

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)



Audit Number: AO-001396

### SITE DETAILS

Site: **Pakistan Tobacco Company - Akora Khattak Factory & GLT**

Address: Main GT road, Nowshera, Khyber Pakhtunkhwa, Pakistan, 24040, Akora Khattak, PAKISTAN

Contact Person: Gul Fatima

AWS Reference Number: AWS-000427

Site Structure: Single Site

### CERTIFICATION DETAILS

Certification status: Certified Core

Date of certification decision: 2025-May-09

Validity of certificate: 2028-May-08

### AUDIT DETAILS

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

Audit Type(s): Re-Certification Audit

Audit Start Date: 2024-Dec-17

Audit End Date: 2024-Dec-19

Lead Auditor: Rizwan Masood

Audit team participants:

Rizwan Masood, Lead Auditor

Site Participants:

Muhammad Ali, Factory Manager

Maha Ali, Sustainability Senior Supervisor

Zain Khan, Services Engineer

Anand Kumar, Team Leader

Bilal Mehmood, Facility & utility Manager

Saad Hafeez, Sustainability Officer

Kamil Shehzad, HR Manager

Amir Iqbal, IR Manager

Jamal Toru, CORA Manager

Hassan Moonis, PK ESG Manager

Gul Fatima, Sustainability Manager

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ADDITIONAL INFO

Summary of Audit Findings: During the certification audit, 4 minor non-conformities and 7 observations were raised.

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 15 March 2025.

CLOSURE OF FINDINGS AND CORRECTIVE ACTION PLAN:

The Client has successfully resolved 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.  
Minor non-conformities must be closed out by the time of the next annual audit.

The audit team recommends re-certification of Pakistan Tobacco Company - Akora Khattak Factory & GLT at Core level pending approval of the corrective actions plan for the non-conformities.

Scope of Assessment: The scope of services covers the recertification audit for assessing conformity of Pakistan Tobacco Company - Akora Khattak Factory & GLT factory against the AWS International Water Stewardship Standard Version 2.

Pakistan Tobacco Company's Akora Khattak Factory is located in Akora Khattak, Nowshera District in Khyber-Pakhtunkhwa province of Pakistan. PTC-Akora Khattak Factory spans over a total area of 47.24 acres. It has two main processes green leaf threshing (GLT) and cigarette Production. GLT is a seasonal process and operates only in tobacco harvesting season. Cigarette production operated around the year.

The audit was conducted onsite on 17 - 19 Dec, 2024.

The onsite site audit included the review of documents, interviews of stakeholders, visit included the assessment of site water infrastructure, storage of potential sources of pollution and WASH facilities at site.

FINDINGS

NUMBER OF FINDINGS PER LEVEL

Observation	7
Minor	4

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### FINDING DETAILS

Finding No: TNR-015994

Checklist Item No: 1.1.1

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2025-Dec-17

Checklist item: 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.

Findings: Site has identified what it considers as its catchment, sub-catchment and area of physical scope. However, there are some inconsistencies and insufficient scientific/hydrological justification:

- Site mentioned that its main catchment is Indus Basin, which is fine for a wider context but is too large and varied for e.g. catchment water balance, especially given that the site is relying solely on groundwater.
- The site defined sub-catchment as the Nowshera District Premises but that is an administrative boundary and does not meet the definition of a (sub)catchment.
- The site relies on groundwater for its water needs but has not collected adequate hydrological information about its source aquifer(s) (confined under impermeable layers or groundwater table, where they are recharged, etc) to define its catchment.

Corrective action: Site is working on the hydrological report with technical expert to clarify and incorporate the requirements of the indicators

Evidence of implementation: Please find attached file for detailed technical justification.

Finding No: TNR-016020

Checklist Item No: 1.3.4

Status: Open

Finding level: Observation

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

Findings: To address the gap that the site does not yet have sufficient quantification of the quality of its ultimate receiving body i.e. Kabul River, the site is starting to test the river water. The sampling plan and results will be reviewed at the next audit.

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## Alliance for Water Stewardship (AWS)

Audit Number: AO-001396

Finding No:	TNR-016024
Checklist Item No:	1.5.3
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Dec-17
Checklist item:	The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.
Findings:	Site has not quantified the water balance for its identified catchment. The balance shared is not about identified catchment or aquifer but for Indus basin, which is hundreds of times larger than the identified catchment.
Corrective action:	Site is working on the hydrological report with technical expert to clarify and incorporate the requirements of the indicators
Finding No:	TNR-016051
Checklist Item No:	1.8.1
Status:	In Progress - CA plan approved
Finding level:	Observation
Checklist item:	Relevant catchment best practice for water governance shall be identified.
Findings:	Site has only documented the practices it has implemented or participated which is actually requirement of indicator 3.9.1. in this indicator, Identification of best practice should inform the site about further water stewardship actions it could implement.
Corrective action:	Not applicable as relevant catchment best practice for water governance already identified and presented during the audit. Evidence attached for reference.
Finding No:	TNR-016052
Checklist Item No:	1.8.2
Status:	In Progress - CA plan approved
Finding level:	Observation
Checklist item:	Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.
Findings:	Site has only documented the practices it has implemented or participated which is actually requirement of indicator 3.9.2. in this indicator, Identification of best practice should inform the site about further water stewardship actions it could implement.
Corrective action:	Not applicable as relevant sector and/or catchment best practice for water balance already identified and presented in audit. Evidence attached for reference.

