CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-001320

WSAS WATER STEWARDSHIP ASSURANCE SERVICES

SITE DETAILS

Site: **Haleon - Dungarvan, Ireland**
Address: Lisfennel Cl, Knockbrack, Co. Waterford,, X35 Y983, Dungarvan, IRELAND
Contact Person: James Tarmey
AWS Reference Number: AWS-000738
Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Core
Date of certification decision: 2025-Feb-20
Validity of certificate: 2028-Feb-19

AUDIT DETAILS

Audited Service(s): AWS Standard v2.0 (2019)
Audit Type(s): Initial Audit
Audit Start Date: 2024-Oct-22
Lead Auditor: Ruth Wandera

Site Participants:
Sarabjit Paul, Site Director
Tom Breslin, EHS Director
Philip Singleton, Engineering Director
James Tarmey, Utilities and Facilities Manager
Sullivan Doherty, Utilities Team Lead OTC
Ken Dowling, Utilities Team Lead OC
Shikar Makardoij, Site Utilities Engineer
Ailbhe Healy, Researcher
Eva Walsh, Communication & Engagement
Richard O'Donoghue, EHS Manager
Amit Saxena, VS Director OC

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ADDITIONAL INFO

Summary of Audit Findings: A total of 23 findings were raised during the certification audit: 0 major non-conformities, 11 minor non-conformities, and 12 observations.

The Client is requested to perform a root cause analysis and define corrective actions for each of the non-conformities and to submit these to WSAS within 30 days of receipt of the audit report by 10-Jan-25.

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 (within75 days) by 23-Feb-25.

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

The audit team recommends certification of Haleon Dungarvan at Core level pending approval of the corrective actions plan.

CLOSURE OF FINDINGS AND CORRECTIVE ACTION PLAN:

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

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

Haleon's Dungarvan facility has been operational for over 30 years and employs 750 people. As a global supply site, it serves 70 markets worldwide, producing bulk granulate and tablets for regional packaging and delivering finished packs to regions including the Middle East and Europe.
The site includes two manufacturing buildings, totaling 45,704 m² along with a boiler house. The Medical Device (OC) division, established in 1981, has seven product classifications and serves over 170 markets. The Medicinal (OTC) division, founded in 1987, operates with nine CMO partnerships and supplies six sister sites. Across these divisions, the site holds two Drug Product Licenses and three Medical Device Certifications.
Medical Device (OC) operations focus on cleansing tablets, fixative paste, and powder adhesives. Geographically, the site is bordered by the N25 road on the north and east sides, with Dungarvan Bay to the east, Dungarvan town to the north, and rural farmland to the south and west.

Haleon Dungarvan facility named its catchment as the Colligan-Mahon catchment. The Colligan-Mahon catchment is divided into six sub catchments with 35 river waterbodies, two lakes, five transitional, seven coastal and 15 groundwater bodies. The Haleon site is situated in sub catchment 17-6 in the Colligan- Brickey,basin and is influenced by the river Brickey and the river Colligan which both ultimately discharge into Dungarvan Harbour to the east of the site.
The Ballinamuck Source, which is the main public water supply for the Dungarvan area and the sole supply source for the Haleon site, is drawn from the Dungarvan Ground Water Body. Ballinamuck is located northwest of Dungarvan town alongside the Colligan River.

The onsite audit was conducted from 22 to 24 October 2024.

The onsite site visit included the assessment of water related infrastructure and potential sources of pollution at OC and OTC as follows:
- Incoming water points and meters
- Onsite storage facilities
- Wastewater Treatment Works prior to municipal discharge
- Biomass unit
- Main chemical storage area and associated procedures
- Staff ablution facilities, toilets, and drinking water facilities
- Main wastewater discharge point
- Laboratories on site

FINDINGS

NUMBER OF FINDINGS PER LEVEL

Observation	12
Minor	11

FINDING DETAILS

Finding No:	TNR-014306
Checklist Item No:	1.3.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Oct-22
Checklist item:	Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped
Findings:	In 2022, the site recorded a total water consumption of 75,706 m³, with a measured discharge of 44,220 m³, leaving 31,486 m³ unaccounted for. The site is aware of this discrepancy and is actively working to address it. Evidence of progress will need to be demonstrated at the next surveillance. No indication or quantification of water losses and storage was provided.
Corrective action:	The site has put forward on the project list for 2025 a metering upgrade and additional meters to bring down this unaccounted water losses.

Finding No:	TNR-014307
Checklist Item No:	1.3.3
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Oct-22
Checklist item:	Site water balance, inflows, losses, storage, and outflows, including indication of annual variance in water usage rates, shall be quantified. Where there is a water-related challenge that would be a threat to good water balance for people or environment, an indication of annual high and low variances shall be quantified.
Findings:	The unaccounted-for water at both OC and OTC sites was recorded at 43% in 2020, 44% in 2021, and 42% in 2022. However, no quantification of water losses or storage was provided.
Corrective action:	The storage of water has now been quantified via water storage tanks in OC and OTC however, the site has put forward on the project list for 2025 a metering upgrade and additional meters to bring down this unaccounted water losses.

Finding No:	TNR-014387
Checklist Item No:	1.5.3
Status:	In Progress - CA plan approved
Finding level:	Observation
Checklist item:	The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.
Findings:	The catchment water balance must be assessed during the next surveillance audit to evaluate progress in obtaining the catchment water balance for the Colligan-Mahon catchment and/or the Brickey-Colligan sub-catchment. It also needs to include ground water.
Corrective action:	The site has now included and identified the ground water supplies. The site has also met with Local Authority Water Programme (LAWPRO) society with discussions around the Dungarvan catchment

Finding No:	TNR-014730
Checklist Item No:	1.6.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Oct-22
Checklist item:	Shared water challenges shall be identified and prioritized from the information gathered.
Findings:	The facility listed the following shared water challenges which it came up with through research rather than consultation with stakeholders. The facility is expected to understand the current and future shared water challenges in the catchment, by linking the water challenges identified with stakeholders as well as with the site's water challenges which means that stakeholder engagement is inevitable to fulfil this requirement.
Corrective action:	The site is to reach out to the identified stakeholders on their shared water challenges, contact has been made with a major stakeholder LAWPRO and is awaiting on insigth.

Finding No:	TNR-014731
Checklist Item No:	2.3.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Oct-22
Checklist item:	A water stewardship plan shall be identified, including for each target: - How it will be measured and monitored - Actions to achieve and maintain (or exceed) it - Planned timeframes to achieve it - Financial budgets allocated for actions - Positions of persons responsible for actions and achieving targets - Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.
Findings:	The targets identified in WSP are not SMART. It is not clear how it is monitored and measured.
Corrective action:	The site will have a meeting in the new year regarding setting targets and resources that would be required. A deep review of the WSP will also need to be done to satisfy the indicator

Finding No:	TNR-014418
Checklist Item No:	2.4.1
Status:	In Progress - CA plan approved
Finding level:	Observation
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:	Since Haleon is in the process of updating its emergency response plan, the contribution of a second supply line to good water stewardship or its alignment with best practices remains unclear. For actions in the water stewardship plan to be effective, they must explicitly support AWS outcomes and align with recognized best practices. Without this clear alignment, the second line's role in advancing water stewardship objectives may require further clarification or justification.
Corrective action:	Action for the site to identify a water risk mitigation plan developed along with the relevant public agencies.

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Finding No:	TNR-014422
Checklist Item No:	3.1.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Oct-22
Checklist item:	Evidence that the site has supported good catchment governance shall be identified.
Findings:	Although progress is underway, the site has yet to clearly define specific targets for its water governance initiatives and implement them to meet the indicator requirements.
Corrective action:	Schedule periodic check-ins with stakeholders (e.g. quarterly), to include identification of evidence to support good catchment governance and set targets to implementing.

Evidence of implementation:

In the Initial Audit (October 2024) the site agreed a meeting with LAWPRO (Local Authority Waters Programme) who works on behalf of Ireland's 31 local authorities to protect and restore good water quality in our rivers, lakes, estuaries, ground and coastal water through catchment science and local community engagement. LAWPRO was established to fulfil requirements under the European Union Water Framework Directive and is funded by the Department of Housing, Local Government and Heritage. LAWPRO coordinates the efforts of local authorities and other public bodies in the implementation of the River Basin Management Plans.

Target Completed - On the 9th of December, the site met with LAWPRO,
Ann Phelan - Community Welfare Officer (CWO), who is directly in communications with the site on activities in the community and catchment.
Jim Croke - Catchment Scientist, provides information with regards to quality and catchment relations

The meeting had outlined how heavily involved LAWPRO is with the community and water related issues having done a presentation on how Haleon Dungarvan can be more water compliant.

Outcomes and targets set to be completed in the coming weeks: (Updated on the WSP) (WSP action plan Excel file, Row 16)
1. Registration to be a certified Water Steward - 11th April 2025 (The programme supports business customers with training on how to lower water consumption and reduce operating costs while also protecting the environment.)
2. Waterford Food Festival - 25th - 27th April (Sustainability team will attend the sustainability seminar that happens at the festival and how Organisations like Haleon can be directly involved.
3. LAWPRO Water Heritage Day - 20th August 2025, TBC (This is an opportunity to explore our intangible cultural heritage and links with the past through customs, practices and traditions. Water Heritage Day on Sunday 20th August will focus on discovering traditional knowledge, skills and practices associated with our natural waters)

Please follow Emails Numbered from 1 to 4 for clear tread.
Images of targeted events attached.
I have attached Email saved filed and PDF's of the emails as they might not open.
Presentations attached from the meeting with LAWPRO

Finding No:	TNR-014477
Checklist Item No:	3.3.1
Status:	In Progress - CA plan approved
Finding level:	Observation
Checklist item:	Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.
Findings:	The progress toward achieving the water balance targets outlined in the water stewardship plan is still in its early stages, and an accurate assessment of the water balance has not yet been established.
Corrective action:	The site will need to look at where the gaps are within the site where no metering and damaged meters are to be included or fixed.

