

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-000263



### SITE DETAILS

Site: **ITC Limited Foods Division - Malur**

Address: Gangapura Village, Yeshwanthapura Gram Panchayat Malur Taluk, Malur, Karnataka, INDIA

AWS Reference Number: AWS-000058

Site Structure: Single Site

### CERTIFICATION DETAILS

Certification status: Certified Platinum

Date of certification decision: 2022-Nov-02

Validity of certificate: 2025-Nov-02

### AUDIT DETAILS

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

Audit Type(s): Initial Audit

Audit Start Date: 2022-May-25

Lead Auditor: Mia Antoni-Naidoo

Audit team participants:

Bharat Nagar

Amit Singh

Mia Antoni-Naidoo, Lead Auditor

Site Participants:

Noel Fernandez, Human Resources

Prasad Madineni, Maintenance Engineer

Dinesh R, Quality manager

Shivendru Mathur, Corporate EHS

Jaisimha MS, Senior Manager EHS

Aditya Gupta, Other

Anant Maheshwari, Divisional EHS

Abhishant Baishya, Divisional EHS

Harish Babu, Senior Programme Manager, ITC Mission Sunehra Kal

Raghu Ram A.K., Senior Programme Manager, ITC Mission Sunehra Kal

ND Vishwanath, Factory Manager

Navneet Singh, Corporate Sustainability

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### ADDITIONAL INFO

**Summary of Audit Findings:** A total of 17 findings were raised during the certification audit, 2 major non-conformities, 10 minor non-conformities, and 5 observations. The major non-conformities were of sufficient concern to warrant the categorisation of the non-conformity as major and related to risk identification, legal compliance and disclosure. All major non-conformities must be sufficiently addressed and closed out in order for certification to be awarded.

The Client has performed a root cause analysis and defined corrective actions for each of the non-conformities and has submitted these to WSAS within 60 days of receipt of the audit report. These have been approved. The major non-conformities have been sufficiently addressed and evidence have been submitted to WSAS within 90 days of receipt of the report. The Major non-conformities have been closed. Minor non-conformities must be closed out by the time of the next annual audit.

The audit team recommends certification of ITC Malur at Platinum level pending approval of the corrective actions plan and closure of the major non-conformities.

#### CLOSURE OF FINDINGS AND CORRECTIVE ACTION PLAN:

The Client has successfully resolved the major non-conformities and submitted the corrective action plan addressing all findings.

**Scope of Assessment:** The scope of services covers the Initial certification audit for assessing conformity of ITC Malur against the AWS International Water Stewardship Standard Version 2. The advance indicators were included in the scope of the assessment.

ITC has a food production unit in the Malur block in the Kolar district of Karnataka, with a water requirement of approximately 55,000 kl per annum. The unit manufactures noodles, The uncertainty and heterogeneity of hard rock aquifer system of the area combined with anthropogenic factors such as rapid urbanisation, change of agricultural patterns, and breakdown of traditional cascading tank system, led to the failure of bore wells in the region, including those within the unit premises, creating external dependency on tanker water. Understanding the criticality of the situation within the factory as well as the surrounding area, ITC has been working on water stewardship outcomes in the catchment,

The audit was conducted onsite on 25 -27 May and 3rd June 2022.

The onsite site visit included the assessment of the activities taking place at the Malur food Factory and catchment activities relating to water stewardship.

### SCORE

102.00

### FINDINGS

#### NUMBER OF FINDINGS PER LEVEL

<b>Observation</b>	5
<b>Minor</b>	10
<b>Major</b>	2

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### FINDING DETAILS

Finding No: TNR-001105

Checklist Item No: 1.1.1

Status: Open

Finding level: Observation

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

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

Findings: Although the site has provided piping plans for the reticulation and processing of water on site it is not immediately clear from the plan that the site is a zero effluent discharge site and that the system is a closed loop without exit. The site should amend the piping plan and map to reflect the flow of water more accurately.

Finding No: TNR-000884

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 site is recommended to make the stakeholder list less generic, more specific to names of companies, groups, schools or individuals as appropriate.

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Finding No:	TNR-000663
Checklist Item No:	1.3.6
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-May-25
Checklist item:	On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.
Findings:	The condition of the IWRA has not be added nor a description of the cultural value.
Corrective action:	<p>While current health status of few IWRAs has been included, going forward, description of the status of all IWRAs i.e. current condition relative to a normal or healthy status using the 0-5 scale approach as suggested by the AWS Standard including indigenous cultural values will also be included.</p> <p>Based on Sites assessment, the identified on-site IWRAs do not hold any indigenous cultural value as these are water areas/structures built by the site within its premises for its own operational use. Additionally, these are not used by the local community or indigenous people. Going forward, the same will be included for all IWRAs in the revised manual.</p>
Evidence of implementation:	Condition of the IWRA's will be evaluated and described using the 0-5 scale approach and presented in the AWS manual of the site in the subsequent surveillance audits.

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Audit Number: AO-000263

Finding No:	TNR-000949
Checklist Item No:	1.5.2
Status:	Closed
Finding level:	Major
Due date:	2022-Nov-04
Checklist item:	Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.
Findings:	The water supplier permits have been issued in the name of the individual and not the company. There is a question around the permit conditions and whether the permit are valid for commercial use. This represent a significant potential reputational risk to the site. The site is to review the situation and if necessary rectify to ensure legal compliance. Evidence to prove compliance is required to close the finding.

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### Corrective action:

The site has revisited and reviewed borewell registration certificates/water permits of both the water suppliers and all other associated statutory approvals. Based on the review, the site wants to assure that all legal compliances in line with applicable local regulations are in place. The detailed findings of the review are presented below:

#### 1) Establishing clear linkage between owners of borewell and the entities supplying water (company) :

The Karnataka Ground Water Authority (KGWA) issues registration certificates of borewells in the name of owners of the land where the borewells are situated and the name of the associated entity (company) is not included in the certificate. This is as per the format of the application for borewell registration issued by KGWA. Accordingly, the borewell registration certificates/water permits pertaining to the entities supplying water to the Site are also issued in the name of the individuals who own the land.

Refer Evidence 1.1: Form 4 – Application format for registration of borewells as per KGWA

Even though the, borewell registration certificates/water permits do not mention the name of the entity (company), the same can be established through the GST (Goods & services tax) certificates issued by the Karnataka government. The GST certificate is required by all entities that engage in commercial activity under their trade name.

The GST certificate of both the water suppliers clearly specifies that the individuals who own the land and against whose name the borewell registration certificates/water permits have been issued, are also the owners of the entities supplying water to the Site.

Refer Evidence 1.2: GST Certificates of both the suppliers of water

Therefore, even though the water permits as per local regulations do not include the name of the commercial entity supplying water, clear ownership linkage is evident through other Government-issued regulatory documentation (GST certificate).

