CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-001807

WSAS WATER STEWARDSHIP ASSURANCE SERVICES

SITE DETAILS

Site: **BAT Nigeria - Ibadan**
Address: 1, Tobacco way, Oluyole Local Government Area, Ibadan, 20001, Ibadan, NIGERIA
Contact Person: Angela Irobunda
AWS Reference Number: AWS-000478
Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Core
Date of certification decision: 2026-Feb-04
Validity of certificate: 2029-Feb-03

AUDIT DETAILS

Audited Service(s): AWS Standard v2.0 (2019)
Audit Type(s): Re-Certification Audit
Audit Start Date: 2025-Nov-11
Audit End Date: 2025-Nov-13
Lead Auditor: Anasse Ait Lemkademe

Site Participants:
Yemisi Ogunsola, Facilities Team Lead
Bisayo Lawal, Business Analyst Operations
Hasnain Ishtiaq, Operations Director
Toluwalope Ige, Engineering Utilities Manager
Ogheneosume Abada-Efajemu, Sustainability Coordinator
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Ayotunde Olukolu, Sustainability Coordinator support
Daniel Adeyemi, Utilities Technician
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John Njoroge, Operations Security Manager
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Waqas Ali Khan Khan, Manufacturing Manager
Valentine Ebikade, PMD Manager
Olatunbosun Oloko, Quality Compliance & Performance Manager
Oluwadare Adejoorin, Procurement Business Manager

ADDITIONAL INFO

Summary of Audit Findings: During the recertification audit, 7 non-conformities and 23 observations were raised.

The Client is requested to perform a root cause analysis and define corrective actions for each of the non-conformities and to submit these to WSAS by 30/12/2025.

The 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 28/01/2026.

The audit team recommends re-certification of BAT Nigeria Ibadan Factory at Core level pending closure of the non-conformities.

Scope of Assessment: The scope of services covers the recertification audit for assessing conformity of BAT Nigeria Ibadan Factory against the AWS International Water Stewardship Standard Version 2.

The basin is approximately 6,800 km² and lies between latitudes 6°34'N and 7°38'E 8' N and longitudes 3°26'E and 3°59'E. The Ona River flows through the western portion of the basin. The site it self is situated in a low, gently undulating area.
The main aquifer system in the area is the weathered-fractured, confined aquifer. It is recharged primarily by rainfall and potentially by leakages from shallower aquifers. The depth of the aquifer at the site is between 3 to 12 meters below ground level (bgl). A deeper aquifer, with artesian conditions, exists at a depth of over 200 meters bgl. The aquifers in the area are primarily composed of weathered and fractured quartzite and migmatite complex rocks.
The site experiences two distinct seasons: a dry season with minimal rainfall and a rainy season with significant rainfall. The dry season occurs when the northeast trade wind prevails, while the rainy season begins around April with the arrival of the southwest trade wind. Water related infrastructure includes Boreholes, piezometers, water storage facilities, water and wastewater treatment plants as well as stormwater management, water reuse and firefighting systems

The audit was conducted onsite on 11/11/2025 -13/11/2025.
The onsite site visit included the assessment of the following:
• Borehole and Piezometer
• Water Storage Facilities
• Water Treatment Plant
• Wastewater Treatment Plant
• BAT Factory
• Stormwater Management System
• Staff WASH Facilities
• Water Reuse System
• Firefighting System

FINDINGS

NUMBER OF FINDINGS PER LEVEL

Observation	23
Non-Conformity	7

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FINDING DETAILS

Finding No:	TNR-022182
Checklist Item No:	1.1.1
Status:	Closed
Finding level:	Non-Conformity
Due date:	2026-Feb-12
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 site relies on a groundwater aquifer as its ultimate water source, the aquifer has not been mapped.
Corrective action:	'- Engage hydrogeologist consultant to re-assess and expand groundwater and aquifer mapping using both existing data and additional analysis - Update the site catchment and physical scope definition based on the study outputs. Due date: Jan 16, 2026

Finding No:	TNR-022183
Checklist Item No:	1.2.1
Status:	Open
Finding level:	Observation
Checklist item:	Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall: - Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people; - Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies; - Provide evidence of stakeholder consultation on water-related interests and challenges; - Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups; - Identify the degree of stakeholder engagement based on their level of interest and influence.
Findings:	The stakeholder mapping does not consider the updated physical scope related to the aquifer.
Corrective action:	Review and update stakeholder mapping once the physical scope has been revised to reflect the true extent of the aquifer, and document the review process.

Finding No:	TNR-022184
Checklist Item No:	1.3.1
Status:	Open
Finding level:	Observation
Checklist item:	Existing water-related incident response plans shall be identified.
Findings:	The incident plan does not explicitly address all common water-related scenarios, particularly WWTP failure, which is not clearly established in the documentation.
Corrective action:	Update the incident and emergency response plan to explicitly include WWTP failure and other water-related scenarios, with clear roles and response steps.

Finding No:	TNR-022185
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:	While extensive analytical data is available, a comprehensive long-term tracking process is missing.
Corrective action:	Establish a documented long-term tracking process with defined indicators, responsibilities, review frequency, and trend analysis.

Finding No:	TNR-022186
Checklist Item No:	1.5.2
Status:	Open
Finding level:	Observation
Checklist item:	Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.
Findings:	The site could not renew its water-use permit on time due to a regulator website failure, the regulator issued an official letter acknowledging responsibility for the delay. Permit conditions are tracked and followed, and overall compliance is well-managed.
Corrective action:	Retain regulator acknowledgement as evidence and strengthen internal permit tracking by initiating renewals earlier if possible

Finding No:	TNR-022187
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:	Water abstractions are only partially accounted for, and the extent of the aquifer is not yet mapped, limiting the completeness of the balance.
Corrective action:	Complete aquifer mapping and update abstraction water balance, at the same time documenting assumptions and limitations.

