CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-001607

WSAS WATER STEWARDSHIP ASSURANCE SERVICES

SITE DETAILS

Site: **British American Tobacco Kenya plc - Nairobi factory**
Address: Industrial Area, Likoni Rd, 30000-00100, Nairobi, KENYA
AWS Reference Number: AWS-000460
Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Core
Date of certification decision: 2025-Sep-29
Validity of certificate: 2028-Sep-28

AUDIT DETAILS

Audited Service(s): AWS Standard v2.0 (2019)
Audit Type(s): Re-Certification Audit
Audit Start Date: 2025-Jul-09
Audit End Date: 2025-Jul-11
Lead Auditor: Ruth Wandera

Site Participants:
Stephen Muli, SSA Sustainability Manager
Jeremy Magui, Sustainability Executive
Sarah Ng'ang'a, Sustainability Intern
Ann Waireri, Utilities Manager
Thomas Abuga, Mechanical & Projects Executive
Pius Mugendi, Engineering Intern
Gabriel Owuor, Primary Manufacturing Department Line Lead
Harriet Rwanda, Leaf Sustainability Manager
Owen Muruthi, Business Comms and Sustainability
Judith Pilli Nagery, Factory Manager
Daniel Kariuki, Engineering Manager

ADDITIONAL INFO

Summary of Audit Findings: During the recertification audit, two non-conformities and eight observations were raised.

BAT Kenya needs to submit a root cause analysis and corrective actions for each of the non-conformities to WSAS within seven days of receipt of the audit report, by 21 August 2025.

Non-conformities must be closed within 90 days of the end of the audit. In order to meet this timeline evidence is to be submitted to WSAS (within 75 days) by 25 September 2025.

The audit team recommends re-certification of British American Tobacco Kenya plc (BAT Kenya) - Nairobi factory at Core level pending closure of the non-conformities.

CLOSURE OF FINDINGS AND CORRECTIVE ACTION PLAN:

The Site has successfully closed all Non-conformities.

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Scope of Assessment: Scope of Services
The services covered a recertification audit to assess the conformity of British American Tobacco Kenya plc (BAT Kenya) – Nairobi Factory against the AWS International Water Stewardship Standard, Version 2.

Facility Overview
The facility is located in Industrial Area, Makadara Constituency, Nairobi, Kenya. It operates in an industrial setting and produces cigarettes. Steam from boilers is used in the primary manufacturing process to ensure the final product reaches a moisture content of 13%.

The main water sources for the site are: Two boreholes & Municipal supply from the Nairobi City Water and Sewerage Company

Water Treatment and Usage on site

Borehole water is treated using a Modern Oral RO treatment plant. Steam from boilers is used in primary manufacturing processes. Wastewater is treated on-site in an Effluent Treatment Plant (ETP). There are no cooling towers and no rainwater harvesting activities. Stormwater is directed into the drainage system, which is inspected regularly; defects are logged, tracked, and repaired. Firefighting water is stored in a 150,000-liter dedicated tank. Stormwater is discharged into the main drainage system. Treated effluent water is recycled for internal non-potable uses (e.g., washrooms). Sewage is discharged into the municipal sewer system.

The facility has 296 regular employees and 208 third-party contractors.

The site occupies a total area of 10.81 acres, predominantly built-up.

The facility is located in the Upper Athi Catchment, within the Nairobi River sub-catchment.

The audit was conducted On-site audit from 9–11 July 2025.

Catchment visit was to Ndakaini Dam (Thika Dam), one of Nairobi city's four main water sources.

The following stakeholders were Interviewed:

- Divine Caterers

- Ndakaini Dam (Thika Dam) representatives

FINDINGS

NUMBER OF FINDINGS PER LEVEL

Observation	8
Non-Conformity	2

FINDING DETAILS

Finding No:	TNR-019309
Checklist Item No:	1.3.2
Status:	Open
Finding level:	Observation
Checklist item:	Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped
Findings:	The site has supplied data on municipal water inflow from the main meters at Gate 1 and Gate 2, as well as borehole water usage based on meter readings. However, the volumes of water exiting the site through the four outflow points are not clearly documented. Water losses are presented as the difference between total inflow and the sum of utilisation and storage. As a result, the overall water balance—i.e., the relationship between inflows and outflows—is unclear. Although a site map was provided, it did not include flow directions or quantities, making it difficult to accurately assess the water balance.

Finding No:	TNR-019313
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:	Regarding the water quality of the receiving body—the Nairobi River—the site shared email correspondence indicating that data had been requested from the Water Resources Authority (WRA) – Nairobi Sub-region, the Kenya Innovative Finance Facility for Water, and the University of Nairobi. However, none of these stakeholders were able to provide the requested data. Although the WRA appeared to have shared some information in the email exchange, the site did not include this as part of the submitted evidence. Additional water quality tests done on samples obtained following a visit to the Ruai Sewerage Treatment plant indicated that various quality parameters exceeded the legislative thresholds. As such, progress in obtaining verified water quality data for the Nairobi River should be revisited and closely reviewed during the next audit. This will provide a conclusive view of the scenario on the water discharged to the river after treatment. As such, progress in obtaining verified water quality data for the Nairobi River should be revisited and closely reviewed during the next audit.

Finding No:	TNR-019332
Checklist Item No:	1.3.7
Status:	Open
Finding level:	Observation
Checklist item:	Annual water-related costs, revenues, and a description or quantification of the social, cultural, environmental, or economic water-related value generated by the site shall be identified and used to inform the evaluation of the plan in 4.1.2.
Findings:	BAT Kenya – Nairobi provided financial support to the Kenya Extended Producer Responsibility Organization (KEPRO) for clean-up activities on the Nairobi River (31st August 2024) and the Mtoine River (4th March 2025), aligned with the International Day of Action for Rivers. Additionally, river-cleaning equipment was donated to the WRUA on 12th July and 26th September 2024. There remains considerable room for improvement in supporting WASH initiatives within the catchment. Currently, only 22% of the catchment area has access to proper sewage connections, and just 29% of the population has access to adequate sanitation. Open defecation continues to be a major contributor to poor surface water quality.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-001607

Finding No:	TNR-019333
Checklist Item No:	1.4.1
Status:	Closed
Finding level:	Non-Conformity
Due date:	2025-Oct-10
Checklist item:	The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be identified.
Findings:	Print-pack, a supplier of primary inputs for the facility and located within the same catchment area, has been part of the supply chain since the facility's initial certification four years ago. However, during this period, the facility has not been able to obtain data on the quantity, quality, or level of water risk associated with the supplier. The site provided evidence of planning a sustainability supplier summit for Q3 2025, with plans to invite Print-Pack—a key supplier of wrapping materials—to participate. During the summit, Print-Pack was expected to present its ESG roadmap, including its water footprint, while BAT will share best practices and seek a commitment to water stewardship.
Corrective action:	To refine the approach, we shall involve the contract manager from BAT and have a joint formal session with the sustainability manager from Printpack as well as their senior management where we will share our water stewardship journey and see how we can work together to address the communication gaps and align on our approach to drive together the water stewardship journey as partners. To get an understanding of water use we shall request for water intensity, water quality results, and level of water risk. The formal meeting with Printpack Management is scheduled for 28th August and we shall give them a timeline of one week to provide the information, by 6th September. This action is assigned to the Sustainability Manager and Sustainability Executive.