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## Alliance for Water Stewardship (AWS)

Audit Number: AO-001396

Finding No: TNR-016053  
Checklist Item No: 1.8.3  
Status: In Progress - CA plan approved  
Finding level: Observation  
Checklist item: Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.  
Findings: Site has only documented the practices it has implemented or participated which is actually requirement of indicator 3.9.3. in this indicator, Identification of best practice should inform the site about further water stewardship actions it could implement.  
Corrective action: Not applicable as relevant sector and/or catchment best practice for water quality already identified and presented in audit. Evidence attached for reference.

Finding No: TNR-016055  
Checklist Item No: 1.8.4  
Status: In Progress - CA plan approved  
Finding level: Observation  
Checklist item: Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.  
Findings: Site has only documented the practices it has implemented or participated which is actually requirement of indicator 3.9.4. in this indicator, Identification of best practice should inform the site about further water stewardship actions it could implement.  
Corrective action: Not applicable as relevant catchment best practice for site maintenance of Important Water-Related Areas already identified and presented during the audit. Evidence attached for reference.

Finding No: TNR-016054  
Checklist Item No: 1.8.5  
Status: In Progress - CA plan approved  
Finding level: Observation  
Checklist item: Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.  
Findings: Site has only documented the practices it has implemented or participated which is actually requirement of indicator 3.9.5. in this indicator, Identification of best practice should inform the site about further water stewardship actions it could implement.  
Corrective action: Not applicable as relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services already identified and presented during the audit. Evidence attached for reference.

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## Alliance for Water Stewardship (AWS)

Audit Number: AO-001396

Finding No:	TNR-016025
Checklist Item No:	2.4.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Dec-17
Checklist item:	A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.
Findings:	Site has not demonstrated co-ordination with relevant public-sector and infrastructure agencies, in development of these plans.
Corrective action:	Site is currently in progress of developing a plan to mitigate or adapt to water risks in-coordination with the relevant public-sector and infrastructure agencies.
Finding No:	TNR-016043
Checklist Item No:	4.1.2
Status:	In Progress - CA plan approved
Finding level:	Observation
Checklist item:	Value creation resulting from the water stewardship plan shall be evaluated.
Findings:	Site has not quantified the financial value created by water stewardship plan .
Corrective action:	Financial value created by water stewardship plan will be quantified and incorporated into the water stewardship plan
Finding No:	TNR-016046
Checklist Item No:	5.1.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Dec-17
Checklist item:	The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.
Findings:	Site has not clearly disclosed positions of those accountable for compliance with water-related laws and regulations.
Corrective action:	Disclosure will be made specifically highlighting the positions accountable for compliance with water-related laws and regulations.

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## Alliance for Water Stewardship (AWS)

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### Report Details

Report	Value
Report prepared by	Rizwaan Masood
Report approved by	Ozge Gokmen
Report approved on (Date)	07/02/2025

### Surveillance

<b>Proposed date for next audit</b> 2025-Dec-16	
Comment	Annual surveillance recommended

### Stakeholder Announcements

Date of publication	Location
25/11/2024	Mashriq Newspaper Local Language
17/10/2024	Company Web Site. <a href="https://www.ptc.com.pk/content/dam/endorsement/pk/en/download/media/AWS-000427_BAT%20Akora%20Pakistan_Stakeholder%20Announcement%20v2.pdf">https://www.ptc.com.pk/content/dam/endorsement/pk/en/download/media/AWS-000427_BAT%20Akora%20Pakistan_Stakeholder%20Announcement%20v2.pdf</a>
17/10/2024	WSAS website
17/10/2024	AWS Website
Comment	Stakeholder announcement was published on AWS and WSAS websites 8 weeks before the audit. Also, Site has published stakeholder announcement at website, 8 weeks before the audit. the announcement was also published in local newspaper.

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### Catchment Information



Catchment Map (BAT Akora).png

### Catchment Information

The site is located in Indus Basin. For its water needs, it primarily relies on groundwater extracted from 6 onsite wells. The site has on site wastewater treatment plant and discharges its treated wastewater into the local community drain and ends up in Kabul River, the ultimate receiving water body approximately 2 kms from site.

### Client Description and Site Details

#### Client/Site Background

Pakistan Tobacco Company's Akora Khattak Factory is located in Akora Khattak, Nowshera District in Khyber-Pakhtunkhwa province of Pakistan. PTC-Akora Khattak Factory spans over a total area of 47.24 acres. It has two main processes green leaf threshing (GLT) and cigarette manufacturing from the threshed tobacco. GLT is a seasonal process and operates only in tobacco harvesting season. Cigarette production operated around the year.



Site Map BAT Akora.jpg



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### Summary of Shared Water Challenges

#### Summary of Shared Water Challenges


The site has identified shared water challenges through stakeholder consultation. The water-related challenges in the catchment area include

- Potential Contamination of groundwater from surface water pollution
- Lack of regulations and groundwater modeling tools
- Weak institutional framework in the water sector
- Land use change in terms of industrialization & urbanization, resulting in decreasing recharge area.
- Groundwater Depletion & Insufficient water storage capacity.


### 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.*  Yes


Comment Water is sourced from the onsite boreholes, and these were visited during the site visit.

**0.1.1.1** *The site(s) occupy one catchment OR an exception has been granted.*  Yes

Comment Yes, 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

Comment Yes, the scope of the proposed certification shall be under the control of a single management system.

**0.1.1.3** *The scope of the proposed certification shall be homogeneous with respect to primary production system, water management, product or service range, and the main market structures.*  Yes

Comment The scope of the proposed certification is homogeneous with respect to primary production system, water management, product or service range, and the main market structures.

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### 1 STEP 1: GATHER AND UNDERSTAND

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

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

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

 in progress

**Comment** Physical scope of the site is available and mapped, including site boundaries and catchment information. Pakistan Tobacco company is located in Akora Khattak, Nowshera District in Khyber-Pakhtunkhwa province of Pakistan. PTC-Akora Khattak Factory spans over a total area of 47.24 acres.

