water distribution and usage through the three metered input water lines alongwith the water treatment systems.

Water service provider for plant is National Water Supply and Drainage Board (NWSDB). Ultimate water sources for the plant are identified as Kalu River and Kelani River. Around 67% of the total input water supply to site is through Kalu river and 33% through Kelani river. The wastewater (both process effluent and sewage) generated at site is discharged through two wastewater discharge outlets which connects to Ratmalana/Moratuwa wastewater treatment plant from where the treated wastewater is ultimately discharged to the Indian Ocean at Angulana Wastewater Discharge.

The catchment that the site affects is identified as Kelani River catchment and Kalu river catchment. Kalu River, originates from Idikatupana in Samanala Mountain, flows through Ratnapura and Horana districts and empties into the Indian Ocean at Kalutara district. The watershed of Kalu River spreads across an area of 2766 km2.

Kelani River starts in the middle of the central hills in Sri Lanka (Nallatanniya area) and ends at Mattakuliya in Colombo. The watershed of Kelani River spreads across an area of 2230 km2.

- 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.

WSAS



Alliance for Water Stewardship (AWS)

Audit Number: AO-001215

The site has identified internal and external stakeholders covering different stakeholder	Comment	The site has identified intern	al and external stakeholders	covering different stakeholder
---	---------	--------------------------------	------------------------------	--------------------------------

groups. The stakeholders have been listed based on their level of interest and influence. The identified stakeholders cover State Government, General Public, neighboring industries and

employees as internal stakeholders.

Finding No: TNR-011340

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.

Q Obs.

Comment The potential influence and interest of site on stakeholder have been identified.

1.3 Gather water-related data for the site, including: water balance; water quality, Important Water-Related Areas, water governance, WASH;

water-related costs, revenues, and shared value creation.

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

Q Obs.

Comment The presented document, site's emergency response plan covers the plan / actions to

mitigate the water related incidents / emergencies in case of natural disaster such as flood

and cyclone.

1.3.2 Site water balance, including inflows, losses, storage, and outflows shall

Q Obs.

be identified and mapped

Comment Site has presented water circuit diagram mapping the site water intake from three input water lines and water usage at various locations alongwith the capacity of water storage tanks.

The water consumptions are recorded and monitored on daily basis. Site has mentioned that

currently, site has not installed discharge water meter.

Site has presented the drainage system drawing which shows the storm water drain, process

water and sewage discharge points.

1.3.3 Site water balance, inflows, losses, storage, and outflows, including

indication of annual variance in water usage rates, shall be quantified.

Where there is a water-related challenge that would be a threat to good water balance for people or environment, an indication of annual high

and low variances shall be quantified.

Comment The annual intake of water for the year 2021 to 2023 is provided by plant. Site has not made

adequate effort to prepare the site water balance as there is no information about the quantity of water being used in different sections of the plant, losses in process / utilities and the

outflow from site.

Site has made a generic statement that it has considered 80% of the total water withdrawal as

the wastewater quantity generated at site.

Finding No: TNR-011349

1.3.4 Water quality of the site's water source(s), provided waters, effluent and

receiving water bodies shall be quantified. Where there is a

in progress

in progress

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.

Comment - Raw water quality is being tested annually by external agency.

- RO Water is being tested daily by internal lab.

- Quarterly testing for major parameters and once in a year for 26 parameters as per requirement of CEA of quality of Industrial Effluent discharge to Central Water Treatment Plant.

- Quarterly testing of Storm Water discharge to Central Water treatment Plant. The annual values of effluent discharge for last three years are presented.

Finding No: TNR-012237

WSAS



Alliance for Water Stewardship (AWS)

Audit Number: AO-001215

1.3.5

	mapped, including chemicals used or stored on site.	Yes
Comment	Site has mapped the potential sources of pollution.	
1.3.6	On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.	⊘ Yes

Potential sources of pollution shall be identified and if applicable.

Comment There are no Important Water-Related Areas at site.

1.3.7 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.

Comment Site has identified the following water related costs:

Water sourcing costSewerage discharge cost

Heating CostCooling CostPurification CostWater Testing Cost

For water related revenues, site has mentioned about the revenues generated from the final

product manufactured.

