

Alliance for Water Stewardship (AWS)

Audit Number: AO-001688

SITE DETAILS

Site: Fatima Fertilizer Company Limited - Sadiqabad

Address: Fatima Plant Site, Mukhtar Garh, District Rahim Yar Khan, 64350, Sadiqabad, PAKISTAN

Contact Person: Muhammad Waseem
AWS Reference Number: AWS-000450

Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Core

Date of certification decision: 2025-Oct-01

Validity of certificate: 2028-Sep-30

AUDIT DETAILS

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

Audit Type(s): Re-Certification Audit

Audit Start Date: 2025-Aug-11 Audit End Date: 2025-Aug-13 Lead Auditor: Rizwan Masood

Site Participants:

Manager HSEQT,

Lead Environment,

Executive Admin,

Executive Horticulture,



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ADDITIONAL INFO

Summary of Audit Findings: During the recertification audit, no non-conformities and 6 observations were raised.

The audit team recommends re-certification of Fatima Fertilizer - Sadiqabad at Core level.

Scope of Assessment: The scope of services covers the recertification audit for assessing conformity of Fatima Fertilizer - Sadiqabad against the AWS International Water Stewardship Standard Version 2.

The Fatima Fertilizer is one of the leading fertilizer producing plants in Pakistan, its products include Nitro Phosphate, Calcium Ammonium Nitrate, Urea and CO2. The intermediate products include Nitric Acid and Ammonia. The plant is located in district Rahim Yar Khan - Tehsil Sadiq Abad, in the southern part of Punjab province and the area is actually the water stressed region. The main issues include water quality (TDS and Arsenic levels) and water scarcity. The site has a 3 shift operation and around 750 employees work here.

The audit was conducted onsite from 11 to 13 Aug, 2025.

The onsite site audit included the review of documents, interviews of stakeholders, visit of important water related facility at site. Ultimate recieving body of site's effulent i.e. SCARP lake was also visited durring the audit.

FINDINGS

NUMBER OF FINDINGS PER LEVEL Observation 6



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FINDING DETAILS

Finding No: TNR-020356

Checklist Item No: 1.1.1
Status: Open

Finding level: Observation

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: Although the Fatima Fertilizer Plant is located in the Lower Indus Plain

Aquifer (LIPA), it delineated a 45 km radius as the catchment area, supported by a study. Area defined in such a way may not align with the natural hydrogeological boundaries of the Lower Indus Plain Aquifer (LIPA). Clarification and differentiation between the physical scope (45

km) and the actual hydrogeological catchment is needed.

Finding No: TNR-020215

Checklist Item No: 2.1.1
Status: Open

Finding level: Observation

Checklist item: 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.

Findings: Site Leadership has recently been changed but commitment has not

been signed by the current leadership.



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Finding No: TNR-020358

Checklist Item No: 2.3.2 Status: Open

Finding level: Observation

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

- How it will be measured and monitored

- Actions to achieve and maintain (or exceed) it

Planned timeframes to achieve itFinancial budgets allocated for actions

- Positions of persons responsible for actions and achieving targets

- Where available, note the link between each target and the

achievement of best practice to help address shared water challenges

and the AWS outcomes.

Findings: Several WSP targets are not fully aligned with SMART criteria. In

particular, some are qualitative without measurable indicators, and others are marked "long-term" or "NA" without clear completion dates.

Finding No: TNR-020359

Checklist Item No: 3.3.1
Status: Open

Finding level: Observation

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

water stewardship plan shall be identified.

Findings: Water saving projects implemented in 2024 (e.g., Significant water

savings achieved through efficiency initiatives) are not clearly linked to

water balance outcomes in the WSP. Misclassification under

"governance" creates uncertainty in demonstrating progress against

Indicator 3.3.1.

Finding No: TNR-020212

Checklist Item No: 5.3.1
Status: Open

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: Site has communicated its shared water challenges and performance

with stakeholders in engagement sessions. It is recommended to disclose its water stewardship performance on some appropriate forum.



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Finding No: TNR-020213

Checklist Item No: 5.4.1 Status: Open

Finding level: Observation

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

these challenges shall be disclosed.