#### 2) Permitted use of water for commercial purposes :

The registration certificate issued by KGWA, does not mention the specific purpose of use of water as the KGWA has a specific format in which it issues the borewell registration certificates to all entities which does not contain this information. As per Karnataka ground water rules, Form 5A is used for granting borewell registration to existing users. This form 5A is a standard format of the KGWA and it does not mention the purpose of usage of water (commercial or any other purpose).

Refer Evidence 2.1: Form 5A – Application format for issuing the certificate of registration of borewells as per KGWA

While the borewell registration certificate/water permit does not specify the

purpose of use, there are other Government-issued documentation available to establish that commercial use is permitted for water supplied by these entities to the Site:

Commercial License issued by local village governance body (Gram Panchayat)

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Both suppliers of water have a license for commercial distribution of the water extracted from the borewell issued by the local village governance body (Gram Panchayat). The gram panchayat is a village governing body which is constituted under the provisions of the Indian constitution. Any matters related to and concerning the village which is governed by the gram panchayat body has to be approved by the gram panchayat office of that village. This general license issued to both the water suppliers, permits commercial distribution of water from the borewells. This license is a significant requirement for them to withdraw the water from their borewells and distribute it for commercial purposes, considering both these borewells are located in the area which comes under the gram panchayat jurisdiction.

Refer Evidence 2.2: Gram panchayat permission for commercial withdrawal of borewell water.

Commercial License issued by state electricity department -

Both water suppliers have commercial license for use of electricity for commercial purposes from the state electricity department to operate their borewells for drawing water.

Refer Evidence 2.3: Permission from state electricity department for commercial use of electricity for the borewells

The above evidences are sufficient to establish that permits issued to the entities supplying water to the Site are valid for commercial use.

Systems & Processes:

The Site has a process for checking the conditions and necessary approvals before on-boarding any water supplying agencies and is aware of the conditions that have been mentioned in the borewell registration certificates of both the water suppliers. Both the water suppliers are complying to the conditions as mentioned in the registration certificates.

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Evidence of implementation:	<p>The following evidence files were reviewed against the description of the check process undertaken:</p> <p>Evidence 1.1: Form 4 – Application format for applying for registration of borewells as per KGWA</p> <p>Evidence 1.2: GST Certificates of both the suppliers of water</p> <p>Evidence 2.1: Form 5A – Application format for issuing the certificate of registration of borewells as per KGWA</p> <p>Evidence 2.2: Gram panchayat permission for commercial distribution of borewell water. (Three separate documents have been highlighted as evidence for this indicator; the first evidence showcases the permission given by the Gram Panchayat as is in the local language, whereas the other two documents highlight the translated version of this permission for better understanding of the reviewer)</p> <p>Evidence 2.3: Permission from state electricity department for commercial use of electricity for the borewells</p> <p>The corrective and preventive actions undertaken are suitable, explanation provided by the site is clear, and evidences support the explanation.</p>
Finding No:	TNR-000916
Checklist Item No:	1.5.5
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-May-25
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:	The site has adequately identified and mapped the IWRA in the catchment, however, there is no assessment of the condition or status of each IWRA. This is a requirement of the Standard and it assists with prioritising the work required to maintain and enhance the status of these sites which is implemented in Step 3..
Corrective action:	While current health status of few IWRA has been included, going forward, description of the status of all IWRA i.e. current condition relative to a normal or healthy status using the 0-5 scale approach as suggested by the AWS Standard.



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Finding No:	TNR-000917
Checklist Item No:	1.6.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-May-25
Checklist item:	Shared water challenges shall be identified and prioritized from the information gathered.
Findings:	The site has identified the shared water challenges in the catchment through the Core Area Perspective Plan (CAPP), the site studied the reports available and through engagement with NGOs and government bodies. The auditor has reviewed the evidence provided and no evidence of prioritisation could be found in the document. The site is also required to describe the process by which prioritisation was undertaken. The site will need to work on this aspect of the indicator to achieve compliance.
Corrective action:	<p>Even though, a prioritization process has not been described in the AWS manual, the site has prioritized its shared water challenges through various engagements with the local community in the catchment and other stakeholders through participatory rural appraisals, and meetings with NGO's and government bodies. The evidence of such methods used in arriving at the prioritization shall be presented in the site's AWS manual and shared with the audit team.</p> <p>Site will define this process for prioritization of the identified shared water challenges in the catchment in terms of their significance and urgency, and will describe the process under the indicator requirement in the site's AWS manual.</p>
Evidence of implementation:	<p>1. Documented process of prioritization of shared water challenges will be developed and presented in the subsequent surveillance audits.</p> <p>2. Evidences will be shared which will highlight the process used in arriving at the prioritization in the site's AWS manual in the subsequent surveillance audits.</p>

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Finding No:	TNR-000664
Checklist Item No:	1.7.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-May-25
Checklist item:	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.
Findings:	The water risks indicator has not been adequately addressed to achieve compliance. The site has identified and prioritised the water risks, with likelihood and severity of impact, however, timeframe, potential cost and potential impact has not been assessed. Only 5 risks have been identified and this can be expanded upon. The site is required to add more detail and depth to addressing this indicator as addressing risk is a significant principle guiding the activities of implementing the AWS Standard.
Corrective action:	The Site has reviewed the existing risk identification process, and the risk table will be modified and made more exhaustive including assessment of potential cost and impact wherever possible.

Based on this review, the site has considered water risks from multiple perspectives including potential/future risks that may affect the site and have an impact in both short and long term. This helps in ensuring that all the potential water risks which can affect the site are identified, prioritized and appropriately addressed. Along with this, the site has also stressed upon assessing the potential cost & potential impact and timeframe of each identified risk.

The site has identified the water risks into three categories: Physical risks, Regulatory risks and Reputational risks. A summary of the different water risks identified by the site and added to the new updated water risk table of the site:

1. Risks related to drying, contamination of aquifer of the borewells of water suppliers.
2. Climatic risks like drought and flood in the catchment
3. Risks related to breakdown of the site's water treatment and effluent treatment facilities
4. Risks related to restrictions on water withdrawal, water quantity from the water suppliers borewells
5. Legal risks related to non-compliance of water related regulations by the government bodies.
6. Risks related to negative publication/awareness/any event for the site.

The site has presented a new water risk table which lists down the identified water risks, prioritizing them along with their likelihood, severity of impact, given timeframe, potential costs and business impact.