Finding No:	TNR-019335
Checklist Item No:	1.5.3
Status:	Open
Finding level:	Observation
Checklist item:	The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.
Findings:	The data provided by the facility pertains to the broader Athi Basin, which is a large and diverse catchment area. While the overall water balance for the Athi Basin appears to be positive based on the submitted evidence, it is important to assess the specific status of the Upper Athi—particularly the Nairobi catchment where the site is located—as this sub-catchment is likely to face greater water stress than the basin as a whole. Groundwater studies indicate a projected water deficit before 2050. However, there remains a need for more precise and up-to-date data on the current water balance to support informed decision-making and long-term water stewardship planning.

Finding No:	TNR-019336
Checklist Item No:	1.5.4
Status:	Open
Finding level:	Observation
Checklist item:	Water quality, including physical, chemical, and biological status, of the catchment shall be identified, and where possible, quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be identified.
Findings:	The catchment's water quality remains poor, and there is a critical need for more reliable, comprehensive, and up-to-date water quality data to inform effective water stewardship strategies.

Finding No:	TNR-019380
Checklist Item No:	3.6.2
Status:	Open
Finding level:	Observation
Checklist item:	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.
Findings:	Although the site, through one of its employees, has participated in clean-up activities within the catchment, there is still scope for BAT to increase its involvement in WASH initiatives in the catchment. This should be assessed during the next audit.

Finding No:	TNR-019383
Checklist Item No:	3.7.1
Status:	Open
Finding level:	Observation
Checklist item:	Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.
Findings:	The visit to Aquamist was prompted by a public health concern rather than by the objective stated in row 24 of the Water Stewardship Plan, where the facility's target for Indirect Water Use was to understand the water footprint of indirect water users. While the facility obtained water footprint data from service providers outside the catchment area, assessing the water footprint of indirect water users within the catchment would have yielded more relevant and actionable insights for effective water stewardship.

Finding No:	TNR-019381
Checklist Item No:	3.7.2
Status:	Closed
Finding level:	Non-Conformity
Due date:	2025-Oct-10
Checklist item:	Evidence of engagement with suppliers and service providers, as well as, when applicable, actions they have taken in the catchment as a result of the site's engagement related to indirect water use, shall be identified.
Findings:	The facility provided evidence of engagement with suppliers and service providers, most of whom are located outside the catchment area. However, it is unclear what specific actions resulted from these engagements regarding indirect water use. Additionally, no evidence was provided of engagement or progress in obtaining water data from Printpak and other indirect water users within the site's catchment. This issue represents a repeat non-conformity from the previous year.
Corrective action:	Develop a more comprehensive action plan based on the information already provided by BAT Kenya suppliers and service providers, with a tracker to monitor progress and achievements on the same and ensure that all vendors/service providers within the catchment area include Printpak. We shall engage the suppliers and service providers quarterly starting from the 10th of Sept,2025 and score them on their water stewardship initiatives during the supplier reviews where the BAT contract manager is involved. The actions will be tracked on the action tracker for the supplier relationship management by the Sustainability Executive. This will be actioned by the 10th of September 2025 by the Sustainability manager and the contract owners. Thereby quarterly reviews will be scheduled on every second month of the quarter.

Finding No:	TNR-019384
Checklist Item No:	4.1.1
Status:	Open
Finding level:	Observation
Checklist item:	Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.
Findings:	Performance against targets in the site's Water Stewardship Plan was evaluated and recorded in column L of the plan. However, the site's contribution to achieving the Alliance for Water Stewardship (AWS) outcomes is not clearly articulated.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-001607

WSAS WATER STEWARDSHIP ASSURANCE SERVICES

Report Details

Report	Value
Report prepared by	Ruth Wandera
Report approved by	Ozge Gokmen
Report approved on (Date)	14/08/2025

Surveillance

Proposed date for next audit
2026-Jul-09

Stakeholder Announcements

Date of publication	Location
14/05/2025	Website: https://www.batkenya.com/content/dam/endmarkets/ke/en/download/media/AWS-Audit-Call-for-Stakeholder-Input-Nairobi-Site.pdf
13/05/2025	AWS
13/05/2025	WSAS

Catchment Information

Catchment Information

The site is located within the Upper Athi Catchment, specifically in the Nairobi River sub-catchment. Water is supplied by the Nairobi City Water and Sewerage Company (NCWSC), which operates within the Athi Basin but sources water from multiple catchments through inter-basin transfers.

NCWSC's four primary water sources are:

- Thika Dam

- Sasumua Dam

- Ruiru Dam

- Kikuyu Springs

In addition to these surface water sources, the site also abstracts groundwater from the Nairobi Aquifer Suites. This aquifer is classified as a Moderate Productivity Aquifer, consisting of Plio-Pleistocene volcanic formations interbedded with paleosols and inter-volcanic sediments. It underlies much of the Nairobi metropolitan area and is recharged along the eastern edge of the Rift Valley, with groundwater flowing eastward.

The aquifer characteristics are as follows:

Type: Complex multilayered system

Recharge zone: Unconfined in the Rift Valley recharge area, becoming confined toward the east

Main aquifer layer: Upper Athi Series

Depth: Typically 120–300 m below ground level (bgl)

Wastewater Management
Wastewater generated at the site is discharged to the Ruai Wastewater Treatment Plant, which subsequently discharges treated effluent into the Nairobi River.

Nairobi River Catchment Overview
The Nairobi River Catchment spans approximately 700 km² and includes the Ngong-Motoine, Nairobi, and Mathare rivers, which ultimately join the Athi River and flow into the Indian Ocean. The catchment lies in a tropical climate with bimodal rainfall, experiencing:

Peak rainfall: February–April and October–December

Dry period: August

Key Challenges in the Catchment

- Water scarcity: Driven by overuse for domestic, industrial, and agricultural needs.

- Pollution: Resulting from untreated sewage and industrial waste, degrading water quality.

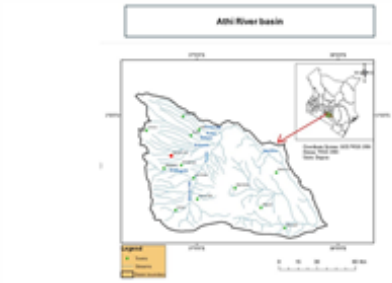
- Groundwater overexploitation: Increased reliance due to unsafe surface water.

- Flooding: Frequent in informal settlements due to poor urban planning and loss of vegetation.

- Habitat loss: Encroachment on protected forests such as Ngong and Kikuyu, and threats to Nairobi National Park.

Environmental Importance
Forested areas, covering only 5.7% of the catchment, play a crucial role in regulating water flow and maintaining biodiversity. However, rapid urban expansion and weak environmental enforcement are accelerating ecosystem degradation, reducing water quality, and increasing health and flood risks.

Inter-Basin Transfers
Water supply to Nairobi is augmented by inter-basin transfers from the Upper Tana Basin through the Thika and Sasumua reservoirs, which are essential for meeting the city's water demand.



Athi Catchment.jpg

Nairobi water sources.jpg

Nairobi Interbasin transfer.jpg

1.1.1_Ground_Water_Catchment_Description.jpg

Client Description and Site Details

Client/Site Background
The facility is located in Industrial Area, Makadara Constituency, Nairobi, Kenya. It operates in an industrial setting and produces cigarettes. Steam from boilers is used in the primary manufacturing process to ensure the final product reaches a moisture content of 13%.