Finding No:	TNR-014478
Checklist Item No:	3.3.2
Status:	In Progress - CA plan approved
Finding level:	Observation
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:	Between 2019 and 2021, the facility achieved significant reductions in total water usage, including a 50% decrease in maximum flow rates, attributed to process improvements. However, specific details of the implemented improvements have not been provided.
Corrective action:	Follow up on the information for this improvement and capture it as a project that had water reductions on site.

Finding No:	TNR-014436
Checklist Item No:	3.4.2
Status:	In Progress - CA plan approved
Finding level:	Observation
Checklist item:	Where water quality is a shared water challenge, continual improvement to achieve best practice for the site's effluent shall be identified and where applicable, quantified.
Findings:	No significant progress has been made under this indicator to demonstrate continual improvement toward achieving best practices for the site's effluent management. Progress will be reassessed during the Surveillance review.
Corrective action:	The site has looked at OTC Effluent Outstation to be upgraded, the insight to how we can improve will need to be looked into at a early stage. (Reach out to companies that could assist)

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Finding No:	TNR-014440
Checklist Item No:	3.5.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Oct-22
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 implementation of measures to maintain or enhance the catchment's important water-related areas has not yet begun. Additionally, the water stewardship plan lacks clearly defined targets.
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. Clearly define targets to satisfy the indicator.

Evidence of implementation: 3.1.5

In the Initial Audit (October 2024) the site agreed a meeting with LAWPRO (Local Authority Waters Programme) who works on behalf of Ireland's 31 local authorities to protect and restore good water quality in our rivers, lakes, estuaries, ground and coastal water through catchment science and local community engagement. LAWPRO was established to fulfil requirements under the European Union Water Framework Directive and is funded by the Department of Housing, Local Government and Heritage. LAWPRO coordinates the efforts of local authorities and other public bodies in the implementation of the River Basin Management Plans.

Target Completed - On the 9th of December, the site met with LAWPRO,
Ann Phelan - Community Welfare Officer (CWO), who is directly in communications with the site on activities in the community and catchment.
Jim Croke - Catchment Scientist, provides information with regards to quality and catchment relations

Jim Croke had presented on the quality of water related areas via the the site catchments.ie
- the meeting described to the site about our catchment and where water is received and it's quality.
- Jim showed us the platform on how we can monitor our IWRA and the catchment, please refer to image 1. Catchment.ie website and explanation in how to use & image 2. Catchment.ie website and targeting Agricultural Measures.
- Presentation attached.

Outcomes and targets set to be completed in the coming weeks: (Updated on the WSP and attached) (WSP Excel file Row 17)
1. Engagement with Uisce Éireann completed on the 7th of Feb 2025 to complete a survey on works to be completed in the replacement of Main incoming (damaged water meter) Please see email 4. Main incoming meter replacement meeting RE Meter Survey
2. Attend Connecting Communities road show as advised from LAWPRO in May 2025.

Please see attached Action WSP, Please can you review this Action WSP for Major indicator 3.1.1. There was a mix up with the files uploaded. Apologies for this.

Finding No:	TNR-014455
Checklist Item No:	3.7.1
Status:	In Progress - CA plan approved
Finding level:	Observation
Checklist item:	Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.
Findings:	The indirect water use targets outlined in the water stewardship plan were not achieved.
Corrective action:	Include water use and the targets within the WSP

Finding No:	TNR-014465
Checklist Item No:	3.9.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Oct-22
Checklist item:	Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.
Findings:	Actions related to the metering project, aimed at achieving best practices and meeting water balance targets, have not been implemented. The evidence provided indicates that the project has not yet been approved, raising uncertainty about whether implementation will proceed.
Corrective action:	The site will review all projects early next as very few projects have been approved, we will attend the Capital Project Meetings to ensure that the project will be allocated money. Depending on pricing of the project and the type of metering the site would need to isolate parts of the plant to include meters. The project needs to scoped.

Finding No:	TNR-014467
Checklist Item No:	3.9.3
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Oct-22
Checklist item:	Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.
Findings:	Actions aimed at achieving best practices related to water quality targets have not yet been implemented.
Corrective action:	The site had a meeting on 09/12/2024 with information regarding water quality at the catchment and from the supply, we had really good engagement with the scientists and we will be engaging for reports on the information and updates moving forward.

Finding No:	TNR-014471
Checklist Item No:	3.9.4
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Oct-22
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 specific actions have been implemented to achieve best practices or meet targets for maintaining Important Water Related Areas (IWRAs).
Corrective action:	The site will research more IWRA's that are relevant to the indicator and Haleon Dungarvan, reach out to LAWPRO on ideas regarding this indicator as they are the specialist for Ireland and all water related issues.

Finding No:	TNR-014472
Checklist Item No:	3.9.5
Status:	In Progress - CA plan approved
Finding level:	Observation
Checklist item:	Actions towards achieving best practice related to targets in terms of WASH shall be implemented.
Findings:	The actions implemented to achieve best practices related to WASH targets will require review during the surveillance audit.
Corrective action:	Review the WSP and ensure that WASH activities have been implemented on site before the surveillance audit

Finding No:	TNR-014473
Checklist Item No:	4.1.1
Status:	In Progress - CA plan approved
Finding level:	Observation
Checklist item:	Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.
Findings:	The actions outlined in the water stewardship plan were mostly in the initial stages, with limited implementation to fully achieve proper evaluation and AWS outcomes. Progress will be reviewed during the surveillance audit.
Corrective action:	Review the WSP and ensure that water stewardship outcomes activities have been implemented on site before the surveillance audit

Finding No:	TNR-014474
Checklist Item No:	4.1.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Oct-22
Checklist item:	Value creation resulting from the water stewardship plan shall be evaluated.
Findings:	The value creation resulting from the water stewardship plan was not evaluated, likely due to the plan not being fully implemented and the absence of sufficient data for evaluation at this stage.
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-014475
Checklist Item No:	4.1.3
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Oct-22
Checklist item:	The shared value benefits in the catchment shall be identified and where applicable, quantified.
Findings:	The shared value benefits within the catchment have not been identified or quantified due to the lack of implementation (Step 3) in the catchment area.
Corrective action:	Demonstrate the shared value benefits of WSP implementation and for the applicable benefits provide a quantification.

Finding No:	TNR-014553
Checklist Item No:	4.3.1
Status:	In Progress - CA plan approved
Finding level:	Observation
Checklist item:	Consultation efforts with stakeholders on the site’s water stewardship performance shall be identified.
Findings:	The facility reported that the Stakeholder Engagement Plan has been updated to incorporate progress, including the integration of Shared Water Challenges informed by stakeholder input. However, this should be reviewed during the surveillance audit, as the survey achieved only a 32% response rate. Additionally, individual stakeholder interviews revealed that the topic of water challenges, as well as the resulting Shared Water Challenges, had not been sufficiently addressed.
Corrective action:	The site will need to keep a constant engagement with stakeholders internally and externally.

Finding No:	TNR-014482
Checklist Item No:	5.2.1
Status:	In Progress - CA plan approved
Finding level:	Observation
Checklist item:	The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.
Findings:	It is unclear if the presentation provided as evidence is the same one shared with stakeholders on 18 October 2024.This because the email proof was submitted as a JPEG image.
Corrective action:	The site will source out the correct emails that satisfy this email

Finding No:	TNR-014481
Checklist Item No:	5.3.1
Status:	In Progress - CA plan approved
Finding level:	Observation
Checklist item:	A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.
Findings:	A summary of the site's water stewardship performance was shared by email however performance was not quantified.
Corrective action:	The site will need need to include performance indicators as part of satisfying this indicator moving forward

Finding No:	TNR-014486
Checklist Item No:	5.4.2
Status:	In Progress - CA plan approved
Finding level:	Observation
Checklist item:	Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.
Findings:	The facility has provided evidence of efforts made by the site to engage stakeholders. Coordination and support of public-sector agencies is still at inception stages and is yet to be determined.
Corrective action:	The site had reached out to LAWPRO a huge public sector and is a national shared service working on behalf of all 31 local authorities in Ireland. We are currently engaging with them to meet most of the indicators within the post audit findings.

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WSAS WATER STEWARDSHIP ASSURANCE SERVICES

Report Details

Report	Value
Report prepared by	Ruth Wandera
Report approved by	Ozge GOKMEN
Report approved on (Date)	09/12/2024

Surveillance

Proposed date for next audit
2025-Oct-22

Stakeholder Announcements

Date of publication	Location
30/09/2024	Notice boards OC & OTC
21/07/2024	https://www.haleon.com/content/dam/haleon/corporate/documents/our-impact/environment/integrating-water-stewardship/AWS-dungarvan-stakeholder-announcement.pdf
06/08/2024	WSAS
06/08/2024	AWS

Catchment Information

Catchment Information

Haleon Dungarvan facility named its catchment as the Colligan-Mahon catchment. The Colligan-Mahon catchment is divided into six sub catchments with 35 river waterbodies, two lakes, five transitional, seven coastal and 15 groundwater bodies. The Haleon site is situated in sub catchment 17-6 in the Colligan- Brickey,basin and is influenced by the river Brickey and the river Colligan which both ultimately discharge into Dungarvan Harbour to the east of the site.