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Evidence of implementation:	The new methodology for risk identification and prioritisation, and a revised water risk assessment table were reviewed. The assessment now includes a wider range of risks, timeframe for the risks is noted, and potential business impact and potential costs are described. The evidence is sufficient to demonstrate that the risk assessment now is much improved. There are still some inconsistencies, questions and comments due to which the finding now remains as a minor finding.
Finding No:	TNR-000665
Checklist Item No:	1.7.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-May-25
Checklist item:	Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.
Findings:	The site can improve on the presentation of information on opportunities for water -related activities.The site has not addressed potential savings associated with the opportunities e.g. social return on investment is not there and also not quantified: the potential savings. The site has made brief and generic attempt at addressing this indicator. All aspects must be addressed and in more detail.
Corrective action:	Site shall rework on the approach for complying to this indicator. Site will identify and present the opportunities with addressing all aspects of it like potential savings from these opportunities, quantifying the potential savings wherever feasible and practical, highlighting the business opportunities emanating from the opportunities identified.

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## Alliance for Water Stewardship (AWS)

Audit Number: AO-000263

Finding No:	TNR-000939
Checklist Item No:	2.1.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-May-25
Checklist item:	<p>A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:</p> <ul style="list-style-type: none"><li>- That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes</li><li>- That the site implementation will be aligned to and in support of existing catchment sustainability plans</li><li>- That the site's stakeholders will be engaged in an open and transparent way</li><li>- That the site will allocate resources to implement the Standard.</li></ul>
Findings:	<p>The site's has provided evidence of commitment thais based on the requirements of Version 1 of the Standard and not Version 2, which is the current version. The site will need to update the commitment to the requirements of Version 2 of the AWS Standard.</p>
Corrective action:	<p>The commitments made by the site in the water stewardship policy have been aligned with the requirements defined under the indicator 2.1.1 in the version 2 of AWS standard.</p> <p>Following are the statements in the policy along with the requirements that they address as per the indicator.</p> <ul style="list-style-type: none"><li>- Lastly, I commit to disclosing material water-related information to all relevant audiences in an appropriate format (That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes)</li><li>- Coordinate with and support farmers and nearby villages in their efforts to encourage water-related planning and implement water-optimization interventions (That the site implementation will be aligned to and in support of existing catchment sustainability plans)</li><li>- Strive to engage stakeholders in our efforts and communicate regularly with relevant parties (That the site's stakeholders will be engaged in an open and transparent way)</li><li>- I will support the site's effort to continually improve and adapt it water stewardship actions and plans and ensure that there is sufficient organizational capacity to successfully implement the AWS standard (That the site will allocate resources to implement the Standard)</li></ul>

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## Alliance for Water Stewardship (AWS)

Audit Number: AO-000263

Finding No:	TNR-000669
Checklist Item No:	2.3.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-May-25
Checklist item:	<p>A water stewardship plan shall be identified, including for each target:</p> <ul style="list-style-type: none"><li>- How it will be measured and monitored</li><li>- Actions to achieve and maintain (or exceed) it</li><li>- Planned timeframes to achieve it</li><li>- Financial budgets allocated for actions</li><li>- Positions of persons responsible for actions and achieving targets</li><li>- Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.</li></ul>
Findings:	<p>The site's decision to set very broad targets and actions for their water stewardship plan render them to not be considered to be SMART, the timeframe as being continuous renders them hard to track continual improvement as does the lack specific metrics. It is recommended to have more specific targets which change each year. The Standard requires for the learning from achieving targets in the Water Stewardship Plan to demonstrate evolution of the plan each year.</p>
Corrective action:	<p>The water stewardship plan will be revised, and the existing targets will be converted into SMART targets through inclusion of specific annualized targets that will be tracked for continual improvement. The site will have year on year targets both at factory and catchment level. The stewardship plan will be monitored to show a continuous year on year evolution from the targets achieved and the inclusion of new targets considering the changing water related regulatory, social, environmental, cultural, economic landscape in the catchment.</p>
Finding No:	TNR-000941
Checklist Item No:	2.4.1
Status:	Open
Finding level:	Observation
Checklist item:	<p>A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.</p>
Findings:	<p>The site presents only a fraction of the information and evidence available to demonstrate compliance. The site should gather its evidence in a more comprehensive manner and in more detail to demonstrate that this indicator has been addressed.</p>

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## Alliance for Water Stewardship (AWS)

Audit Number: AO-000263

Finding No:	TNR-000670
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 should consider adding this metric to the water stewardship plan going forward.
Finding No:	TNR-000942
Checklist Item No:	4.3.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-May-24
Checklist item:	Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.
Findings:	The site has presented photos from meeting where ITC has engaged with stakeholders meetings held on special days (World Water Day, Environment Day, World Soil Day etc). The site has not presented evidence relating to consultation efforts on the water stewardship performance. The site is required to provided evidence that the water stewardship performance has been shared with stakeholders and they have been consulted on the performance.
Corrective action:	The site conducts multiple consultations and discussion meetings with various stakeholders (in the form of annual stakeholder meetings) on the water stewardship interventions at various levels (village community panchayat level, farmer level, government body level etc.), which covers discussion on site's water stewardship performance.  Evidence (like written commentary/ feedback/ suggestions) will be recorded and presented in a structured manner to demonstrate that the site's performance has been discussed and consulted on with the stakeholders.
Evidence of implementation:	Documentary evidences of written commentary/feedbacks on the water stewardship plan & performance, photographs of consultation engagements with stakeholders.

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## Alliance for Water Stewardship (AWS)

Audit Number: AO-000263

Finding No:	TNR-000729
Checklist Item No:	4.4.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-May-24
Checklist item:	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.
Findings:	The site is required to redesign the way in which the water stewardship plan is presented in order to reflect the modifications, adaptations and lessons learned. This is easily achieved if the plan is presented per annum.
Corrective action:	<p>The Site's plan will be presented every annum reflecting the learnings and the subsequent modification made to the plan in the last financial year. At present, the site does have a process wherein it includes the feedbacks, consultations, suggestions given by relevant stakeholders on the site's water stewardship plan and targets and adapts and updates the plan targets accordingly. However, the current format the water stewardship plan has been develop does not reflect the process of adaption and modification of the plan.</p> <p>The site shall modify the water stewardship plan and the way it is presented. The plan shall be developed with annualized targets and actions, to help update the plan by adapting to the various inputs received from stakeholder consultations/feedbacks, evolving water related challenges, changing water related legal and regulatory landscape, social, cultural, environmental landscape etc.</p>
Finding No:	TNR-000943
Checklist Item No:	5.1.1
Status:	Open
Finding level:	Observation
Checklist item:	The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.
Findings:	Although the internal governance structure has been posted at the factory entrance this is the only disclosure of this information. The site is recommended to expand the disclosure of this information to a wider audience.