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

in progress

Comment Site has presented document which summarises whether there are adequate WASH services available for site employees, Operational Contractors, Warehouse Contractors, Construction

Contractors, Drivers/ Logistics, Employees / contractors positioned in remote locations (e.g. wastewater treatment plant), security desk and for all Other Users.

Finding No: TNR-012233

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.

closed

Comment Site stated that it is in process of communicating with the suppliers and the same shall be

done in future.

Finding No: TNR-012234

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 listed that the key outsourced parties include security, canteen, janitorial, and

contractors. The consumption of these parties are already included in the site water

consumption.

Site needs to understand the requirement of the indicator.

Finding No: TNR-012235

1.5 Gather water-related data for the catchment, including water

governance, water balance, water quality, Important Water-Related

Areas, infrastructure, and WASH



Alliance for Water Stewardship (AWS)

Audit Number: AO-001215

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

Yes

water stewardship collective action.

Comment Site has identified and listed the following water related policies / initiatives / Acts:

- National Policy on Protection and Conservation of Water Sources, their Catchments and

Reservations in Sri Lanka, 2014
- National Drinking Water Policy, 2001

Rural Water Supply and Sanitation Sector, 2001
National Environmental Action Plan 2022-2030
National Watershed Management Policy (2004)

National Climate Change Adaptation Strategy for Sri Lanka (2010)
 Environmental Protection License (EPL) - National Environmental Act

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

Yes

customary water rights.

Comment Site has identified following water related legal and regulatory requirements:

- Agreement with National Water Supply and Drainage Board (NWSDB) for Sewer Connection

which mentions the quality parameters for discharge

- National Environmental Act, No. 47 of 1980 regulations 2008 which mentions the quality

parameters for discharge of effluent

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

in progress

seasonal, variance.

Comment Site has gathered partial information related to precipitation in the catchment, water

production at various water treatment plants. However, the catchment water balance is not

assessed.

Finding No: TNR-012236

1.5.4 Water quality, including physical, chemical, and biological status, of the

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

Yes

Comment A study on "A Simplified Equation for Calculating the Water Quality Index (WQI), Kalu River,

Sri Lanka", undertaken in August 2023, by water quality data collected from The Central

Environmental Authority (CEA) for seven sampling sites.

The site has presented a review report of CATCHMENT WATER QUALITY in which the water

quality of surface water and ground water in the catchment area.

The drinking water wells across the Colombo district consistently meet the standards of

quality required for safe consumption.

1.5.5 Important Water-Related Areas shall be identified, and where

appropriate, mapped, and their status assessed including any threats to people or the natural environment, using scientific information and

Yes

through stakeholder engagement.

Comment IWRA have been identified by site alongwith the condition.

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

in progress

Site has gathered information (based on data available online) about the existing water

related infrastructure within the catchment such as water treatment plants in the catchment.

Finding No: TNR-012256

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

in progress

WSAS

Comment



Alliance for Water Stewardship (AWS)

Audit Number: AO-001215

Comment	Site has not identified the adequacy of available WASH services within the catchment. Site has gathered some information related to WASH (type of toilets & drinking water) scenario for the whole country based on census data 2012. The current scenario / adequacy of WASH services within the catchment is not known.
	Finding No: TNR-011353
1.6	Understand current and future shared water challenges in the catchment, by linking the water challenges identified by stakeholders with the site's water challenges.
1.6.1	Shared water challenges shall be identified and prioritized from the information gathered.
Comment	Generic Shared water challenges have been identified such as Water availability, Water Quality, etc. It is not clear what is the challenge in Water Quality. The same needs to be identified for each water challenge. All identified Shared water challenges have been categorised as High priority. Finding No: TNR-011376
4.0.0	
1.6.2	Initiatives to address shared water challenges shall be identified. in progress
Comment	Site has stated that by undertaking measures to limit water withdrawal and consumption by adopting efficient processes and operations, spreading awareness among stakeholders would help in addressing the shared water challenges.
	Finding No: TNR-011378
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 in progress costs and business impact.
Comment	Site has identified the water risks faced by site but did not priortise the risks. Finding No: TNR-011379
1.7.2	Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.
Comment	Site has made an attempt to categorise the opportunities as physical, reputational or regulatory.
	Finding No: TNR-012238
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. Yes
Comment	Site has presented a document with details of identified best practices for Water Governance.
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 best practice methods for water balance and have implemented some of

2 Quality StreetNorth Berwick, EH39 4HW, UNITED KINGDOM

them.



