Audit Report

ALLIANCE FOR WATER STEWARDSHIP CERTIFICATION

Format v1.0
ITC PSPD, KOVAI, TAMIL NADU, INDIA

PREPARED BY: DNV GL BUSINESS ASSURANCE INDIA PRIVATE LIMITED | DATED: 31.10.2019 | VERSION: 02

INTRODUCTION

Client Name	ITC Limited
AWS Reference Number	AWS-010-INT-CAB-00-06-008-0009
Project No.	SC145134
Address	Thekkampatti Village, Vivekanandapuram Post, Karamadai Block, Mettupalayam Taluk, Coimbatore District, Tamil Nadu
Contact details of the person responsible for AWS	N Alagiri – Head, Engg. 09989055764
DNV GL Team	Kiran Radhakrishnan (Lead Auditor) Bhargav Lankalapalli Mallikarjunarao Behera (Hydrogeology Expert)
Audit Dates	22 – 24 August 2019
Technical Reviewer	Vadakepatth Nandkumar
Scope of the assessment including all locations and facilities that were visited	Location at Thekkampatti Village, and watershed created by the river Bhavani
Nature of Site	Single Site
Certification/Audit Type	Initial Certification
Level of Certification Recommended	**Platinum (>80 points)**
Dated	5 October 2019

Document Type: *Internal*

ABOUT THE SITE

Overview of Unit and Location	ITC's unit at Kovai ('ITC Kovai') manufactures paper and specialty paper products and is located on the river Bhavani. The unit is certified to the ISO9001 and ISO14001 management systems. The main inputs used in manufacture are water, waste paper, chemicals and power from a co-gen plant and windmills. Monthly reviews of performance are carried out by unit management company. There are monthly and quarterly reviews carried out by the DMC. Further, EHS audits are carried out once a year, divisional and corporate audits happen once a year and IMS audits, once in six months. The unit has to report on its effluent to the PCB once in a month; online monitoring is in place for stack and effluent monitoring.
Internal Governance	Area effectiveness teams run the functions with cross-functional teams. Along with SET (Service Effectiveness Teams) teams they report to pillar teams and further to unit steering board (direction, support and monthly review) PACT level persons track the KPIs at floor level. Personnel on floor own the equipment and identify abnormalities and monitor KPIs wrt. respective equipment. The governance levels: 1. L&D pillar 2. AET 3. E&T pillar level 4. Facility SMEs level AWS Core team formed is headed by N Alagiri, Head, Engg. Idea/suggestions received are evaluated for implementation to kaizen. Awareness sessions are also given via videos and sessions for water, to families of employees and contract workers.
Description of the catchment in which the client operates	Bhavani watershed is the catchment area, covering an area of 2.3 lakh Ha ITC considers the upper Bhavani river basin covering Palakkad, Coimbatore, Nilagiri and Erode. Study was carried out in 2016 with WWF. Hydrogeology Study has been carried out by Geovale (an ecological and hydrogeological study) Watershed analysis was carried out via remote sensing, which involved: • Micro watershed analysis • Basin analysis • of surface runoff Geovale also carried out the aquifer characteristic study to conclude the type and health and behavior of aquifer. Eg. storability, yield, transmissivity, etc.

	Water Budget of area: 27% is runoff Usable resources is 43 mcm; most farming is carried out using underground water. Since inception, a multi stakeholder approach has been undertaken in programmes. Part of Karamadai Block, ITC carries out CSR activities in this catchment area. The area under this coverage has increased from 4 to 8 panchayats.
Summary of shared water challenges and Programmes to counter challenges	Health and malnutrition, and open defecation were problems earlier, which have been tackled via ITC's Anganwadi development programmer and work with the state government and Swacch Bharat Mission. Official MoU with DRDA and State Government for waste management is in place for the 'clean villages' programme. 86% of water used in agriculture – so demand side management activities has been focused on. Eg. • Ring bunds with mulching and drip to save 50% of water; • Drip irrigation to save 40% of water. • Absorption trenches. MoU with TNAU is in place to spread these practices further. Programmes have ensure approx. savings of ~50 lakh cum. via supply and demand side. TNAU validates demand side savings while EY validates supply side savings. Seven panchayats are classified into 29 micro watershed areas. 30 water use groups have been promoted to ensure maintenance and ownership of waterbodies in the catchment area. Water use groups were supported by ITC for renovation and desilting. Further, groups independently own and monitor the usage of water. Farmers have been involved in planning, and water harvesting has been carried out via checkdams. Programmes ensure ownership is inculcated among participants, as a practice. Annual General Body Meetings are carried during March of every year to share progress and take feedback; this has been carried out over last three years. For the first time in the last year, ITC published a book as well. Other modes of disclosures include village board for sites and activities carried out.
Visit to Source Water Location	Source water location is the Bhavani river; DNV GL visited the source of intake from channel of the river Bhavani as well as the inlet into the unit premises.
Visit to Water Discharge Location	The facility is a zero discharge unit.
Stakeholder Interview Observations	Stakeholder interaction was undertaken on 22 August 2019. Summary of discussions from the interactions:

	Villagers: ITC works in four panchayats in the catchment area. Main stakeholders here include SHGs from Thekkampatti, *anganwadi* teachers and the Kemarampalaym Community leader. Earlier open defecation used to be a WASH related challenge. 156 families exist in this area; 120 families had individual household toilets. The site is now concentrating on a rural solid waste programme. Besides, a government hospital is not in place, so the community expects ITC to help with hospital/health center. Hygiene related diseases were a challenge as well. The site identified needy people in consultation with the Panchayat head. Modes of alerts and communication to target open defecation included whistles, tom toms and dolls. An MoU has also been signed for raising awareness on source segregation of wastes. Thekkampatti has also been awarded for the best panchayat in the district. 5000 tonnes have been converted to compost. **Teachers and Community Members** ITC and its partners ensures that orientation programmes are held and rapport improved with community leaders. Awareness meetings are conducted every month where community needs are expressed. Each village has respective committees where trainings and awareness sessions are also undertaken. Interactions with a Balwadi teacher highlighted the difference from previously having only one room and ITC initiatives helping increase strength of students attending class after renovation and construction of kitchen, bathrooms and tiling etc. The Balawadi also carries out other initiatives which raises awareness as well eg. feeding of babies. Now started boiling, filtration etc. faster WASH programme. List of suppliers and service providers, along with the actions they have taken as a result of the site's engagement relating to indirect water use was evidenced. No major issues wrt. supply chain were indicated. **Interaction with Farmers** Farmers in 6 panchayats were part of the interaction. It was indicated that MSK and COODU conduct joint innovations by coming to doorsteps and that the site does not discriminate between small and large stakeholders. Sprinklers were provided free of cost from ITC and 20-30 persons taught on irrigation from Jain Irrigation. R Sundharamurthy from Mardhur village indicated that 5 years ago, 5000 plants were washed out due to drought and needed to pump water for four hours. Now he is able to plant the same number of plants, due to better ground water recharge through the nearby check dam.

	Raju, Kazhambalam president, indicated that the farmers an d WUGs help in identification of initiatives and suggests for implementation during WUG meetings. Another farmer in Kalampalayam indicated that borewells are sparingly used, since open wells have water. A group of farmers bought jointly land for implementation where 150 wells will get recharged from structures built via site's intervention. It was also indicated that the effects of recharge were felt as much as around 2kms away. Another farmer indicated that initially a large size of plot had to be sold off. After trench construction, check dams, etc. groundwater got recharged helping with 24 hrs water supply for 300 families. Challenges indicated were related to wild boars entering plantations. ITC has also helped a tribal family in obtaining ownership of a patta of 40 acres and in cultivating lablab and horsegram in previously uncultivated land, thus helping with improving livelihood.

AUDIT COMMENTS

	Detail	*Score*	*Detail of Evidence Verified*	*Type of Finding Major/Minor/Observation*	*Corrective actions / Response from ITC*
STEP 1: GATHER DATA TO UNDERSTAND SHARED WATER CHALLENGES AND WATER RISKS, IMPACTS AND OPPORTUNITIES *Intent: To ensure that the site gathers data on its water use and its catchment context and that the site uses these data to understand its shared water challenges as well as its contributions (both positive and negative) to these challenges, water risks, impacts, and opportunities. This information also informs the development of the site's water stewardship strategy and plan (Step 2) and guides the actions (Step 3) necessary to fulfil the site's commitments*					
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.	1	Draft Water Security Plan for Upper Bhavani Basin (WWF India Study dated July 2019) was evidenced. The piping network from village revenue department and approved drawings dated 05.03.2010, signed by revenue inspector and village administrative officer was also evidenced. This also indicates plant operation and irrigation use.		
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	0	There is no local association at the	ITC may relook into stakeholder identification	Stakeholders are grouped into six categories. They

	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		location with respect to water. Stakeholders have been identified and challenges related to each have been identified.	(broad categorisation), the modes of engagement with each group and responses. NGOs and media may need to be added and identified as stakeholders which may be monitored/involved. The process of stakeholder identification, engagement and responding to challenges and issues may be formalised through a formal standard operating procedure.	include (1) Private, (2) Panchayat Raj Institutions (PRI), (3) Community, (4) Govt/Public, (5) Research Institutions & NGO, (6) Others. Level of engagement against each category will be included.
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	0	Degree of influence has been rated as either high or low.		
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	1	Reference to On-site Water Emergency Response Plan V 1.0 dated 01.03.2019 is provided.		
1.3.2	Site water balance, including inflows, losses, storage, and	1	A water balance diagram indicating approximate		

	outflows shall be identified and mapped.		inflows and outflows and process uses in each day of operation has been arrived at.		
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.	0	Site water balance including amounts has been quantified. High and low variances are tracked at plant and shop levels, this was evidenced during our site visit.	Site water balance document and the procedures to quantify amounts may be formalised as a controlled document.	Water balance and the procedure will be included in controlled Documents
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.	1	Drinking water is tested quarterly by a third party as per IS10500. This was evidenced via reports dated 2019.07.08 for drinking water (canteen) and drinking water (waste paper area). Effluent treated water quality tests were observed from SAP records for last three months; this was compared with TNPCB norms in consent.		
1.3.5	Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.	1	Environmental risk register covers risks linked to environment including water related risks. Factory layout indicating chemical storage areas evidenced including locations of hazardous wastes stored (Drawing		

			No. FAC/Layout/015, Factory-015 Chemical Storage) was evidenced.		
1.3.6	On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.	1	One surface well has been identified as being an important resource, which has been already there during construction of project and has been mapped.	The basis for identifying and defining an 'IWRA' may be formally documented.	Agreed. It will be documented in the procedural manual.
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.	0	No direct water related revenue is generated since site does not produce water related goods. Value creation is identified. Costs related to water have been arrived at from SAP and Water Cost Back-ups.	This process needs to be documented in a formal operating procedure.	Agreed. It will be documented in the procedural manual.
1.3.8	Levels of access and adequacy of WASH at the site shall be identified.	1	21 points for drinking water has been established and allocated based on number of employees in an area. 6 female latrines are also available at the site, with a total of 47 in the site. The numbers of urinals and toilets are more than that mandated by law.		