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## Alliance for Water Stewardship (AWS)

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Finding No:	TNR-000730
Checklist Item No:	5.2.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-May-24
Checklist item:	The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.
Findings:	The Site is required to disclose the water stewardship plan as it has been documented, including how they contribute to the AWS Outcomes to relevant stakeholders.
Corrective action:	<p>The site will disclose and communicate the water stewardship plan to relevant stakeholders in the manner it is developed and documented including how it contributes to achieve the AWS outcomes. The plan will be disclosed in the form of paintings or murals to cater to the local village community, in booklets, discussed in village meetings, NGO meetings, government body meets and all other forms of possible engagements with relevant stakeholders.</p> <p>To show how the site's AWS plan contributes to achieve the AWS outcome of safe water, sanitation and hygiene for all (WASH), the site conducts meetings with the women and child development, anganwadis members, gram panchayats among other relevant stakeholder to display the various interventions carried out towards improving WASH facilities. The site has also conducted many handover and felicitation ceremonies of new improved WASH infrastructure in schools and anganwadis. In addition, the site has also developed and printed booklets on showcasing the various interventions on improving WASH facilities in the catchment which are distributed widely among the catchment communities and government bodies.</p> <p>For the AWS outcome of sustainable water balance, site has adopted ways to disclose its many interventions through information booklets highlighting site's sustainable management of water resources and ensuring water security for all in the catchment. In addition to these information booklets, site also discloses its water stewardship plan performance and its achieved outcomes across many events and celebrations of World Water day, World Environment day and many more.</p> <p>For disclosing its interventions towards improving and developing catchment IWRA's, ensuring good water quality and good water governance site through its many community level engagements with the local communities and gram panchayats discusses and discloses its many interventions to achieve the mentioned AWS outcomes. Periodic engagements with community water user groups (WUG) are carried out to discuss the progress on the water recharge structures development, check dams, farm ponds etc. and to monitor the progress against these. This also ensures a better water governance at catchment through the water user groups taking care of all village level water interventions.</p>



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Finding No:	TNR-000944
Checklist Item No:	5.3.1
Status:	Closed
Finding level:	Major
Due date:	2022-Nov-04
Checklist item:	A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.
Findings:	<p>The site has annual Stakeholder meeting for disclosure of water stewardship activities, these are department officials, local communities, local authorities. The site was unable to provide evidence as to what information was disclosed to the communities, provided only evidence of the meeting with stakeholders. The site must either provide concrete evidence of the presentation or information disclosed at previous interactions or demonstrate compliance to the indicator by subsequent disclosure of water stewardship performance, including quantified performance against targets as per the indicator requirements.</p>
Corrective action:	<p>At present, the site has displayed the water stewardship performance in a quantified manner as murals/paintings on the walls of the catchment villages (community notice board). Photographs of such displays are readily available with the site and have been attached here for your reference. Refer: Evidence 4</p> <p>In addition, records of the disclosure meetings are also maintained readily in the form of minutes of meetings in the regional language highlighting all the discussed matter and information conveyed in the stakeholders meeting. One such minute of meeting is also attached here for your reference. Refer: Evidence 1 &amp; Evidence 2</p> <p>Site has documented evidence of the various meetings, gatherings where site has disclosed the water stewardship plan performance progress to all stakeholders. These meetings are held at various levels to address all the different categories of stakeholders. In such meetings, information regarding the site's progress on the targets set in the water stewardship plan are presented and discussed with the people. Refer: Evidence 1, Evidence 2 &amp; Evidence 6</p> <p>Site's displays the performance and progress in a format which is easily understood by the people. Opinions/views are welcomed and duly considered and are noted for further concurrence. Site has presented additional evidence which displays the type and nature of information that was disclosed in those meetings. Refer: Evidence 3</p> <p>Apart from these disclosures at local catchment level, the water stewardship activities are extensively highlighted in the Annual Sustainability Report of ITC Limited for the past three years, which could be accessed through the following link: <a href="https://www.itcportal.com/sustainability/sustainability-reports.aspx">https://www.itcportal.com/sustainability/sustainability-reports.aspx</a> Refer: Evidence 5</p>

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Evidence of implementation: The following evidences were presented by the site and reviewed:

1. Evidence 1: Minutes/Resolution of a annual stakeholder meeting which shows the evidence of the type of information about the water stewardship plan performance disclosed to the stakeholders at this meeting.
2. Evidence 2: A key Summary in English language of the Evidence 1.
3. Evidence 3: Brochure On WASH interventions in the catchment
4. Evidence 4: Water stewardship plan performance display as wall writings
5. Evidence 5: Case Studies of AWS initiatives at Malur in ITC Annual Sustainability Report disclosed publicly
6. Evidence 6: Newspaper articles showcasing ITC Malur's interventions towards WASH

As the site provide evidence on what information was disclosed to the communities in the annual stakeholder meeting, and that the information disclosed includes summary of actions implemented and quantified performance against targets, the finding can be closed.

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Signature WSAS

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

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### Report Details

Report	Value
Report prepared by	Mia Antoni-Naidoo
Report approved by	Neringa Pumputyte
Report approved on (Date)	04 August 2022

### Surveillance

**Proposed date for next audit**  
2023-May-24

### Stakeholder Announcements

Date of publication	Location
2022-Apr-22	WSAS and AWS Website

### Catchment Information

#### Catchment Information

The ITC Malur factory unit is situated in South Pennar River basin. The basin area covers 3.2 Lakh hectares. Since the unit is dependent on ground water sources for development initiatives priority area (5400 Ha) is considered which is immediate catchment of Malur Unit. 4 Micro watersheds are demarcated in Priority area for Execution of Water Stewardship Initiatives, with 7 working panchayats - Thornahalli, Madivala, Nosagere, Orohalli, Doddanallala, Jadigenahalli and Khazihosahalli.



Catchment.jpg

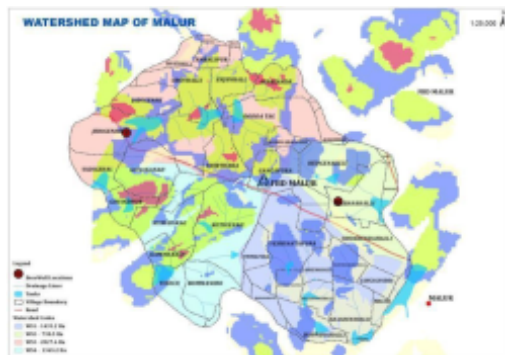
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Catchment1.jpg



Catchment2.jpg



Factory Boundary.jpg

### Client Description and Site Details

#### Client/Site Background

ITC Limited Malur is a food factory in between the main road of Hoskote and Malur taluk headquarters. In this factory ITC Ltd. is preparing noodles as the primary food product. The factory is situated 12 kms away from Hoskote and 8 kms from Malur towns. The People of the surrounding villages are working in the factory as employees.