Alliance for Water Stewardship (AWS)

Audit Number: AO-001215

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 Water Quality.	
1.8.4	Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.	in progress
Comment	The provided evidence does not include relevant best practice for maintnance of Imp Water-Related Areas.	oortant
	Finding No: 7	NR-011380
1.8.5	Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.	Q Obs.
Comment	Site has identified the best practices for adequate WASH services available at site.	



Alliance for Water Stewardship (AWS)

Audit Number: AO-001215

2	STEP 2: COMMIT & PLAN - Commit to be a responsible water steward and develop a Water Stewardship Plan
2.1	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.
2.1.1	A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments: - That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes - That the site implementation will be aligned to and in support of existing catchment sustainability plans - That the site's stakeholders will be engaged in an open and transparent way - That the site will allocate resources to implement the Standard.
Comment	The commitment letter signed by Country Head on 07.08.2024 includes the required commitments.
2.2	Develop and document a process to achieve and maintain legal and regulatory compliance.
2.2.1	The system to maintain compliance obligations for water and wastewater management shall be identified, including: - Identification of responsible persons/positions within facility organizational structure - Process for submissions to regulatory agencies.
Comment	Site has presented the system to maintain water and wastewater related legal compliances alongwith the Staff name & position of responsible persons for ensuring Legal Compliance.
2.3	Create a water stewardship strategy and plan including addressing risks (to and from the site), shared catchment water challenges, and opportunities.
2.3.1	A water stewardship strategy shall be identified that defines the overarching mission, vision, and goals of the organization towards good Yes water stewardship in line with this AWS Standard.
Comment	Haleon has a Corporate Water Policy at the Haleon Website which is being followed by Mt. Lavinia site. They are high level principles with mission, vision and targets for Water globally.
2.3.2	A water stewardship plan shall be identified, including for each target: - How it will be measured and monitored - Actions to achieve and maintain (or exceed) it - Planned timeframes to achieve it - Financial budgets allocated for actions - Positions of persons responsible for actions and achieving targets - Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.



Alliance for Water Stewardship (AWS)

Audit Number: AO-001215

Comment The Water Stewardship plan prepared by site mentions a no. of actions points which are

mainly to engage with stakeholder, gather information about catchment, identification of best

practices and sharing site's best practices.

For a single action point, site has linked it with various AWS outcomes. The same needs to be

checked.

There is no defined process of how the targets will be measured and monitored.

Finding No: TNR-012248

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 Site has shared Haleon group's Water stewardship document. This document does not cover

a plan to mitigate the identified water risks.

Additionally, site has prepared a document in which they had a meeting with other industry in the catchment and gathered information about their activities at site and in the catchment. The

requirement of the indicator is different.

In the site's

Finding No: TNR-011385



Alliance for Water Stewardship (AWS)

Audit Number: AO-001215

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. Q Obs.
Comment	Site has engaged with the National Water Board (NWSDB) / Forest Department / Divisional Secretary Office for tree plantation activity and display boards at nachchimale catchment area in Kalu river on 19th June 2024. Following display boards were placed at the nachchimale catchment area: - Protect the water resource - Protect our environment - Our most valuable resource is Water
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.
Comment	Site has stated that there are no water rights other than that are part of legal requirements to the site.
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	Site has implemented system to verify legal regulatory compliance and are tracking it every month during the EHS council meeting.
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	Site has shared a document "National Policy on Drinking Water" which clearly states that NWSDB takes care of the drinking water supply in the country.
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.
Comment	Site has some water related targets in the Water stewardship plan but those are not directly related to water balance. There is no clarity on what the actual Water Balance targets are. Finding No: TNR-012250
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.
Comment	Site has presented a table with actual water consumption for last three years, i.e. 2021 to
	2023. The water consumption for 2023 has reduced compared to last two years. But, the water consumption for 2022 increased compared to 2021. There is no reason on the change in water consumption.
	Finding No: TNR-012251