The main water sources for the site are: Two boreholes & Municipal supply from the Nairobi City Water and Sewerage Company

Water Treatment and Usage on site

Borehole water is treated using a Modern Oral RO treatment plant. Steam from boilers is used in primary manufacturing processes. Wastewater is treated on-site in an Effluent Treatment Plant (ETP). There are no cooling towers and no rainwater harvesting activities. Stormwater is directed into the drainage system, which is inspected regularly; defects are logged, tracked, and repaired. Firefighting water is stored in a 150,000-liter dedicated tank. Stormwater is discharged into the main drainage system. Treated effluent water is recycled for internal non-potable uses (e.g., washrooms). Sewage is discharged into the municipal sewer system.

The facility has 296 regular employees and 208 third-party contractors.

The site occupies a total area of 10.81 acres, predominantly built-up.

1.1.1_2025_BAT Kenya_Nairobi_site_spatial_location 2.jpg

1.1.1_2025_BAT Kenya_Nairobi_site_spatial_location 3.jpg

1.1.1_2025_BAT Kenya_Nairobi_site_spatial_location.jpg

Summary of Shared Water Challenges

Summary of Shared Water Challenges
The following were the shared water challenges provided by the facility:

- Lack of public awareness and education about water issues hinders effective water management.
- Human activities are damaging the environment, leading to significant alterations in climate and rainfall patterns.
- Cutting down trees for urban development and economic reasons contributes to climate change and impacts water levels.
- The aquifer system is vulnerable to contamination from industrial, agricultural, and domestic sources, which can compromise water quality and make it unsafe for drinking and irrigation
- Over-extraction of groundwater, leading to a decline in water table.
- Current water and waste laws and regulations are not being properly enforced.

1	STEP 1: GATHER AND UNDERSTAND	
1.1	*Gather information to define the site's physical scope for water stewardship purposes, including: its operational boundaries; the water sources from which the site draws; the locations to which the site returns its discharges; and the catchment(s) that the site affect(s) and upon which it is reliant.*	
1.1.1	*The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including:* *- Site boundaries;* *- Water-related infrastructure, including piping network, owned or managed by the site or its parent organization;* *- Any water sources providing water to the site that are owned or managed by the site or its parent organization;* *- Water service provider (if applicable) and its ultimate water source;* *- Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies;* *- Catchment(s) that the site affect(s) and is reliant upon for water.*	Yes

Comment

Site Boundaries
The site boundaries are detailed in the attachment titled '1.1.1_2025_BAT Kenya_Nairobi_site_spatial_location'.

Water-Related Infrastructure
Information on the water-related infrastructure, including the piping network owned or managed by the site or its parent organization, is provided in the following documents:

'1.1.1 2025 BAT Kenya Drainage and Water Distribution-Model'

'1.1.1 2025 BAT Kenya Water Distribution Drainage Spill Containment'

'1.1.1 2025 Water and Drainage Layout'

The site infrastructure includes:

- Two water inlets (indicated in light blue)

- Four stormwater outlets

- Three sewer outlets

Water Sources
The main sources of water for the site are:

- Two boreholes (abstracting groundwater from the Nairobi Aquifer Suite)

- Municipal supply from Nairobi City Water and Sewerage Company (NCWSC)

Water Treatment and Usage
- Borehole water is treated using a modern Oral RO treatment plant.

- Steam from boilers is used in primary manufacturing processes.

- Wastewater is treated on-site in an Effluent Treatment Plant (ETP).

- There are no cooling towers and no rainwater harvesting activities.

- Stormwater is channeled into the drainage system, which is regularly inspected, with defects logged, tracked, and repaired.

- Firefighting water is stored in a dedicated 150,000-liter tank.

- Treated effluent is recycled for internal non-potable use (e.g., washrooms).

- Sewage is discharged into the municipal sewer system.

Water Service Provider and Source
The site is located within the Upper Athi Catchment, specifically the Nairobi River sub-catchment.
Water is supplied by Nairobi City Water and Sewerage Company (NCWSC), which sources water from multiple catchments via inter-basin transfers. The four main water sources are:

- Thika Dam

- Sasumua Dam

- Ruiru Dam

- Kikuyu Springs

In addition to surface water, the site also abstracts groundwater from the Nairobi Aquifer Suite, a Moderate Productivity Aquifer composed of Plio-Pleistocene volcanic formations. The aquifer is recharged along the eastern edge of the Rift Valley, with groundwater flow generally directed eastward.

Discharge Points and Wastewater Management
Wastewater from the site is discharged to the Ruai Wastewater Treatment Plant, which subsequently releases treated effluent into the Nairobi River.

Catchments Affected and Relied Upon
The site relies on and affects the Athi, Tana and Nairobi catchments. Relevant hydrological details are included in the following attachments:

'1.1.1 Ultimate Water Sources Discharge'

'1.1.1 Ground Water Catchment Description'

'Nairobi Catchment Hydrological Map'

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

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

Yes

Comment	Stakeholder Identification Stakeholders and their water-related challenges have been identified as part of the site's water stewardship efforts. Two additional stakeholders were recently included: - Thika Dam - Thika Upper Tana Water Resources Users Association (WRUA) Associated water-related challenges for these stakeholders have also been documented. Stakeholder Identification Process The stakeholder identification process adhered to the following principles: - Inclusivity Across Relevant Groups The process aimed to cover all relevant stakeholder groups, including vulnerable populations, women, minority groups, and Indigenous communities. Key stakeholders in this category include: - Kibera Slum residents (represented through Kirichwa WRUA) - Mukuru Promotion Centre Consideration of the Physical Scope Stakeholder identification was aligned with the site's physical water scope, including those connected to: The ultimate water sources The ultimate receiving water bodies This was achieved by establishing relationships with: - Regulatory bodies responsible for the relevant catchments - Civil society organizations active within those catchments - Private businesses and Companies - Educational institutions Evidence of Stakeholder Consultation A total of three stakeholder consultation meetings have been held in the past year, focusing on shared water-related interests and challenges. Variation in Participation Willingness and Ability The site acknowledges that stakeholders' willingness and ability to participate vary across groups. This is documented in Column T of the stakeholder analysis file: '1.2.1 2025 BAT Stakeholder Potential Influence' Degree of Stakeholder Engagement The degree of stakeholder engagement has been assessed based on each stakeholder's level of interest and influence. These are recorded in Columns I and J of the same stakeholder analysis document.	
1.2.2	*Current and potential degree of influence between site and stakeholder shall be identified, within the catchment and considering the site's ultimate water source and ultimate receiving water body for wastewater.*	Yes

Comment

Stakeholder identification was aligned with the site's physical water scope, including those connected to the ultimate water sources and the ultimate receiving water bodies. This was achieved by establishing relationships with:

- Regulatory bodies responsible for the relevant catchments e.g. Ruai Sewerage treatment plant(Nairobi City Water and Sewerage Company, NCWSC), WRA-Water Resource Authority, Nairobi City County etc.
- Civil society organizations active within those catchments e.g. Mukuru Promotion Centre, Kirichwa WRUA-Water Resource Users Association
- Private businesses and Companies e.g. East Africa Breweries Limited - Maltings, Kamongo Paper Mill, Haleon, Lunga Lunga square Mall
- Educational institutions e.g. University of Nairobi
- Suppliers and Contractors e.g. Cleanways Drycleaners Ltd, Print Pak etc.