Finding No:	TNR-022188
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 assessment does not yet cover the full catchment, and seasonal variations for surface water are missing. While relevant threats to water quality are identified and recent data sources have been consulted, a complete baseline was not established at initial certification, and there is no ongoing monitoring system to track catchment-wide changes over time.
Corrective action:	Expand assessment to cover the full catchment, include seasonal variability using secondary data, and define a periodic review mechanism.

Finding No:	TNR-022189
Checklist Item No:	1.5.5
Status:	Open
Finding level:	Observation
Checklist item:	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.
Findings:	IWRA Mapping and assessment remain incomplete. External knowledge sources have not yet been fully incorporated into the IWRA assessment.
Corrective action:	Incorporate credible external data sources into IWRA and document how they inform risk identification and prioritization.

Finding No:	TNR-022190
Checklist Item No:	1.5.6
Status:	Open
Finding level:	Observation
Checklist item:	Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.
Findings:	The infrastructure list has not yet been updated to reflect the revised physical scope, particularly regarding aquifer-related elements.
Corrective action:	Update infrastructure list once the revised physical scope is prepared

Finding No:	TNR-022191
Checklist Item No:	1.6.1
Status:	Open
Finding level:	Observation
Checklist item:	Shared water challenges shall be identified and prioritized from the information gathered.
Findings:	While a prioritization has been completed, the rationale behind the prioritization is not clearly explained, and some challenge descriptions remain vague. Consistency between stakeholder feedback, research, and the final list of challenges is partially missing.
Corrective action:	Clearly document prioritization criteria, scoring methodology, and refine challenge descriptions for consistency.

Finding No:	TNR-022192
Checklist Item No:	1.6.2
Status:	Open
Finding level:	Observation
Checklist item:	Initiatives to address shared water challenges shall be identified.
Findings:	While joint initiatives are acknowledged, specific planned and actionable initiatives are missing. The linkage between these initiatives and the shared water challenges identified is not clearly demonstrated
Corrective action:	Define clear, time-bound joint initiatives linked to shared water challenges, including roles and expected outcomes.

Finding No:	TNR-022205
Checklist Item No:	1.8.1
Status:	Open
Finding level:	Observation
Checklist item:	Relevant catchment best practice for water governance shall be identified.
Findings:	While the practices are documented, some of them are not sufficiently specific.
Corrective action:	Improve documentation to clearly define scope, implementation steps, ownership, and outcomes.

Finding No:	TNR-022207
Checklist Item No:	1.8.2
Status:	Open
Finding level:	Observation
Checklist item:	Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.
Findings:	While the list is comprehensive, several practices are not sufficiently specific
Corrective action:	Refine the practices list using a standard structure to ensure clarity and consistency.

Finding No:	TNR-022206
Checklist Item No:	1.8.3
Status:	Closed
Finding level:	Non-Conformity
Due date:	2026-Feb-12
Checklist item:	Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.
Findings:	The site has presented only internal/site-level best practices, without identifying catchment-level or sector-relevant water quality best practices.
Corrective action:	- Identify priority catchment water quality issues and conduct a catchment water quality risk (surface water and groundwater). Share analysis report with Oluyole LG and regulators and develop a follow-up monitoring. - Conduct a best-practice gap assessment and relevant best practices (e.g., pollution prevention, monitoring, awareness) in collaboration with Ministry of Environment, Water Corporation and Oluyole LG community heads. - Incorporate at least two catchment-level water quality initiatives into the WSP. Due date: Jan 16, 2026
Evidence of implementation:	A catchment water quality assessment done (surface water and groundwater) and result analysis shared with key regulators. Now awaiting response and a follow-up monitoring.

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Finding No:	TNR-022208
Checklist Item No:	1.8.4
Status:	Closed
Finding level:	Non-Conformity
Due date:	2026-Feb-12
Checklist item:	Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.
Findings:	The site has not identified best practices specific to the maintenance of Important Water-Related Areas (IWRAs). Evidence presented relates only to general infrastructure maintenance and does not address IWRA-specific needs.
Corrective action:	- Conduct an IWRA identification and mapping exercise using stakeholder input. - Identify site-relevant IWRAs and expand infrastructure maintenance procedures to include IWRA protection and monitoring measures. - Conduct best-practice gap assessment and identify relevant best practices and integrate into the WSP for planning and implementation Due date: Jan 16, 2026

Evidence of implementation: Engagements have been made, awaiting feedback from key regulators and stakeholders. Evidence attached.

UPDATE:

We took steps to identify best practices from both external and catchment-relevant sources which we intend to adopt and benchmark. They were not mentioned because they are still under review by the management.

- Coordinating with International Institute of Tropical Agriculture (IITA) in Oyo State on reforestation and landscape restoration; to support activities like reforesting watershed areas that support water catchment health

- Water quality advocacy/ awareness campaign in the catchment (modeled on Nestle Nigeria's National Water Quality Advocacy Campaign): Partnering with the local NGO and Ministry of Environment to raise awareness of water quality and safe water practices on IWRAs, with a focus on practical guidance for communities, policymakers, and businesses.

- Stakeholder engagement shown through World Water Day activities and 10hour tour on selected industries in Oyo state that demonstrate advanced water management systems to promote engagements and awareness.

Additionally, here are also best practices for BATN site collaboration with OORBDA's (Ogun-Oshun River Basin Development Authority) and MAN's (Manufacturers Association of Nigeria) plans. These practices are aligned with the Ibadan Urban Flood Management Project (IUFMP) and academic research from the University of Ibadan.

- Riparian Buffer Restoration: this is the installation of vetiver grass buffers along the site-adjacent banks to mitigate high turbidity and sediment runoff. The target is for Ona River Corridor.