Water related infrastructure including, ground water & discharge point, with piping network has been documented.

The site primarily relies on groundwater extracted from 6 onsite wells. The site has on site wastewater treatment plant and discharges its treated wastewater into the local community drain and ends up in Kabul River, the ultimate receiving water body approximately 2 kms from site.

Site has identified what it considers as its catchment, sub-catchment and area of physical scope. However, there are some inconsistencies and insufficient scientific/hydrological justification:

- Site mentioned that its main catchment is Indus Basin, which is fine for a wider context but is too large and varied for e.g. catchment water balance, especially given that the site is relying solely on groundwater.
- The site defined sub-catchment as the Nowshera District Premises but that is an administrative boundary and does not meet the definition of a (sub)catchment.
- The site relies on groundwater for its water needs but has not collected adequate hydrological information about its source aquifer(s) (confined under impermeable layers or groundwater table, where they are recharged, etc) to define its catchment.

**Finding No: TNR-015994**

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

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<b>1.2.1</b>	<p><i>Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall:</i></p> <ul style="list-style-type: none"> <li><i>- Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people;</i></li> <li><i>- Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies;</i></li> <li><i>- Provide evidence of stakeholder consultation on water-related interests and challenges;</i></li> <li><i>- Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups;</i></li> <li><i>- Identify the degree of stakeholder engagement based on their level of interest and influence.</i></li> </ul>	 Yes
Comment	Site has identified the relevant stakeholders in the catchment and established effective engagements with them. Site has identified their water related challenges through consultations. However, site has not provided evidence of stakeholder consultations for identification of shared water challenges.	
<b>1.2.2</b>	<p><i>Current and potential degree of influence between site and stakeholder shall be identified, within the catchment and considering the site's ultimate water source and ultimate receiving water body for wastewater.</i></p>	 Yes
Comment	The site has prioritized stakeholders based on the current and potential degree of influence and interest between the site and the stakeholders. According to the classification the Environmental Protection Agency (EPA), local community and farmers were identified as top priority stakeholders.	
<b>1.3</b>	<p><i>Gather water-related data for the site, including: water balance; water quality, Important Water-Related Areas, water governance, WASH; water-related costs, revenues, and shared value creation.</i></p>	
<b>1.3.1</b>	<p><i>Existing water-related incident response plans shall be identified.</i></p>	 Yes
Comment	The site management has identified potential water-related incidents and emergencies. The main water-related emergency scenarios identified include breakdowns in water and wastewater network, flood, spillage etc. These response plans found documented.	
<b>1.3.2</b>	<p><i>Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped</i></p>	 Yes
Comment	The site has effectively mapped its water infrastructure. Also, the site has installed sufficient instrumentation on water lines, and water consumption is monitored and recorded by area. The site is also consistently monitoring its water inflows, losses, storage, and outflows. (please refer slide 6 - 8 of additional documents)	
<b>1.3.3</b>	<p><i>Site water balance, inflows, losses, storage, and outflows, including indication of annual variance in water usage rates, shall be quantified. Where there is a water-related challenge that would be a threat to good water balance for people or environment, an indication of annual high and low variances shall be quantified.</i></p>	 Yes
Comment	Site has quantified water balance for year 2024. This includes quantification of inflows, storages, consumptions, losses and out flows. The water balance is based on measured (where flow meters are installed) and some estimated values (please refer slide 6 - 8 of additional documents).	

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<b>1.3.4</b>	<i>Water quality of the site's water source(s), provided waters, effluent and receiving water bodies shall be quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be quantified.</i>	 Obs.
Comment	<p>The site has developed and implemented a water quality monitoring plan, which encompasses source water, drinking water, and effluents. The quality parameters and frequencies of monitoring are defined in line with the regulatory requirements (please refer slide 6 - 8 of additional documents).</p> <p>However, Site has not yet clearly identified the quality of its ultimate receiving body i.e. Kabul river. The ground water quality for tubewell near the river has been presented in hydrological report - it representative groundwater quality rather than river quality. For river water quality, the site said it is starting to test the river water - the sampling plan and results will be reviewed at the next audit.</p>	
<b>1.3.5</b>	<i>Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.</i>	 Yes
Comment	<p>Potential sources of pollution at site found adequately documented/identified and mapped. These includes fuels, chemicals, fertilizers and pesticides. During the site visit it has been noted that the adequate mitigation measures have been implemented to prevent pollution. Chemical and fuel storages were provided with secondary containments and spillage control arrangements were readily available.</p>	
<b>1.3.6</b>	<i>On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.</i>	 Yes
Comment	<p>Site has identified water reservoirs, onsite bore well and etc. as onsite IWRAs, however these were not having any shared social, cultural, environmental or religious values. During the site visit, no onsite important water related area was observed and in discussion with site representative it was concluded that there is no onsite IWRA.</p>	
<b>1.3.7</b>	<i>Annual water-related costs, revenues, and a description or quantification of the social, cultural, environmental, or economic water-related value generated by the site shall be identified and used to inform the evaluation of the plan in 4.1.2.</i>	 Yes
Comment	<p>The site has documented the water-related costs for the year 2024, encompassing expenses for water extraction, processing, quality monitoring, effluent treatment, and disposal. Additionally, site has also identified social, cultural, environmental values generated through these activities. The costs of water related initiatives were added during the audit.</p>	
<b>1.3.8</b>	<i>Levels of access and adequacy of WASH at the site shall be identified.</i>	 Yes
Comment	<p>The facility has made sufficient provisions to guarantee safe drinking water, sanitation, and hygiene (WASH) for all employees. Additionally, the site has evaluated WASH access at the workplace, encompassing aspects of water supply, sanitation, and hygiene. The facility also ensures separate toilets for males and females and has assessed the sufficiency of the number of toilets available for each gender.</p>	
<b>1.4</b>	<i>Gather data on the site's indirect water use, including: its primary inputs; the water use embedded in the production of those primary inputs the status of the waters at the origin of the inputs (where they can be identified); and water used in out-sourced water-related services.</i>	
<b>1.4.1</b>	<i>The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be identified.</i>	 Yes