Findings: Site has communicated its shared water challenges with stakeholders in

engagement sessions, but it is recommended to disclose these on some

appropriate forum



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Report	Value
Report prepared by	Rizwan Masood
Report approved by	Ozge GOKMEN
Report approved on (Date)	30/09/2025

Surveillance

Proposed date for next audit

2026-Aug-11

Comment Annual Survillence recommended

Stakeholder Announcements

Date of publi	ication Location
04/07/2025	Company Website: https://www.fatima-group.com/public- stakeholder-announcement/
03/06/2025	WSAS website
03/06/2025	AWS website
Comment	Stakeholder announcment was publisted on AWS and WSAS websites 8 week before the audit. Also Site published the announcement in english and translated in urdu, on campany website



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Catchment Information



Catchment Map (Fatima Fertilzer).jpg

Catchment Information

The Fatima Fertilizer Plant is located in the Lower Indus Plain Aquifer (LIPA) catchment in the southern part of Punjab province which is actually the water stressed region. The site water inputs are canal water (around 30%) and underground water (70%). The site has a defined catchment area around the site. This declaration of catchment is duly supported by the hydrological study of its tube-wells. The identified catchment is based on ground water and effluent discharge. A portion of water is supplied form the surface water (Tibbi Minor canal) and the canal is coming from Head Panjnad, which is fed by the five seasonal rives. Including watershed of these 5 rivers may exceed the size of the country and not proportionate to scope of a site. So the surface water catchment is considered same as already defined which include the main distributary of canal.

The main issues include ground water quality (high TDS and Arsenic levels) and fresh (surface) water scarcity. Though the ground water is not scarce or rapidly depleting, but it is saline and not good for domestic or agriculture use.

Client Description and Site Details

Client/Site Background

The Fatima Fertilizer is one of the leading fertilizer producing plants in Pakistan, its products include Nitro Phosphate, Calcium Ammonium Nitrate, Urea and carbon dioxide (CO2). The intermediate products include Nitric Acid and Ammonia. Site has 3 shift operation and around 750 employees work here.

The Site has two sources of water: canal water (around 30 %) and underground water (70 %). The site has control on all water lines in plant and are under continuous monitoring.

Water input sources are local canal and groundwater sources, canal and underground (well) water respectively, away from the site. Initially, the water is collected in raw water reservoirs and further processed as required. The site has two categories of effluents; one is compliant with local effluent water quality standards and other is not. The compliant stream is discharged to SCARP channel and it ultimately reaches to the SCARP lakes. The other (non-compliant) stream is evaporated in onsite evaporation ponds.

The Fatima Fertilizer Plant is located in the Lower Indus Plain Aquifer (LIPA) System in the southern part of Punjab province which is actually the water stressed region. The site water inputs are canal water (secondary) and underground water (Main). The site has a defined local catchment area around the site. This declaration of catchment is duly supported by the hydrological study of its tube-wells. The identified catchment is based on ground water and effluent discharge. A portion of water is supplied form the surface water (Tibbi Minor canal) and the canal is coming from Head Paninad, which is fed by the five seasonal rives.

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Summary of Shared Water Challenges

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Site has identified and prioritized the shared water challenges in with consultation with stakeholders. The top priority shared water related challenges in the catchment include.

- Quality degration and over extraction of ground water
 Insufficient supply of canal (fresh) water
- Poor WASH arrangements
- Agricultural and domestic runsoff contaminating water bodies
- Canal water theft

0.0.1	Water Source & Discharge Locations	
0.01	Have any water source or discharge locations been visited during the audit, if so, which and where? If none were visited, please provide justification.	⊘ Yes
Comment	Site treated effluent is discharged to SCARP water channel which ends up in SCARF SCARP lakes lakes were visited during the audit.	P lakes.



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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:

Q Obs.

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

Comment

Site has documented its boundaries and water related infrastructure at site. The Site has two sources of water: canal water (around 30 %) and underground water (70 %). The site has control on all water lines in plant and are under continuous monitoring.

Water input sources are canal & ground water sources, canal and underground (well) water respectively, away from the site. Initially, the water is collected in raw water reservoirs and further processed as required.

The site has two categories of effluents; one is compliant with local effluent water quality standards and other is not. The compliant stream is discharged to SCARP channel and it ultimately reaches to the SCARP lakes. The other (non-compliant) stream is evaporated in onsite evaporation ponds.