- Nutrient Stripping via CFWs: The deployment of Constructed Floating Wetlands (CFWs) in site retention ponds to address seasonal phosphate spikes common in Ogun-Oshun River Basin. The target is for Ona River /Eleyele Watershed

- A collective lobby for a centralized industrial wastewater plant in Ibadan: A collaborative exercise to be championed by MAN from 2025 multi-stakeholder workshop outcomes

- Collective Aquifer Monitoring: The implementation of an automated Groundwater Telemetry Circle sharing data with OORBDA to manage basement complex drawdown. The target is for the Local Basement Complex Aquifer

- IUA/IWRA Restoration: Native reforestation of the Ona riverbank to prevent erosion, in collaboration with NCF (Nigerian Conservation Foundation)/ NCF Green Recovery Nigeria (GRN) Strategy. The target

	is Ona River Corridor / Ibadan Floodplain. - Water Hyacinth Management: Converting harvested hyacinth into organic mulch for local agriculture. The target is for Eleyele Wetland / Oyan River.
Finding No:	TNR-022521
Checklist Item No:	1.8.5
Status:	Open
Finding level:	Observation
Checklist item:	Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.
Findings:	The site has not identified best practices for WASH services at the catchment level, even though WASH is recognized as a shared challenge in the region. Evidence provided focuses solely on on-site WASH practices and does not address broader catchment-wide needs or initiatives.
Corrective action:	- Document indirect approaches such as advocacy, partnerships, and alignment with authorities, clearly explaining legal constraints. - Conduct a catchment-level WASH needs and risk assessment with Oluyole LG community, key stakeholders and regulators - Identify at least one shared WASH intervention (e.g., borehole rehabilitation, hygiene awareness). - Include WASH actions in the WSP as shared-value initiatives.
Finding No:	TNR-022211
Checklist Item No:	2.2.1
Status:	Open
Finding level:	Observation
Checklist item:	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.
Findings:	While the roles and responsibilities are documented, a clear, consolidated description of the overall compliance process is still missing.
Corrective action:	Develop a Standard Operating Procedure (SOP) of the compliance monitoring and renewal process

Finding No:	TNR-022215
Checklist Item No:	2.3.2
Status:	Closed
Finding level:	Non-Conformity
Due date:	2026-Feb-12
Checklist item:	A water stewardship plan shall be identified, including for each target: - How it will be measured and monitored - Actions to achieve and maintain (or exceed) it - Planned timeframes to achieve it - Financial budgets allocated for actions - Positions of persons responsible for actions and achieving targets - Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.
Findings:	The actions and targets presented are broad and lack clarity. Several KPIs are either undefined or not measurable, and the plan includes routine operational activities that do not reflect additional effort or improvement commitments.
Corrective action:	- Revise the WSP to include clear, time-bound, and measurable targets beyond routine operations. - Explicitly link actions to AWS outcomes, shared risks, IWRAs, and stakeholder needs. - Define KPIs, owners, and timelines for each action. Due date: Jan 9, 2026

Finding No:	TNR-022219
Checklist Item No:	2.4.1
Status:	Closed
Finding level:	Non-Conformity
Due date:	2026-Feb-12
Checklist item:	A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.
Findings:	There is a lack of evidence that site-specific risks or shared catchment risks have been assessed or incorporated into any structured mitigation framework. There was no evidence provided of engagement with public-sector or infrastructure agencies in the development of risk mitigation measures.
Corrective action:	- Develop a documented Water Risk Mitigation and Adaptation Plan aligned with shared water risks identified by public-sector stakeholders (e.g., water agencies, local authorities, and key stakeholders) during the AWS Stakeholder Workshop. - Formalize engagement through meeting records and correspondence - Share agreed actions, responsibilities and timelines for closure to all stakeholders, including follow-up monitoring. Due date: Jan 16, 2026
Evidence of implementation:	The Feedback from AWS Workshop (held in August 2025) with shared catchment risks identified by the stakeholders, have been structured. Engagements have been made regarding top losses and risks and awaiting feedback for plans for collaboration.

Finding No:	TNR-022232
Checklist Item No:	3.3.3
Status:	Open
Finding level:	Observation
Checklist item:	Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.
Findings:	It's not clear why the site performs quarterly water quality testing for the re-allocated water, while domestic (internal) water is monitored monthly.
Corrective action:	Document the technical and risk-based justification for different testing frequencies in procedures.

Finding No:	TNR-022240
Checklist Item No:	3.4.1
Status:	Open
Finding level:	Observation
Checklist item:	Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.
Findings:	Some implemented targets are not documented in the water stewardship plan
Corrective action:	Update the WSP to fully reflect all implemented targets and commitments.

Finding No:	TNR-022531
Checklist Item No:	3.5.1
Status:	Open
Finding level:	Observation
Checklist item:	Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.
Findings:	The site has considered infrastructure elements shared with community, such as a borehole allocated for social use, as IWRAs, and implemented actions on them. The AWS Guidance indicates this can be accepted although the intent behind IWRAs is to focus on natural water-related areas (e.g., rivers, wetlands, recharge zones, riparian zones) that hold ecological, social, cultural, or environmental importance.
Corrective action:	Clarify IWRA scope in line with AWS guidance, focusing on natural water-related areas while documenting contextual risks separately. Additionally, this will be updated after the IWRA identification and mapping exercise planned using stakeholder input.

Finding No:	TNR-022242
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 site has not set specific indirect water use targets in the water stewardship plan.
Corrective action:	Define and include realistic indirect water use targets in the WSP with tracking mechanisms.

Finding No:	TNR-022243
Checklist Item No:	3.9.1
Status:	Open
Finding level:	Observation
Checklist item:	Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.
Findings:	Best practices are not yet explicitly integrated into the WSP.
Corrective action:	Prepare best practices explicitly into relevant WSP sections.

Finding No:	TNR-022251
Checklist Item No:	3.9.2
Status:	Open
Finding level:	Observation
Checklist item:	Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.
Findings:	Best practice actions are not explicitly included in the WSP.
Corrective action:	Explicitly map best practices into relevant WSP sections.