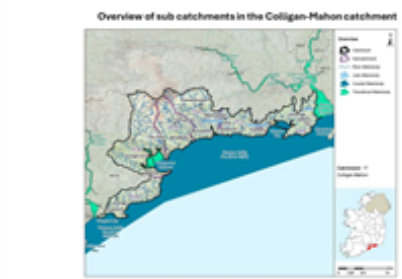
The Ballinamuck Source, which is the main public water supply for the Dungarvan area and the sole supply source for the Haleon site, is drawn from the Dungarvan Ground Water Body. Ballinamuck is located northwest of Dungarvan town alongside the Colligan River.

The Dungarvan Ground Water Body can be considered an unconfined aquifer. However, at Ballinamuck, the static water level lies within an upper alluvial unit, which confines the groundwater at the well site. Geological Survey Ireland (GSI) have developed a Ground Water Body description for the Dungarvan Ground Water Body. The description for the Dungarvan GWB is accessible in the attachment 'DungarvanGWB'.

The Source Protection Area (SPA), delineated in the attached document, 'Ballinamuck groundwater abstraction points' provides an assessment of the land area that contributes groundwater to the Ballinamuck Source.

The SPA includes the complete catchment area to the source, i.e. the zone of contribution (ZOC), and it is delineated as the area required to support an abstraction from long-term recharge.
The public supply at Ballinamuck can produce at least 7300 m³/d; the largest recorded well yield in the Republic of Ireland. The current abstraction is approximately 5450 m3 /d.
The Ballinamuck source consists of four bored wells owned and operated by Uisce Eireann/Irish Water. Ballinamuck is located within the Colligan River Sub-catchment.

Ballinamuck groundwater abstraction points.jpg



Overview of sub catchments in the Colligan-Mahon catchment.jpg

Client Description and Site Details

Client/Site Background
Haleon's Dungarvan facility has been operational for over 30 years and employs 750 people. As a global supply site, it serves 70 markets worldwide, producing bulk granulate and tablets for regional packaging and delivering finished packs to regions including the Middle East and Europe.

The facility manufactures products in the following categories:

Oral Health: With science-based brands like Sensodyne, Panadol, Parodontax, and Polident, these products support dental and oral health.

Respiratory: Leading brands for cold, flu, nasal congestion, and allergy relief, such as Otrivin and Theraflu, use advanced science to help manage respiratory symptoms.

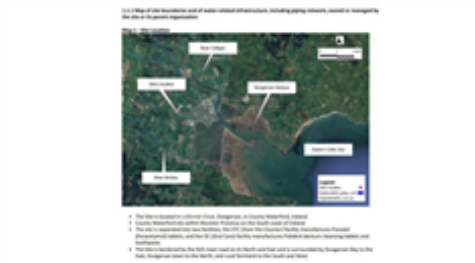
Pain Relief: The portfolio includes well-known brands like Panadol, Voltaren, and Advil, which help alleviate pain and inflammation, enhancing quality of life.

Vitamins, Minerals, and Supplements: With a leading range of health and wellness brands, such as Centrum, Caltrate, and Emergen-C, Haleon’s products support everyday health across 70+ markets.

Digestive Health & More: Trusted brands like Eno and Tums are recognized for treating heartburn, acid indigestion, and other digestive issues.

The site includes two manufacturing buildings, totaling 45,704 m² along with a boiler house. The Medical Device (OC) division, established in 1981, has seven product classifications and serves over 170 markets. The Medicinal (OTC) division, founded in 1987, operates with nine CMO partnerships and supplies six sister sites. Across these divisions, the site holds two Drug Product Licenses and three Medical Device Certifications.

Medical Device (OC) operations focus on cleansing tablets, fixative paste, and powder adhesives. Geographically, the site is bordered by the N25 road on the north and east sides, with Dungarvan Bay to the east, Dungarvan town to the north, and rural farmland to the south and west.



Site location.jpg

1.1.1 Map 2.2 Site Overview OC.JPG

1.1.1 Map 7 3D Map Haleon OC 2024 Final_08.02.2024.jpg

OTC Plant layout.jpg

Site Boundaries.jpg

OC Plant layout.jpg

1.1.1 Map 10 3D Map Haleon OTC 2023 Final_01.12.2023.jpg

1.1.1 Map 2.3 Site Overview OTC.JPG

Summary of Shared Water Challenges

Summary of Shared Water Challenges

The facility listed the following shared water challenges which it came up with through research rather than consultation with stakeholders. The stakeholder survey achieved only a 32% response rate. Additionally, individual stakeholder interviews revealed that the topic of water challenges, as well as the resulting Shared Water Challenges, had not been sufficiently addressed.

1. Water Availability - National and regional uncertainty over current and future water availability and the effects of climate change may have unforeseen impacts across the country with regards to changes to abstraction legislation. The site relies on municipal water supply for all of its water requirements. Regional uncertainty over current and future water availability and the effects of climate change may have unforeseen impacts on the site with regards to changes to legislation.
2. Water Quality - According to the WRI, the site is in an area of 'Extremely High' Coastal Eutrophication Potential. Excess ammonia and phosphate leading to eutrophication are the dominant issues in rivers and lakes in Colligan Mahon Catchment. While pollution from organic matter is also a concern. Nitrates and excessive nutrients are the significant issue for transitional and coastal water bodies in the Colligan Mahon Catchment. Increases in flooding events from river bodies that have sediment issues and an increase in urban runoff creating more pressure on wastewater treatment and further impacts on site discharge licenses.
3.Water Infrastructure -Dungarvan Tidy Towns Concerned with water quality and environmental health of the catchment including visible plastic pollution, particularly the Colligan Estuary and Dungarvan harbour. Concerns include urban water runoff, agricultural runoff and wastewater leaks and overflows. Any leaks in infrastructure could have reputational or compliance implications
4.WASH - There is a need for a changing and washroom facility open for public use in Dungarvan town which has been campaigned for by local councillors and residents
5. Flooding events - Flooding is an increasing issue in the Brickey and Colligan catchment due to climate change. Plans to include and recruit catchment community groups to work on nature based solutions are being prioritised to alleviate impacts of flooding and stormwater overflow.

0.1	**General Requirements for Single Sites, Multi-Sites and Groups**	
0.1.1	*Eligibility Criteria*	
0.1.2		
0.1.2.1	*Have any water source locations and water-related discharge locations been visited during the audit, if so, which and where? If none were visited please provide justification.*	No
Comment	None were visited because this was an initial audit and the site has two operations OC and OTC which have different inlets and discharge points.	
0.1.1.1	*The site(s) occupy one catchment OR an exception has been granted.*	Yes
Comment	The site occupies one catchment.	
0.1.1.2	*The scope of the proposed certification shall be under the control of a single management system.*	Yes
0.1.1.3	*The scope of the proposed certification shall be homogeneous with respect to primary production system, water management, product or service range, and the main market structures.*	Yes

1	STEP 1: GATHER AND UNDERSTAND	
1.1	*Gather information to define the site's physical scope for water stewardship purposes, including: its operational boundaries; the water sources from which the site draws; the locations to which the site returns its discharges; and the catchment(s) that the site affect(s) and upon which it is reliant.*	
1.1.1	*The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including:* *- Site boundaries;* *- Water-related infrastructure, including piping network, owned or managed by the site or its parent organization;* *- Any water sources providing water to the site that are owned or managed by the site or its parent organization;* *- Water service provider (if applicable) and its ultimate water source;* *- Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies;* *- Catchment(s) that the site affect(s) and is reliant upon for water.*	Yes
Comment	The physical scope of the site was mapped and includes the following: Site Boundaries: Available in '1.1.1 Map 2.2 Site Overview OC', '1.1.1 Map 2.3 Site Overview OTC', and 'Site Maps'. Water-Related Infrastructure: This includes the piping network owned or managed by the site or its parent organization, documented in 'Floor Layouts - OC' and 'Floor Layouts - OTC'. Water Sources: Covers any water sources supplying the site that are owned or managed by the site or its parent organization, found in 'GROUNDWATER Source Information'. Water Service Provider and Ultimate Water Source: This information is located in 'GROUNDWATER Source Information', '1.1.1 Map 6 Water Source Ballinamuck WTP', and '1.1.1 Map 5 Major Aquifers in the South East Region'. Discharge Points and Wastewater Service Provider: This includes any discharge points and details of the wastewater service provider, along with the ultimate receiving water body or bodies, found in '1.1.1 Map 3 Site Water Sources and Discharge Points'. Catchments: Identifies the catchment areas that the site impacts and depends on for water. Relevant information is located in '1.1.1 2021 17-colligan-mahon-catchment-summary-wfd-cycle-3', 'GROUNDWATER Source Information', '1.1.1 Map 6 Water Source Ballinamuck WTP', '1.1.1 Map 5 Major Aquifers in the South East Region', and '1.1.1 Map 1 Site location in Catchment'.	
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.

Yes

Comment

Stakeholders and their water-related challenges were identified in column J of the 'Stakeholder Prioritisation & Engagement Plan' document.

Inclusion of Relevant Stakeholder Groups: The stakeholder list covers Irish Farmers Association (IFA), which is a community-based organization. This fulfils the standard requirement for including vulnerable populations, women, minorities, and Indigenous communities in the Irish context.

Consideration of the Physical Scope and Water-Related Stakeholders: Stakeholders associated with the site's water sources and discharge points are included. Uisce Éireann (Irish Water) is identified as a key stakeholder responsible for the water supply (from the Ballinamuck Water Treatment Plant) and discharge to Dungarvan and Baile na nGall Wastewater Treatment Plants, which ultimately release to Dungarvan Bay.

Evidence of Stakeholder Consultation on Water-Related Interests and Challenges: Documentation of consultations can be found in 'Stakeholder Comms Folders' and 'External Stakeholder Survey & Responses'.

Stakeholder Participation Variability: The potential variation in stakeholders' ability and/or willingness to engage is noted in column F of the 'Stakeholder Prioritisation & Engagement Plan'.