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Comment	Site has identified the suppliers of its primary inputs. Majority of its suppliers are not located in the catchment. Tobacco is sourced from Leaf growing areas (some of which lie within catchment) and site has collected the water footprints of the tobacco harvesting in the catchment in collaboration with the leaf department.	
1.4.2	<i>The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.</i>	Yes 
Comment	Site has different outsourced activities, but all of these are executed within the site boundaries. There is no embedded water use of outsourced services within the Catchment.	
1.5	<i>Gather water-related data for the catchment, including water governance, water balance, water quality, Important Water-Related Areas, infrastructure, and WASH</i>	
1.5.1	<i>Water governance initiatives shall be identified, including catchment plan(s), water-related public policies, major publicly-led initiatives under way, and relevant goals to help inform site of possible opportunities for water stewardship collective action.</i>	Yes 
Comment	Site has adequately identified the water governance initiatives in the catchment. These includes water supply and sanitation infrastructure improvement, rainwater harvesting initiatives in the catchment, flood control and agricultural water use efficiency initiatives and etc.	
1.5.2	<i>Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.</i>	Yes 
Comment	The site has documented legal and regulatory requirements related to water. These include stipulations from the Environmental Protection Act, Factories Act, National Environmental Quality Standards, KP Water Act, 2020 among others	
1.5.3	<i>The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.</i>	in progress 
Comment	As mentioned in 1.1.1, site has hypothetically identified its catchment and has not investigated adequately about the hydrology of the source aquifer. The balance shared is not about identified catchment or aquifer but for Indus basin, which is hundreds of times larger than identified catchment.	
<b>Finding No: TNR-016024</b>		
1.5.4	<i>Water quality, including physical, chemical, and biological status, of the catchment shall be identified, and where possible, quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be identified.</i>	Yes 
Comment	Ground water is mostly source of water in the catchment. The site has gathered information on water quality of ground water at different locations in the catchment. Water in most of the samples (67%) is not fit for human consumption, having biological contamination. Site also has presented annual variation trends in quality parameters.	
1.5.5	<i>Important Water-Related Areas shall be identified, and where appropriate, mapped, and their status assessed including any threats to people or the natural environment, using scientific information and through stakeholder engagement.</i>	Yes 
Comment	Site has identified "Warsak Dam" and "Kabul River" as catchment IWRA's. the status and threats found identified for the important water related areas.	
1.5.6	<i>Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.</i>	Yes 

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Comment	The source of water in the catchment is mostly the ground water. Mostly, the water is extracted through private bores. Some areas are connected with piped supplied network but mostly there is no organized water supply network. The catchment mostly has the open drain channels these also transport the domestic effluents. Site has summarized the catchment water infrastructure and its condition in normal and extreme conditions.	
1.5.7	<i>The adequacy of available WASH services within the catchment shall be identified.</i>	 Yes
Comment	The site has identified the drinking water and sewage network in the catchment area. The data indicates that only 50% of population have access to safe drinking water and the sanitation condition in the catchment are very poor.	
1.6	<i>Understand current and future shared water challenges in the catchment, by linking the water challenges identified by stakeholders with the site's water challenges.</i>	
1.6.1	<i>Shared water challenges shall be identified and prioritized from the information gathered.</i>	 Yes
Comment	<p>The site has identified shared water challenges through stakeholder consultation. The water-related challenges in the catchment area include</p> <ul style="list-style-type: none"> <li>- Potential Contamination of groundwater from surface water pollution</li> <li>- Lack of regulations and groundwater modeling tools</li> <li>- Weak institutional framework in the water sector</li> <li>- Land use change in terms of industrialization &amp; urbanization, resulting in decreasing recharge area.</li> <li>- Groundwater Depletion &amp; Insufficient water storage capacity.</li> </ul> <p>Also, Site has prioritized the shared water challenges (mentioned orderly) on the basis of significance and stakeholder feedback.</p>	
1.6.2	<i>Initiatives to address shared water challenges shall be identified.</i>	 Yes
Comment	Site has identified the initiatives to address the identified shared water related challenges. These include on-site and catchment level projects like; agriculture water use efficiency improvement, provision of water filtration plants for communities, awareness and cleanup drives etc.	
1.7	<i>Understand the site's water risks and opportunities: Assess and prioritize the water risks and opportunities affecting the site based upon the status of the site, existing risk management plans and/or the issues and future risk trends identified in 1.6.</i>	
1.7.1	<i>Water risks faced by the site shall be identified, and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.</i>	 Yes
Comment	The site has identified water-related risks and prioritized them using a likelihood and impact-based priority matrix. The identified risks are divided into 3 categories: physical risks, reputational risks and regulatory risks	
1.7.2	<i>Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.</i>	 Yes
Comment	The site has documented various water-related opportunities. Some are currently being utilized, while others are in the planning stages. Additionally, these opportunities have been ranked according to their significance. Also, site has identified social, cultural, environmental benefits through these opportunities.	