Finding No:	TNR-022244
Checklist Item No:	3.9.3
Status:	Open
Finding level:	Observation
Checklist item:	Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.
Findings:	Actions towards achieving best practice are not explicitly included in the WSP
Corrective action:	Include clear action plans, timelines, and responsibilities for achieving best practices in the WSP.

Finding No:	TNR-022245
Checklist Item No:	3.9.4
Status:	Closed
Finding level:	Non-Conformity
Due date:	2026-Feb-12
Checklist item:	Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.
Findings:	No best practices for IWRA maintenance have been identified, documented, implemented, monitored, or integrated into the WSP.

Corrective action:

'- Engage Oluyole Local Government (site catchment) requesting to explore areas where the site can offer support on IWRA challenges.
- Develop and implement an IWRA Maintenance Action Plan for the nominated IWRAs (e.g., clean-ups, erosion control, buffer protection, awareness campaigns). Engage BATN Foundation for support.
- Document activities with photos, monitoring records, and stakeholder participation evidence.
- Designate the Ifelodun borehole (recently commissioned borehole in 2025) as a monitoring borehole to track the influence of BATN operations on IWRA water quality and water levels, including conducting the required mapping and assessments.

UPDATED RESPONSE BELOW

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Here is the broader plan.
We will formally identify, document, and integrate IWRA maintenance best practices into the WSP, with defined targets and a monitoring framework.

1. Identification of IWRA Maintenance Best Practices

We will develop an IWRA maintenance framework from:
- Generating a map of the rivers and IWRAs within the catchment using the corrected catchment stakeholder map, identify 4 –6 water zones within the Ona catchment, select predefined sampling points for assessment by the BAT team.
- seek guidance from local environmental authorities
- benchmark BAT Global and BATN environmental standards, and
- Site-specific catchment and IWRA risk assessment outcomes.

The best practices for the site will include, (not limited to):

- Periodic IWRA clean-up and waste prevention activities (planned in H1 2026 during events like World environment day and World Clean-up Day as a collaboration with the regulators/community reps/other stakeholders; and also during Local government community market days; and subsequent awareness events),
- Erosion and runoff control measures,
- Protection of buffer zones around identified IWRAs,
- Stakeholder and community engagement on IWRA protection,
- Periodic groundwater level and quality monitoring to assess operationa influence (a recent exercise is being conducted after generating an IWRA mapping of the catchment and selecting some IWRA sampling points for assessment)

2. Integration into the WSP

The identified best practices and actions will be:

- Documented within the IWRA Maintenance Action Plan and tracked,
- Incorporated as a formal section of the site's WSP, and

- Linked to specific WSP objectives, responsibilities, timelines, and performance targets.

For the targets and Performance Objectives, we will be tracking:
- annual implementation of planned IWRA maintenance activities,
- completion rate of IWRA actions against the approved plan, and
- annual review of groundwater monitoring data to assess trends and potential impacts.

3. Implementation and Stakeholder Engagement
We will engage Oluyole Local Government and other community stakeholders to support IWRA maintenance initiatives. BATN Foundation will also be engaged to support implementation.

4. Monitoring, Documentation, and Review

- The Ifelodun borehole (commissioned in 2025) will be designated as a monitoring borehole to track groundwater quality and water levels related to IWRA protection.
- Monitoring results, activity records, photographs, and stakeholder engagement evidence will be maintained.
- Progress and performance against IWRA maintenance targets will be reviewed periodically and integrated into WSP reviews and site management review processes.

Evidence of implementation: An IWRA mapping of the catchment where some IWRA sampling points for assessment (5 sample points with Sub catchment region) were selected: Odo-Ona, Onipepeye, Kute, Asejire (Osun river),Eleyele

The test results of the sampling were shared with key regulators and host community chairman, and a follow up will occur when a meeting is scheduled.

UPDATE:

As reported in 1.8.4, here are identified best practices from both external and catchment-relevant sources awaiting implementation:

Category 1:
- Coordinating with International Institute of Tropical Agriculture (IITA) in Oyo State on reforestation and landscape restoration; to support activities like reforesting watershed areas that support water catchment health

- Water quality advocacy/ awareness campaign in the catchment (modeled on Nestle Nigeria's National Water Quality Advocacy Campaign): Partnering with the local NGO and Ministry of Environment to raise awareness of water quality and safe water practices on IWRAs, with a focus on practical guidance for communities, policymakers, and businesses.

- Stakeholder engagement shown through World Water Day activities and 10hour tour on selected industries in Oyo state that demonstrate advanced water management systems to promote engagements and awareness.

Category 2:

- Riparian Buffer Restoration: this is the installation of vetiver grass buffers along the site-adjacent banks to mitigate high turbidity and sediment runoff. The target is for Ona River Corridor.

- Nutrient Stripping via CFWs: The deployment of Constructed Floating Wetlands (CFWs) in site retention ponds to address seasonal phosphate spikes common in Ogun-Oshun River Basin. The target is for Ona River /Eleyele Watershed

- A collective lobby for a centralized industrial wastewater plant in Ibadan: A collaborative exercise to be championed by MAN from 2025 multi-stakeholder workshop outcomes

- Collective Aquifer Monitoring: The implementation of an automated Groundwater Telemetry Circle sharing data with OORBDA to manage basement complex drawdown. The target is for the Local Basement Complex Aquifer

- IUA/IWRA Restoration: Native reforestation of the Ona riverbank to prevent erosion, in collaboration with NCF (Nigerian Conservation Foundation)/ NCF Green Recovery Nigeria (GRN) Strategy. The target

	is Ona River Corridor / Ibadan Floodplain. - Water Hyacinth Management: Converting harvested hyacinth into organic mulch for local agriculture. The target is for Eleyele Wetland / Oyan River.
Finding No:	TNR-022246
Checklist Item No:	3.9.5
Status:	Open
Finding level:	Observation
Checklist item:	Actions towards achieving best practice related to targets in terms of WASH shall be implemented.
Findings:	Not all actions are integrated into the WSP.
Corrective action:	Reconcile all actions and fully integrate them into the WSP.
Finding No:	TNR-022249
Checklist Item No:	4.1.3
Status:	Closed
Finding level:	Non-Conformity
Due date:	2026-Feb-12
Checklist item:	The shared value benefits in the catchment shall be identified and where applicable, quantified.
Findings:	No quantitative or qualitative evaluation of shared value outcomes is available
Corrective action:	'- Revise and link Shared Value Assessment site presentation to environmental, social, and economic outcomes in the catchment. - Define indicators to measure shared benefits (e.g., improved access, reduced risk, enhanced ecosystem health). - Integrate shared value narrative and indicators into the WSP. Due date: Jan 9, 2026
Evidence of implementation:	Shared Value Benefits in Catchment with embedded environmental, social, and economic outcomes in the catchment.