WSAS

2 Quality Street North Berwick, EH39 4HW, UNITED KINGDOM

### Summary of Shared Water Challenges




#### Summary of Shared Water Challenges

ITC commissioned a Core Area Perspective Plan in Sustainable Management of Water Resources and Water Security Programme in Malur and Hoskote taluks in order to better understand the Shared Water Challenges of the catchment in which they operate. The study found that the twin pressures of population growth and economic development have led to higher water use and over exploitation of ground water resources has resulted in drying shallow wells and adopting the water management practices are virtually non-existent. There is inefficiency in use of water in agriculture and domestic purpose. It is estimated that only 40% of water use efficiency is achieved. Shared water challenges can be described as:

- 1) Depleting Ground water Levels - As per groundwater resource estimation the net annual ground water availability for the study area is 3875 ham, annual gross ground water draft for all uses is 7060 ham and the stage of ground water development is 182.19%. This is due to the reduced rainfall and increase in the ground water extractions.
- 2) High water Demand from Agriculture sector-due to low efficiency in irrigation Increasing water demand in the catchment for agricultural, industrial and domestic uses as the watershed is near to Bangalore. The demand for vegetables and water intensive crops are increasing because of large market.
- 3) High probability of Drought. It has been observed that the frequency of occurrence of drought is once in 5 years at Malur taluk. The recent trend in the rainfall shows that there is shortfall of rains in 2013, 2014, 2016 & 2017. Hence, in the catchment there is high probability of drought occurrence once in 5 years.
- 4) High Drinking water demand in the Catchment. As per studies of Geovale Report Pg. 90 and CGWB reports 2009
  - There is no River source in the catchment.
  - There are no reliable Surface water source for Drinking & Domestic water usage in the catchment.
  - Ground water is the only source of drinking water.

#### 0.1 General Requirements for Single Sites, Multi-Sites and Groups

##### 0.1.1 Eligibility Criteria

0.1.1.1	The site(s) occupy one catchment OR an exception has been granted.	 Yes
0.1.1.2	The scope of the proposed certification shall be under the control of a single management system.	 Yes
0.1.1.3	The scope of the proposed certification shall be homogeneous with respect to primary production system, water management, product or service range, and the main market structures.	 Yes

### 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.

Q  
Obs.

**Comment** Located in the South Pennar River Basin as the catchment. The site has developed a Watershed map of Malur which is showing the underlying hydro-geological structure and has a colour coded key for priority areas for recharge. There are two other catchment map which show the position of the site within the catchment. The watershed map is aligned with the government provided tools. There is a map which has the site boundaries.

Water is purchased by the site from two private water suppliers . The water is tankered from privately owned wells outside the factory but within the catchment, the site is involved with replenishment projects in the area. There is a map which shows the piping network of the supplier but not that of the internal structure of the site. There are no discharge points on the site as water is not discharged from the site. All water is retained and re-used.

See Step 1 PDF for Evidence.

**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.

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Obs.

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Comment	<p>The site has created a table to list the stakeholders for the site. The list is fairly generic, no names of the suppliers provided, and it includes the column which indicates the level of interest of the stakeholder and the level of influence which the stakeholder has upon the site.</p> <p>The site has engaged with the stakeholders on identifying the shared water challenges and this has been included in the same table. The stakeholders have been further categorised according to the stakeholder relationship and details have been provided on the issues on which they have engaged on. There are photographs of the stakeholder meetings provided as evidence and meeting minutes are available.</p> <p>See Step 1 PDF for Evidence.</p>	
1.2.2	<i>Current and potential degree of influence between site and stakeholder shall be identified, within the catchment and considering the site's ultimate water source and ultimate receiving water body for wastewater.</i>	 Yes
Comment	<p>Covered in the same document as above.</p> <p>See Step 1 PDF for Evidence.</p>	
1.3	<i>Gather water-related data for the site, including: water balance; water quality, Important Water-Related Areas, water governance, WASH; water-related costs, revenues, and shared value creation.</i>	
1.3.1	<i>Existing water-related incident response plans shall be identified.</i>	 Yes
Comment	<p>The site has an onsite emergency response plan for water specifically. The plan identifies what should be done in each type of incident and by whom.</p>	
1.3.2	<i>Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped</i>	 Yes
Comment	<p>The site has mapped basically the site water balance with inflows, storage and losses. There are no outflows as this is net zero discharge site. See Step 1 PDF for Evidence.</p>	
1.3.3	<i>Site water balance, inflows, losses, storage, and outflows, including indication of annual variance in water usage rates, shall be quantified. Where there is a water-related challenge that would be a threat to good water balance for people or environment, an indication of annual high and low variances shall be quantified.</i>	 Yes
Comment	<p>The site has created a water balance per day based on annual data reverse calculate per day. They have provided the accounting for inflow water from the tankers and all the storage points and the treatment points. The site has also tracked the annual variance of water consumption ratio of m3 per tonne of finished product. The site has also mapped the groundwater level trends in the Malur Catchment. Malur is considered to be an over exploited catchment area. See Step 1 PDF for Evidence.</p>	
1.3.4	<i>Water quality of the site's water source(s), provided waters, effluent and receiving water bodies shall be quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be quantified.</i>	 Yes
Comment	<p>The incoming water is tested by an in house laboratories on a daily basis and then once a month to an external laboratories which are accredited to the NABL. Drinking water is tested and results are submitted government for review. There is no effluent which is not reused. There is micro biological testing performed onsite. The TDS levels show seasonal variance which is tracked by the site.</p> <p>The site presented data for the catchment also. See Step 1 PDF for Evidence.</p>	

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## Alliance for Water Stewardship (AWS)

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<b>1.3.5</b>	<i>Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.</i>	 Yes
Comment	The site has mapped the areas on site which have the potential for polluting water. The veg oil receiving areas has been bunded to prevent pollution as there have been incidents of spillage during off loading. The auditor visited the chemical store and the hazardous waste collection point during the audit. See Step 1 PDF for Evidence.	
<b>1.3.6</b>	<i>On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.</i>	 in progress
Comment	<p>List of important water related areas at the site:</p> <ol style="list-style-type: none"><li>1. Borewell: Site has three borewells within its boundary. All the three borewells were not yielding groundwater and are de-functional over a long period of time.</li><li>2. Rain water collection pond: Unit has a rainwater collection pond with dimensions of 22 meter * 11 meter with a depth of 3 meters and water holding capacity of 726 cubic meters. All the storm water channels are discharged into this rain water collection pond.</li><li>3. Raw water tanks: Raw water tanks of capacity 1005.6 Kl is used to store the fresh water received through the water supply tankers.</li><li>4. Water Treatment plant: Raw water is treated before distribution to individual consumption points in the water treatment plant of the unit. The raw water undergoes through multiple stages of filtration before finally getting discharged into the distribution system.</li><li>5. Effluent treatment plant: ETP of 200 KLD capacity is present in the unit to treat the process effluents/waste water and convert into treated water. The treated waste water is then used for gardening and toilet flushing within the unit.</li></ol> <p>See Step 1 PDF for Evidence.</p> <p style="text-align: right;"><b>Finding No: TNR-000663</b></p>	
<b>1.3.7</b>	<i>Annual water-related costs, revenues, and a description or quantification of the social, cultural, environmental, or economic water-related value generated by the site shall be identified and used to inform the evaluation of the plan in 4.1.2.</i>	 Yes
Comment	<p>The site has calculated the annual cost for purchase of water, treatment of water, chemical costs, maintenance costs, energy costs have been included for pumping of water.</p> <p>The site has also developed a description of the social, cultural and environmental value generated by the site. No quantification has been undertaken.</p> <p>Costs associated with activities in the catchment have been captured in the WS plan.</p> <p>See Step 1 PDF for Evidence.</p>	
<b>1.3.8</b>	<i>Levels of access and adequacy of WASH at the site shall be identified.</i>	 Yes
Comment	The site have mapped the drinking water and toiler facilities for the site. They have added a table which lists the number of drinking fountains available to staff. Similarly the hand wash stations have been mapped and identified. Access to drinking water and toilets are compared to against the requirements mandated as per Factories Act, 1948 (Section 18) and The Karnataka Factories Rules 1969. See Step 1 PDF for Evidence.	
<b>1.4</b>	<i>Gather data on the site's indirect water use, including: its primary inputs; the water use embedded in the production of those primary inputs the status of the waters at the origin of the inputs (where they can be identified); and water used in out-sourced water-related services.</i>	