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**				
	Detail	***Score***	***Detail of Evidence Verified***	***Type of Finding Major/Minor/Observation***	***Corrective actions / Response from ITC***
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.	NA	Primary input is waste paper which are from outside the watershed area and thus, this is considered as none.		
1.4.2	The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.	1	6 FG conversion centres are located in the catchment area, but the water use from these are identified as negligible.		
1.4.3 ADV	The embedded water use of primary inputs in catchment(s) of origin shall be quantified	7	LCA report by PE International dated 2015 and by Thinkstep dated 24 July 2018 has been carried for grey (70-75%) and white (20-25%) water respectively. 10 m^3/T of water is used. Additional ~3 m^3/T is from embedded water use, with a majority from chemicals.		
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.	1	Agencies and responsibilities have been identified and recorded. Goals identified are discussed under water stewardship plans.	Goals may be linked to identified initiatives. Process of identification of water related initiatives and identification of goals needs to be formalised and documented.	Agreed. It will be documented in the procedural manual.
1.5.2	Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or	1	Consent copy valid till 2022 is in place; authorisation for 6600 m^3/day from Bhavani		

	stakeholder-verified customary water rights.		river was also evidenced by us. Monthly tracking and reviewing of Statutory Compliance was evidenced (dated May 2019 and June 2019) and validated by Engg Head and primary and secondary manager responsible.		
1.5.3	The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.	1	This has been quantified and referenced to the WWF Report Pg. no. 78		
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.	1	WWF (Pg. 103) has carried out water tests in several areas near Dam. Pollution happens only from Coonoor due to town waste and drainage. GeoVale carries out tests on surface water quality.	How samples are chosen and if these are representative of the entire water source may be evaluated. Tests may be carried out to evaluate groundwater quality as well.	Water quality samples are tested in 13 Locations representing Upper Bhavani basin by WWF Research team. Water quality is tested in Bhavani river Upstream and at Mettupalayam which is the representative locations (WWF Report page no-103). Agreed Ground water will be tested at representative locations.
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	1	IWRAs have been identified and mapped and status has been assessed and documented.		

	through stakeholder engagement.				
1.5.6	Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.	1	The site has no identified dependence on public water-related infrastructure. A Core Area Perspective Plan, Baseline Report and NGO Proposals are in place for mapping and evaluating infrastructure. ` The WWF Report maps major water related infrastructure (public govt-related infrastructure and infrastructure where ITC has provided funds)	Water-related infrastructure available in the catchment may identified additionally and evaluated with regard to vulnerability to climate change.	Public Water Infrastructures in the catchment has been mapped (WWF study report Page No:75). Tributary wise Land use /Land cover mapping is done. Decadal changes in cropping pattern & Trend analysis is done from 1980 to 2016. (Page No: 30 - 38). Regarding Climatic change and rainfall analysis is done from 2007 to 2017. Evapotranspiration, Infiltration, monthly water balance, Soil texture analysis is done for catchment area (Report on vegetation modelling is attached). Planned to measure Evaporation by installing open Pan evaporimeter.
1.5.7	The adequacy of available WASH services within the catchment shall be identified	1	ITC has identified households with sanitation and the gaps on which actions have to be undertaken (eg. basic awareness, access to toilets)		
1.5.8 ADV	Efforts by the site to support and undertake catchment level water-related data collection shall be identified.	4	Objectives identified by the site are mapped based on external studies undertaken.	Efforts may be brought out in terms of formal timelines set to achieve objectives.	Agreed. It will be documented in the procedural manual.
1.5.9 ADV	The adequacy of WASH provision within the	NA	*Not chosen.*		

	catchments of origin of primary inputs shall be identified.				
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.	1	Industrial data has been prepared from Core Area plan. Studies predict at least 2 droughts in a span of ten years. Other identified challenges: 1. No uniform water flow in river 2. High water demand from agriculture sector 3. High ground water draft 4. High drinking water demand from cities 5. Industrial Demand increase.		
1.6.2	Initiatives to address shared water challenges shall be identified.	1	Initiatives have been identified to address water challenges identified; eg. demand side management interventions for higher demand from agriculture, capacity building, etc.	ITC may map its identified initiatives vs each shared challenge identified in 1.6.1	Sites shared water Challenges & efforts made to address these challenges are provided in "3 Years progress Brochure" & released in Public Function by Local MP Govt Officials & local Panchayat Presidents. Also disclosed in Annual General body meeting (Water Mela) which is conducted every year during March (Photos & Minutes are provided). These Brochures are given to all Water User Groups & Key

					stakeholders. It is also available in Implementing NGO Office and can be availed on demand.
1.6.3 ADV	Future water issues shall be identified, including anticipated impacts and trends	3	Water availability is the key issue identified considering trend for increased demands across sectors and and a drought expected every ten years. Trends and impacts are identified for both the upper Bhavani basin and ITC focus areas.	Anticipated impacts due to the identified future water issue (ie. water availability) needs to be identified.	Water budget for future scenarios (2026) is done (WWF Report page 133). Scenarios is built for 2026 by projecting same rainfall as current & reduction in rainfall. It also projected anticipated impacts in broader areas. Detailed impacts will be assessed
1.6.4 ADV	Potential water-related social impacts from the site shall be identified, resulting in a social impact assessment with a particular focus on water	4	A study on impact on irrigation due to effluent use in farming has been conducted through TNAU and a bio-remedial solution document has been provided.	In future periods, a comprehensive social impact assessment may be carried out covering persons living in the catchment area which also links to water and water-related rights.	Agreed. It will be carried out once in 3 years.
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.	1	Water risks and opportunities are identified, along with respective likelihood and severity and cost to business.		
1.7.2	Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.	1	Water risks and opportunities are identified, along with respective likelihood and severity and cost to business	ITC may link each opportunity to public sector agencies and their relevant initiatives. Prioritisation of opportunities need to be specific and clear.	Agreed. It will be documented in the procedural manual.
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	1	Best practices in the catchment for water governance have been identified, as per the IWMP.		
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 .	1	ITC has identified three best practices through IWMP, TNAU, and Central Soil and Water Conservation. National and international benchmarks have also been identified in Technical EIA Guidance Manual for Pulp and Paper Industries.		
1.8.3	Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.	1	Outlet TSS of backwater is <20 ppm. ITC is following MoEF guidance and best practices for the sector.		
1.8.4	Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified	1	Aquifer recharge, water literacy among farmers, water conservation and organising water user groups have been identified as best practices.		
1.8.5	Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified	1	Regular awareness campaigns and promotion of sanitation committees, collaboration with government departments, etc. have been referenced.	Swachh Bharat Mission guidelines may be referenced and detailed.	Best Practices of WASH has adopted as per " **Guidelines for Swachh Bharat Mission Gramin- 2017 "**. Individual Household Toilets are constructed in Collaboration with Karamadai Block Panchayat which is the block level implementing agency of Swachh Bharat Mission