WSAS



Alliance for Water Stewardship (AWS)

Audit Number: AO-001215

3.3.3	Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.	S
Comment	There is no legal binding on the site for re-allocation of water.	
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.	
Comment	Site is maintaining water quality parameters as per legal requirements. However, site has increased the frequency from annual to quarterly for wastewater and storm water discharge. Finding No: TNR-01225	3
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.	s
Comment	No continual improvement target set by site. The site maintains the wastewater quality as per legal requirement.	
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. Obs	•
Comment	No specific targets set in water stewardship plan. But, site has engaged with government authorities for display boards and providing manpower for community awareness campaigns in the nachchimale catchment area. Following display boards were placed at the nachchimale catchment area: - Protect the water resource - Protect our environment - Our most valuable resource is Water	
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.	s
Comment	Site has presented the provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers onsite.	
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 ye 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.	s
Comment	Site has been reducing their water consumption compared to previous years. The site is not impinging on the human right to safe water and sanitation of communities through their operations.	
3.7	Implement plan to maintain or improve indirect water use within the catchment:	
3.7.1	Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified. in progres	s



Alliance for Water Stewardship (AWS)

Audit Number: AO-001215

Comment	Site has not set any indirect water use targets in the water stewardship plan. During audit, site has mentioned that it is in process of identifying supplier and service providers. Later, they have submitted a document of engagement with one of the service provider for laundry. *Finding No: TNR-01138**	
3.7.2	Evidence of engagement with suppliers and service providers, as well as, when applicable, actions they have taken in the catchment as a result of the site's engagement related to indirect water use, shall be identified.	√ SS
Comment	During audit, there was no evidence of engagement with suppliers and service providers. Site is in process of communicating with the suppliers for which the draft letter is prepared by site. After the audit, site has presented a document of engagement with laundry service provider for an awareness session on AWS.	
	Finding No: TNR-01320)9
3.8	Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have.	
3.8.1	Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.) ed
Comment	Site has shared meeting minutes with other industry in the catchment, but it states the site activities and preparedness with respect to water stewardship. Evidence related to shared water-related infrastructure owners is not there. Site is in process of communicating with the owners of shared water-related infrastructure. Finding No: TNR-01138	38
3.9	Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.	
3.9.1	Actions towards achieving best practice, related to water governance, as applicable, shall be implemented. in progres	√ SS
Comment	Site has engaged with other industry and government authorities in the catchment. Finding No: TNR-01321	11
3.9.2	Actions towards achieving best practice, related to targets in terms of water balance shall be implemented. Ob.	-
Comment	Site has presented evidence of installation of water meters in various water lines. But, these have already been implemented 2 years ago. There is no evidence of implementation of other identified best practices.	
3.9.3	Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.) es
Comment	Site has presented a document about water quality in the catchment. The document does not mention any activity / implementation of best practice related to water quality. However, site is maintaining the water quality parameters as per legal requirements.	
3.9.4	Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.	√ SS
Comment	Site has identified a no. of IWRA's in the catchment. There are no activities implemented / supported by site to improve the IWRA's other than the display boards near the Nchchimale	

WSAS

2 Quality StreetNorth Berwick, EH39 4HW, UNITED KINGDOM

catchment.

Finding No: TNR-012260



Alliance for Water Stewardship (AWS)

Audit Number: AO-001215

3.9.5 Actions towards achieving best practice related to targets in terms of

WASH shall be implemented.

Comment Maintenance of existing WASH facilities at site.





Alliance for Water Stewardship (AWS)