Finding No:	TNR-022250
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:	The disclosure currently places strong emphasis on water usage metrics. The full spectrum of water stewardship performance is missing.
Corrective action:	Expand disclosure to include governance, catchment risks, stakeholder engagement, shared actions, WASH considerations, and progress against AWS outcomes.

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WSAS WATER STEWARDSHIP ASSURANCE SERVICES

Report Details

Report	Value
Report prepared by	Anasse Ait Lemkademe
Report approved by	Ozge Gokmen
Report approved on (Date)	13/12/2025

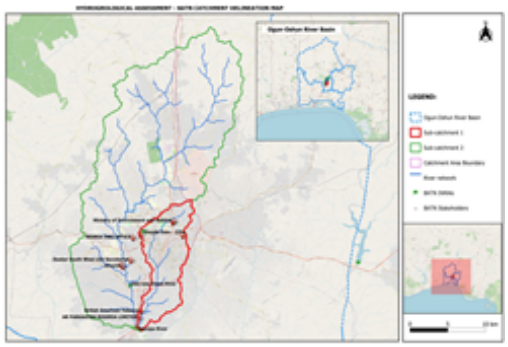
Surveillance

Proposed date for next audit
2026-Nov-11

Stakeholder Announcements

Date of publication	Location
21/07/2025	AWS website
21/07/2025	WSAS website
21/07/2025	Site entrance

Catchment Information



IBadan Catchment.jpg

Catchment Information

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

The BAT Ibadan site is situated within the Ogun–Osun River Basin, specifically in the Precambrian Basement Complex sub-basin. The hydrology of Ibadan is influenced by three main north–south flowing river systems:

Ogunpa River (central),

Ona River (west), and

Ogbere River (east).

The Ogunpa River, which drains the central region of the city, merges with the Ona River approximately 2.2 km south of the site. The Ogunpa catchment (~50 km²) consists of natural tributaries but is heavily canalized in urban sections, contributing to complex stormwater dynamics. All rivers ultimately drain towards the Atlantic Ocean as part of the broader regional system.

Groundwater Context

The site abstracts groundwater from local weathered and weathered–fractured basement complex aquifers, where static water levels range between 3–12 m bgl (3.84 m bgl at BAT). Deeper aquifers (>200 m bgl) display artesian characteristics. The aquifer system is largely of crystalline basement geology, consisting of quartzites, banded gneiss, augen gneiss, migmatites, and local pegmatites and amphibolites. Recharge occurs primarily via rainfall infiltration, with potential contributions from minor perched aquifers where confining clay layers are absent.

The broader aquifer system is influenced by the Lullemeden–Irhazer Aquifer System, although the site specifically exploits the coastal plain sands aquifer overlying the basement complex.

Water Supply and Discharge Infrastructure

The site operates independently of municipal water services, relying 100% on boreholes. No treated effluent is discharged externally; all treated wastewater is reused internally, contributing to reduced catchment impact.

Catchment Features

The wider Ibadan catchment is located in a tropical climate with well-defined wet and dry seasons. Although the area generally has abundant rainfall, water supply can fluctuate seasonally. Flooding is a recurrent problem, driven by intense wet-season rainfall, undersized or clogged stormwater infrastructure, and urban expansion along floodplains.

There are no officially designated protected areas or inter-basin transfers within the immediate catchment. Dominant water uses include domestic water supply, urban consumption, and small-to-medium-scale industrial use. The area is not characterized by major agricultural or heavy industrial water demand.

Client Description and Site Details

Factory Ibadan.jpg

Client/Site Background

The British American Tobacco (BAT) Ibadan factory is located in the Aiyetoro area of Ibadan, Oyo State, along the Lagos–Ibadan Expressway in south-western Nigeria. The site sits at Latitude 7°18'36.4"N and Longitude 3°52'17.0"E, at an elevation of approximately 145 m a.m.s.l., about 1.37 km south of the Ibadan Toll Gate. The surrounding environment is predominantly industrial, with nearby factories, access roads, and direct adjacency to a major federal highway.

The site manufactures cigarette products, using cut rag tobacco wrapped and packaged on high-speed production lines. Water plays a critical operational role, particularly in steam generation (boilers) and in cooling systems (chillers, cooling towers, heat exchangers). Additional water needs include domestic consumption (cleaning, sanitation, laundry, bathing), fire protection systems (hydrants and sprinkler networks), and general site services.

BAT Ibadan relies exclusively on on-site boreholes (10 units) as its water supply source. These feed two main treatment trains:

Industrial/production water treatment plant, and

Potable water treatment plant for drinking water.

The site also includes storage tanks, an extensive water distribution network, boilers, cooling towers, wastewater treatment facilities, stormwater pit and drainage systems, sewer networks, and localized irrigation systems.

All process water, sewage, spillages, and stormwater are directed to the on-site Wastewater Treatment Plant (WWTP). After treatment, effluent is fully reused within the site for non-human consumption, and no untreated or treated wastewater is discharged outside the facility.