The degree of stakeholder engagement has been assessed based on each stakeholder's level of interest and influence. These are recorded in Columns I and J of '1.2.1 2025 BAT Kenya Stakeholder Potential Influence' document.

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

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

Comment

Existing water-related incident response plans have been documented and are available in the file titled '1.3.1 Water Emergency Situations'.
This document outlines the procedures in place for managing water-related emergencies at the site.
Other relevant documents provided were as follows: '1.3.1 Spill Management Procedure', '1.3.1 Emergency Release Response Action Plan' and '1.3.1 EHS PROCEDURE FOR THE STORAGE AND HANDLING OF FLAMMABLE MATERIALS'.

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

Comment

The site has supplied data on municipal water inflow from the main meters at Gate 1 and Gate 2, as well as borehole water usage based on meter readings. However, the volumes of water exiting the site through the four outflow points are not clearly documented. Water losses are presented as the difference between total inflow and the sum of utilisation and storage. As a result, the overall water balance—i.e., the relationship between inflows and outflows—is unclear. Although a site map was provided, it did not include flow directions or quantities, making it difficult to accurately assess the water balance.

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.* Yes

Comment

Although the overall water balance—i.e., the relationship between inflows and outflows—remains unclear, the site has quantified annual variances in key water performance metrics, including abstraction rates versus target, water intensity versus target, and progress toward the water recycling target. The site is currently on track to meet all three objectives.

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.* Obs.

Comment

The site submitted evidence of municipal and borehole water quality results, along with effluent data, in the document titled "1.3.4 Water Inflow and Outflow Quality Summary." Stormwater monitoring data was provided separately in the document "Storm Water – Effluent."

With regard to the water quality of the receiving body, the Nairobi River, the site shared email correspondence showing that data had been requested from the Water Resources Authority (WRA) – Nairobi Sub-region, the Kenya Innovative Finance Facility for Water, and the University of Nairobi. However, none of these stakeholders were able to provide the requested data. While the WRA appeared to have shared some data via email, the site did not include it in the submitted evidence.

The site also provided the relevant legislative documents applicable to on-site water quality compliance, including:

Effluent Discharge Licence

KS EAS 12:2014 (Water Testing Parameters)

The Environmental Management and Coordination (Water Quality) Regulations

Furthermore, the facility submitted evidence of root cause analyses conducted in instances where water quality results failed to meet compliance requirements.

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

Comment

Potential pollution sources are identified in the document "1.3.5 List of Hazardous Substances" and mapped in "1.3.5 BAT Kenya Water Distribution, Drainage, and Spill Containment". The facility has also provided an environmental risk assessment for the chemicals stored on site, along with details regarding bunding and the use of spill pallets.

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

There are no IWRAs on site

1.3.7 *Annual water-related costs, revenues, and a description or quantification of the social, cultural, environmental, or economic water-related value generated by the site shall be identified and used to inform the evaluation of the plan in 4.1.2.* Obs.

Comment

Annual water-related costs and revenues have been identified, along with a description of the social, environmental, and economic value generated by the site's water-related activities.

It was noted that the facility's annual membership contribution to the Water Resources Users Association (WRUA) was only KES 1,500, which raises concerns given the critical WASH (Water, Sanitation, and Hygiene) needs in the informal settlements represented by the WRUA.

However, the facility subsequently provided evidence of additional support for WASH-related initiatives since the last audit, including:

Financial contributions to the Kenya Extended Producer Responsibility Organization (KEPRO) for the Nairobi River clean-up on 31st August 2024, and the Mtoine River clean-up on 4th March 2025, in recognition of the International Day of Action for Rivers.

Donation of river-cleaning equipment to the WRUA on 12th July 2024 and 26th September 2024.

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

Comment: Access to and adequacy of WASH facilities at the site are detailed in the document "1.3.8 WASH on Site." Relevant legislation, specifically CAP 242, has been provided, and the site appears to not only meet but exceed these requirements. This is demonstrated by a lower number of users per facility than mandated, the inclusion of religiously sensitive washrooms, and the provision of soap and Vaseline to employees.

Additionally, drinking water quality data, as presented in section 1.3.4, complies with the applicable legislative standards.

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.* No

Comment: Print-Pack, a supplier of cigarette packaging materials, is the only provider of primary inputs located within the site's catchment. Despite this being the fourth certification cycle, the site has not engaged with Print-Pack to understand their water use. This is noted in cell E8 of the document "1.4.1 / 1.4.2 Indirect Water Use 2025."
The site provided evidence of planning a sustainability supplier summit for Q3 2025, with plans to invite Print-Pack—a key supplier of wrapping materials—to participate. During the summit, Print-Pack is expected to present its sustainability roadmap, including its water footprint, while BAT Kenya will share best practices and seek a commitment to water stewardship.
However, evidence also indicates that an initial ESG supplier summit was held in October 2024, and Print-Pack does not appear to have been engaged at that time, based on the documentation provided.

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

Comment: The embedded water use associated with outsourced services has been identified and quantified in the following documents provided by the site:
- '1.4.1 / 1.4.2 Indirect Water Use 2025'
- 'Re: Indirect Water User – Request for Data on Water Conservation at Your Premises'

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

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

Comment: Water governance initiatives have been identified and are detailed in the document "1.5.1_Water_Governance_Initiatives_in_Nairobi_River_Basin." These initiatives include:

- Wetlands Restoration in Nairobi

- Nairobi River Basin Restoration Programme

- Scaling Resource Efficiency and Cleaner Production (RECP) in the Nairobi Rivers Basin

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

Comment: Applicable water-related legal and regulatory requirements have been identified and are documented in "1.5.2_Water_Regulations_Review_AWS."

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

Comment: The data provided by the facility pertains to the broader Athi Basin, which is a large and diverse catchment area. While the overall water balance for the Athi Basin appears to be positive based on the submitted evidence, it is important to assess the specific status of the Upper Athi—particularly the Nairobi catchment where the site is located—as this sub-catchment is likely to face greater water stress than the basin as a whole.

As no new data on the catchment water balance was obtained, the site provided evidence of efforts made over the past year to acquire this information. These efforts include:

- An email inquiry to the WRUA – Nairobi Sub-region

- Correspondence with the Kenya Innovative Finance Facility for Water

- An outreach email to the University of Nairobi

Groundwater studies indicate a projected water deficit before 2050. However, there remains a need for more precise and up-to-date data on the current water balance to support informed decision-making and long-term water stewardship planning.

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.* — Obs.

Comment: Much of the groundwater in the Nairobi Aquifer Suite (NAS) naturally contains high levels of dissolved fluoride, often exceeding the Kenyan standard of 1.5 mg/L (KEBS, 2007). This is particularly evident in the deeper aquifers, where fluoride concentrations may exceed 10 mg/L. Time-series data further indicate changes in groundwater chemistry over time, with declining calcium levels and increasing concentrations of chloride and fluoride.

Surface water quality in the Athi Basin is generally poor. However, available data is limited, with only pH and Electrical Conductivity (EC) values recorded between 2012 and 2018. The site provided email correspondence demonstrating efforts to obtain more recent data from the Water Resources Authority (WRA) – Nairobi Sub-region, the Kenya Innovative Finance Facility for Water, and the University of Nairobi. While WRA appears to have shared some information via email, this was not included in the submitted evidence.