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<b>1.4.1</b>	<i>The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be identified.</i>	 Yes
Comment	The site has identified their primary inputs for the factory and there is one suppliers which is located in the catchment, the maida (fine flour). The site has worked with the supplier Kesari Roller Four Mills on their water consumption practices and also on their water quality checks which are performed by the supplier.	
<b>1.4.2</b>	<i>The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.</i>	 Yes
Comment	The site began with a list from procurement of outsourced suppliers and they reviewed these to see which were located in the catchment. None of the suppliers are located in Malur.	
<b>1.4.3</b>	<i>Advanced Indicator The embedded water use of primary inputs in catchment(s) of origin shall be quantified.</i>	 Yes
Comment	<p>The site has performed a life cycle assessment for the noodle product and undertook the study for 2016-2017. The calculations have been repeated for 2021 -22 data. The information shows that the site has calculated the embedded water use of the product. The water reduction programme can be seen in the results changed from the first study to the present day.</p> <p>1.4.3 The embedded water use of primary inputs in catchment(s) of origin shall be quantified. The embedded water use of primary inputs in catchments of origin has been derived from a life cycle assessment of the product (Noodles) by a water footprint study. Source: Water footprint inventory Study: Based on the demand side water consumption interventions at site, the water footprint from operations as per 2021-22 data stands at 2.11 m3/ton and hence, the total water footprint per ton of product would be 2057.59 m3/ton See Step 1 PDF for Evidence.</p>	
Score	5	
<b>1.5</b>	<i>Gather water-related data for the catchment, including water governance, water balance, water quality, Important Water-Related Areas, infrastructure, and WASH</i>	
<b>1.5.1</b>	<i>Water governance initiatives shall be identified, including catchment plan(s), water-related public policies, major publicly-led initiatives under way, and relevant goals to help inform site of possible opportunities for water stewardship collective action.</i>	 Yes
Comment	<p>The site has created a table where all the government departments have been identified and with this also covered the roles/responsibilities of the bodies. A third column shows the activities undertaken for water-related improvement/maintenance. Although the site has not strictly listed the initiatives, the information provided and the interactions witnessed on site by the auditor is sufficient to confirm that the site is aware and familiar with the initiatives led by public-sector agencies. The ITC site has contributed to the projects within the catchment. The interventions by the site have led to improvements. See Step 1 PDF for Evidence.</p>	
<b>1.5.2</b>	<i>Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.</i>	 closed

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**Comment** The site has a consent to operate permit which expires in Sept 2022. The boreholes must be registered and there are three registrations for them and they do not expire. The boreholes are not currently in use as they are dry and not producing water.

The site is ISO 14001 certified and have a legal register which has been attached as evidence. The shared water permits of the water suppliers (4 in nos.) were reviewed and it was found that the borewells are registered in the name of an individual and not in the name of mentioned water supplying agency. The permit conditions also mention about specific purpose of use of water (permission sought while applying for borewell registration) from borewell. The site shall consider the compliance with relevant permit conditions for the borewell while identifying water supplier to avoid non-compliance and addressing the associated water risks.

**Finding No: TNR-000949**

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


**Comment** The site has sourced the information for Kolar District Water Balance using the CGWB 2012b. See Step 1 PDF for Evidence. There is information provided on the catchment balance/water availability and local rainfall data. Ground water data is available in the same report and it appears to be increasing slightly per annum. Unfortunately demand is also increasing. The site has adequately demonstrated that they are aware of the current state of the catchment water balance.

**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.*  **Yes**

**Comment** The Geovale report shows the catchment water quality data for physical and chemical parameters but not for biological parameters. The results have been quantified. The study show results for TDS at various depths/levels below ground. pH, nitrates and other parameters have also been recorded but can be found in the Geovale report, excerpts of which have been attached here as evidence.

The site also has interactions with suppliers on their water quality testing programmes, the maida (fine flour) supplier is one of these.


See Step 1 PDF for Evidence.

**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.*  **in progress**

**Comment** The site has identified several generic areas within the catchment which are considered IWRAs, these are tanks/check dams, open wells, recharge zones and commons. They have been identified generically only at this indicator. More specific maps have been provided and this has been developed further under Step 3. The data has been sourced from the Geovale report.

See Step 1 PDF for Evidence.

**Finding No: TNR-000916**

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


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**Comment** The site is not reliant on any public infrastructure for water supply or effluent disposal. For the catchment the site has mapped public related infrastructure in the Core Area Perspective Plan. Water related infrastructure has been mapped for the Malur Watershed. The site has identified water harvesting structures in the catchment. The status of these areas (IWRAs) is considered to be poor as they have not been maintained. The site has begun to upgrade these areas and in this process have assessed potential exposure to flooding.

The site has used the drought proofing tool to create scenarios for the site. See attached for evidence and see Step 1 PDF for Evidence.

**1.5.7** *The adequacy of available WASH services within the catchment shall be identified.*  **Yes**


**Comment** The site has identified a sanitation survey performed by NGO partner. The survey has focused on access to sanitation services but not drinking water. The Core Area Perspective Plan (CAPP) for Malur provides data on access to drinking water. The information can be improved by mapping the availability of water for the toilets. The government provides drinking water through RO units in each village. A study was conducted which identified that 49 schools out of 100 had inadequate WASH facilities based on government requirements. Schools have septic tanks, however, these often are under-capacitated and require to be enlarged or pumped to empty every three years or more frequently. Some schools only have access to leach pit.

See Step 1 PDF for Evidence.