					Formal MoU is executed with Karamadai Block Panchayat on 29 May 2018 to implement Rural Solid waste management.
STEP 2: COMMIT TO BE A RESPONSIBLE WATER STEWARD AND DEVELOP A WATER STEWARDSHIP PLAN Intent: *To ensure there is sufficient leadership support, site authority, and allocated resources for the site to implement the AWS Standard. It focuses on how a site will act on shared water challenges and improve its performance and the status of its catchment in terms of the AWS water stewardship outcomes. Step 2 links the information gathered in Step 1 to the actions implemented in Step 3, by describing who will do what and when.*					
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.	1	A Water Stewardship Policy and Commitment signed by Unit Head, dated March 2019 was evidenced. No pre-existing catchment plans have been in place.		
2.1.2 ADV	A statement that explicitly covers all requirements set out in Indicator 2.1.1 and is signed by the organization's senior-most executive or governance	1	This statement is also signed by COO, Mr Vadraj Kulkarni		

	body and publicly disclosed shall be identified.				
2.2	**Implement plan to achieve site water balance targets.**				
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.	1	Periodic frequencies are identified for ensuring compliance, along with area-wise responsibilities. A compliance report is submitted monthly dated Jun 2019 which also indicates primary and secondary responsible persons. Register is updated based on subscriptions and updates received from Corporate. The application Renewal of water withdrawal from River Bhavani for 9.9.2019 to 8.9.2024 was also evidenced.		
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.	1	Water Strategy is the Policy and Commitment. Mission, Vision and goals for onsite and catchment areas are in place.		
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	1	Targets for the last four years have been evidenced, along with budgets for watershed and WASH activities. These were evidenced for both catchment and site.		

	- 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				
2.3.3 ADV	The site's partnership/water stewardship activities with other sites within the same catchment (which may or may not be under the same organisational ownership) shall be identified and described.	NA	No additional site within catchement location, so not applicable.		
2.3.4 ADV	The site's partnership/water stewardship activities with other sites in another catchment(s) (either under same corporate structure or with another corporate site) shall be identified.	4	Knowledge sharing and discussions happen between ITC, Malur and this site.		
2.3.5 ADV	Stakeholder consensus shall be sought on the site's water stewardship plan. Consensus should be achieved on at least one target. A list of targets that have consensus and in which stakeholders are involved shall be identified.	7	Water stewardship plan and its elements were communicated as an EHS objective. The target on specific water consumption of 5% was agreed upon. Attendance in EHS committee meeting was evidenced. Sample minutes from Kandiyur Gram Panchayat WUG for 2018-19 for 400 Ha, 40 Farm ponds, and 20 MPTs in 2018-19. Consensus is achieved through Water		

			User Group meetings at village level. MoUs are in place with COODU and Imayam (NGOs) for overall plan agreed upon with individual panchayat WUGs signed by ITC and NGO.		
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.	1	Risks identified are low water flows in Bhavani, depleting groundwater due to high draft, extreme weather events like drought or flood, degrading forest lands affecting recharge and flows, possibility for stricter regulations, social licence to operate can be affected. Activities are linked to each identified risk in 1.7.1	What ITC and others will do (roles and responsibilities) needs to be defined formally. Risks and action plans need to reference 1.5.6.	ITC is working with relevant stakeholders to address the issues in the catchment area & at large in Bhavani river basin. Conducted stakeholders meetings regularly. Formal Detailed project report will be prepared and documented.
2.4.2 ADV	A plan to mitigate or adapt to water risks associated with climate change projections developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.	6	Scenarios have been identified and plans and activities developed with TNAU, KVK, WWF and others.		
STEP 3: IMPLEMENT THE SITE'S STEWARDSHIP PLAN AND IMPROVE IMPACTS Intent: *To ensure that the site is implementing the plan outlined in Step 2, mitigating risks and driving actual improvements in performance*					
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.	0	Stakeholders identified in WWF report and stakeholder identification have been bought in and have been involved in multistakeholder planning and governance. 29 WUGs and individual groups have been identified.	Mapping of catchment governance may be attempted.	
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.	1	No rights of communities have been defined as per legislation. ITC has voluntarily identified 6 tribal groups and famers. Tribal group identified are the *Irulars* (in the Ukkainur hamlet).	Forestry Department study (*Study to Improve Socio-economic Level of Irular Tribes depending on Forest for Livelihiood in Karamadai Block, 2018*' by Dr Arumugam, Forest Expert.) has been evidenced which covers four panchayats.; its link to water may be shown. WASH issues identified for this group may be focussed upon in the future.	Water source to ITC unit is Bhavani river. Bhavani river has 66% forest area. In small area of forest these Irular tribes are living. ITC is understanding the Livelihood of these tribes & supporting them. Initiated discussion with relevant stakeholders (Tribal department) to address WASH related issues of Tribals.
3.1.3 ADV	Evidence of improvements in water governance capacity from a site-selected baseline date shall be identified.	2	A Green Policy is in place dated 1 August 2015 where targets for environmental parameters such as fresh water consumption, recycle/reuse and rain water harvesting. A water governance hierarchy has also been implemented.		
3.1.4 ADV	Evidence from a representative range of stakeholders showing consensus that the site is seen as positively contributing to the good water governance of	2	Evidences have been mapped via acknowledgements, letters, meeting minutes and other records from		