In summary, the catchment's water quality remains poor, and there is a critical need for more reliable, comprehensive, and up-to-date water quality data to inform effective water stewardship strategies.

1.5.5 *Important Water-Related Areas shall be identified, and where appropriate, mapped,and their status assessed including any threats to people or the natural environment, using scientific information and through stakeholder engagement.* — Yes

Comment: Important Water-Related Areas (IWRAs) have been identified, and their status assessed, as documented in "1.5.5_Catchment_IWRA."

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

Comment	Existing and planned water-related infrastructure—including their condition and potential exposure to extreme events—has been identified and documented in "1.5.6_Water_Related_Infrastructure."	
1.5.7	*The adequacy of available WASH services within the catchment shall be identified.*	Yes
Comment	WASH services within the catchment have been identified as inadequate. Nationally, only about 59% of the Kenyan population has access to safe drinking water, and just 29% have access to basic sanitation services. The situation in Nairobi mirrors this national trend, with many residents—particularly in informal settlements—relying on unregulated water sources, which results in high costs and increased health risks from waterborne diseases. Sanitation coverage is also critically low in these areas, with many households lacking access to proper facilities. This has led to widespread practices such as open defecation, posing significant public health and environmental risks.	
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.*	Yes
Comment	The following were the shared water challenges provided by the facility: - Lack of public awareness and education about water issues hinders effective water management. - Human activities are damaging the environment, leading to significant alterations in climate and rainfall patterns. - Cutting down trees for urban development and economic reasons contributes to climate change and impacts water levels. - The aquifer system is vulnerable to contamination from industrial, agricultural, and domestic sources, which can compromise water quality and make it unsafe for drinking and irrigation - Over-extraction of groundwater, leading to a decline in water table. - Current water and waste laws and regulations are not being properly enforced.	
1.6.2	*Initiatives to address shared water challenges shall be identified.*	Yes
Comment	The facility has provided both site-level and catchment-level initiatives addressing each of the identified shared water challenges.	
1.7	*Understand the site's water risks and opportunities: Assess and prioritize the water risks and opportunities affecting the site based upon the status of the site, existing risk management plans and/or the issues and future risk trends identified in 1.6.*	
1.7.1	*Water risks faced by the site shall be identified, and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.*	Yes
Comment	Water-related risks faced by the site have been identified and prioritized, considering the likelihood and severity of impact within a defined timeframe, along with potential costs and business implications. In response to previously raised observation, the risk analysis for flooding has also been reviewed and revised accordingly.	
1.7.2	*Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.*	Yes

Comment	The indicator was met as documented in "1.7.2 Water-Related Opportunities Register 2025." The register includes: Identification of water-related opportunities – documented in Column C Site participation details – documented in Column P Assessment and prioritization of potential savings – detailed in Column M Business opportunities – outlined in Column K	
1.8	*Understand best practice towards achieving AWS outcomes: Determining sectoral best practices having a local/catchment, regional, or national relevance.*	
1.8.1	*Relevant catchment best practice for water governance shall be identified.*	Yes
Comment	The facility has listed several relevant catchment-level best practices, including: Monitoring and evaluation of tree survival rates to assess the effectiveness of afforestation efforts and make data-driven adjustments. This supports adaptive management and improves long-term success. Active participation in multi-stakeholder platforms to discuss and identify collaborative initiatives addressing water-related challenges within the catchment. Support and partnership with public sector initiatives focused on water resource management and conservation. Collaboration with local government in afforestation activities to enhance catchment resilience and water retention.	
1.8.2	*Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.*	Yes
Comment	The facility has identified several best practices related to water balance management, including: Automation of daily water use monitoring, reporting, and tracking systems to enhance real-time oversight and support timely decision-making. Regular training for employees and contractors on-site to promote good water stewardship practices and support ongoing water conservation efforts. Upgrading the effluent treatment plant to increase the volume of water recycled on-site, thereby improving overall water efficiency and reducing freshwater demand.	
1.8.3	*Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.*	Yes

Comment	The facility has identified several best practices related to water quality management, including: Conducting bi-annual Legionella testing, which goes beyond regulatory requirements and demonstrates proactive risk management. Incorporating bamboo trees in afforestation efforts, leveraging their natural ability to filter pollutants and improve water quality. Participating in clean-up activities, which contribute to the removal of pollutants and the overall improvement of local water resource quality.	
1.8.4	*Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.*	Yes
Comment	The facility has identified several best practices related to the maintenance of Important Water-Related Areas (IWRAs), including: Wetland restoration, recognizing their critical role in enhancing water quality, attenuating floods, and serving as key sources of surface water. Establishing a monitoring and evaluation program to track and assess the impact of interventions on catchment-level IWRAs. Incorporating fruit trees into afforestation efforts, which supports water cycle regulation while also providing food and livelihood benefits to the local community.	
1.8.5	*Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.*	Yes
Comment	The facility has identified several best practices aimed at providing equitable and adequate WASH services, including: Exceeding regulatory standards for WASH facilities by maintaining a ratio of 1:15 for both male and female users—surpassing the government-mandated ratio of 1:25—and constructing additional women's washrooms and showers at the G2 facility. Providing soap and petroleum jelly to on-site workers to promote personal hygiene and improve overall health and well-being. Participating in clean-up activities, which contribute to safer water access for surrounding communities and support public health and human dignity.	

2	**STEP 2: COMMIT & PLAN - Commit to be a responsible water steward and develop a Water Stewardship Plan**	
2.1	*Commit to water stewardship by having the senior-most manager in charge of water at the site, or if necessary, a suitable individual within the organization head office, sign and publicly disclose a commitment to water stewardship, the implementation of the AWS Standard and achieving its five outcomes, and the allocation of required resources.*	
2.1.1	*A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:* *- That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes* *- That the site implementation will be aligned to and in support of existing catchment sustainability plans* *- That the site's stakeholders will be engaged in an open and transparent way* *- That the site will allocate resources to implement the Standard.*	✓ Yes
Comment	The website link and photographs of the on-site disclosure are included in the attachments "POLICY STATEMENTS INVENTORY" and "Sample Image at Gate 4." The indicator requirements have been met as follows: Water stewardship program disclosure – The site will implement and report progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes – Yes. Alignment with catchment sustainability plans – Site implementation will be aligned with and support existing catchment sustainability plans – Yes. Stakeholder engagement – Stakeholders will be engaged in an open and transparent manner – Yes. Resource allocation – The site will allocate resources to implement the Standard – Yes. 2.1.1 Link to Water Stewardship Policy: https://www.batkenya.com/content/dam/endmarkets/ke/en/download/who-we-are/BAT-Kenya-Water-Stewardship-Policy.pdf 2.1.1 Policy Statements Inventory – Highlights locations where policies are displayed. 2.1.1 Sample Policy Display at Gate 4 – See attached image.	
2.2	*Develop and document a process to achieve and maintain legal and regulatory compliance.*	
2.2.1	*The system to maintain compliance obligations for water and wastewater management shall be identified, including:* *- Identification of responsible persons/positions within facility organizational structure* *- Process for submissions to regulatory agencies.*	✓ Yes

Comment

The document “2.2.1 Water Regulations Review AWS” identifies the responsible persons and positions within the facility’s organizational structure for various water-related legislations.