The Fatima Fertilizer Plant is located in the Lower Indus Plain Aquifer (LIPA) System in the southern part of Punjab province which is actually the water stressed region. The site water inputs are canal water (around 30%) and underground water (70%). The site has a defined catchment area around the site. This declaration of catchment is duly supported by the hydrological study of its tube-wells. The identified catchment is based on ground water and effluent discharge. A portion of water is supplied form the surface water (Tibbi Minor canal) and the canal is coming from Head Panjnad, which is fed by the five seasonal rives. Including watershed of these 5 rivers may exceed the size of the country and not proportionate to scope of a site. So the surface water catchment is considered same as already defined which include the main distributary of canal. There is no change in the catchment, water sources, discharges or onsite water infrastructure, from last years.

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



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1.2.1 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.

Comment

Site has documented a process to identify stakeholders, and their water related challenges. The list of idnetified stakeholders includes all the mandatory categories required by standard. These includes water related governence bodies, regulators, local/vulnerables community, farmers, and NGOs. Also, site has organized engagement sessions with the key stakeholder and consulted for their water related challenges. Prominent challenges identified are lack of supply and sanitation inferastructure, high slanity of ground water, poor drinking water qualtiy and ageing of water inerastructure.

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.



Comment Site identified degree of influence of each stakeholder on site and site on stakeholder.

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.



Comment Site has identified potential water related emenergency scnerioos and documented response plan for these. The identified scnireos include spillages of fuels and chamencals, water supply distruptions and failour of watewater treatment plant.

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



Comment Site has documented its water network mapping the site water intake from two input water

sources is collected in raw water reservoirs and further processed. The water consumptions are recorded and monitored on daily basis.

Site has presented the drainage system drawing which shows the storm water drain, process water and sewage discharge points.

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



Comment

Site has quantified annual water balance for year 2024. This includes inflows, consumptions, losses, storage, and outflows. Site also documented the annual variance of consumption also the variance in water water socurce availibility i.e. canal water and bore water. In year 2024, site consumed around 87 % of ground water.

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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	Site has established a water quality monitoring plan. This encompasses the monitoring of ra water, polished water, process effluent discharge, and potable water. Monitoring the quality effluent discharged into the SCARP channel through an EPA-approved laboratory on a monthly basis is also a crucial step in ensuring compliance with environmental regulations.	
1.3.5	Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.	⊘ Yes
Comment	The potential pollution sources at the site were found to be adequately documented, identified, and mapped. These include fuels, chemicals, and hazardous waste.	
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	Site has 10 fishponds declared as Important Water-Related Area. These ponds are maintained by dedicated staff. These ponds are supplying fish to the employees and community.	
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	Site has compiled water related operational costs. These includes raw water cost and processing costs. Raw water cost includes irrigation bills and pumping cost of underground water to site. Further, on site different processing costs add to the water as per process requirements. The detailed costing sheet (O&U Budget 2023) is attached. Also, Site has considered the costs of implementation of water stewardship actions and associated shared value benifits.	
1.3.8	Levels of access and adequacy of WASH at the site shall be identified.	⊘ Yes
Comment	Site has assessed WASH arrangements at site, and these found to be adequate in accordance with local requirements. Site also have evaluated the adquacy based on gender ratio. Good WASH related arrangements were observed at site during the audit. These arrangements are not only for the staff but also workers and contractors at site. Adequate numbers of toilet and drinking water stations maintained.	-
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	Site explained that no source of primary inputs in located in the site's catchment i.e. no embedded water consumption in the catchment	
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	Site have engaged some services providers at site but all the water consumption in the service provission is from site water consuption. no indirect water consumption in the catchment.	

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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

Yes

water stewardship collective action.

Comment Site has identified and listed the following water related policies / initiatives / Acts in the catchment, these include:

- National Water Policy (2018)Punjab Water Act (2019)
- National Program for Improvement of Watercourses
- Clean Drinking Water for All (CDWA)
- Recharge Wells and Rainwater Harvesting
- Community-Based Disaster Risk Reduction (CBDRR)

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



Comment

Site has identified water related regulations/laws are applicable and compliance is being ensured.