	the catchment shall be identified		the identified stakeholders Eg, Stakeholder meet on 20.3.2017 was evidenced.		
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	1	Legal compliance tracking is carried out by the Environment Manager monthly, which is approved by the Utility and Engg Heads monthly. Third party and corporate audits also take place Procedure for Identification, Review and Evaluation of Legal and Other requirements, Doc No. OP-02, V4, dated 01.08.2016 was evidenced.		
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	1	No water rights are defined at the catchment level; within site, water rights related to WASH requirements of workers and daily water provision is in place.		
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	1	Site has achieved 58% reuse till Q1 vs the target of 50%. The value in 2018-19 was 40%. Catchment targets are also monitored by the site.	Tracking vs targets to be needs to be formally monitored and recorded in monthly meetings. MSK/other meetings eg. QPR which analyse targets and achievements	Agreed. It will be documented in the procedural manual. QPRs are recorded in Portal & audited by third party. This will be discussed Water stewardship meetings

				vs targets may be formally recorded.	
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	1	Specific water consumption reduction targets have been set and are monitored by site.		
3.3.3	Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.	NA	No legally binding documentation or reallocation is applicable at the site.		
3.3.4 ADV	The total volume of water voluntarily re-allocated (from site water savings) for social, cultural and environmental needs shall be quantified	4	5-6 families in the forest area who do not have access to pipelines have been provided water. Around ~100 m^3 per day (tracked by flowmeter) have been sent to farmers nearby. Central public health guidelines advocate ~50 L (rural) and 110 L (urban) per person per day. For 2018-19, ITC has provided 102 KL of water per day for surrounding communities.		
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.	1	Online monitoring is connected to TNPCB systems. Treated effluent targets complies with TNPCB norms. Daily monitoring reports are in place as well.	Catchment water quality targets related to surface and ground water may also be identified.	Agreed. It will be documented in the procedural manual for monitoring.

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	NA	Water quality has not been identified as a shared water challenge.		

3.5	**Implement plan to maintain or improve the site's and/or catchment's Important Water-Related Area**				
	Detail	***Score***	***Detail of Evidence Verified***	***Type of Finding Major/Minor/Observation***	***Corrective actions / Response from ITC***
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	1	IWMP has been used to identify IWRAs (under 'Gather'), and these are also linked to catchments in 2.3.2. NGO Project Engineer reports and approves records before acknowledgement in Work Completion Report. Eg. evidenced for Farm Ponds in 2018-19.	Procedures/processes may be formally documented as a good practice.	Adopted Standard operating procedures following the applicable local norms and references.
3.5.2 ADV	Evidence of completed restoration of non-functioning or severely degraded Important Water-Related Areas including where appropriate cultural values from a site-selected baseline date shall be identified. Restored areas may be outside of the site, but within the catchment.	4	393 water harvesting structures have been renovated/constructed in the last 3 years. Initiatives in Thodudhasanur village where loose-boulder check dam has been built was evidenced. SOP for soil and moisture conservation programme was evidenced.	Actual rainwater harvested information may be quantified based on infiltration to ground, instead of capacity.	ITC MSK adopted Standard Operating Procedures (SoP) for reporting Storage capacity of Water harvested. Calculation of storage is based on tideman method. ITC will explore quantification of water percolation to ground through infiltration rates at site.
3.5.3 ADV	Evidence from a representative range of stakeholders showing consensus that the site is seen as positively contributing to the healthy status of Important Water-Related	2	Group meeting minutes of Neelampathy WUG for MPT 2017-18 acknowledging work done was evidenced, dated 12.03.2019. Other		

	Areas in the catchment shall be identified		success stories on stakeholder consensus are recorded in the book published during the Water Mela. Concerns are recorded in minutes. Kandanji WUG meeting was evidenced dated 10.12.17, where request for activities (eg. check dams, request for repair of constructed dam) were received.		
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	1	Provision of adequate WASH facilities have been identified and quantified. Test records for monitoring of drinking water quality has also been evidenced.		
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.	1	Requirements and rights of communities have been identified and linked to needs of stakeholders via Stakeholder Engagement exercises.	Social impact assessment carried out may be further linked to human rights.	Agreed.
3.6.3 ADV	A list of actions taken to support the provision to stakeholders in the catchment of access to safe drinking water, adequate sanitation and hygiene awareness shall be identified	5	Sanitation like toilet construction and activities like awareness programs on open defecation, awareness trainings to *balwadis* and *anaganwadis* were evidenced. During our		

			stakeholder interaction, we visited few constructed toilets and solid waste collection facilities.		
3.6.4 ADV	In catchments where WASH has been identified as a shared water challenge, evidence of efforts taken with relevant public-sector agencies to share information and to advocate for change to address access to safe drinking water and sanitation shall be identified	2	WASH has been considered a challenge and taken as an initiative in surrounding panchayats. Eg. MoU with Karamadai Panchayat and Imayam dated 29 May 2018 was evidenced. Panchayat-deputed collection staffs under MNREGS are engaged to collect Organic & Process wastes. Request from ITC to plan *anganwadis* at five areas in Karamadai block and approval from District Project Director in Nov. 2018 was evidenced. Initiatives described by ITC have been evidenced during site visits.		
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.	NA	No targets were set on indirect water use, since no 'embedded water use' was identified.		
3.7.2	Evidence of engagement with suppliers and service providers, as well as, when applicable, actions they have	1	Engagement with suppliers was evidenced.		