**1.5.8** *Advanced Indicator*  **Yes**  
*Efforts by the site to support and undertake catchment level water-related data collection shall be identified.*

**Comment** The site commissioned a variety of studies in the catchment through the services of external expert service providers. The motivation for ITC has been their commitment to sustainability and have been working on their water stewardship journey for some years. The company policy is "water for all". Evidence of the commissioned studies is attached. There is no evidence to suggest that at least one type of data are collected with certified methods or by licensed testing institutions; (+1) nor that sharing the data with stakeholders; (+1) was performed.


**Score** 5

**1.5.9** *Advanced Indicator*  **Yes**  
*The adequacy of WASH provision within the catchments of origin of primary inputs shall be identified.*

**Comment** The site did not present evidence for this indicator during the audit. Attached is a Core Area Perspective Plan (CAPP) for the Krishnagiri district of Tamil Nadu. The Core Area Perspective Plan (CAPP) Report has chapters which assess access to drinking water, sanitation in schools, and toilets in households. The packaging supplier is a primary input for the Noodles and they are located in the district of Tamil Nadu.

**Score** 3

**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.*  **in progress**


**Comment** The site has identified the shared water challenges in the catchment through the Core Area Perspective Plan (CAPP), the site studied the reports available and through engagement with NGOs and government bodies. The main challenges are lowering of water levels, increased demand, high probability of drought, high demand for drinking water. The auditor has reviewed the evidence provided and no evidence of prioritisation could be found in the document. The site is also required to describe the process by which prioritisation was undertaken.  
See Step 1 PDF for Evidence.

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**Finding No: TNR-000917**


**1.6.2** *Initiatives to address shared water challenges shall be identified.*  **Yes**

**Comment** The site has prepared a table which maps the challenges, the corresponding area of focus and the Initiatives which go with them. Much detail has been provided showing the site's comprehensive understanding of the issue. This is evident in the work performed in the catchment to address the shared water challenges.  
See Step 1 PDF for Evidence.

**1.6.3** *Advanced Indicator*  
*Future water issues shall be identified, including anticipated impacts and trends*  **Yes**

**Comment** Geovale Study calculated future scenarios for water demand in the Malur catchment area. The anticipated results showed increased demand on water use across all sectors. Using the IWMA tool the ground water availability will be insufficient to meet demands. The demand will outstrip the supply.


**Score** The Water Risk filter can be used to improve the level of information.  
3

**1.6.4** *Advanced Indicator*  
*Potential water-related social impacts from the site shall be identified, resulting in a social impact assessment with a particular focus on water.*  **Yes**

**Comment** The site has listed their potential social impacts but have used only general terms. See Step 1 PDF for Evidence.


**Score** 1

**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.*  **in progress**

**Comment** The site has identified and prioritised the water risks, with likelihood and severity of impact, however, timeframe, potential cost and potential impact has not been assessed. Only 5 risks have been identified and this can be expanded upon. No timeframes, potential costs nor business impact has been addressed.  
See Step 1 PDF for Evidence.


**Finding No: TNR-000664**

**1.7.2** *Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.*  **in progress**

**Comment** The site has identified several opportunities from the risks already identified. There is only 6 mentioned, however, the site has already initiated many projects which represent opportunities for water-related benefit which are not related to risk. These should be identified and listed. The site has not addressed potential savings associated with the opportunities.

**Finding No: TNR-000665**

**1.8** *Understand best practice towards achieving AWS outcomes: Determining sectoral best practices having a local/catchment, regional, or national relevance.*

**1.8.1** *Relevant catchment best practice for water governance shall be identified.*  **Yes**

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**Comment** The site has identified best practice in governance through their own commissioned studies and also the government studies and initiatives. Engaging with stakeholders has extended this this knowledge and understanding.  
The best practices for the addressing the shared water challenges are identified from the recommendations made from the two study reports (Geovale & Urdhwam) and also from the standard manual for Integrated watershed Development Program (IWMP) and Watershed Guidelines Manual. See Step 1 PDF for Evidence.

**1.8.2** *Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.*



Yes

**Comment** The site has list what they have identified as being Best Practice in Water Balance:  
Water Balance Best Practice  
1. Rain water harvesting in existing & new water harvesting structures –Securing surface & ground water in the unit catchment -Renovation of Tanks, Check Dams, Construction /Formation of Farm Ponds, Sunken ponds, well recharges etc.  
2. Land Treatment: Trench cum Bund, Contour Bund & Water Absorption trenches for Soil Erosion control & Moisture retention in the catchment Private lands. Plantation in Commons  
3. Demand management in agriculture- More than 90 % of surface & ground water is used by agriculture. So need to focus on producing more with less water. Collaboration with Technical institutes to create demonstration plots thru FFS. These initiatives to be taken up in large scale in campaign mode.  
4. Reduction in specific water consumption for the product: Use of water efficient manufacturing practices and technologies to reduce the product water consumption.  
5. Reduction in fresh water consumption for the unit: Adopting water efficient technologies to reduce consumption of fresh water.  
6. Rain water harvesting and use of rainwater: Development of rain water harvesting structures in and around the unit to utilize rain water thereby reducing dependency on surface or groundwater.  
7. Adopting water efficient technologies: Adopting water efficient technologies in water treatment processes to reduce waste water generation.  
8. Reuse and Recycle water: Reuse treated waste water from ETP and STP in landscaping and washing activities inside the unit.  
See Step 1 PDF for Evidence.


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



Yes


**Comment** Many of the Best Practices identified are recommended by government.  
Best on-site practices for water quality are based on national standards as governed by Bureau of Indian Standards (BIS) like:  
1. IS 10500 (2012): Drinking water specification  
Best practices in catchment :  
• Mulching with Organic waste: Farm waste to be applied back to soil. Mulching will reduce the evaporation loss and holds soil moisture for prolonged period. organic holds moisture up to 5 times its weight. This applied farm waste get converted into organic manure and increases the soil organic carbon.  
• Micro Irrigation: Reduces water conveyance loss and feed water to root zone. It reduces 45-50% of water. It also reduces fertiliser requirement. Planned to convert 100% of the area from flood irrigation to Drip thru convergence model.  
• Cover crop /Inter crop: Intercropping with legumes will add revenue to the farmers along with increasing soil fertility and moisture conservation  
• Insitu moisture conservation through trenches, bund stabilisation and ring bunds: Act as catch pits and Capture the run off in the field (60000-80000 litres/Ha).It increases the time of concentration of rainwater. It saves 25-30% of water  
• Modernisation of Irrigation systems: Regular maintenance and updation of structures and equipment's. Collaborate with drip companies to ensure proper maintenance of drip systems  
• Regulated deficit and critical irrigation: Irrigation at crop critical irrigation stages and need based  
• Local cultivars: Encouraging farmers to grow local cultivars which requires less water.  
• Integrated Pest & Nutrient Management (IPM & INM) : Farmers are educated with importance & the benefits from IPM & INM practices where organic pesticides & nutrient management is promoted, This reduces the usage chemical pesticides & fertilizers which intern reduces the agriculture return flows to the aquifers.