The documents “2.2.1_EHS_Procedure_for_Tracking_of_Legislation”, “2.2.1 Licences Tracker”, and “2.2.1 Licence Renewal Escalation Matrix” demonstrate the tracking of relevant legislation as well as the processes for submission to regulatory agencies. These processes may include:

Email communications

Reporting of incidents/accidents

Statutory audits

Statutory inspections

Additionally, the site conducts an annual self-review and audit against the set standards for each applicable act.

As further evidence, a report titled “2.2.1 Kenya Internal Legal & Compliance Audit” was provided, in line with the organization’s documented procedure.

2.3 *Create a water stewardship strategy and plan including addressing risks (to and from the site), shared catchment water challenges, and opportunities.*

2.3.1 *A water stewardship strategy shall be identified that defines the overarching mission, vision, and goals of the organization towards good water stewardship in line with this AWS Standard.*

Yes

Comment

A water stewardship strategy has been established, outlining the organization’s overarching mission, vision, and goals for responsible water stewardship, in alignment with the AWS Standard.

2.3.2 *A water stewardship plan shall be identified, including for each target:*
- How it will be measured and monitored
- Actions to achieve and maintain (or exceed) it
- Planned timeframes to achieve it
- Financial budgets allocated for actions
- Positions of persons responsible for actions and achieving targets
- Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.

Yes

Comment

The site’s Water Stewardship Plan clearly details the following:

Targets (Column C)

Measurement and monitoring methods (Column D)

Actions to achieve and maintain (or exceed) targets (Column E)

Planned timeframes for achievement (Column G)

Financial budgets allocated for these actions (Column F)

Responsible positions for executing actions and achieving targets (Column I)

Where applicable, links between each target and best practice outcomes addressing shared water challenges and AWS outcomes (Columns N, O, & Q)

Additionally, the Water Stewardship Plan addresses specific water challenges in Column Q.

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.*	Yes

Comment

Additionally, solid waste is frequently dumped into sewer lines through manholes, causing blockages that require constant personnel deployment for clearing.

Following this visit, the site updated the document "2.4.1 Water Emergency Situations" to include mitigation measures such as risk assessments, spill kit management procedures, and awareness training to better manage environmental releases.

3	**STEP 3: IMPLEMENT - Implement the site's stewardship plan and improve impacts**

3.1 *Implement plan to participate positively in catchment governance.*

3.1.1 *Evidence that the site has supported good catchment governance shall be identified.* ✓ Yes

Comment

The facility provided the following evidence of implementation to demonstrate support for good catchment governance:

Line 31 of the Water Stewardship Plan (WSP):
Target – Meet BAT global water KPIs, specifically achieving 50% water recycling by 2025 and a 35% reduction in water withdrawal against baseline.
Evidence – Snippets from the Sustainability Report showing reported performance (Document: 3.1.1 Snippets Sustainability Report).

Line 38 of the Water Stewardship Plan (WSP):
Target – Establish the status, challenges, and opportunities for catchment infrastructure.
Evidence – The facility visited the Ruai Wastewater Treatment Plant (NCWSC), held discussions on infrastructure-related challenges, and subsequently incorporated these findings into BAT's water risk matrix.

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

The facility has identified the following measures in place to respect the water rights of others:

Pollution prevention infrastructure – Spill gates, bunding, and spill kits are available, with personnel trained in their use to prevent contamination.

Stakeholder engagement – Regular engagements are conducted, with the Water Resource Users Association (WRUA) invited to raise any community water-related concerns.

Responsible water abstraction – A valid water abstraction permit is maintained, with regular monitoring to ensure no over-abstraction.

Licensed effluent discharge – An effluent discharge licence issued by the municipal authority allows the safe release of treated effluent into the public sewer system, preventing pollution.

Catchment rehabilitation – Afforestation activities are undertaken to support the rehabilitation of water towers.

3.2 *Implement system to comply with water-related legal and regulatory requirements and respect water rights.*

3.2.1 *A process to verify full legal and regulatory compliance shall be implemented.* ✓ Yes

Comment

The facility provided the following evidence of implementation of the process to verify full legal and regulatory compliance:

Abstraction Permit – Borehole 1

Abstraction Permit – Borehole 2

Q1 & Q2 borehole water quality results – Communicated to the relevant authorities

Effluent discharge test results – Communicated to the relevant authorities

3.2.2	*Where water rights are part of legal and regulatory requirements, measures identified to respect the water rights of others including Indigenous peoples, shall be implemented.*	Yes
Comment	The facility provided evidence of a root cause analysis conducted for exceedances identified during borehole water quality monitoring, where elevated levels of potassium and fluoride were detected in both on-site boreholes. This analysis was necessary to demonstrate the implementation of corrective measures aimed at meeting legal and regulatory requirements and ensuring that the site's operations do not negatively impact the water rights of others, as noted in the observation raised during the 2024 audit. As a countermeasure, signage was installed at all borehole water outlets indicating "Water Not Safe for Drinking," ensuring compliance with legal requirements and protection of community water rights.	
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.*	Yes
Comment	The facility provided evidence of progress towards achieving sustainable water balance with the targets set out in the Water Stewardship Plan (WSP), specifically the target in Row 7 to attain a 50% water recycling rate by 2025. To meet this target, the site has undertaken an Effluent Treatment Plant (ETP) upgrade, with evidence documented in the BAT Kenya ETP Improvement Report. Additional supporting actions include leakage repairs on the boiler feed water line (Boiler Feed Water Line Leak IPS) and the repair of a hydrant line leak (03022025 Hydrant Line Leak PM Card). These activities demonstrate ongoing implementation efforts aligned with the WSP target.	
3.3.2	*Where water scarcity is a shared water challenge, annual targets to improve the site's water use efficiency, or if practical and applicable, reduce volumetric total use shall be implemented.*	Yes
Comment	Water scarcity is a shared water challenge and annual targets to improve the site's water use efficiency, or reduce volumetric total use were implemented as follows: The facility provided evidence of progress towards achieving sustainable water balance with the targets set out in the Water Stewardship Plan (WSP), specifically the target in Row 7 to attain a 50% water recycling rate by 2025. To meet this target, the site has undertaken an Effluent Treatment Plant (ETP) upgrade, with evidence documented in the BAT ETP Improvement Report. Additional supporting actions include leakage repairs on the boiler feed water line (Boiler Feed Water Line Leak IPS) and the repair of a hydrant line leak (03022025 Hydrant Line Leak PM Card). These activities demonstrate ongoing implementation efforts aligned with the WSP target.	
3.3.3	*Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.*	Yes
Comment	This indicator was not applicable for the site.	
3.4	*Implement plan to achieve site water quality targets*	
3.4.1	*Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.*	Yes