Degree of Stakeholder Engagement: Engagement levels, based on each stakeholder's interest and influence, are recorded in columns E, F, and K of the 'Stakeholder Prioritisation & Engagement Plan'.

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

Yes

Comment

The 'Stakeholder Prioritisation & Engagement Plan' document identifies the current and potential influence between the site and stakeholders in columns E to I. Additionally, the document '1.2.1 Stakeholder Identification Process and Maps' shows the stakeholders that are located within the catchment area, and has considered both the site's ultimate water source and the receiving water body for wastewater.

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

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

Yes

Comment

The facility has developed plans to address the following contingencies:

- Chemical Spills: Protocols are in place for managing chemical spills to prevent contamination and ensure safety.

- Water Supply Disruption: Plans cover events that could lead to an insufficient or contaminated water supply, potentially affecting facility operations.

- Source Water Quality Issues: Preparedness for any deviations from water quality standards that could impact production quality or safety.

- Critical Operations: Measures to safeguard operations essential to product manufacturing, laboratory analysis, and compliance activities.

- Emergency Response Plan: Includes responses to adverse weather events and provisions for a fire water retention pond.

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

in progress

Comment

In 2022, the OC & OTC sites recorded a total water consumption of 75,706 m³, with a measured discharge of 44,220 m³, leaving 31,486 m³ unaccounted for. No indication or quantification of water losses and storage was provided.The site is aware of this discrepancy and is actively working to address it. Evidence of progress will need to be demonstrated at the next surveillance.

Finding No: TNR-014306

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

in progress

Comment

The OC and OTC sites have reported discrepancies in water consumption and discharge over recent years:
2020: Total water consumption was 93,203 m³, with a measured discharge of 53,230 m³, resulting in 39,973 m³ unaccounted for equivalent to 43%.
2021: Total water consumption was 93,101 m³, with a measured discharge of 52,334 m³, leaving 40,767 m³ unaccounted for equivalent to 44%.
2022: Total water consumption was 75,706 m³, with a measured discharge of 44,220 m³, leaving 31,486 m³ unaccounted for equivalent to 42%.
2023/2024 Total water consumption at OC was 27,214m³, with a measured discharge of 20,103m³, leaving 7,111m³ unaccounted for equivalent to 26% .
2023/2024 OTC data was incomplete.
Efforts are underway to address the unaccounted-for portion by installing meters where necessary as part of an ongoing project. The site is aware of these discrepancies and is actively working towards their resolution. Demonstrable progress in addressing this issue will be required during the next surveillance review.

Finding No: TNR-014307

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

Yes

Comment

The facility provided water quality data for OC and OTC in compliance with the license requirements outlined in Schedules A and B. Irish Water reports on receiving body discharge and incoming water quality were included in the attachments titled 1.3.4 Uisce Éireann Discharge Water Quality Reports and 1.3.4 Uisce Éireann Incoming Water Quality Summaries.

An incident management report was also submitted regarding exceedances at the OTC facility site effluent waters. The Total Nitrogen (as N) levels were reported as 79.8 mg/L in 2021 and 80.4 mg/L in 2022, compared to the license A limit of 80 mg/L.

The site disclosed four incidents in 2022 where Trade Effluent discharge license limits were exceeded, including one chloride exceedance. Following these incidents, the facility updated its limit parameters to ensure regulatory compliance, and Irish Water issued a revised license. Despite these exceedances, no violation notices or fines were imposed.

The facility provided the following explanation:

The OC license, issued in 2019, was based on operating conditions at that time. During the COVID-19 pandemic, Haleon significantly reduced process water consumption, achieving a 50% reduction in maximum flow. While this reduction was positively received by Uisce Éireann, it inadvertently led to less dilution of effluent, causing an increase in chlorides and nitrogen levels. Haleon self-reported these exceedances and engaged with Uisce Éireann to identify solutions.

To address the issue, Haleon retained an external consultant who advised renegotiating license parameters with Uisce Éireann to reflect the site's revised operating conditions.

Concurrently, Haleon identified that its use of an aqueous washing process, which drained wastewater as Trade Effluent (TE), negatively affected TE quality. The facility transitioned to a new process that captures the chemicals in plastic flexible intermediate bulk containers (FIBCs) for incineration, resulting in improved effluent quality, particularly regarding Chemical Oxygen Demand (COD).

Ultimately, Haleon and Uisce Éireann agreed to revised TE parameters that align with the facility's updated water usage and processes.

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

Yes

Comment

The site visit confirmed that the storage and management of chemicals and hazardous waste were of a high standard. Evidence was provided identifying potential sources of pollution, including: Oils and fuels, Liquid nitrogen, Pharmaceutical powders, Granulated paracetamol, Nicotine oil, Other liquids stored on site. The locations of these materials were mapped, and comprehensive documentation was provided. A detailed inventory of 226 chemicals stored on-site is available in the document titled 1.3.5 Site Raw Materials Inventory. This document identifies chemicals that pose risks to water bodies and water abstraction points and specifies the associated hazard types for each chemical.

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

Comment

No IWRA on 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.*

Yes

Comment

The facility disclosed its annual water-related expenses and highlighted the environmental and economic value generated through water-related initiatives. One such project involved the biomass culvert with a condensate recovery skid that had been undersized for the steam requirements of the OTC site, resulting in condensate being discharged to the drain.

To address this inefficiency, the facility implemented an upgrade to a larger condensate recovery skid. This improvement has resulted in annual cost savings of approximately €35,000 in energy and water.

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

Yes

Comment

During the site visit, it was confirmed that the facility complies with Irish legislative requirements for Workplace Water, Sanitation, and Hygiene (WASH) facilities. Observations and documentation revealed the following:

Sanitary Facilities for Catering Staff:
The contracted catering staff are provided with separate toilet facilities, as documented in the attached photographs. This complies with the requirements outlined on page 26, Section 4.D.7, Point 3 of IS 340: Hygiene in the Catering Sector, which states, "Separate designated sanitary accommodation shall be provided for food workers."

General Sanitary Facilities:
The facility adheres to Regulation 20 of the Safety, Health, and Welfare at Work Act, meeting hygiene standards and providing adequate lavatories and washbasins equipped with hot and cold running water. These facilities are appropriately located near workstations, restrooms, changing rooms, and shower rooms. Additionally, provisions are made for the separate use of facilities for men and women where necessary, ensuring adequate and suitable showers for employees as required by the nature of their work or health reasons.

Feminine Hygiene Products:
The facility ensures the provision of feminine hygiene products for staff.

Drinking Water:
The facility meets the requirement to provide an adequate supply of wholesome drinking water at conveniently accessible points, as outlined in Irish legislation. Both the OTC and OC sites have multiple plumbed water fountains, including two in each canteen area, as well as water coolers.

Overall, the site complies with all applicable Irish legislative requirements for WASH facilities.

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

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

Yes

Comment

The primary inputs for the site are sourced from locations outside the site's catchment area. Evidence has been provided to identify and verify the sources of these inputs.

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

Yes

Comment

The facility disclosed information regarding the embedded water use associated with the outsourced employee uniform laundry service, despite the company providing the service being located outside the site's catchment area. Additionally, the facility provided the CWS Sustainability Report to support this disclosure.

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

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

Yes

Comment

The facility has identified several water governance initiatives to guide its water stewardship efforts, highlighting opportunities for collective action and alignment with broader water management goals. These initiatives include:

Water Framework Directive (WFD):
The WFD has been the primary legal framework for water protection in Europe since 2000. It focuses on achieving good qualitative and quantitative water health by reducing and eliminating pollution while ensuring sufficient water availability to meet both wildlife and human needs.

River Basin Management Plans (RBMPs):
Developed in six-year cycles, RBMPs provide a structured approach to assessing, planning, implementing, and reviewing water quality management strategies. Ireland's water quality management framework has evolved through the first and second RBMP cycles, enabling more effective planning and action.

National Water Resources Plan (NWRP):
The NWRP outlines how Uisce Éireann aims to provide a safe, sustainable, secure, and reliable water supply for its customers while safeguarding the environment. This plan ensures long-term water supply resilience.

Flood Risk Management Plan (Colligan-Mahon):
This plan outlines strategies for the cost-effective and sustainable long-term management of flood risks within the Colligan-Mahon River Basin. It includes proposed measures to mitigate significant flood risks while considering environmental and economic factors.

These initiatives inform the site’s approach to water stewardship, offering valuable insights into regulatory frameworks, strategic goals, and opportunities for collaboration.

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

Yes

Comment

The facility has developed a Register of Environmental Legislation to serve as a reference for Irish and EU laws currently applicable to the Republic of Ireland, specifically tailored to Haleon Dungarvan.

For each piece of legislation, the following details are included:

Year
Statutory Instrument (SI) Number
Title
Enforcements
Summary of the Legislation
Relevance to HALEON
Compliance Checklist
Pages 16 to 23 of the '1.5.2 Pages 20-25 Environmental Register of legislation' document focused on legislation related to Water.

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

Obs.