The factory employs approximately 1,093 employees and contractors, operating 24/7 under a continuous 7-7-10 hour shift rotation, with auxiliary services working normal day schedules. The whole site spans 123,574 m² (≈26.96 acres), arranged in a horseshoe industrial layout that includes the main production block, bonded warehouse, utilities, engineering workshop, ETP facilities, waste zones, boiler and compressor units, LPG storage, and diesel tank farm. Residential infrastructure such as a visitors' chalet and management housing is also present on the property.

Summary of Shared Water Challenges

Summary of Shared Water Challenges

The provided data covers three main categories of water challenges faced by the BAT Ibadan factory:

Current Onsite Water Challenges: Over-abstraction and stress on water sources due to decayed equipment, lack of proper water management, and deteriorated infrastructure. Mitigation actions include implementing water efficiency programs, resurfacing underground pipes, and monitoring water consumption with flowmeters.

Catchment Water Challenges: Decreased water availability and pollution in the surrounding area, which affects both local water systems and the factory's operations. This includes engagement with local stakeholders to address water stress in the broader catchment.

Future Water Challenges: Anticipated increased water risk due to factors like climate change and industrial growth. This may lead to higher stress on water availability, requiring future strategies such as sustainable sourcing and improved water management systems.

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	Water Supply Boreholes	

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.*	✓ closed
Comment	The site has provided a comprehensive site map that clearly outlines its physical boundaries and includes all major water-related infrastructure, including piping networks, water supply lines, wastewater flows, and stormwater drainage. The mapping also identifies wastewater discharge points, service providers, and the ultimate receiving environment. The catchment boundaries appear to be defined based on hydrological and topographical considerations. ***Finding No: TNR-022182***	
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.*	Obs.
Comment	The site has strengthened its stakeholder process by identifying six new stakeholders, documenting the approach used, and conducting a workshop on 26/08/2025 with 40 stakeholders invited. Stakeholder interests and levels of influence are clearly recorded. However, vulnerable groups and NGOs have not been included, as the site relies solely on the host community and indirect outreach via the BAT Foundation due to tobacco-sector restrictions.	
1.2.2	*Current and potential degree of influence between site and stakeholder shall be identified, within the catchment and considering the site's ultimate water source and ultimate receiving water body for wastewater.*	✓ Yes
Comment	The site has reviewed both its direct and indirect influence over stakeholders and evaluated the influence stakeholders have on its water use and wastewater management. Influence within the broader catchment has also been assessed, and the results have been integrated into the stakeholder engagement approach.	

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.* Obs.

Comment: The site has identified emergency response procedures that cover water-related incidents, and these are integrated within the factory management system. Response actions are clearly defined, and appropriate emergency materials (spill kits, chemicals-handling equipment) are available and well-located. Water-related risks are also included in the Business Continuity Plan.

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

Comment: The site has developed a comprehensive mapping of all on-site water flows, including inflows, production uses, water treatment processes, storage components, wastewater flows, domestic uses, and rainwater/stormwater pathways. Water recycling and reuse streams are also clearly identified, including their purposes, and all water losses and discharge points have been mapped.

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: The site has developed a complete water balance that accounts for all inflows, outflows, storage, and losses. Annual variances in water consumption have been quantified and are linked to increased production levels. Water losses—including evaporation, leakage, and product water—are properly included, and irrigation use is calculated.

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 conducts regular water quality monitoring, including daily pH and TDS measurements and monthly chemical and microbiological testing for both incoming water and treated effluent. Stormwater, when mixed with WWTP outflow, is also analyzed as part of the effluent. Testing is performed externally with results verified against applicable compliance limits, and drinking water quality is monitored monthly.

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

Comment: The site has identified all on-site pollution sources, including chemicals, fuels, and hazardous waste, and these areas are clearly mapped on an updated site plan. Chemical storage, diesel tanks, and waste disposal areas are secure, well-maintained, and compliant with safety requirements. An emergency response plan is in place for pollution incidents, and appropriate security measures exist to prevent leaks or accidental releases.

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: The site has identified and mapped its on-site IWRA, notably Borehole 8, which provides water to the surrounding community and therefore holds social and public value.

1.3.7	*Annual water-related costs, revenues, and a description or quantification of the social, cultural, environmental, or economic water-related value generated by the site shall be identified and used to inform the evaluation of the plan in 4.1.2.*	Yes
Comment	The site has identified and documented all relevant water-related costs, including those linked to stewardship activities such as stakeholder engagement and technical studies. While no water-related revenues apply, the site has described the social value generated through its community water provision activities, which are implemented and financially supported by the Foundation.	
1.3.8	*Levels of access and adequacy of WASH at the site shall be identified.*	Yes
Comment	The site has provided a full breakdown of WASH facilities, which are clean, well-maintained, and accessible to all worker categories, including contractors. Facilities account for gender-specific needs and mobility considerations. While national regulations only specify that facilities must be “adequate” without defining ratios per person, the current provision appears sufficient. Hygiene awareness materials and pictograms are available, and wastewater from WASH facilities is properly treated through the domestic system.	
1.4	*Gather data on the site’s indirect water use, including: its primary inputs; the water use embedded in the production of those primary inputs the status of the waters at the origin of the inputs (where they can be identified); and water used in out-sourced water-related services.*	
1.4.1	*The embedded water use of primary inputs, including quantity, quality and level of water risk within the site’s catchment, shall be identified.*	Yes
Comment	The site has identified all primary inputs and verified their locations relative to the catchment, noting that only one supplier operates within the catchment. For this supplier, the site has collected annual water-use data and assessed water stress conditions. Evidence of supplier engagement is documented.	
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 site has identified all outsourced services, including seven providers, of which three operate within the catchment and two use water supplied directly by the site. Water use for catchment-based services has been quantified, and off-site services using their own water are also accounted for	
1.5	*Gather water-related data for the catchment, including water governance, water balance, water quality, Important Water-Related Areas, infrastructure, and WASH*	
1.5.1	*Water governance initiatives shall be identified, including catchment plan(s), water-related public policies, major publicly-led initiatives under way, and relevant goals to help inform site of possible opportunities for water stewardship collective action.*	Yes
Comment	The site has compiled and summarized all relevant water governance policies, publicly-led initiatives, and institutional frameworks applicable to the catchment. It demonstrates an understanding of how these initiatives guide its water stewardship strategy and has identified opportunities for alignment and contribution.	
1.5.2	*Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.*	Obs.