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<b>1.8</b>	<i>Understand best practice towards achieving AWS outcomes: Determining sectoral best practices having a local/catchment, regional, or national relevance.</i>	
<b>1.8.1</b>	<i>Relevant catchment best practice for water governance shall be identified.</i>	Q Obs.
Comment	<p>Site is actively involved in initiatives to support catchment governance. These include organizing policy discussion, awareness campaigns and partnering with governance bodies to support governance initiatives. Some of the initiatives are as follow;</p> <ul style="list-style-type: none"> <li>- WASH Community Awareness Drive</li> <li>- Leaf Supplier Manual sharing with farmers to promote best irrigation practices</li> <li>- Cleanup drive in the catchment</li> <li>- Engagements with governmental, Institutional and private sector for better water governance in area and etc</li> </ul> <p>However, Site has only documented the practices it has implemented or participated which is actually requirement of indicator 3.9.1. in this indicator, Identification of best practice should inform the site about further water stewardship actions it could implement.</p>	
<b>1.8.2</b>	<i>Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.</i>	Q Obs.
Comment	<p>Site has implemented many onsite and catchment initiatives those can be considered as best practices related to water balance. Catchment initiatives include promoting leaser leveling and alternate furrow irrigation technique in agriculture in catchment. Onsite, extensive recycling of treating effluent for gardening, toilet flush, solar panel cleaning etc.</p> <p>However, site has only documented the practices it has implemented or participated which is actually requirement of indicator 3.9.2. in this indicator, Identification of best practice should inform the site about further water stewardship actions it could implement.</p>	
<b>1.8.3</b>	<i>Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.</i>	Q Obs.
Comment	<p>Site has implemented many waters quality related initiatives. These include catchment water quality investigation and sharing with relevant stakeholders in the catchment. Setting stringent quality paraments to be maintained on treated effluent discharge.</p> <p>However, site has only documented the practices it has implemented or participated which is actually requirement of indicator 3.9.3. in this indicator, Identification of best practice should inform the site about further water stewardship actions it could implement.</p>	
<b>1.8.4</b>	<i>Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.</i>	Q Obs.
Comment	<p>Site has executed a clean-up drive on the River Kabul. The Kabul River is an identified Important Water related Area in the catchment</p>	
<b>1.8.5</b>	<i>Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.</i>	Q Obs.
Comment	<p>The site has adequate arrangements to ensure access to drinking water, sanitation and hygiene (WASH) for all workers. Site has maintained separate toilets for males and females also evaluated the adequacy of number of toilets for each gender. Site is regularly monitoring the quality of drinking water through a 3rd party laboratory. Site also has installed 16 drinking water filtration systems for community in catchment to support access to drinking water.</p>	

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## Alliance for Water Stewardship (AWS)

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2	STEP 2: COMMIT & PLAN - Commit to be a responsible water steward and develop a Water Stewardship Plan	
2.1	<i>Commit to water stewardship by having the senior-most manager in charge of water at the site, or if necessary, a suitable individual within the organization head office, sign and publicly disclose a commitment to water stewardship, the implementation of the AWS Standard and achieving its five outcomes, and the allocation of required resources.</i>	
2.1.1	<i>A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:</i> <ul style="list-style-type: none"> <li>- That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes</li> <li>- That the site implementation will be aligned to and in support of existing catchment sustainability plans</li> <li>- That the site's stakeholders will be engaged in an open and transparent way</li> <li>- That the site will allocate resources to implement the Standard.</li> </ul>	 Yes
Comment	Site has established commitment to AWS which is endorsed by Factory Manager. The commitment statement is covering all aspects of alliance for water stewardship standard. The commitment found readily available on company web-site, for public or any interested party. ( <a href="https://www.ptc.com.pk/content/dam/endmarkets/pk/en/download/media/AWS%20Governance.pdf">https://www.ptc.com.pk/content/dam/endmarkets/pk/en/download/media/AWS%20Governance.pdf</a> ). This has also been posted it on prominent locations at site.	
2.2	<i>Develop and document a process to achieve and maintain legal and regulatory compliance.</i>	
2.2.1	<i>The system to maintain compliance obligations for water and wastewater management shall be identified, including:</i> <ul style="list-style-type: none"> <li>- Identification of responsible persons/positions within facility organizational structure</li> <li>- Process for submissions to regulatory agencies.</li> </ul>	 Yes
2.3	<i>Create a water stewardship strategy and plan including addressing risks (to and from the site), shared catchment water challenges, and opportunities.</i>	
2.3.1	<i>A water stewardship strategy shall be identified that defines the overarching mission, vision, and goals of the organization towards good water stewardship in line with this AWS Standard.</i>	 Yes
Comment	Site has documented its water stewardship strategy. This defines the overarching mission, vision, and goals of the organization towards good water stewardship in line with this AWS Standard.	
2.3.2	<i>A water stewardship plan shall be identified, including for each target:</i> <ul style="list-style-type: none"> <li>- How it will be measured and monitored</li> <li>- Actions to achieve and maintain (or exceed) it</li> <li>- Planned timeframes to achieve it</li> <li>- Financial budgets allocated for actions</li> <li>- Positions of persons responsible for actions and achieving targets</li> <li>- Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.</li> </ul>	 Yes



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Comment


Site has developed Water Stewardship Plan. This includes action items (initiatives), responsibilities, budget (cost), time frame and relevance with AWS outcomes and shared water challenge. The initiatives are focused on shared water challenges and AWS standard outcomes.

2.4

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

2.4.1

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

 in progress

Comment



Site has developed mitigation plans against the water related risks. However, site has not demonstrated co-ordination with relevant public-sector and infrastructure agencies, in development of these plans.