	taken in the catchment as a result of the site's engagement related to indirect water use, shall be identified		GreenCo template used (Green Supply Chain credit 4) A standard critical vendor identification process is in place, which also identifies actions based on chemical or water use. Action plan has been put against each critical vendor and ITC also engages with these vendors during vendor meets. On water related issues, awareness session on water and waste were carried out in 2018-19.		
3.7.3 ADV	Actions taken to address water related risks and challenges related to indirect water use outside the catchment shall be documented and evaluated	5	Challenges linked to indirect water use (eg. water consumption of critical suppliers) are recorded and improvements have been recorded.	Documentation and records of actions taken with respect to other identified risks may also be formally maintained.	Agreed.
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	1	The evidences such as requests from water user groups for renovation and desilting were reviewed. These are also signed as acknowledgement of receipt.		
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	1	ITC has identified institution promotion, multistakeholder meeting and annual general body		

			meeting as actions towards meeting best practices. Pgs. 8, 80 and 92 of IWMP are referenced for choosing these actions as best practices.		
3.9.2	Actions towards achieving best practice, related to targets in terms of water balance shall be implemented	1	Implementation of actions related to targets related to water balance at both site and catchment have been demonstrated through water savings achieved.	Records for implementation of best practices in the catchment may be formally maintained.	Agreed.
3.9.3	Actions towards achieving best practice, related to targets in terms of water quality shall be implemented	1	Implementation of actions related to best practices towards achieving targets linked to water quality have been evidenced (eg. Fibron filter)		
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	1	Yearly plans have been achieved, as evidenced under 3.5.1.	Measurable targets may be identified for all identified challenges.	Measurable targets are identified for 4 out of 5 shared challenges.
3.9.5	Actions towards achieving best practice related to targets in terms of WASH shall be implemented	1	Actions are linked to plans identified and implemented under 3.6.3 where these are linked to national plans and other best practices.		
3.9.6 ADV	Achievement of identified best practice related to targets in terms of good water governance shall be quantified	3	WUGs in catchment and AGMs are identified as best practices for good water governance. WUG maintenance fund (24 groups in 18-19 which cost Rs. 2,28,000)	Targets need to be formalised wrt. Identified good water governance practices. Quantification vs targets may be brought out clearly.	Agreed

			and local contributions for all initiatives are quantified and reviewed every year.	A documented process may be established to quantify and document attributes.	
3.9.7 ADV	Achievement of identified best practice related to targets in terms of sustainable water balance shall be quantified	5	Achieved numbers are quantified for reduction in specific water consumption and increase in use of recycled water. Achievements vs catchment water balance targets are also quantified.	A documented process may be established to quantify and document numbers being captured.	Agreed. It will be documented in the procedural manual.
3.9.8 ADV	Achievement of identified best practices related to targets in terms of water quality shall be quantified	5	Achievements related to site water quality targets are brought out for site.	Achievements related to catchment water quality can be brought out once targets/monitoring of surface and ground water quality are brought out under 3.4.1. A documented process may be established to quantify and document numbers being captured.	Agreed. It will be documented in the procedural manual.
3.9.9 ADV	Achievement of identified best practices related to targets in terms of the site's maintenance of Important Water-Related Areas have been implemented	4	The numbers of IWRA and plans related to each are brought out in 3.5.1		
3.9.10 ADV	Achievement of identified best practice related to targets in terms of WASH shall be quantified	2	Best practices are linked to education, classrooms and anganwadi toilets. Current status vs each practices is brought out.	Targets may be formally/explicitly brought out for each practice. A documented process may be established to quantify and document numbers being captured.	Agreed.
3.9.11 ADV	A list of efforts to spread best practices shall be identified.	3	- Water use group meeting and Annual Meetings		

			- Audio visual communications aimed at general public - Rally and awareness sessions aimed at college students Report from COODU for Water Mela – 2018 was evidenced.		
3.9.12 ADV	A list of collective action efforts, including the organizations involved, positions of responsible persons of other entities involved, and a description of the role played by the site shall be identified.	8	Persons involved and their positions and responsibilities and proofs of banners for the programs conducted in collaboration and images on communication were evidenced	Linkages and roles played by the site, other entities and a list of collective actions need to be documented. This may also link to the organisations and responsibilities identified.	Agreed.
3.9.13 ADV	Evidence of the quantified improvement that has resulted from the collective action relative to a site-selected baseline date shall be identified and evidence from an appropriate range of stakeholders linked to the collective action (including both those implementing the action and those affected by the action) that the site is materially and positively contributing to the achievement of the collective action shall be identified	6	ITC survey with farmers was evidenced with the mobile application. Analysis is done for banana and coconut farmers as they have been identified as the dominant crop in the area.	ITC may explore identifying and reporting on quantified improvements wrt. other stakeholders who are linked to collective action.	Agreed. Other stakeholders apart from Farmers will be considered.

STEP 4: EVAUATE THE SITE'S PERFORMANCE

Intent: *To review a site's performance against the actions taken in Step 3, learn from the results – both intended and unintended – and inform the next iteration of the site's water stewardship plan. This evaluation shall occur at least annually, but sites should consider more frequent evaluations.*

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	1	Unit Management Committee meeting was evidenced for May 2019 covering water consumption (river water withdrawal, machine production, ETP water recycling). These meetings evaluate performance vs targets wrt. site and catchment. The monitoring and evaluation structure for the site's water stewardship plan has been defined.	The procedures and structures need to be defined in controlled documents, along with details such as frequencies of evaluations and outcomes.	Agreed. It will be documented in the procedural manual.
4.1.2	Value creation resulting from the water stewardship plan shall be evaluated	1	Value creation resulting from plans are evaluated in terms of savings of water and money for various projects and activities in the site and catchment.		
4.1.3	The shared value benefits in the catchment shall be identified and where applicable, quantified	1	Shared economic, coal environmental and cultural value benefits are identified and where applicable, quantified.		
4.1.4	A governance or executive-level review, including discussion of shared water challenges, water risks, and opportunities, and any water-related cost savings or benefits	0	Governance/executive level review of shared water challenges and risks and opportunities was not evidenced.	Review of shared water challenges, risks, savings vs benefits, etc. needs to be carried out at the executive level.	Agreed. Executive level review will be adopted at Regional & National level (CSR) on quarterly basis.