Audit Number: AO-001215

4	STEP 4: EVALUATE - Evaluate the site's performance.											
4.1	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.											
4.1.1	Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.											
Comment	The initial Water Stewardship Plan for site was prepared in Q1 this year, i.e. around Feb'24. As of now, there is no set frequency for evaluation of water stewardship plan. The existing projects are being monitored. Whenever, there is an update on the existing target, the details for same is being updated. Finding No: TNR-012261											
	Tilluling No. TNN-012201											
4.1.2	Value creation resulting from the water stewardship plan shall be evaluated.											
Comment	Site has presented a document with water savings for 2023 and 2024. The water savings											
	have been identified as value creation.											
	Finding No: TNR-012262											
4.1.3	The shared value benefits in the catchment shall be identified and where applicable, quantified.											
Comment	Shared value benefits in the catchment have not been identified by site. Finding No: TNR-012263											
4.2	Evaluate the impacts of water-related emergency incidents (including extreme events), if any occurred, and determine the effectiveness of corrective and preventative measures.											
4.2.1	A written annual review and (where appropriate) root-cause analysis of the year's emergency incident(s) shall be prepared and the site's yes response to the incident(s) shall be evaluated and proposed preventative and corrective actions and mitigations against future incidents shall be identified.											
Comment	Site has presented a root cause analysis report for an incident - COD of the laboratory effluent exceeds the tolerance limit for Industrial Effluent Discharge into Public Sewers, due to the potential introduction of residual chemical waste (solid or liquid) into sink in table 04 which is dedicated for normal washing. After identifying the root cause analysis, site has prepared the corrective action plan to avoid occurrence of incident in future. However, the incident reported was for year 2022. There was no such incident observed in 2023.											
4.3	Evaluate stakeholders' consultation feedback regarding the site's water stewardship performance, including the effectiveness of the site's engagement process.											
4.3.1	Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.											
Comment	Site's water stewardship performance for some actions is being discussed with internal stakeholders in the monthly EHS council meeting. There are no discussion till now with the											
	external stakeholders. Finding No: TNR-012264											



Alliance for Water Stewardship (AWS)

Audit Number: AO-001215

4.4 Evaluate and update the site's water

stewardship plan, incorporating the information obtained from the evaluation process in the context of continual improvement.

4.4.1 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.

Comment Site has segregated the WSP for year 2024 to 2025 based on discussion during the EHS

council meeting.

Finding No: TNR-013213

in progress



Alliance for Water Stewardship (AWS)

Audit Number: AO-001215

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.
Comment	Disclosed to internal stakeholders through awareness sessions, my learning platform for employees where they can access the SOP for Water Stewardship. The external stakeholders can register complaint / feedback at plant main gate and that will be handed over to HR department and if that is related to Water, it will be forwarded to EHS department. But the external stakeholders will not be aware of the internal governance responsible for water related regulations.
	Finding No: TNR-012266
5.2	Communicate the water stewardship plan with relevant stakeholders.
5.2.1	The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.
Comment	Site has conducted a AWS Review meeting with internal stakeholders in which the WS Plan was shared. Site has plan to share the water stewardship plan with other stakeholders in the catchment. Finding No: TNR-012267
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 in progress minimum.
Comment	As the site in in initial stages of implementation of water stewardship programs, site has not disclosed a summary of the site's water stewardship performance against targets. Site has plan to disclose the water stewardship performance of site in future. Finding No: TNR-012268
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.
Comment	Site has presented the document Business Continuity Plan for 2023-24 in which various scenarios for water related incidents are identified. There is no indication of shared water challenges and
	the efforts made by site to address the challenges. Finding No: TNR-012269
5.4.2	Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified. Yes

WSAS



Alliance for Water Stewardship (AWS)

Audit Number: AO-001215

С	comment	Site	ha	as p	oresen	ited	communication	with	National	Water	Supply (& C	Orainage B	oard and	d other

industry in the catchment.

Site has engaged with the above stakeholders to gather information about the catchment and supported public sector agency by tree plantation and awareness session in the Nacchimale

catchment

5.5 Communicate transparency in water-related compliance: make any site

water-related compliance violations available upon request as well as any corrective actions the site has taken to prevent future occurrences.

5.5.1 Any site water-related compliance violations and associated corrections

shall be disclosed.

Yes

Comment Last year, there have been no water-related compliance violations by site. The earlier water

related compliance violation was addressed and details have been covered in earlier

indicators.

5.5.2 Necessary corrective actions taken by the site to prevent future

occurrences shall be disclosed if applicable.

Yes

Yes

Comment No corrective actions were required as there no water-related compliance violations.

5.5.3 Any site water-related violation that may pose significant risk and threat

to human or ecosystem health shall be immediately communicated to

relevant public agencies and disclosed.

There were no such violation by site that may pose significant risk and threat to human or

ecosystem health.

Comment

Photographic Evidence from Audit