- 1. The Punjab environmental protection act, 1997
- 2. The Punjab Water act 2019.
- 3. Factories act 1934 is adequately covered in FFL legal register.
- 4. Effluent drainage act is adequately covered in EPA act 1997

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



Comment

Site has collected the catchment water balance information. The water balance information has been extracted from the "Groundwater Investigations and Mapping in the Lower Indus Plain" published by Pakistan Council of Research in Water Resources (PCRWR). This also include the annual/seasional varriance.

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.



Comment

The catchment has two water sources, canal water and underground water. The canal water quality is good but availability is only seasonal basis. however, ocassionaly agricultural runoff contaminations are observed. Where as the TDS and especially the Arsenic levels are high in underground water.

Site is regularly monitoring th both water qualities and analysing the annual tresnts as well.

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.



Comment

Site has identified following as catchment important water related areas (IWRAs).

- Tube-well area at Ahmed Pure Lama
- The SCARP lakes

site has assesed the conditions and threats to the identified IWRAs. Also, site has mapped these areas in the catchment.

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



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Comment

Site has gathered information about the existing water related infrastructure within the catchment. the main componenets are

- Canal Systems
- Water Supply Schemes
- Drainage Systems

Site also has assessed the condition of inferastructure under the extreme event like floods. The future/planned inferastructure project also found identified.

The adequacy of available WASH services within the catchment shall 1.5.7

be identified.



Comment

Site has identified that the WASH arrangements in catchment are very poor. There is scarcity of clean drinking water, lack of sanitation infrastructure and lack of hygiene related

1.6 Understand current and future shared water challenges in the

catchment, by linking the water challenges identified by stakeholders

with the site's water challenges.

1.6.1 Shared water challenges shall be identified and prioritized from the

information gathered.



Comment

Site has identified and prioritized the shared water challenges in with consultation with stakeholders. The top priority shared water related challenges in the catchment include.

- Quality degration and over extraction of ground water
- Insufficient supply of canal (fresh) water
- Poor WASH arrangements
- Agricultural and domestic runsoff contaminatiing water bodies
- Canal water theft

1.6.2 Initiatives to address shared water challenges shall be identified.



Comment

Site has identified the initiatives to address the identified shared water related challenges. These include

- Adoption of water efficient agricultural methods
- Wastewater treatment of water before discharge
- Installation of drinking water stations for community
- Engaging with water related governance bodies in the catchment and etc.

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

Yes

Yes

costs and business impact.

Comment Site has identified water risks faced by the site and prioritized them according to likelihood and severity of impact. These risks include oprational, regulatory, finencial and reputational

risks.

1.7.2 Water-related opportunities shall be identified, including how the site

may participate, assessment and prioritization of potential savings, and

business opportunities.

Water related opportunities are identified and prioritization. These includes site and

catchment opportunities for better governance, freshwater conservation, recycling and

rainwater harvesting opportunities.

Comment



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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 site has identified best practices for water governance by itself and by stakholders in the catchment. These include;

- Adoption of water efficient irrigation techniques like drip irrigation

- Collaboration with local communities, government agencies, and NGOs

- lining of canal network (to prevent seepage losses)

- Stakeholder consultation sessions

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.



The site is located in water stressed area and the company is engaged to promote drip Comment

irrigation technology to get better crop yields in limited water supply. Also rainwater is charged to to ground through recharge pits near APL area.

1.8.3 Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.



Site has identified the best practices for Water Quality. Some of these are listed below. Comment

- Source Water quality monitoring and well switching based on quality results and trends

- Canal water recharge to ground to improve ground water quality

- Groundwater Quality Surveillance

- Public Awareness and Education

1.8.4 Relevant catchment best practice for site maintenance of Important

Water-Related Areas shall be identified.



Site has one onsite and two catchment IWRAs identified. related best Practices are as follow Comment

- The effluent monitoring and controls on water disposed to SCARP lakes found rigorous.

- Source Water quality monitoring and well switching based on quality results and trends at

APL well area

- Canal water recharge to ground to improve ground water quality at APL well area

1.8.5 Relevant sector and/or catchment best practice for site provision of

equitable and adequate WASH services shall be identified.



Comment Though FFL has very few female employees but female washrooms/toilets were available all across Special focus on Hygiene and hand washing facilities. Site is also dilivering safe

drinking water to communities around the factories free of cost.