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3	<b>STEP 3: IMPLEMENT - Implement the site's stewardship plan and improve impacts</b>	
3.1	<i>Implement plan to participate positively in catchment governance.</i>	
3.1.1	<i>Evidence that the site has supported good catchment governance shall be identified.</i>	 Yes
Comment	Site is actively involved in initiatives to support catchment governance. These include organizing policy discussion, awareness campaigns and partnering with governance bodies to support governance initiatives. Some of the initiatives are as follow; <ul style="list-style-type: none"> <li>- WASH Community Awareness Drive</li> <li>- Leaf Supplier Manual sharing with farmers to promote best irrigation practices</li> <li>- Cleanup drive in the catchment</li> <li>- Engagements with governmental, Institutional and private sector for better water governance in area and etc.</li> </ul>	
3.1.2	<i>Measures identified to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be implemented.</i>	 Yes
Comment	The site has implemented several initiatives to protect the water rights of local communities. These include: <ul style="list-style-type: none"> <li>- Installation of drinking water filtration plants for communities</li> <li>- Reduction in Well Water Withdrawal</li> <li>- Treatment of site wastewater before it leaves the premises</li> </ul>	
3.2	<i>Implement system to comply with water-related legal and regulatory requirements and respect water rights.</i>	
3.2.1	<i>A process to verify full legal and regulatory compliance shall be implemented.</i>	 Yes
Comment	Water-related legal compliance is regularly monitored, with the EPA mandating assessments of priority effluent quality parameters. All water quality results have been found to comply with the required standards. Furthermore, the site has obtained all necessary approvals and licenses for operation.	
3.2.2	<i>Where water rights are part of legal and regulatory requirements, measures identified to respect the water rights of others including Indigenous peoples, shall be implemented.</i>	 Yes
Comment	Site explained that no legally defined water rights of others including indigenous people are applicable. However, provision of safe drinking water and provision of toilets to all workers at site is site obligation and site is compliant with it.	
3.3	<i>Implement plan to achieve site water balance targets.</i>	
3.3.1	<i>Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.</i>	 Yes
Comment	Site is working to improve its water efficiency and reduce water consumption. Site has documented its water usage reduction journey which shows site has significantly improved its water balance over last couple of years. Site has set water conservation projects in its water stewardship plan and tracking the progress of these projects.	

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<b>3.3.2</b>	<i>Where water scarcity is a shared water challenge, annual targets to improve the site's water use efficiency, or if practical and applicable, reduce volumetric total use shall be implemented.</i>	 Yes
Comment	Though site is not located in water scarce area but site has still plans and target to improve its water efficiency and reduce the consumption. Efficiency improvement plans found in place and these are continuously tracked. It has been noted that site has achieved its water efficiency target over last couple of years and aiming to achieve 50% improvement by 2025 as compared to 2018.	
<b>3.3.3</b>	<i>Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.</i>	 Yes
Comment	No such legal binding applicable,	
<b>3.4</b>	<i>Implement plan to achieve site water quality targets</i>	
<b>3.4.1</b>	<i>Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.</i>	 Yes
Comment	The quality of process effluent is also being regularly monitored. Last 3rd party report found compliant with local wastewater quality parameters. effluent quality reports are submitted to environmental protection agency every quarter. In water stewardship plan site has mentioned that the targets requirements for its effluent discharge, which apparently are more stringent than regulatory requirements.	
<b>3.4.2</b>	<i>Where water quality is a shared water challenge, continual improvement to achieve best practice for the site's effluent shall be identified and where applicable, quantified.</i>	 Yes
Comment	The quality of process effluent is also being regularly monitored. Last 3rd party report found compliant with local wastewater quality parameters. effluent quality reports are submitted to environmental protection agency every quarter. In water stewardship plan site has mentioned that the targets requirements for its effluent discharge, which apparently are more stringent than regulatory requirements.	
<b>3.5</b>	<i>Implement plan to maintain or improve the site's and/or catchment's Important Water-Related Areas.</i>	
<b>3.5.1</b>	<i>Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.</i>	 Yes
Comment	Site has executed a clean-up drive on the River Kabul. The Kabul River is an identified Important Water Related Area in the catchment	
<b>3.6</b>	<i>Implement plan to provide access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers at all premises under the site's control.</i>	
<b>3.6.1</b>	<i>Evidence of the site's provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers onsite shall be identified and where applicable, quantified.</i>	 Yes
Comment	The site has adequate arrangements to ensure access to drinking water, sanitation and hygiene (WASH) for all workers. Site has maintained separate toilets for males and females also evaluated the adequacy of number of toilets for each gender. Also, site is regularly monitoring the quality of drinking water through a 3rd party laboratory.	