	realized, and any relevant incidents shall be identified				
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 .	1	It was indicated that no incident was identified in the year.	A procedure to define 'incidents' linked to water and carry out root cause analysis and responses need to be document.	Agreed. It will be documented in the procedural manual.
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	1	Records for consultation efforts carried out were evidenced in the form of photographs, meeting minutes, etc.	Recording processes, frequency of consultation, etc. may be defined in formal documented procedures.	Agreed. It will be documented in the procedural manual.
4.3.2 ADV	The site's efforts to address shared water challenges shall be evaluated by stakeholders. This shall include stakeholder reviewing of the site's efforts across all five outcome areas, and their suggestions for continual improvement.	3	Photographs were evidenced and broad agendas and outcomes of the Water Melas are recorded in a book. Proofs of stakeholder consensus are also maintained.	Minutes of the Conferences may be formally recorded**.** Stakeholder reviews of the sites' efforts across all five outcome areas may also be formally recorded.	Agreed. Minutes of meeting will be documented.
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.	1	Procedure for AWS Performance Evaluation and Continual Improvement v4, dated 01.03.2019 was evidenced.	Reviews need to be evidenced via formal records (even if evaluated and has come to conclusion that no change is required)	Agreed. Minutes of review will be documented.

STEP 5: COMMUNICATE ABOUT WATER STEWARDSHIP AND DISCLOSE THE SITE'S STEWARDSHIP EFFORTS

Intent: *To encourage transparency and accountability through communication of performance relative to commitments, policies, and plans. The disclosure of relevant information allows others to make informed opinions on a site's operations and tailor their involvement to suit*

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	1	The internal governance mechanism is listed outside the gate for the general public.	The site may identify other channels who may be outside eg. available on request, website, other. ITC may translate the same to local language (Tamil) as well, as a good practice.	Agreed. Translation to local language will be done.
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	1	Public display boards and murals in English and Tamil. Relevant catchment targets are disclosed in brochures and annual melas (26 March 2019) which includes farmers, NGOs and government. Onsite: video and brochure for employees and contract workers. Sangamam meeting last carried out every quarter. (6 August 2019)		
5.3	**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.**				

5.3.1	A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.	1	"A Journey towards Water Security at Bhavani River Basin" Progress Snapshot 2015-2019 is published, and also distributed to govt. authorities.		
5.3.2 ADV	The site's efforts to implement the AWS Standard shall be disclosed in the organization's annual report.	NA	This is awaited.	This needs to come out in the ITC Sustainability Report 2019.	
5.3.3 ADV	Benefits to the site and stakeholders from implementation of the AWS Standard shall be quantified in the organization's annual report.	NA	This is awaited.	This needs to come out in the ITC Sustainability Report 2019.	
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.	1	Efforts and work undertaken to address shared-water challenges are disclosed via murals, brochures and annual water melas to communities, water user groups and local governmental institutions.		
5.4.2	Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified	1	Efforts to coordinate and engage with various stakeholder groups have been identified by the site.		
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	1	No violations were identified during the year.	Operating procedures for identifying and defining violations and formulating corrections in	Agreed. It will be documented in the procedural manual.

				case of any violation needs to be evidenced.	
5.5.2	Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable	NA			
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.	1	Communication is carried out from site level. None were identified during the year.	An SOP needs to be evidenced for this.	Agreed.

SUMMARY SCORE

STEP	CORE POINTS	ADVANCED POINTS
STEP 1	**24**	**18**
STEP 2	**5**	**18**
STEP 3	**17**	**62**
STEP 4	**6**	**3**
STEP 5	**7**	**0**
TOTAL	**59**	**101**
EVALUATION RESULT		
Certification/Audit Type	Initial Certification	
Level of Certification Recommended	**Platinum (>80 points)**	

MAJOR NCS

Detail of Finding	**CAP**	
	Root Cause	**Specific CA**
None Identified	-	-

MINOR NCS

Detail of Finding	**CAP**	
	Root Cause	**Specific CA**
Documented processes need to be evidenced for all clauses where the terms '*identified*' and '*evaluated*' are used in the AWS Standard. A documented process needs to be established to quantify and document attributes being identified and numbers being captured. An 'AWS manual' may be prepared.	Agreed.	Detailed AWS manual will be prepared which will cover all AWS requirement (Unit & Catchment).
Site water balance document and the procedures to quantify amounts may be formalised as a controlled document.	Agreed.	

Mapping of catchment governance may be attempted through a formal documented procedure.	Agreed. Catchment level stakeholders & their roles & responsibilities are mapped in WWF Report. These stakeholders are involved in meetings (WUG Meetings, Water Melas, Inaugurations, field visit etc) & trainings. Formal MoUs are established with TNAU, DRDA & expert NGOs. Exchange of letters with Water Resource department, Gram Panchayat, Forest Department, Local Education Institution is done.	
Tracking vs targets to be needs to be formally monitored and recorded in monthly meetings. MSK/other meetings eg. QPR which analyse targets and achievements vs targets may be formally recorded.	Agreed.	Tracking against targets will be captured in minutes of meeting on quarterly basis.

OBSERVATIONS

Detail of Finding	**CAP**	
ITC may relook into stakeholder identification (broad categorisation), the modes of engagement with each group and responses. NGOs and media may need to be added and identified as stakeholders which may be monitored/involved.	**Root Cause** Stakeholders are identified and engagement process are established.	**Specific CA** It will be reviewed on annual basis
The process of stakeholder identification, engagement and responding to challenges and issues may be formalised through a formal standard operating procedure.	Agreed. Based on shared challenges ITC established collaboration with respective Govt departments/ Research Institutions/ Farmers Groups/ to address the issues.	
The basis for identifying and defining an 'IWRA' may be formally documented.	Agreed.	All-important water related areas in catchment are identified and it will be formally documented.
Goals identified as part of water governance initiatives may be linked to identify initiatives.	Agreed.	