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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	ala a coma anti ala alli la a fala attiti a di Tha a ata ta ana anti a a ala a coma anti ala alli fa a local a	Q bs.
Comment	An AWS Commitment statement has been signed by General Manager Manufacturing. The statement include the commitments listed in this indicator. This commitment has been publically disclosed on company website. Available on the company's public webpage	
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.	⊘ ′es
Comment	FFL has developed and implemented SOP for identification of applicable legal requirements. Manager HSE is responsible for compliance evaluation of applicable legal requirements. The compliance responsibilities lies with concerned managers, mentioned in legal resister. The responsibility to submit the compliance report to the regulator also found set.	
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 ywater stewardship in line with this AWS Standard.	⊘ ′es
Comment	Site has documented its water stewardship strategy, which defines the mission, vision, and goals of the organization towards good water stewardship in line with this AWS Standard.	
2.3.2	Llavorita visibilita a mana a comuna di anno di anno di anno di	Q bs.

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Yes

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Comment Site has developed the water stewardship plan which includes actions, targets, financial

budget and responsible. These initiatives cover both the actions related to site and the catchment. Also, site has established the link between WSP actions with shared water

challenges and AWS 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.

Comment Site shared the evidience of its engagement with SCARP audthorities to discuss its

arrangments to minimize/eleminate the risk of noncompliant effulent release to SCARP

chanels.



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3	STEP 3: IMPLEMENT - Implement the site's stewardship plan and improve impacts
3.1	Implement plan to participate positively in catchment governance.
3.1.1	Evidence that the site has supported good catchment governance shall be identified.
Comment	The site is positively contributing and demonstrated good support for improved water governance in catchment in collaboration with relevant authorities/stakeholders. The site has engaged external stakeholders including water governance bodies. Shared water challenges were discussed. During the meeting with stakeholders FFL site presented it's water stewardship performance and water governance initiatives, including quantified progress against targets for community initiatives. Site also has conrtibuted for lining and maintemence of some open water irrigation channels in the catchment.
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	Site is providing safe drinking water and access to toilets to all employees, as part of its obligations. Also The organization is providing treated/ safe drinking water to nearby community through 5 drinking water stations.
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.
Comment	HSE manager is responsible for evaluation of legal and regulatory compliance on quarterly basis. As far water related requirements, compliance was verified during the audit. This includes effluent quality monitoring, EPA approval, effluent discharge permissions, water extraction and canal water quota approvals and etc. During the audit, water compliances were verified, and all and licenses were found to be valid. Effluent quality monitoring reports were within permissible limits.
3.2.2	Where water rights are part of legal and regulatory requirements, measures identified to respect the water rights of others including holding longing peoples, shall be implemented.
Comment	The site clarified that legally defined water rights, including those of indigenous peoples, do not apply. However, the site is obligated to provide safe drinking water and toilets for all workers, and it complies with this requirement.
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 site has implemented actions, aiming to minimize freshwater intake and improve the catchment water balance, by enhancing water efficiency and reducing overall water use, FFL's water stewardship plan outlines strategies to reduce the water footprint and achieve targeted water balance goals. The water stewardship plan with status of progress towards meeting water balance targets has been updated in water stewardship plan.

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3.3.2 Comment	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. Site has set a target to reduce water footprint by Dec 2025.	Yes
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	No such legal binding applicable	
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	Site has set a target to reduce sulphate in treated effleunt from 350 ppm to less than 300 ppm. The legal limiti for this is 600 ppm. Site already have achieved 350ppm.	
3.4.2	Where water quality is a shared water challenge, continual improvement to achieve best practice for the site's effluent shall be identified and where applicable, quantified.	₹ Yes
Comment	Site has set a target to reduce sulphate in treated effleunt from 350 ppm to less than 300 ppm. The legal limiti for this is 600 ppm. Site already have achieved 350ppm.	
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.	⊘ Yes

Comment

For on site IWRA (Fish ponds) sit has implemented following actions to maintain/enhance its status.