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<b>3.6.2</b>	<i>Evidence that the site is not impinging on the human right to safe water and sanitation of communities through their operations, and that traditional access rights for indigenous and local communities are being respected, and that remedial actions are in place where this is not the case, and that these are effective.</i>	 Yes
Comment	No evidence was observed during the audit that site is impinging on the human right to safe water and sanitation of communities through their operations. Site also has installed 16 drinking water filtration systems for community to support access to drinking water.	
<b>3.7</b>	<i>Implement plan to maintain or improve indirect water use within the catchment:</i>	
<b>3.7.1</b>	<i>Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.</i>	 Yes
Comment	Company is actively engaged with the tobacco farmers in the catchment, for efficient water use in agriculture. Site has promoted the leaser leveling technique and achieved around 11% water saving in 2024. Site is also promoting Alternate Furrow Irrigation technique and achieved 9% water saving.	
<b>3.7.2</b>	<i>Evidence of engagement with suppliers and service providers, as well as, when applicable, actions they have taken in the catchment as a result of the site's engagement related to indirect water use, shall be identified.</i>	 Yes
Comment	Though site has only tobacco farmers are the indirect water users in the catchment and these are effectively engaged. but site also has approached the suppliers in other catchments.	
<b>3.8</b>	<i>Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have.</i>	
<b>3.8.1</b>	<i>Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.</i>	 Yes
Comment	Site has engaged the government bodies and the owners of the shared infrastructure (Tehsil Municipality officer, Public Health Engineering, Commissioner) on AWS agenda. Site shared the hydrological report, which also contains the concerns on the shared infrastructure.	
<b>3.9</b>	<i>Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.</i>	
<b>3.9.1</b>	<i>Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.</i>	 Yes
Comment	Site is actively involved in initiatives to support catchment governance. These include organizing policy discussion, awareness campaigns and partnering with governance bodies to support governance initiatives. Some of the initiatives are as follow; - WASH Community Awareness Drive - Leaf Supplier Manual sharing with farmers to promote best irrigation practices - Cleanup drive in the catchment - Engagements with governmental, Institutional and private sector for better water governance in area and etc.	
<b>3.9.2</b>	<i>Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.</i>	 Yes

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Comment	Site has implemented many onsite and catchment initiatives those can be considered as best practices related to water balance. Catchment initiatives include promoting leaser leveling and alternate furrow irrigation technique in agriculture in catchment. Onsite, extensive recycling of treating effluent for gardening, toilet flush, solar panel cleaning etc.	
<b>3.9.3</b>	<i>Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.</i>	 Yes
Comment	Site has implemented many waters quality related initiatives. These include catchment water quality investigation and sharing with relevant stakeholders in the catchment. Setting stringent quality paraments to be maintained on treated effluent discharge.	
<b>3.9.4</b>	<i>Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.</i>	 Yes
Comment	Site has executed a clean-up drive on the River Kabul. The Kabul River is an identified Important Water Related Area in the catchment	
<b>3.9.5</b>	<i>Actions towards achieving best practice related to targets in terms of WASH shall be implemented.</i>	 Yes
Comment	The site has adequate arrangements to ensure access to drinking water, sanitation and hygiene (WASH) for all workers. Site has maintained separate toilets for males and females also evaluated the adequacy of number of toilets for each gender. Site is regularly monitoring the quality of drinking water through a 3rd party laboratory. Site also has installed 16 drinking water filtration systems for community in catchment to support access to drinking water.	

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4 STEP 4: EVALUATE - Evaluate the site's performance.	
4.1	<i>Evaluate the site's performance in light of its actions and targets from its water stewardship plan and demonstrate its contribution to achieving water stewardship outcomes.</i>
4.1.1	<i>Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.</i> <span style="float: right;">✔ Yes</span>
Comment	The organization is continuously monitoring performance against AWS plan. The performance against each target has been evaluated and updated on the tracking sheet.
4.1.2	<i>Value creation resulting from the water stewardship plan shall be evaluated.</i> <span style="float: right;">🔍 Obs.</span>
Comment	Site has evaluated the water savings from the water stewardship plan actions. However, site has not quantified the financial value created by these actions.
4.1.3	<i>The shared value benefits in the catchment shall be identified and where applicable, quantified.</i> <span style="float: right;">✔ Yes</span>
Comment	Site has identified shared value benefits for the actions in water stewardship plan. Shared value benefits include social, environmental and economic benefits.
4.2	<i>Evaluate the impacts of water-related emergency incidents (including extreme events), if any occurred, and determine the effectiveness of corrective and preventative measures.</i>
4.2.1	<i>A written annual review and (where appropriate) root-cause analysis of the year's emergency incident(s) shall be prepared and the site's response to the incident(s) shall be evaluated and proposed preventative and corrective actions and mitigations against future incidents shall be identified.</i> <span style="float: right;">✔ Yes</span>
Comment	Site representative explained that no real time water related emergency incident or extreme event occurred, hence no such evaluation available.
4.3	<i>Evaluate stakeholders' consultation feedback regarding the site's water stewardship performance, including the effectiveness of the site's engagement process.</i>
4.3.1	<i>Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.</i> <span style="float: right;">✔ Yes</span>
Comment	Site has executed a consultation process on its performance. Multiple stakeholders were asked set of questions on site's performance. The responses and suggestions were recorded.
4.4	<i>Evaluate and update the site's water stewardship plan, incorporating the information obtained from the evaluation process in the context of continual improvement.</i>
4.4.1	<i>The site's water stewardship plan shall be modified and adapted to incorporate any relevant information and lessons learned from the evaluations in this step and these changes shall be identified.</i> <span style="float: right;">✔ Yes</span>
Comment	Site reviews the Water stewardship plan on monthly basis and update it based on the relevant information and lesson learned.