Comment	The facility shared an email documenting their inquiry regarding the catchment water balance, which appears to have been unsuccessful. As a follow-up, they provided Water Available for Use (WAFU) data, indicating a projected decline in the WAFU within the South East Region of Ireland.	
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	Water Framework Directive (WFD) Monitoring Monitoring began in 2007, with the most recent data reviewed up to 2015. In 2015: - 10 river and lake water bodies (27%) were classified as Good or High status. - 6 water bodies (16%) were classified as less than Good status. - Four river water bodies/sites have a high ecological status objective, with: - 3 water bodies (75%) at High status. - 1 water body at Good status. Rivers in the Colligan-Brickey sub-catchment were classified as Moderate. Groundwater Bodies - Dungarvan groundwater body, which underlies the site, is under review along with five groundwater bodies (Ballyknock, Helvick Head, Glenville, and Tourig Group 3). - Elevated nitrate concentrations were observed in all five bodies. - Phosphate levels are a concern in one groundwater body, likely contributing to nutrient loads in surface waters failing to meet quality objectives. - Ammonia from a waste facility is an issue in one groundwater body. - Two of the ten groundwater bodies are classified as At Risk. Pressures on Water Quality The most significant pressure on river and lake water bodies is agriculture, followed by: Urban wastewater, Domestic wastewater, Forestry, Other sources Domestic wastewater was identified as a significant pressure in Two river water bodies (Dunhill and Brickey) and One groundwater body (Tramore). Summary Efforts to address nutrient contributions from groundwater and improve the status of surface water bodies remain critical, with agriculture and wastewater management identified as the primary areas of concern. The facility also supplied the public water supply monitoring reports from Irish Water.	
1.5.5	*Important Water-Related Areas shall be identified, and where appropriate, mapped,and their status assessed including any threats to people or the natural environment, using scientific information and through stakeholder engagement.*	Yes

Comment	The Colligan-Mahon catchment consists of six sub-catchments with the following water bodies: 35 river water bodies, 2 lakes, 6 transitional water bodies, 6 coastal water bodies, & 10 groundwater bodies. Water Framework Directive (WFD) Monitoring Monitoring began in 2007, with the most recent data reviewed up to 2015. In 2015: - 10 river and lake water bodies (27%) were classified as Good or High status. - 6 water bodies (16%) were classified as less than Good status. - Four river water bodies/sites have a high ecological status objective, with: - 3 water bodies (75%) at High status. - 1 water body at Good status. Rivers in the Colligan-Brickey sub-catchment were classified as Moderate. Groundwater Bodies - Dungarvan groundwater body, which underlies the site, is under review along with five groundwater bodies (Ballyknock, Helvick Head, Glenville, and Tourig Group 3). - Elevated nitrate concentrations were observed in all five bodies. - Phosphate levels are a concern in one groundwater body, likely contributing to nutrient loads in surface waters failing to meet quality objectives. - Ammonia from a waste facility is an issue in one groundwater body. - Two of the ten groundwater bodies are classified as At Risk. A map was provided which presents the locations of the IWRAs within the catchment and sub-catchment.	
1.5.6	*Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.*	Yes

Comment

Uisce Éireann (formerly Irish Water) is a state-owned utility company responsible for water and wastewater services across Ireland. Established in 2013, it became a standalone national utility on 1 January 2023, following its renaming on 31 December 2022.

Key Operations
Uisce Éireann manages a vast network and infrastructure to provide drinking water and wastewater treatment:

Water Infrastructure:
755 Water Treatment Plants
1,711 Water Pumping Stations
1,426 Water Reservoirs
63,000 km of water mains

Wastewater Infrastructure:
1,062 Wastewater Treatment Plants
2,206 Wastewater Pumping Stations
2,000 Storm Water Overflows
26,000 km of foul/combined sewer network

Risk Assessments by Region
National Risks (County Waterford)
Very Low Risk: Water scarcity, earthquakes
Low Risk: Tsunami, urban flooding, river flooding
Medium Risk: Wildfires
High Risk: Coastal flooding

Dungarvan Area (WRI Assessment)
Medium-High Risk: Riverine flood risk
Medium Risk: Drought
Low-Medium Risk: Seasonal variability

These assessments highlight potential environmental challenges, including flood risks and water scarcity.
The facility provided information on the 'Water Services Strategic Plan' (WSSP) that Uisce Éireann is undertaking in order to improve the standards of water services throughout the country.

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

Yes

Comment

Haleon Dungarvan is in the South-East region, where 99.8% of the population has access to safely managed drinking water and sanitation services. This is according to the 'Clean and Safe Water Ireland's UN SDGs 2019 - Report on Indicators for Goal 6 Clean Water and Sanitation - Central Statistics Office (2021 report)'
According to WHO UNICEF, 2022. JMP (washdata.org) 96% of the population of Ireland has access to safely managed drinking water facility with improved water sources and 79.8% of the population of Ireland is reported to have access to safely managed sanitation facility with improved facilities that are not shared with other households and where excreta are safely disposed of in situ or removed and treated offsite.

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.*

in progress

Comment

The facility listed the following shared water challenges which it came up with through research rather than consultation with stakeholders. The stakeholder survey achieved only a 32% response rate. Additionally, individual stakeholder interviews revealed that the topic of water challenges, as well as the resulting Shared Water Challenges, had not been sufficiently addressed.
1. Water Availability - National and regional uncertainty over current and future water availability and the effects of climate change may have unforeseen impacts across the country with regards to changes to abstraction legislation. The site relies on municipal water supply for all of its water requirements. Regional uncertainty over current and future water availability and the effects of climate change may have unforeseen impacts on the site with regards to changes to legislation.
2. Water Quality - According to the WRI, the site is in an area of 'Extremely High' Coastal Eutrophication Potential. Excess ammonia and phosphate leading to eutrophication are the dominant issues in rivers and lakes in Colligan Mahon Catchment. While pollution from organic matter is also a concern. Nitrates and excessive nutrients are the significant issue for transitional and coastal water bodies in the Colligan Mahon Catchment. Increases in flooding events from river bodies that have sediment issues and an increase in urban runoff creating more pressure on wastewater treatment and further impacts on site discharge licenses.
3.Water Infrastructure -Dungarvan Tidy Towns Concerned with water quality and environmental health of the catchment including visible plastic pollution, particularly the Colligan Estuary and Dungarvan harbour. Concerns include urban water runoff, agricultural runoff and wastewater leaks and overflows. Any leaks in infrastructure could have reputational or compliance implications
4.WASH - There is a need for a changing and washroom facility open for public use in Dungarvan town which has been campaigned for by local councillors and residents
5. Flooding events - Flooding is an increasing issue in the Brickey and Colligan catchment due to climate change. Plans to include and recruit catchment community groups to work on nature based solutions are being prioritised to alleviate impacts of flooding and stormwater overflow.

Finding No: TNR-014730

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

Comment

The facility has identified initiatives in the attachment '1.6.2 Initiatives to address Shared Water Challenges' they include:
- Water availability - Water balance to be assessed in order to better manage water consumed onsite. Catchment balance to be assessed and estimated as accurately as possible. Meet with Uisce Eireann to better understand the availability and risks to the water supply.
- Water Quality - Arrange a meeting with LAWPRO scientists to better understand water quality and pressures on quality in the catchment. Undertake water quality testing on incoming water.
- Water Infrastructure - Maintain engagement with Uisce Eireann on local infrastructure projects. Ensure site is on the business alert register for Uisce Eireann. Check projects planned, in progress and complete on Uisce Eireann website. Have an emergency response plan in place for water outages and shortages and resilience plan for prolonged shortages.
- WASH - Engage with local councillors regarding public wash facility in Dungarvan.
- Flooding Events - Meeting is being arranged with LAWPRO for visit to site and discuss involvement with catchment initiatives.

1.7 *Understand the site's water risks and opportunities: Assess and prioritize the water risks and opportunities affecting the site based upon the status of the site, existing risk management plans and/or the issues and future risk trends identified in 1.6.*

1.7.1 *Water risks faced by the site shall be identified, and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.* Yes

Comment	The facility provided water risks (Column A), prioritized them (Column F) including likelihood (Column D) and severity of impact (Column E) and assessed potential costs (Column G) and business impact (Column B).	
1.7.2	*Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.*	Yes
Comment	The facility provided water-related opportunities linked to the list in 1.7.1 (column H) including how the site may participate (column I) assessment and prioritization (Column J) of potential savings and business opportunities (Column K).	
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	The facility has provided the following practices as best practice for water governance : 1. Defining Roles and Responsibilities Clearly allocate and distinguish roles within the organization for: Water-related strategy and policy planning. Implementation and operational management. Regulation and coordination across responsible authorities. 2.Transparent Data Sharing Accurately collect and disclose site water use and water quality data. Share this information transparently with stakeholders, including the public, in formats accessible to the target audience. 3.Public-Private Collaboration Actively engage in partnerships with Uisce Éireann and Waterford County Council Water Services. Collaborate to enhance mutual understanding of shared challenges and to plan for water-related risks and opportunities. 4.Peer Engagement for Water Stewardship Work with organizations in the Dungarvan IDA Business Park to promote water stewardship practices among members. 5.Engagement with Suppliers Request water use information from suppliers. Explore ways to reduce water consumption during the production of raw materials and service provision. 6. Supporting Community Water Initiatives Partner with Waterford County Councilors on water-related initiatives, such as the public toilet and changing room WASH efforts. 7.Participation in Multi-Stakeholder Platforms Contribute to governance platforms like the Local Water Authority Programme (LAWPRO) by: Facilitating and attending planning meetings with LAWPRO Communities Team members. Collaborating with water scientists and catchment stakeholders.	
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 facility identified the following sector- and catchment-specific best practices for improving water balance and efficiency: 1. Detailed Water Use Studies Implement a metering program to analyze water usage and gather data on unaccounted water use within the facility. 2. Leak Detection and Mitigation Conduct a comprehensive assessment to detect and measure leaks, followed by implementing actions to reduce water loss. 3.Installation of Water-Efficient Equipment Replace outdated, less efficient fixtures with modern, water-saving alternatives, such as: Faucet aerators Low-flow toilets Automatic shut-off taps 4.Reverse Osmosis (RO) Reuse Systems Install systems to reuse discarded water from the reverse osmosis (RO) treatment process. 5.Stakeholder Engagement Workshops Conduct workshops with internal stakeholders to explore their suggestions for reducing water consumption and improving efficiency. 6.Employee Training Educate employees about practical water-saving measures, such as turning off taps without automatic shut-off features, to encourage responsible water usage in daily activities. 7. Peer Consultation Collaborate with sector peers through the Water Stewardship Ireland Community of Practice to share insights on water efficiency measures and troubleshoot challenges. 8.Setting Ambitious Sustainability Targets Develop and implement SMART targets (Specific, Measurable, Achievable, Realistic, and Timely) for water consumption reduction as part of broader sustainability initiatives.	
1.8.3	*Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.*	Yes