- 1. Monitor water parameters pH, dissolved oxygen, ammonia, and nitrate levels.
- 2. Maintaining a buffer of vegetation around the pond to prevent erosion and filter runoff.
- 3. Periodically remove accumulated sediment and organic matter from the pond bottom to maintain depth and water quality and to control deep percolation.
- 4. Water flow circulation through aeration to prevent stagnation and foul odors.
- 4. Native trees/plants and shrubs are planted around the pond's edges to prevent soil erosion and sedimentation.
- 5. Annual Maintenance during months of March~April.
- 6. Fish ponds Banks strengthening to control water losses.

For catchemnt IWRA (SCARP lake), the water related risks are well identified and control measures documented. The implementation of control measures was verified during the audit. Site has set a hotline with SCARP for communication, if non compliant effluent is discharged to SCRAP channel, to prevent ecological damage at ultimate receiving body. However, this never happened due to strict internal controls, these controls includes continuous effluent quality monitoring before equalization basin and before final discharge.

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.



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Site has assessed WASH arrangements at site, and these found to be adequate in	
accordance with local requirements. Site also have evaluated the adquacy based on gender ratio. Good WASH related arrangements were observed at site during the audit. These arrangements are not only for the staff but also workers and contractors at site. Adequate numbers of toilet and drinking water stations maintained.	r
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
During the visit and interviews didn't found any scenario of impingement of human right to water and sanitation. Stakeholders belonging to community were also interviewed and they expressed that the community appreciated the provision of safe drinking water to the nearby areas	/
Implement plan to maintain or improve indirect water use within the catchment:	
Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.	⊘ Yes
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
Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have.	
Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.	⊘ Yes
Site is not using any shared water related inferastructure. However, site has convy its concerns on local water supply and sanitation network to TMA and recorded MOM.	
Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.	
Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.	⊘ Yes
The site is positively contributing and demonstrated good support for improved water governance in catchment in collaboration with relevant authorities/stakeholders. The site has engaged external stakeholders including water governance bodies. Shared water challenge were discussed. During the meeting with stakeholders FFL site presented it's water stewardship performance and water governance initiatives, including quantified progress against targets for communit initiatives. Site also has conrtibuted for lining and maintemence of some open water irrigation channels	s e y
	accordance with local requirements. Site also have evaluated the adquacy based on gender ratio. Good WASH related arrangements were observed at site during the audit. These arrangements are not only for the staff but also workers and contractors at site. Adequate numbers of toilet and drinking water stations maintained. 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. During the visit and interviews didn't found any scenario of impingement of human right to water and sanitation. Stakeholders belonging to community were also interviewed and they expressed that the community appreciated the provision of safe drinking water to the nearby areas Implement plan to maintain or improve indirect water use within the catchment: Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified. 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. Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have. Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified. Site is not using any shared water related inferastructure. However, site has convy its concerns on local water supply and sanitation network to TMA and recorded MOM. Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance. Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.

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3.9.2

2 Quality StreetNorth Berwick, EH39 4HW, UNITED KINGDOM

in the catchment.

water balance shall be implemented.

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

Yes



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Comment Actions toward achieving best practice water balance are;

- Promoting drip irrigation in the catchment.

- Site-wide Sensor taps installation
- Purifier Water installation in office buildings.
- Purate unit installation
- RO reject water usage in horticulture

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



Comment Site has set a target to reduce sulphate in treated effleunt from 350 ppm to less than 300

ppm. The legal limiti for this is 600 ppm. Site already have achieved 350ppm.

Actions towards achieving best practice, related to targets in terms of 3.9.4 the site's maintenance of Important Water-Related Areas shall be implemented.



Comment For on site IWRA (Fish ponds) sit has implemented following actions to maintain/enhance its status.

- 1. Monitor water parameters pH, dissolved oxygen, ammonia, and nitrate levels.
- 2. Maintaining a buffer of vegetation around the pond to prevent erosion and filter runoff.
- 3. Periodically remove accumulated sediment and organic matter from the pond bottom to maintain depth and water quality and to control deep percolation.
- 4. Water flow circulation through aeration to prevent stagnation and foul odors.
- 4. Native trees/plants and shrubs are planted around the pond's edges to prevent soil erosion and sedimentation.
- 5. Annual Maintenance during months of March~April.
- 6. Fish ponds Banks strengthening to control water losses.

For catchemnt IWRA (SCARP lake), the water related risks are well identified and control measures documented. The implementation of control measures was verified during the audit. Site has set a hotline with SCARP for communication, if non compliant effluent is discharged to SCRAP channel, to prevent ecological damage at ultimate receiving body. However, this never happened due to strict internal controls, these controls includes continuous effluent quality monitoring before equalization basin and before final discharge.