Comment	The status of progress towards meeting the water quality targets outlined in the Water Stewardship Plan (WSP) was assessed as follows: Rows 15–17 of the WSP: Quarterly monitoring of drinking water quality according to defined parameters. Root Cause Analysis (RCA): Conducted to address any water quality issues. Supporting documentation: 3.4.1 Effluent Analysis Results 3.4.1 Legionella Analysis Results 3.4.1 Interceptor Cleaning Analysis Results These measures demonstrate the facility's ongoing commitment to maintaining and improving water quality in line with the WSP targets.	
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	Water quality represents a shared water challenge, and continual improvement efforts to achieve best practice for the site's effluent quality have been identified and quantified through the following evidence: Rows 15–17 of the Water Stewardship Plan (WSP): Quarterly monitoring of drinking water quality according to defined parameters. Root Cause Analysis (RCA): Conducted to investigate and address any water quality issues. Supporting documentation: 3.4.1 Effluent Analysis Results 3.4.1 Legionella Analysis Results 3.4.1 Interceptor Cleaning Analysis Results These initiatives demonstrate the facility's commitment to ongoing water quality improvement aligned with best practices.	
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	Practices outlined in the Water Stewardship Plan (WSP) to maintain and enhance the site's Important Water-Related Areas (IWRAs) have been implemented as follows: Row 25 of the WSP Target: Reforestation of IWRAs Actions: Planting of over 1,000 trees within the catchment area Partnership with catchment stakeholders and key service providers to address deforestation and increase forest cover. Notably, the site partnered with Ndakaine Dam for a reforestation project. Evidence of implementation is attached to the indicator.
3.6	*Implement plan to provide access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers at all premises under the site's control.*
3.6.1	*Evidence of the site's provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers onsite shall be identified and where applicable, quantified.* — Yes
Comment	Evidence demonstrating the site's provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all onsite workers was identified and quantified as follows: Row 34 of the Water Stewardship Plan (WSP): Target: Ensure compliance with public health requirements by maintaining a toilet-to-staff ratio of 1:25 for both male and female workers. Action: Implement WASH facilities on site with an improved ratio of 1:15 toilets per male worker and 1:15 toilets per female worker, ensuring accessibility for persons with disabilities (PWDs). Supporting evidence is attached to the indicator.
3.6.2	*Evidence that the site is not impinging on the human right to safe water and sanitation of communities through their operations, and that traditional access rights for indigenous and local communities are being respected, and that remedial actions are in place where this is not the case, and that these are effective.* — Obs.

Comment

KEPRO's chairperson, Stephen Muli — SSA Sustainability Manager at BAT Kenya Likoni — joined partners including the Mathare River Regeneration Network, Kenya Forest Service, Nairobi County Government, the Nairobi River Commission, and other stakeholders to mark World Wetlands Day 2024. Together, they conducted awareness sessions on sustainable waste management and coordinated clean-up activities across several locations in Nairobi.

Held under the theme "Wetlands and Human Wellbeing," the event reinforced the message that the environment is a shared responsibility to protect, not a resource to exploit. In a LinkedIn post, KEPRO emphasized the importance of collective action in safeguarding vital ecosystems.

BAT views this initiative as a valuable entry point to contribute meaningfully to Water, Sanitation, and Hygiene (WASH) efforts within the catchment. This is particularly relevant in Nairobi, where many informal settlements rely on the so-called "flying toilet" — a term used to describe human waste ending up in rivers due to the absence of proper sanitation facilities. In this context, KEPRO's waste collection and clean-up activities go beyond simply clearing Important Water Related Areas (IWRAs); they address a critical dimension of WASH by reducing pollution and protecting public health.

The facility also provided evidence of donating personal protective equipment (PPE) to the Water Resources Users Association (WRUA), which represents vulnerable communities within the catchment.

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

3.7.1 *Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.*

Obs.

Comment

In row 24 of the Water Stewardship Plan, the facility's target for Indirect Water Use was to understand the water footprint of indirect water users. Aquamist is the site's drinking water supplier.

Following reported cholera outbreaks in the country, an assessment of potential contamination points was initiated by BAT Kenya. This led to a site visit to the Aquamist plant on 10 April 2025.

The assessment found that Aquamist's comprehensive safety measures — including manual cleaning, automated sterilization, rigorous water testing, and regular employee health checks — significantly reduce the risk of contamination. These measures effectively address concerns regarding cholera outbreaks and ensure the bottled water remains safe for consumption.

Independent testing by BAT Kenya further confirmed that the water is safe for drinking.

3.7.2 *Evidence of engagement with suppliers and service providers, as well as, when applicable, actions they have taken in the catchment as a result of the site's engagement related to indirect water use, shall be identified.*

closed

Comment

The facility provided evidence of engagement with suppliers and service providers, most of whom are located outside the catchment area. However, it is unclear what specific actions resulted from these engagements in relation to indirect water use. Furthermore, no evidence was provided of engagement or progress in obtaining water data from Printpak, which is located within the site's catchment.

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3.8 *Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have.*

3.8.1	*Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.*	Yes
Comment	The facility provided evidence of a site visit to the Nairobi City Water and Sewerage Company (NCWSC) Ruai Wastewater Treatment Plant as part of its efforts to meet this indicator. The purpose of the visit was to understand the status of the infrastructure in meeting Nairobi's water management needs. During the visit, the treatment plant highlighted three major challenges: Overgrowth of hyacinth Presence of solid waste in the sewer system As a result of this visit, BAT Kenya implemented internal measures, including properly securing all on-site manholes to prevent solid waste from entering the sewer system. An inspection checklist was also developed to ensure ongoing compliance and monitoring.	
3.9	*Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.*	
3.9.1	*Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.*	Yes
Comment	The facility has implemented several relevant catchment-level best practices in water governance, including: Engaging with peer organizations and stakeholders to promote water stewardship and benchmark best practices. Visiting peer sites to identify initiatives that can be adapted to improve water conservation at the facility. Participating in KAM energy awards and audits for benchmarking with peer industries such as Tata Chemicals, EABL, MRM, and Bamburi. Reporting the water stewardship journey in the BAT Kenya Sustainability Report to enhance transparency. Monitoring and evaluating tree survival rates to assess the effectiveness of afforestation efforts, enabling data-driven adjustments that support adaptive management and long-term success. Supporting public sector initiatives focused on water resource management and conservation, including an annual subscription fee paid to Kirichwa WRUA to enable implementation of the WRUA mandate. Collaborating with local government on afforestation activities to enhance catchment resilience and water retention, with implementation evidenced through tree planting at Ndakaini Dam.	
3.9.2	*Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.*	Yes

Comment

The facility has implemented several best practices to support its water balance targets, including:

Automation of daily water use readings, reporting, and tracking to enhance monitoring and enable timely decision-making.

Regular training for employees and contractors on site regarding good water stewardship practices and water conservation initiatives.

Upgrading the effluent treatment plant to increase the volume of water recycled on site.

Establishing leak detection along water infrastructure, conducting root cause analysis, and implementing corrective actions to improve water conservation.

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

Yes

Comment

The facility has implemented several best practices to support its water quality targets, including:

Conducting bi-annual legionella testing, which exceeds legal requirements under current water quality regulations.

Incorporating bamboo trees in afforestation activities to filter pollutants and enhance water quality.

Participating in clean-up activities to remove pollutants and improve the quality of local water resources.

Engaging with the sewerage treatment plant to understand its status, challenges, and opportunities for the facility to contribute to improving water quality in the catchment.

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

Yes

Comment

The facility has implemented several best practices to support its targets for maintaining Important Water-Related Areas (IWRAs), including:

Incorporating fruit trees in tree planting initiatives, which not only help regulate the water cycle but also provide food for the community.