Comment	The facility identified the following sector and catchment-specific best practices to improve water quality: 1. Water Reuse Strategies Explore options to match water quality with its intended purpose. For example, reuse discarded reverse osmosis (RO) water for cleaning or non-potable purposes, reserving high-quality water for essential uses. 2.Nature-Based Stormwater Solutions Utilize rain gardens and bioswales to filter and treat stormwater runoff from roofs and car parks. These systems: Improve water quality by infiltrating initial stormwater runoff. Filter larger storm flows before conveyance. 3. Collaboration with Stakeholders Partner with the Local Water Authority Programme (LAWPRO) Communities Team, scientists, agricultural producers, and other stakeholders to: Promote water stewardship. Address agricultural runoff that negatively impacts catchment water quality. 4.Leak Detection and Repair Identify and fix on-site leaks to prevent polluted water from: Seeping into the ground. Cross-contaminating site or catchment water. 5.Spill Protection and Response Practices Review and enhance spill protection and response protocols, replicating best practices from other site operations. For example, improve spill protection kits for diesel deliveries at key locations. 6.Trade Effluent Management Work with peers in the Water Stewardship Ireland Community of Practice and external consultants to identify and adopt best available technologies for trade effluent control and treatment. 7.Stormwater Drainage Bypass System Install and maintain a bypass system to manage chemical spills. Redirect potential spills from the stormwater drainage system to a firewater retention pond. Ensure spills are neutralized and safely collected for disposal.
1.8.4	*Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.*	Yes

Comment

The facility identified the following relevant catchment best practice for site maintenance of Important Water-Related Areas:

1. Public Communication and Awareness
Support public communication efforts by the Local Water Authority Programme (LAWPRO) to:
Promote awareness of the Water Action Plan 2024.
Highlight the 2025 Community Water Development Fund (CWDF) Open Call, which offers grants to communities for water quality protection and awareness projects.

2.Collaboration with LAWPRO on IWRA Protection
Assist with LAWPRO activities aimed at protecting and restoring IWRA sites within the catchment if such sites are identified as priority action areas.

3.Enhanced Trade Effluent Management
Test and treat site trade effluent beyond standard licensing requirements to ensure high-quality discharge into Dungarvan Bay, a designated IWRA within the catchment.

4.Nature-Based Runoff Management
Capture and treat runoff from site roofs and car parks using rain gardens or bioswales. These measures aim to:
Reduce polluted runoff reaching Dungarvan Bay.
Protect and improve the water quality of this IWRA.

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

Yes

Comment

The facility identified the following best practices to enhance equitable and adequate water, sanitation, and hygiene (WASH) services:

1. Community Support for Public WASH Services
Collaborate with Waterford County Councilors to support the installation of public toilets, washrooms, and changing rooms in Dungarvan Town.

2.Upgrading On-Site Facilities
Replace outdated fixtures in older on-site toilets and washrooms to meet higher standards.
Install no-touch fixtures where appropriate to improve hygiene and convenience.

3.Provision of Feminine Hygiene Products
Offer feminine hygiene products free of charge in on-site toilets and washrooms to promote gender equity and support employee well-being.

4.Optimizing Access to Drinking Water
Relocate drinking water fountains from areas with low usage to high-traffic areas where employees require better access to hydration.

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.

Yes

Comment: The facility publicly disclosed its commitment at both the gate and the reception area of its premises. The disclosed commitments included the following:

The site will implement and disclose progress on water stewardship programs to achieve improvements in AWS water stewardship outcomes. □OK
The site's implementation will align with and support existing catchment sustainability plans. □OK
The site will engage stakeholders in an open and transparent manner. □OK
The site will allocate resources to implement the Standard. □OK

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.

Yes

Comment: The facility provided the following documents and information:
Discharge Licenses: The OTC and OC discharge licenses are available in the folder titled 'Discharge Licenses'.
Identification of Responsible Persons/Positions: Details of the responsible individuals and their roles within the facility's organizational structure are outlined in the document '2.2.1 Legal Compliance System'.
Process for Submissions to Regulatory Agencies: Described in '2.2.1 System for submissions to regulatory bodies', the process includes:
Immediate reporting via email in the event of non-compliance (e.g., exceedance of a license parameter).
Continuous monitoring of flow and temperature.
Regular testing for COD, Suspended Solids, and other parameters as specified in the license, with results based on a monthly 24-hour composite timeframe.
Submission of quarterly reports.

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 water stewardship in line with this AWS Standard.*

Yes

Comment: A water stewardship strategy has been identified, outlining the organization's overarching mission, vision, and goals aligned with the AWS Standard to promote good water stewardship.

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.

in progress

Comment: A water stewardship plan has been identified, which includes the following elements:

Target: Specified in Column K.
Measurement and Monitoring: Details provided in Column O.
Actions to Achieve and Maintain (or Exceed) the Target: Outlined in Column I.
Planned Timeframes: Set out in Column N.
Financial Budgets: Allocated for actions, as listed in Column M.
Responsible Persons/Positions: Specified in Column L.
Link to Best Practices: Where applicable, links between targets and achieving best practices to address shared water challenges and AWS outcomes are noted in Columns Q & R.

Finding No: TNR-014731

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.*

Obs.

Comment: Haleon is currently in discussions with Uisce Eireann (UE) and Waterford County Council (WCC) regarding the establishment of a secondary supply line to the site, which would serve as a backup in the event of water supply disruptions (see email exchange evidence with Waterford County Council). Additionally, as outlined in Haleon's Water Stewardship Plan (2.3.2), an action item has been included to continue engagement with UE and WCC to explore the feasibility of implementing the secondary supply line.

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.*

in progress

Comment

LAWPRO coordinates the efforts of local authorities, including Waterford County Council, and other public bodies in implementing the River Basin Management Plans (RBMPs). Haleon Dungarvan is collaborating with LAWPRO to better understand the implementation of the RBMP sections relevant to the Colligan-Mahon catchment and to explore how the site can best support these efforts.

Similarly, the site is engaging with Uisce Eireann and Waterford County Council to support their implementation of the Irish National Water Resources Plan (NWRP).

While progress is ongoing, the site has yet to clearly define the specific water governance initiatives it aims to achieve.

Finding No: TNR-014422

3.1.2 *Measures identified to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be implemented.*

Yes

Comment

There are no specific indigenous populations in the Dungarvan area, aside from the local community at large. Stakeholder groups contacted through surveys include community organizations such as The Men's Shed, Dungarvan Tidy Towns, and the Travellers Support Group.

The survey aims to understand stakeholders' water use, identify water challenges, and explore opportunities for collaboration.

Additionally, the site is conducting stormwater quality analyses to prevent groundwater contamination. Efforts also include higher-frequency and duplicate effluent analyses, as demonstrated during the site visit.

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

The facility provided evidence of reported incidents to the Irish authorities and a Register of Environmental Legislation, which establishes and maintains a procedure to identify and access legal requirements.
This register serves as a comprehensive guide to Irish and EU legislation applicable to HALEON Dungarvan. It includes details of relevant legislation and codes of practice. Presented in a user-friendly table format, the register allows users to quickly identify specific Acts or Regulations relevant to the facility.

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

The facility provided the effluent analysis results for both OC and OTC based on their individual license requirements.

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.*	Obs.
Comment	The facility has shared a water metering project tracker, indicating that the installation of water meters on-site is 50% complete since the project's initiation. Additionally, the facility provided the following updates: - Water meter maps have been audited, reviewed, and corrected for any errors. - Proposed locations for meters in the OC have been submitted for approval. - Metering actions have been incorporated into the WSP, with specific timeframes outlined for each step. - A review of meters is currently underway in the OTC.	
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.*	Obs.
Comment	The EPA water scarcity risk map, provided by Uisce Éireann, highlights water risk zones in pink, several of which are located within the sub-catchment where the Haleon Dungarvan site operates. The facility stated that, as outlined in the Water Stewardship Plan, it plans to enhance water use efficiency and reduce total volumetric consumption on-site. The initial steps include repairing or replacing non-functional water meters and installing new meters to accurately monitor water consumption across different areas of the OC and OTC sites. This project is already in its early stages. Subsequent efforts will focus on identifying water losses caused by leaks or unnecessary consumption. The facility also reported significant reductions in total water usage between 2019 and 2021 due to process improvements, achieving a 50% reduction in maximum flow rates.	
3.3.3	*Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.*	Yes
Comment	This is not applicable for the facility.	
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.*	Yes

Comment

The facility provided water quality data for OC and OTC in compliance with the license requirements outlined in Schedules A and B.

An incident management report was also submitted regarding exceedances at the OTC facility site effluent waters. The Total Nitrogen (as N) levels were reported as 79.8 mg/L in 2021 and 80.4 mg/L in 2022, compared to the license A limit of 80 mg/L.

The site disclosed four incidents in 2022 where Trade Effluent discharge license limits were exceeded, including one chloride exceedance. Following these incidents, the facility updated its limit parameters to ensure regulatory compliance, and Irish Water issued a revised license. Despite these exceedances, no violation notices or fines were imposed.

The facility provided the following explanation:

The OC license, issued in 2019, was based on operating conditions at that time. During the COVID-19 pandemic, Haleon significantly reduced process water consumption, achieving a 50% reduction in maximum flow. While this reduction was positively received by Uisce Éireann, it inadvertently led to less dilution of effluent, causing an increase in chlorides and nitrogen levels. Haleon self-reported these exceedances and engaged with Uisce Éireann to identify solutions.