Comment	The site has compiled all applicable water-related legal and regulatory requirements and confirmed that no customary rights apply. Reporting obligations, abstraction limits, and quality conditions are documented, and compliance data—including wastewater, abstraction, and WASH requirements—is consistently maintained.	
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 site has quantified the catchment water balance using annual data and has identified local water scarcity conditions. Inputs and outputs are generally supported by data.	
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	The site has identified key physical, chemical, and biological water quality conditions using groundwater WQI maps for dry and wet seasons in the Ibadan area and surface water data for the Ona basin.	
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.*	Obs.
Comment	The site has identified the IWRAs within the catchment and documented their condition.	
1.5.6	*Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.*	Obs.
Comment	The site has identified 14 water-related infrastructure assets within the catchment and documented their condition, planned developments, and vulnerability to extreme weather and climate change. The assessment also covers public water, wastewater, stormwater, and flood management structures.	
1.5.7	*The adequacy of available WASH services within the catchment shall be identified.*	Yes
Comment	The site has identified WASH services within the catchment and supported the assessment with the WASHNORM 2021 report, which includes data on population access to adequate WASH. External sources and public health statistics have been used	
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.*	Obs.
Comment	The site has identified shared water challenges in consultation with stakeholders and has used external tools such as the WWF Water Risk Filter and Aqueduct to validate the challenges.	
1.6.2	*Initiatives to address shared water challenges shall be identified.*	Obs.
Comment	The site has identified several existing initiatives, including public-sector and NGO-led efforts such as those with FBRA	

1.7	*Understand the site's water risks and opportunities: Assess and prioritize the water risks and opportunities affecting the site based upon the status of the site, existing risk management plans and/or the issues and future risk trends identified in 1.6.*	
1.7.1	*Water risks faced by the site shall be identified, and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.*	Yes
Comment	The site has conducted a comprehensive water risk assessment, covering physical, regulatory, and reputational risks, and has considered both shared water challenges and site-specific risks. Risks have been prioritized based on likelihood and severity, with clear timeframes applied. Business, financial, regulatory, and reputational impacts are well-analyzed.	
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 site has identified several water-related opportunities and assessed them in relation to shared water challenges. Opportunities have been prioritized based on feasibility and impact, with clear descriptions of potential participation pathways. Both short-term and long-term business and financial benefits have been evaluated.	
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.*	Obs.
Comment	The site has identified six best practices for water governance and conducted research to ensure their relevance to the catchment.	
1.8.2	*Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.*	Obs.
Comment	The site has identified 14 best practices related to water balance and assessed their relevance to its operations.	
1.8.3	*Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.*	closed
Comment	The site has presented only internal/site-level best practices. ***Finding No: TNR-022206***	
1.8.4	*Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.*	closed
Comment	The site has not identified best practices specific to the maintenance of Important Water-Related Areas (IWRAs). ***Finding No: TNR-022208***	
1.8.5	*Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.*	Obs.
Comment	The site has not identified best practices for WASH services at the catchment level.	

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 site has developed, signed, and publicly disclosed a water stewardship site statement. The statement demonstrates commitment to implementing the AWS Standard and reporting progress on water stewardship actions. It also expresses alignment with catchment sustainability plans and includes commitments to transparent stakeholder engagement.	
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.*	🔍 Obs.
Comment	The site has clearly identified responsible persons for maintaining water and wastewater compliance, and documented evidence of their roles and responsibilities is available. A formal process exists for submitting required reports to regulatory agencies, including clarity on timelines, reporting responsibilities, and data requirements.	
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	The site has developed a water stewardship strategy that includes a defined mission, vision, and goals, and this strategy is formally documented within the Water Stewardship Plan.	
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.*	✓ closed

Comment	The site has developed a Water Stewardship Plan. Roles and responsibilities for each action have been defined. ***Finding No: TNR-022215***	
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.*	closed
Comment	The site has not developed a documented risk mitigation or adaptation plan addressing the water risks identified ***Finding No: TNR-022219***	

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 site has demonstrated active engagement in catchment governance initiatives. Evidence shows that the site organized an engagement session with university students, during which it shared responsible water management practices. Additionally, the site facilitated a multi-stakeholder workshop involving approximately 40 stakeholders, and a second workshop with environmental professionals from 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	The site has confirmed that no additional water rights exist in the catchment beyond those already covered by legal and regulatory frameworks.	
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 site maintains complete records demonstrating compliance with applicable legal and regulatory requirements. Documentation includes regulatory submissions, compliance audit reports, and water-related permits covering abstraction, discharge, and environmental obligations.	
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 site has conducted an analysis of legal and regulatory requirements related to water rights and has confirmed that no legal obligations regarding the water rights of other users or communities—including Indigenous peoples—exist.	
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 site has established one water balance target within the WSP, focused on reducing freshwater withdrawal through the installation of an RO system that allows wastewater to be reused in the steam process.	
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	The site has correctly identified water scarcity as a shared water challenge in the catchment, supported by evidence of a negative water balance. The site has established annual targets for improving water use efficiency, including reducing total volumetric water use.	
3.3.3	*Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.*	Obs.