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





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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 Yes evaluated.
Comment	Site water Stewardship Plan is a live document which includes action items, their progress status and completion details. Performance against the targets outlined in the site's water stewardship plan, along with its contribution to achieving water stewardship outcomes, is regularly evaluated at FFL site executive forum. This ensures alignment with sustainability goals and the continuous improvement of water management practices.
4.1.2	Value creation resulting from the water stewardship plan shall be evaluated.
Comment	Site has evaluated vaule creation from it water stewardship action in year 2024.
4.1.3	The shared value benefits in the catchment shall be identified and where applicable, quantified. Yes
Comment	Site has identified the shared value benefits in the catchment, from actions of its water stewardship plan. These include clean drinking water provision to the communities, Monetary and social value generated through community water initiatives, environmental benefits from tree plantation, less freshwater consumption to be good steward in the catchment etc.
4.2	Evaluate the impacts of water-related emergency incidents (including extreme events), if any occurred, and determine the effectiveness of corrective and preventative measures.
4.2.1	A written annual review and (where appropriate) root-cause analysis of the year's emergency incident(s) shall be prepared and the site's Yes response to the incident(s) shall be evaluated and proposed preventative and corrective actions and mitigations against future incidents shall be identified.
Comment	Site representative explained that no real time water related emergency incident or extreme event occurred, hence no such evaluation available.
4.3	Evaluate stakeholders' consultation feedback regarding the site's water stewardship performance, including the effectiveness of the site's engagement process.
4.3.1	Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.
Comment	Site has engaged external stakeholders on 24th February 2025, governance bodies such as EPA, Irrigation Department, SCARP, and TMA. During the session, shared water challenges were discussed, and FFL presented its water stewardship performance, governance initiatives, and measurable progress on community-based programs. Stakeholder feedback was actively sought, and participants appreciated FFL's proactive efforts. The Minutes of the Meeting (MoM) found recorded adequatly.
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.

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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

Site explained that water Stewardship Plan is modified/updated time to time and with the review of the management, to incorporate any relevant information and lessons learned from the evaluations. last two versions of WSP were reviewed during the audit.



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5	STEP 5: COMMUNICATE & DISCLOSE - Communicate about water stewardship and disclose the site's stewardship efforts	
5.1	Disclose water-related internal governance of the site's management, including the positions of those accountable for legal compliance with water-related local laws and regulations.	
5.1.1	The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.	⊘ Yes
Comment	Site Water related internal governance hierarchy is defined including positions of those accountable for compliance with water-related laws and regulations and it is publically disclosed on company website. Available on the company's public webpage	
5.2	Communicate the water stewardship plan with relevant stakeholders.	
5.2.1	The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.	⊘ Yes
Comment	Site has organized many engagement sessions with external stakeholders. In these sessic with stakeholders FFL site presented it's water stewardship plan and performance, includir quantified progress against targets for community initiatives.	ons ng
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.	Q Obs.
Comment	Site has communicated its shared water challenges and performance with stakeholders in engagement sessions. Site's annual sustainibility report contains very little information on i waterstewardship performance. It is recommended to disclose its water stewardship performance on some appropriate forum	t
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.	Q Obs.
Comment	Site has communicated its shared water challenges and performance with stakeholders in engagement sessions, but it is recommended to disclose these on some appropriate forum	۱.
5.4.2	Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.	⊘ Yes
Comment	Site has engaged external stakeholders on 24th February 2025, governance bodies such a EPA, Irrigation Department, SCARP, and TMA. During the session, shared water challenge were discussed, and FFL presented its water stewardship performance, governance initiatives, and measurable progress on community-based programs. Stakeholder feedback was actively sought, and participants appreciated FFL's proactive efforts. The Minutes of the Meeting (MoM) found recorded adequatly.	



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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	Site representative explained that no water related violation occurred till date.	
5.5.2	Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.	₹ Yes
Comment	Site representative explained that no water related violation occurred till date.	
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	Site representative explained that no water related violation occurred till date.	
	Previous Findings	
	All non-conformities raised in the previous audit have been satisfactorily closed.	⊘ Yes