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5 STEP 5: COMMUNICATE & DISCLOSE - Communicate about water stewardship and disclose the site's stewardship efforts	
5.1	Disclose water-related internal governance of the site's management, including the positions of those accountable for legal compliance with water-related local laws and regulations.
5.1.1	The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed. <span style="float: right;">in progress</span>
Comment	Site's water related internal governance has been disclosed on company website ( <a href="https://www.ptc.com.pk/content/dam/endmarkets/pk/en/download/media/AWS%20Governance.pdf">https://www.ptc.com.pk/content/dam/endmarkets/pk/en/download/media/AWS%20Governance.pdf</a> ). However, site has not explicitly disclosed positions of those accountable for compliance with water-related laws and regulations.
<b>Finding No: TNR-016046</b>	
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. <span style="float: right;">Yes</span>
Comment	Site has presented its water stewardship plan and performance to stakeholders during the engagement sessions and also recorded the feedback on its plan and performance. Additionally, the water stewardship plan is available on company website.
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. <span style="float: right;">Yes</span>
Comment	Site has presented its water stewardship plan and performance to stakeholders during the engagement sessions and also recorded the feedback on its plan and performance. Additionally, the water stewardship plan is available on company website.
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. <span style="float: right;">Yes</span>
Comment	It has been noted that site has only communicated its shared water challenges to stakeholders in formal engagement sessions. Also, these shared water challenges are publicly disclosed at company website; ( <a href="https://www.ptc.com.pk/content/dam/endmarkets/pk/en/download/media/PTC-AKF-Water-Stewardship-Performance.pdf">https://www.ptc.com.pk/content/dam/endmarkets/pk/en/download/media/PTC-AKF-Water-Stewardship-Performance.pdf</a> )
5.4.2	Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified. <span style="float: right;">Yes</span>
Comment	Site has engaged with stakeholders and coordinating with public-sector agencies on AWS agenda. Site has presented its efforts to engage stakeholders and coordinate and support public-sector agencies. Some of these efforts are also disclosed at company website. ( <a href="https://www.ptc.com.pk/content/dam/endmarkets/pk/en/download/media/PTC-AKF-Water-Stewardship-Performance.pdf">https://www.ptc.com.pk/content/dam/endmarkets/pk/en/download/media/PTC-AKF-Water-Stewardship-Performance.pdf</a> )

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5.5	<i>Communicate transparency in water-related compliance: make any site water-related compliance violations available upon request as well as any corrective actions the site has taken to prevent future occurrences.</i>	
5.5.1	<i>Any site water-related compliance violations and associated corrections shall be disclosed.</i>	<div><div>✔</div><div>Yes</div></div>
Comment	Site representative has mentioned that no water related violation has been reported/occurred in recent past	
5.5.2	<i>Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.</i>	<div><div>✔</div><div>Yes</div></div>
Comment	Site representative has mentioned that no water related violation has been reported/occurred in recent past	
5.5.3	<i>Any site water-related violation that may pose significant risk and threat to human or ecosystem health shall be immediately communicated to relevant public agencies and disclosed.</i>	<div><div>✔</div><div>Yes</div></div>
Comment	Site representative has mentioned that no water related violation has been reported/occurred in recent past	



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### Photographic Evidence from Audit

✓  
Yes



Fuel Storage Tank.jpeg

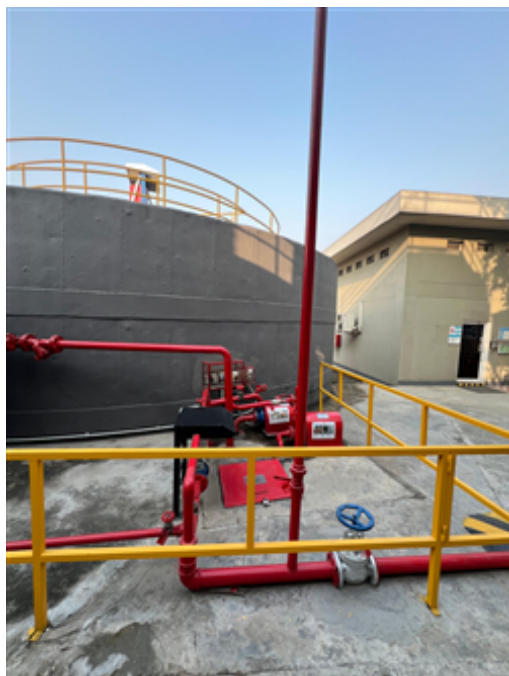


Lab - Spill Kit & washing area.jpeg

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ETP - Plant.jpeg



Filter Plant.jpeg

# CERTIFICATION REPORT

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Lab - Washroom.jpeg

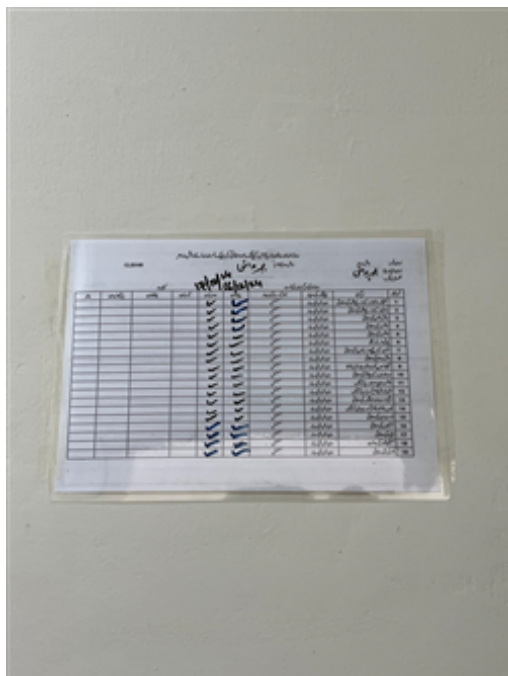


Filtration Plant.jpeg

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Labor Washroom - Cleaning Checklist.jpeg



Labor Washroom - Hand Washing Area.jpeg



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ETP - Pump.jpeg



Labor Washroom.jpeg

# CERTIFICATION REPORT

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Lab - instruments.jpeg



Labor Washroom - Not for Drinking sign.jpeg

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Tube Well no. 4 - 2.jpeg



ETP - 1.jpeg

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Labor Washroom - ETP pipelines.jpeg



Labor Washroom - Ablution Area.jpeg



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Tube Well no. 4.jpeg



ERP - 2.jpeg

### Previous Findings

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



N/A

Comment      No finding was raised in last (SV2) audit.

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