To address the issue, Haleon retained an external consultant who advised renegotiating license parameters with Uisce Éireann to reflect the site's revised operating conditions.

Concurrently, Haleon identified that its use of an aqueous washing process, which drained wastewater as Trade Effluent (TE), negatively affected TE quality. The facility transitioned to a new process that captures the chemicals in plastic flexible intermediate bulk containers (FIBCs) for incineration, resulting in improved effluent quality, particularly regarding Chemical Oxygen Demand (COD).

Ultimately, Haleon and Uisce Éireann agreed to revised TE parameters that align with the facility's updated water usage and processes.

Additionally, the facility is collaborating with Fairybush to assess the feasibility of implementing nature-based solutions, such as raingardens, to manage runoff from car parks. These solutions aim to enhance sustainability by utilizing natural methods to absorb and filter rainwater effectively.

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.*

Obs.

Comment

The facility has committed to continual improvement to achieve best practices for effluent management through the following actions:
- Engaging with LAWPRO to address catchment water quality issues.
- Responding to the new Uisce Éireann trade effluent framework by seeking to better understand opportunities for controlling and reducing effluent volume, contamination levels, and strength.
-To support this, the facility plans to participate in the Advanced Certified Water Stewardship Programme. Through stakeholder engagement in the program, the site aims to explore and implement best practices for trade effluent management.

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 facility provided the following update: - There are currently no site-specific IWRAs. - However, the site has engaged with LAWPRO to address catchment water quality issues and initiatives. A meeting is scheduled for 09/12/2024, which will help inform Haleon's future actions. ***Finding No: TNR-014440***
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	During the site visit, it was confirmed that the facility complies with Irish legislative requirements for Workplace Water, Sanitation, and Hygiene (WASH) facilities. Observations and documentation revealed the following: Sanitary Facilities for Catering Staff: The contracted catering staff are provided with separate toilet facilities, as documented in the attached photographs. This complies with the requirements outlined on page 26, Section 4.D.7, Point 3 of IS 340: Hygiene in the Catering Sector, which states, "Separate designated sanitary accommodation shall be provided for food workers." General Sanitary Facilities: The facility adheres to Regulation 20 of the Safety, Health, and Welfare at Work Act, meeting hygiene standards and providing adequate lavatories and washbasins equipped with hot and cold running water. These facilities are appropriately located near workstations, restrooms, changing rooms, and shower rooms. Additionally, provisions are made for the separate use of facilities for men and women where necessary, ensuring adequate and suitable showers for employees as required by the nature of their work or health reasons. Feminine Hygiene Products: The facility ensures the provision of feminine hygiene products for staff. Drinking Water: The facility meets the requirement to provide an adequate supply of wholesome drinking water at conveniently accessible points, as outlined in Irish legislation. Both the OTC and OC sites have multiple plumbed water fountains, including two in each canteen area, as well as water coolers. The quantities of WASH facilities were provided in the following document '1.3.8 Site WASH adequacy and access'.
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	The facility provided the following information: - Haleon Dungarvan obtains its water from the municipal authority's supply, with no special service arrangements or distinctions from the supply provided to the general population. - There are no land developments that restrict or hinder access to water sources. - Haleon Dungarvan fully complies with the parameters outlined in its trade effluent license. The stakeholder interviews revealed no indications of potential human rights infringements by the facility.
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.* Obs.

Comment

The facility outlined the following planned actions in its water stewardship plan:
- Engage with the current supplier of outsourced laundry services to assess their water usage and identify opportunities for improvement.
- Compile a list of all suppliers and request information on their water usage in the production of raw materials used by Haleon.

The plan listed "Stakeholder Engagement" as the target but did not specify any key metrics to track progress.

The current status indicates that Haleon has engaged with CWS, the laundry supplier, and is awaiting a response. However, it is noted that the supplier is located outside the facility's catchment area.

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.* Yes

Comment

The facility provided evidence of collaboration with their catering supplier, who confirmed efforts to upgrade catering equipment in partnership with Haleon to reduce water usage. For example:
- Ovens: Previously, the equipment consumed 170 liters per hour, while the current ovens use an average of 140 liters per hour when operating on steam. However, only one oven is now used on steam for 4–5 hours per day per site (OC & OTC).
- Refrigeration: No fridges or freezers require a water inlet.
- Dishwashers: Operate on short cycles, and all equipment is switched off when not in use.

These upgrades have contributed to overall water conservation in the facility.

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.* Yes

Comment

The facility has been evaluating the reactivation of its secondary incoming mains water supply to address concerns about water sitting stagnant in the line. This supply could serve as a backup to the OC site in the event of interruptions to the primary feed from the IDA Park ring main.

Waterford City and County Council advised the facility to first determine whether the existing pipe is of adequate size to meet campus water needs.
- If the pipe is sufficient: It should be scoured and pressure tested before being reinstated.
- If the pipe is insufficient: Additional storage capacity or pipe replacement may be required.
Should the secondary supply be reactivated, the facility will also need to reactivate the associated water meter.

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.* Yes

Comment The facility has provided evidence of
- Registering with the Water Stewardship Ireland Community of Practice.
- Actively engaging with peer organisations in Dungarvan IDA Business Park to promote water stewardship amongst the group members.
-Actively engaging with public-private partnership with Uisce Eireann and Waterford County Council Water Services to improve all parties' understanding of shared challenges and better plan responses to current and future water-related risks and opportunities.

3.9.2 *Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.* in progress

Comment The facility provided evidence of the status of the Metering projects execution. The projects for both OC and OTC are in the plan for 2025 but have not been approved yet.

Finding No: TNR-014465

3.9.3 *Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.* in progress

Comment The facility has identified the following sector- and catchment-specific best practices to enhance water quality:

Nature-Based Stormwater Solutions
Implement rain gardens and bioswales to filter and treat stormwater runoff from roofs and parking areas.
These systems:
Improve water quality by infiltrating initial stormwater runoff.
Filter larger storm flows before conveyance.

Lead Auditor Comment: The facility provided evidence of a meeting with Fairybush; however, no implementation has occurred to date.

Collaboration with Stakeholders
Partner with the Local Water Authority Programme (LAWPRO) Communities Team, scientists, agricultural producers, and other stakeholders to:
Promote water stewardship.
Address agricultural runoff impacting catchment water quality.

Lead Auditor Comment: A meeting with LAWPRO has not yet taken place. It is scheduled for 9 December 2024.

Finding No: TNR-014467

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.* in progress

Comment The facility provided evidence of initial email correspondence with LAWPRO, as a step towards its intention to support LAWPRO's efforts to protect and restore Important Water-Related Areas (IWRAs) within the catchment, should LAWPRO designate the IWRA as a priority action area.

However, no specific actions related to achieving best practices or meeting targets for maintaining IWRAs were implemented.

Finding No: TNR-014471

3.9.5 *Actions towards achieving best practice related to targets in terms of WASH shall be implemented.* Obs.

Comment	The facility outlined the following WASH-related action points: - Supporting Waterford County Councilors in the installation of public toilets, washrooms, and changing rooms in Dungarvan Town. - Upgrading fixtures in older on-site toilets and washrooms to align with higher standards, including installing touchless fixtures where feasible. - Offering feminine hygiene products free of charge in on-site toilets and washrooms. - Relocating drinking water fountains from low-usage areas to locations with higher employee activity to better meet hydration needs. However, apart from providing free feminine hygiene products in on-site toilets and washrooms, there was no evidence that the other actions were implemented.

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.* Obs.

Comment: The site's performance against the targets outlined in its water stewardship plan was evaluated, along with its contribution to achieving the water stewardship outcomes detailed in the attachment titled "REVISED Step 4 - Evaluate 4.1-4.4."

4.1.2 *Value creation resulting from the water stewardship plan shall be evaluated.* in progress

Comment: The value creation resulting from the water stewardship plan was not evaluated, likely due to the plan not being fully implemented and the absence of sufficient data for evaluation at this stage.

Finding No: TNR-014474

4.1.3 *The shared value benefits in the catchment shall be identified and where applicable, quantified.* in progress

Comment: The shared value benefits in the catchment were not identified or quantified due to the lack of implementation within the catchment area.

Finding No: TNR-014475

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 response to the incident(s) shall be evaluated and proposed preventative and corrective actions and mitigations against future incidents shall be identified.* Yes

Comment: The facility reported that there were no incidents in the past year.

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.* Obs.

Comment: The facility indicated that they have made significant efforts to engage with area stakeholders through email, an emailed survey, and telephone communications. Stakeholder feedback was incorporated, and Haleon has initiated collaboration with LAWPRO, Waterford County Council, and Dungarvan Tidy Towns to better understand and address shared challenges.

Out of 25 survey emails sent, 8 responses were received, resulting in a 32% response rate.

The Stakeholder Engagement Plan has been updated to reflect progress made, including the integration of Shared Water Challenges based on stakeholder input. This needs to be checked at surveillance audit.

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.*	Yes

Comment

The facility indicated that the Draft Water Stewardship Plan has been evaluated and updated since its initial iteration, incorporating feedback from both internal and external stakeholders. The attached Water Stewardship Plan includes actions that are ongoing as well as new actions that have been identified.
The document titled "REVISED Step 4 - Evaluate 4.1-4.4" (pages 1 to 3) contains an evaluation of each target, indicating whether it has been met and outlining subsequent actions. The updated Water Stewardship Plan is documented under '241010_Rev01 Haleon Dungarvan Water Stewardship Action Plan'.