Comment	The site is re-allocating water from borehole 8 for social use. Evidence shows that the site performs quarterly water quality testing for the re-allocated water.	
3.4	*Implement plan to achieve site water quality targets*	
3.4.1	*Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.*	Obs.
Comment	The site has developed water quality targets, but these are incompletely documented in the Water Stewardship Plan. Only one action/target is listed. The defined water quality targets specify the relevant water bodies and parameters, and timelines for achieving the targets are included	
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	The site demonstrates full compliance with effluent quality requirements. Monitoring data confirms that the treated effluent meets all legal discharge standards. In addition, the site has implemented an RO unit to further improve the quality of treated wastewater, enabling its reuse for steam generation.	
3.5	*Implement plan to maintain or improve the site's and/or catchment's Important Water-Related Areas.*	
3.5.1	*Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.*	Obs.
Comment	Tthe site has considered infrastructure elements shared with community, such as a borehole allocated for social use, as IWRAs, and implemented actions on them. The AWS Guidance indicates this can be accepted although the intent behind IWRAs is to focus on natural water-related areas (e.g., rivers, wetlands, recharge zones, riparian zones) that hold ecological, social, cultural, or environmental importance.	
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	The site has fully complied with all WASH requirements. All facilities are properly listed and meet minimum safety, quality, and access standards.	
3.6.2	*Evidence that the site is not impinging on the human right to safe water and sanitation of communities through their operations, and that traditional access rights for indigenous and local communities are being respected, and that remedial actions are in place where this is not the case, and that these are effective.*	Yes
Comment	The site's abstraction levels are sustainable and do not impact local drinking water availability. All wastewater is fully treated and reused onsite, with no discharge to the environment and no contamination concerns reported by stakeholders. No traditional or indigenous water access rights apply. Stakeholder interviews were conducted, and no issues regarding water access were raised.	
3.7	*Implement plan to maintain or improve indirect water use within the catchment:*	

3.7.1	*Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.*	Obs.
Comment	The site has not set specific indirect water use targets but has taken action by conducting training and awareness sessions for service providers. Water-saving initiatives are in place within the supply chain, with evidence of engagement and monitoring. No catchment-level concerns apply.	
3.7.2	*Evidence of engagement with suppliers and service providers, as well as, when applicable, actions they have taken in the catchment as a result of the site's engagement related to indirect water use, shall be identified.*	Yes
Comment	The site actively engages suppliers on indirect water use, collects information on their water practices, and shares best practices.	
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 site does not share or use any water-related infrastructure, and this was confirmed in Step 1. All required engagements, communications, and verifications were completed, with no risks or follow-up actions identified.	
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.*	Obs.
Comment	Best practices were identified, documented, and implemented in alignment with industry standards. Records and evidence confirm their effectiveness.	
3.9.2	*Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.*	Obs.
Comment	Best practices for water balance were identified, documented, implemented, and monitored with measurable improvements	
3.9.3	*Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.*	Obs.
Comment	Best practices for water balance were identified, documented, implemented, and monitored with measurable improvements	
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.*	closed
Comment	No best practices for IWRA maintenance have been identified, documented, implemented, monitored, or integrated into the WSP.	
	Finding No: TNR-022245	
3.9.5	*Actions towards achieving best practice related to targets in terms of WASH shall be implemented.*	Obs.
Comment	All WASH best-practice requirements are met: best practices were identified, implemented, monitored, improved.	

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.*	✓ Yes
Comment	The site has established a performance evaluation process. Current performance is consistently compared against the targets defined in the WSP, and the metrics used for evaluation are clearly defined and measurable.	
4.1.2	*Value creation resulting from the water stewardship plan shall be evaluated.*	✓ Yes
Comment	The site has assessed and documented the value generated from the implementation of the WSP, with clear descriptions of value creation.	
4.1.3	*The shared value benefits in the catchment shall be identified and where applicable, quantified.*	✓ closed
Comment	The site has not identified any shared value benefits within the catchment. ***Finding No: TNR-022249***	
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 site reported no emergency incidents during the past year.	
4.3	*Evaluate stakeholders' consultation feedback regarding the site's water stewardship performance, including the effectiveness of the site's engagement process.*	
4.3.1	*Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.*	✓ Yes
Comment	The site has maintained adequate documentation of stakeholder meetings and consultations, and stakeholders confirmed that they were properly consulted and informed about the water stewardship targets. The communication of performance against targets was incomplete. The site shared results for only three targets, while performance against the remaining targets was not communicated to stakeholders.	
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 demonstrates control and traceability of Water Stewardship Plan updates. Earlier versions of the plan are properly saved, and records of previous iterations are well maintained.	

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 has established a fully documented governance structure outlining water-related roles and responsibilities. The governance document clearly defines accountability for compliance with applicable water-related laws and regulations, and an organizational chart is available to illustrate the structure. The governance document has been disclosed.	
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 site has provided adequate evidence demonstrating that the Water Stewardship Plan has been communicated to relevant stakeholders through various channels, including emails, and workshop presentations. The information shared clearly explains how the WSP contributes to AWS Standard outcomes and provides sufficient detail for stakeholders to understand the key elements	
5.3	*Disclose annual site water stewardship summary, including: the relevant information about the site's annual water stewardship performance and results against the site's targets.*	
5.3.1	*A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.*	🔍 Obs.
Comment	The site has developed a formal summary of its annual Water Stewardship Plan (WSP) performance, and this document includes quantified results measured against established WSP targets. Evidence shows that the summary has been communicated to relevant stakeholders	
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 has clearly documented its shared water-related challenges and has described the actions and efforts undertaken to address them. The information has been disclosed through appropriate channels, and evidence was provided showing how and where the disclosure occurred.	
5.4.2	*Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.*	✓ Yes
Comment	The site has clearly identified the key stakeholders it engages with and provided adequate documentation of meetings, collaborations, and joint initiatives. Engagement with public-sector agencies is well summarized, and supporting evidence—including records of coordination efforts with government and regulatory bodies—is available	

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 reported no 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 reported no water-related compliance violations.	
5.5.3	*Any site water-related violation that may pose significant risk and threat to human or ecosystem health shall be immediately communicated to relevant public agencies and disclosed.*	Yes
Comment	The site reported no water-related compliance violations.	

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