How samples are chosen and if these are representative of the entire water source may be evaluated. Tests may be carried out to evaluate groundwater quality as well.	Water samples are taken at multiple locations to be representative for entire river basin. Ground water quality be evaluated.	Sampling plan will be evolved.
Water-related infrastructure available in the catchment may identified additionally and evaluated with regard to vulnerability to climate change.	Agreed.	It will be done by Technical person in consultation with Local water user groups.
Efforts to support and undertake catchment level water-related data collection may be brought out in terms of formal timelines set to achieve objectives.	Presently, the data is collected through WWF Study, NGOs baseline documentation & impact study.	Data collection will be formalized.
ITC may map its identified initiatives vs each shared challenge identified in 1.6.1	Agreed.	ITC initiatives will be mapped against the shared challenges.
Anticipated impacts due to the identified future water issue (ie. water availability) needs to be identified.	Agreed.	Future water scenarios will be evolved projecting same rainfall with increased demand based on periodic studies.
In future periods, a comprehensive social impact assessment may be carried out covering persons living in the catchment area which also links to water and water-related rights.	Agreed	It will be done once in 3 years.
ITC may link each opportunity to public sector agencies and their relevant initiatives. Prioritisation of opportunities need to be specific and clear	Agreed	Prioritization criteria/table will be evolved.
Swachh Bharat Mission guidelines may be referenced and detailed.	Agreed.	ITC had formal MoU with DRDA who is responsible for implementing Swachh Bharat mission programme.
Risks identified and related action plans need to reference 1.5.6. What ITC and others will do (roles and responsibilities in mitigating and adapting to identified water risks) needs to be defined formally.	Agreed.	Mapping of Risk Vs Actions plans will be done and documented.
Forestry Department study (*Study to Improve Socio-economic Level of Irular Tribes depending on Forest for Livelihiood in Karamadai Block, 2018*' by Dr Arumugam, Forest Expert.) has been evidenced which covers four panchayats.; its link to water may be shown. WASH issues identified for this group may be focussed upon in the future.	Agreed. .	Discussion with relevant stakeholders (Tribal department) to address WASH related issues of Tribals will be initiated as and when needed.
Catchment water quality targets related to surface and ground water may also be identified as a good practice	Agreed.	

Procedures/processes towards maintaining and enhancing IWRAs may be formally documented as a good practice.	Agreed	
The actual rainwater harvested information may be quantified based on infiltration to ground, instead of capacity.	ITC has standard Operating Procedures (SoP) of reporting Storage capacity of Water harvesting. Calculation of storage is based on tideman method.	ITC will document the water percolation to ground through data/calculation.
Social impact assessment carried out may be further linked to human rights and possible relations to water as a shared resource.	Agreed	It will be carried out once in 3 years.
Documentation and records of actions taken with respect to all identified risks may be formally maintained.	Agreed.	Documentation will be maintained with NGOs engaged.
Records for implementation of best practices in the catchment may be formally maintained.	Agreed.	Documentation will be streamlined.
Measurable targets may be identified for all identified challenges with respect to maintenance of IWRAs.	Agreed.	SMART targets will be evolved based on available resources and requirement.
Targets need to be formalised wrt. identified good water governance practices. Quantification vs targets may be brought out clearly.	Agreed.	
Achievements related to catchment water quality can be brought out once targets/monitoring of surface and ground water quality are brought out under 3.4.1.	Agreed.	
Targets may be formally/explicitly brought out for each best practice identified.	Agreed.	
Linkages and roles played by the site, other entities and a list of collective actions need to be documented. This may also link to the organisations and responsibilities identified.	Agreed.	
ITC may explore identifying and reporting on quantified improvements wrt. other stakeholders who are linked to collective action.	ITC will explore	
The procedures and structures need to be defined in controlled documents, along with details such as frequencies of evaluations and outcomes.	Agreed	It will included in AWS manual
Review of shared water challenges, risks, savings vs benefits, etc. needs to be carried out at the executive level.	Agreed.	Executive level review will be adopted at Regional & National level (CSR) on quarterly basis.
A procedure to define 'incidents' linked to water and carry out root cause analysis and responses need to be document.	Agreed.	
Recording processes, frequency of consultation, etc. may be defined in formal documented procedures.	Agreed.	
Minutes of the Conferences may be formally recorded**.** Stakeholder reviews of the sites' efforts across all five outcome areas may also be formally recorded.	Agreed.	

Reviews need to be evidenced via formal records (even if evaluated and has come to conclusion that no change is required)	Agreed	Minutes of meeting will be documented.
The site may identify other channels who may be outside eg. available on request, website, other.	ITC will explore	
ITC may translate the same to local language (Tamil) as well, as a good practice.	Agreed	Display in local language will be considered.
Efforts to implement AWS Standards and benefits for stakeholders are waited for disclosure in the ITC Sustainability Report 2019.	ITC will continue its reporting protocol.	
Operating procedures for identifying and defining violations and formulating corrections in case of any violation needs to be evidenced.	Agreed	
An SOP needs to be evidenced for the procedure used to communicate any significant risks to human or ecosystem health to relevant parties.	Available.	

Persons Interviewed

- Pranav Sharma – Unit Head
- N Alagiri – Head, Engineering
- N Murali – Head, Production
- TR Subramaniam – Head, Quality
- Sateesh Kumar – HR and CSR
- Saleem – Head, Unit Finance
- MM Subramanyam – Head, Business Excellence
- Harish Babu – ITC CSR Manager
- Premaguru – Utility, Water Manager
- Dinesh – Agriculture and Watershed outside plants
- Malavika – Corp. HSE
- Ashish Bhardwaj – AWS india Coordinator
- Bhiplap Chaterjee – Consultant, Hydrogeology
- Senior Geologist
- Raghupathy – EHS