Participating in clean-up activities to preserve local ecosystems - KEPRO, Kirichwa WRUA initiatives

Monitor and evaluate the afforestation program - Afforestation Campaign (Kijani)

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

Yes

Comment

The facility has implemented several best practices to support its targets in terms of Water, Sanitation, and Hygiene (WASH), including:

Provision of WASH services exceeding regulatory requirements: While the government regulation recommends a ratio of 1:25 for male and female facilities, the site's target is 1:15, achieved through the construction of additional ladies' washrooms and showers at G2.

Provision of hygiene supplies such as soap and petroleum jelly to enhance on-site hygiene for workers.

Participation in clean-up activities, such as those organized by KEPRO, to ensure safe water for all and enhance public health and dignity.

WSAS
2 Quality StreetNorth Berwick, EH39 4HW, UNITED KINGDOM

4	**STEP 4: EVALUATE - Evaluate the site's performance.**
4.1	*Evaluate the site's performance in light of its actions and targets from its water stewardship plan and demonstrate its contribution to achieving water stewardship outcomes.*
4.1.1	*Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.* — Obs.
Comment	Performance against targets in the site's Water Stewardship Plan was evaluated and recorded in column L of the plan. However, the site's contribution to achieving the Alliance for Water Stewardship (AWS) outcomes is not clearly articulated.
4.1.2	*Value creation resulting from the water stewardship plan shall be evaluated.* — Yes
Comment	The value creation resulting from the Water Stewardship Plan was evaluated and is documented in column T of the plan.
4.1.3	*The shared value benefits in the catchment shall be identified and where applicable, quantified.* — Yes
Comment	The shared value benefits in the catchment were identified in cells T24 to T28 of the Water Stewardship Plan (WSP) and include: Biodiversity restoration Carbon sequestration: Mature trees help capture carbon, thereby mitigating the impacts of climate change Soil conservation, which indirectly contributes to climate change mitigation Water cycle regulation Promotion of sustainable livelihoods: Community-involved tree planting activities support local livelihoods through Community Forest Associations (CFAs)
4.2	*Evaluate the impacts of water-related emergency incidents (including extreme events), if any occurred, and determine the effectiveness of corrective and preventative measures.*
4.2.1	*A written annual review and (where appropriate) root-cause analysis of the year's emergency incident(s) shall be prepared and the site's response to the incident(s) shall be evaluated and proposed preventative and corrective actions and mitigations against future incidents shall be identified.* — Yes

Comment

The facility provided both an annual review for 2024 and a semi-annual review for 2025. For the years 2021, 2022, 2023, and 2024, the site reported no water-related emergencies.

In 2025, however, Nairobi County—where the Nairobi site is located—was among the counties in Kenya affected by a cholera outbreak, a water-borne disease. Several confirmed cases were reported in Nairobi, Migori, and Kisumu Counties in April 2025.

Recognizing water-borne diseases as a catchment risk, the site implemented precautionary measures to ensure high hygiene standards at all times. Measures included:

Readily available hand sanitizer in washrooms and other common areas

Provision of soap in washrooms and the canteen area

Employee advisories to:

Drink only bottled water

Wash hands frequently with soap and clean water

Consume only packaged or freshly cooked food served hot

Evidence for these measures was provided in the document "4.2.1_20241505_Annual_Review-Water_related_incidences."

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.*

Yes

Comment

The site's water stewardship performance, including the effectiveness of its engagement process, was assessed through a questionnaire distributed to stakeholders via a QR code during the stakeholder meeting held on 11 June 2025. The questionnaire is referenced on page 10 of the AWS Stakeholder Engagement Report 2025 and slide 15 of the Stakeholder Engagement PPT 2025 Nairobi_CZ (attached).

Stakeholder feedback was subsequently evaluated and documented in "4.3.1 AWS Stakeholder Engagement Feedback Analyzed."

4.4 *Evaluate and update the site's water stewardship plan, incorporating the information obtained from the evaluation process in the context of continual improvement.*

4.4.1 *The site's water stewardship plan shall be modified and adapted to incorporate any relevant information and lessons learned from the evaluations in this step and these changes shall be identified.*

Yes

Comment

The site's water stewardship plan was modified and adapted to incorporate any relevant information and lessons learned from the evaluations in this step and these changes have been identified in blue in the attached plan.

5	STEP 5: COMMUNICATE & DISCLOSE - Communicate about water stewardship and disclose the site's stewardship efforts

5.1 *Disclose water-related internal governance of the site's management, including the positions of those accountable for legal compliance with water-related local laws and regulations.*

5.1.1 *The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.* ✓ Yes

Comment: The site's water-related internal governance, including the positions of those accountable for compliance with water-related laws and regulations, is disclosed in the report "Good Water Governance Report – BAT Kenya Nairobi Manufacturing Factory." This report is available here; https://www.batkenya.com/sustainability-and-responsibility/environmental-sustainability and detailed on page 3.

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: The Water Stewardship Plan, including how it contributes to the AWS Standard outcomes, was communicated to relevant stakeholders during a meeting held at BAT Kenya premises on 11 June 2025, as documented in the report "5.2.1_AWS_Stakeholder_Engagement_Report_2025_NRB" (attached).

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.* ✓ Yes

Comment: A summary of the site's water stewardship performance, including quantified performance against targets, was disclosed here (On page 3 of the good water governance report); https://www.batkenya.com/content/dam/endmarkets/ke/en/download/sutainability-and-responsibility/Nairobi_Factory_Good_Water_Governance_Report_2025.pdf

5.4 *Disclose efforts to collectively address shared water challenges, including: associated efforts to address the challenges;engagement with stakeholders; and co-ordination with public-sector agencies.*

5.4.1 *The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.* ✓ Yes

Comment: The site's shared water-related challenges and efforts made to address these challenges were disclosed at the meeting held at BAT premises on 11 June 2025, as documented in the report "5.2.1_AWS_Stakeholder_Engagement_Report_2025_NRB" (attached).
It was also disclosed here (On page 4 of the good water governance report); https://www.batkenya.com/content/dam/endmarkets/ke/en/download/sutainability-and-responsibility/Nairobi_Factory_Good_Water_Governance_Report_2025.pdf

5.4.2 *Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.* ✓ Yes

Comment	The facility provided evidence of a site visit to the Nairobi City Water and Sewerage Company (NCWSC) Ruai Wastewater Treatment Plant. The purpose of the visit was to understand the status of the infrastructure in meeting Nairobi's water management needs. During the visit, the treatment plant highlighted three major challenges: Overgrowth of hyacinth Presence of solid waste in the sewer system As a result of this visit, BAT Kenya implemented internal measures, including properly securing all on-site manholes to prevent solid waste from entering the sewer system. An inspection checklist was also developed to ensure ongoing compliance and monitoring.	
5.5	*Communicate transparency in water-related compliance: make any site water-related compliance violations available upon request as well as any corrective actions the site has taken to prevent future occurrences.*	
5.5.1	*Any site water-related compliance violations and associated corrections shall be disclosed.*	Yes
Comment	The site did not have any water-related compliance violations.	
5.5.2	*Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.*	Yes
Comment	The site did not have any water-related compliance violations.	
5.5.3	*Any site water-related violation that may pose significant risk and threat to human or ecosystem health shall be immediately communicated to relevant public agencies and disclosed.*	Yes
Comment	The site did not have any water-related compliance violations.	

Previous Findings

	All non-conformities raised in the previous audit have been satisfactorily closed.	No
Comment	All non-conformities raised in the previous audit have been satisfactorily closed except one in 3.7.2 which was raised again.	