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 the roles and positions accountable for compliance with water-related laws and regulations, was disclosed at the site entrance. A photograph serving as evidence of this disclosure is included in the document '5.1.1 Haleon Dungarvan Site Water Governance'.
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.* 🔍 Obs.
Comment	The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, was communicated to relevant stakeholders by email.
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.* 🔍 Obs.
Comment	A summary of the site's water stewardship performance was shared by email however performance was not quantified.
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.* ✓ Yes
Comment	The site's shared water-related challenges and efforts made to address these challenges was disclosed by email.
5.4.2	*Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.* 🔍 Obs.
Comment	The facility has provided evidence of efforts made by the site to engage stakeholders. Coordination and support of public-sector agencies is still at inception stages and is yet to be determined.
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	The facility had no compliance violations in the past year.

5.5.2	*Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.*	Yes
Comment	Not applicable	
5.5.3	*Any site water-related violation that may pose significant risk and threat to human or ecosystem health shall be immediately communicated to relevant public agencies and disclosed.*	Yes
Comment	Not applicable	

Photographic Evidence from Audit

16 OC Stormwater Pollution Bypass Valve to Retention Pond.jpg

11 OC Chemical Store Area.jpg

04 OC Process Water Pumps.jpg

46 OC Laboratory Fume Hoods.jpg

32 Biomass RO Unit.jpg

19 OC Process Effluent 4 x 12 hour sampling boxes.jpg

06 OC Chlorination Dosing Monitor.jpg

31 Biomass Water Softening Tank.jpg

44 OC Laboratory Fume Hood.jpg

08 OC Chlorination Tank and Chemical Bund.jpg

61 OTC Diesel Delivery Point with spill protection.jpg

63 OTC Water Purification System.jpg

27 OC Flammable Liquid Storage.jpg

48 OTC AWS Noticeboard.jpg

12 OC Effluent Station.jpg

54 OTC Outdoor Chemical Storage.jpg

33 Biomass Water Storage Tank.jpg

50 OTC Chemical Waste System.jpg

18 OC Process Effluent Testing Unit.jpg

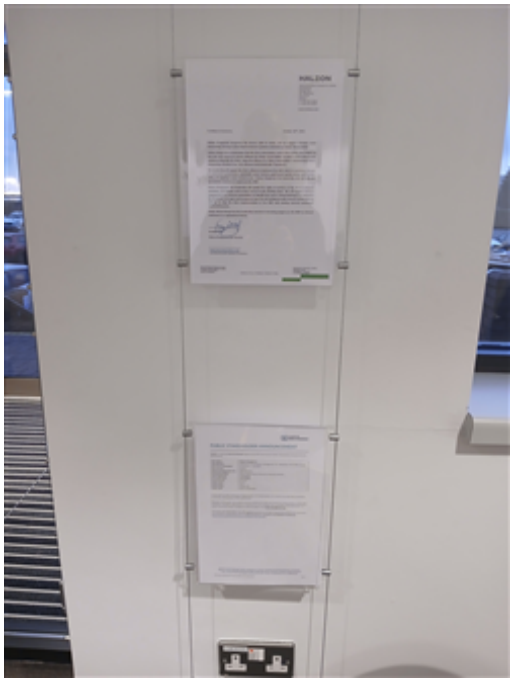
22 OC Stormwater Sample Point.jpg

28 OC Spillkit for delivery of flammable liquids.jpg

52 OTC Chemical Storage.jpg

07 OC Water Meter in Chlorine pump house.jpg

10 OC Firewater Tanks.jpg



01 AWS Committment Reception.jpg

49 OTC Lab Chemical Waste System.jpg

58 OTC Firewater Tank.jpg

CONTROLLED PRINT FROM VEEVA QUALITYDOCS - CP-QD-FRM-
Reason: EHS

Chain of Custody for Trade Effluent Discharge Samples

Site: OC/OTC	Testing schedule: Weekly/Monthly	Date sample is representative of	Sample collected and logged by/date/time	Security receipt of sample date/time	External lab-collected and logged by/date/time
OTC	Tek-Lab Monthly	16/10/2024	PMD 16/10/2024 09:00	Ron 17/10/2024 09:20	17/10/24 11:30
OTC	Enviro Monthly	16/10/2024	PMD 17/10/2024 09:00	Ron 17/10/2024 09:20	Ron 21/10/24 15-10-24 9:05

36 OTC Effluent Log book.jpg

05 OC Chlorination Tank.jpg

30 Biomass Water Softener.jpg

13 OC Effluent Weir and Testing Area.jpg

20241022_105045.jpg

40 OC Laboratory Chemical Storage.jpg

59 OTC Process Water Tank.jpg

14 OC Process Drain Interceptor.jpg

47 OC Laboratory Chemical Bund Storage.jpg

24 OC Chemical Store Labelling.jpg

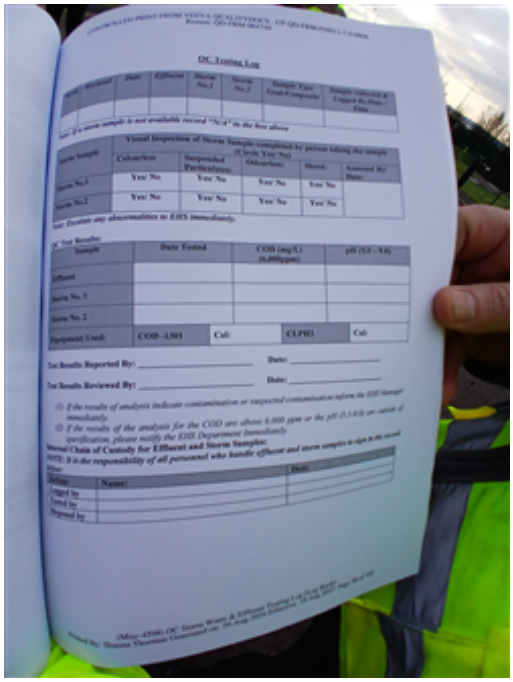
17 OC Effluent Weir.jpg

29 OC Drains covered by spillkit in 28.jpg

34 OTC AWS Commitment Signage at Security Gate.jpg

51 OTC Chemical Storage.jpg

55 OTC Outdoor Chemical Storage.jpg



26 OC Stormwater & Effluent Logbook internal.jpg

03 OC Process Water Storage Tank.jpg

62 OTC Water Purification System.jpg

45 OC Laboratory Fume Hood.jpg

39 OTC Process Effluent Probe.jpg

42 OC Laboratory Chemical Storage.jpg

Yes

Comment Photographic evidence is attached.

41 OC Laboratory Chemical bunded storage.jpg

43 OC Laboratory Fume hood.jpg

56 OTC Steam pipe from Biomass.jpg

21 OC Effluent pH sample point.jpg

31 Biomass RO unit.jpg

60 OTC Diesel Tank for Boiler.jpg

09 OC Fire Water Retention Pond.jpg

53 OTC Laboratory Signage.jpg

15 OC Effluent Station Tank.jpg

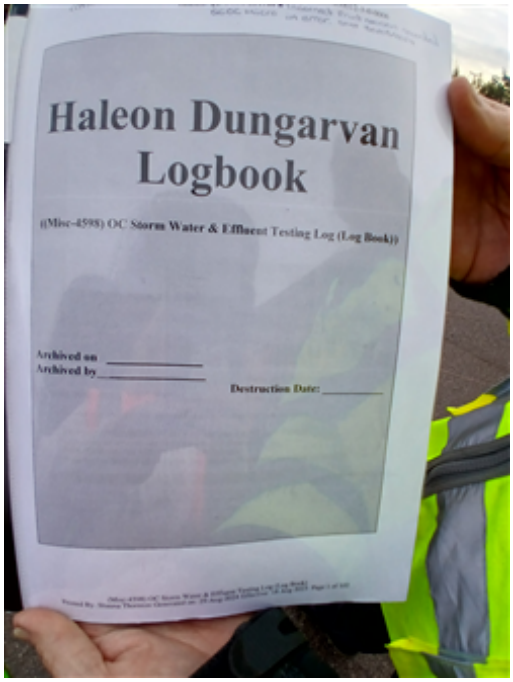
23 OC Chemical Store Interior.jpg

02 OC Main incomer meter location.jpg

37 OTC Process Effluent Station.jpg

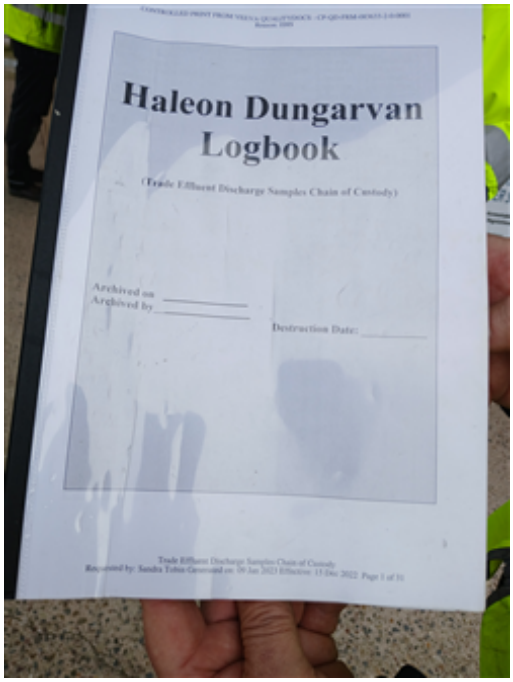
20 OC Effluent Drain Access.jpg

57 OTC Steam Pipe from Biomass.jpg



25 OC Stomwater & Effluent Logbook.jpg

38 OTC Process Effluent Sample Point.jpg



35 OTC Effluent Log Book.jpg

Upgrade or Downgrade of Certification

Justification for Upgrade or Downgrade

Comment Not Applicable

Summary of Evidence which led to change

Previous Findings

All non-conformities raised in the previous audit have been satisfactorily closed.

N/A