Information taken from Step 1 PDF from ITC.

**1.8.4** *Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.*  **Yes**

**Comment** The site has identified the Best Practice on IWRAs from the document Source: IWMP, Central Soil & Water conservation & CGWB Report)

Organising and strengthening Water user groups: To organise stakeholders Farmers and landless to form "water user groups" to own the responsibility to manage the water harvesting structures, to bring water literacy among Farming communities, to improve water productivity and to lead the water saving campaigns  
Water conservation by restoration of water harvesting structures: Augmenting rain water by repair and renovation of water harvesting structures to its original capacity.  
Managed Aquifer Recharge: Groundwater recharge or deep drainage or deep percolation is a hydrologic process, where water moves downward from surface water to groundwater. Recharge is the primary method through which water enters an aquifer.  
Water Literacy among farmers: Various programmes like street plays, Padayatram, awareness mela, video shows will be organised to bring awareness on water usage among farmers. Best practices will be spread through Farmers field school. Water user group leaders will act as ambassadors to reach out all the farmers of the catchment. (Source: IWMP, Central Soil & Water conservation & CGWB Report)

**1.8.5** *Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.*  **Yes**

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### Comment

Best practices for provision of WASH at site is derived from the compliance to The Karnataka Factories Rules 1969.

For catchment, the best practices for provision of WASH is sourced from the document Guidelines for Swachh Bharat Guidelines, an excerpt has been uploaded here as evidence:

1. Regular awareness campaign at village level to sensitize members of community on Sanitation – Health – Hygiene. (Page 4-5,13)
2. Promotion of Sanitation Committees for effective implementation of the program at each village. (Page 28-31)
3. Collaborating with Government departments thru various schemes ( SBM, MNREGS) for implementing Sanitation & SWM Programmes (Page 27)
4. Use of various IEC & Communication tools to bring a behavioral change among community members. (Page- 13,15)
5. Contribution by beneficiaries & village Institutions for WASH support in Schools & Anganwadi's & SWM in villages (Page 16-23).
6. WASH Infrastructures per Swachh Vidyalaya guidelines.

Information taken from Step 1 PDF from ITC.

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-000263




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.		<div><div></div><div>in progress</div></div>
Comment	A copy of the commitment is posted at the entrance of the site and has been attached as evidence. The site's commitment is based on the requirements of Version 1 of the Standard and not Version 2, which is the current version. The site will need to update the commitment to the requirements of Version 2 of the AWS Standard.		
Finding No: TNR-000939			
2.1.2	Advanced Indicator 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 body and publicly disclosed shall be identified.		<div><div></div><div>No</div></div>
Comment	There are two copies posted at the entrance, one signed by the factory manager and the executive Vice president, however no Advanced Indicator points can be awarded against this indicator as the Core Indicator on commitment is not in compliance.		
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.		<div><div></div><div>Yes</div></div>
Comment	The site has a manual legal compliance system but is currently upgrading to an online system with real-time notification of updates. There are designated people assigned to monitor legal compliance. With regards to water-related monitoring/compliance there is a chain of approval for compliance on weekly and monthly basis. The EHS Manager and Factory manager have to sign off on monthly monitoring for compliance. Monthly water treatment results are submitted to Kolar Pollution Board. There is a similar process for Drinking Water, internally for each shift and monthly externally to an accredited lab.		
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.		<div><div></div><div>Yes</div></div>



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Comment	<p>The site has developed a water specific strategy which has a vision and mission. They have identified separate goals for the catchment and the site.</p> <p>Vision Water to All for Today &amp; Tomorrow Mission To achieve water security for all stakeholders by ensuring positive water balance, strengthening water governance at catchment and site &amp; adopting sustainable water use at site by adopting water efficient manufacturing practices and follow reduce, re-use, recycle &amp; reserve principle of water conservation. Goals Catchment: <ul style="list-style-type: none"><li>• Ensure sustainable aquifer management in the catchment</li><li>• Optimise agricultural water usage in the catchment</li><li>• Promote sustainable agriculture practices</li><li>• Promote catchment restoration practices</li><li>• Strengthen water-related governance and institutions in the catchment</li></ul>Site: <ul style="list-style-type: none"><li>• Reduce specific water consumption on a continual basis by improving water use efficiency</li><li>• Continuous monitoring and maintaining treated waste water quality as per statute</li><li>• Maximise reuse and recycle of treated water</li><li>• Create awareness on responsible water consumption</li><li>• To maximise the use of rain water to achieve reduction in fresh water use.</li></ul></p>	
2.3.2	<p><i>A water stewardship plan shall be identified, including for each target:</i></p> <ul style="list-style-type: none"><li>- How it will be measured and monitored</li><li>- Actions to achieve and maintain (or exceed) it</li><li>- Planned timeframes to achieve it</li><li>- Financial budgets allocated for actions</li><li>- Positions of persons responsible for actions and achieving targets</li><li>- Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.</li></ul>	 in progress
Comment	<p>The site has developed a Water Stewardship Plan, separately for the site and also for the catchment. There are 5 targets set for the site. There are targets and actions measurements. All items have been marked as being continuous and budget as per annual CAPEX assigned. There is a generic position assigned to the responsibility. The plan presented in the IRC document is the actual plan for the site.</p> <p>For the Catchment Water Stewardship plan also has generic, broadscale targets and action plans <b>Finding No: TNR-000669</b></p>	
2.3.3	<p><i>Advanced Indicator</i></p> <p><i>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.</i></p>	 Yes
Comment	<p>The site has approved budget to initiate a rain water harvesting project in a neighbouring warehouse also belonging to ITC. Budget has been approved and implementation will be 2023. The rainwater project is estimated to provide 36% of the site's water requirement for one year.</p>	
Score	4	
2.3.4	<p><i>Advanced Indicator</i></p> <p><i>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.</i></p>	 Yes

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**Comment** ITC KOVAI Plant, Tamil Nadu has achieved certification against the AWS standards. ITC Malur is in coordination with ITC PSPD Kovai for understanding, planning and implementing the water stewardship activities in its site and catchment. Knowledge sharing and learnings sharing session were arranged with ITC PSPD Kovai to help the site team to better plan their stewardship activities.

See Step 2 PDF for Evidence.

The site is not awarded with maximum points as the Kovai site's AWS activities are not as a result of interventions initiated by the Malur site.

**Score** 2

### 2.3.5 *Advanced Indicator*

*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.*



Yes

**Comment** The site has selected the water use reduction of 5% and sought consensus internally amongst ITC Stakeholders.

The site has also selected one target from the catchment WS Plan and had meetings with villagers to gain consensus on this one target.

For the site the evidence is accepted to earn points. For the catchment not enough evidence and information has been provided to earn point. Evidence must be in detail, in English, the information presented to stakeholders must be provided as evidence.

**Score** 2

### 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.*



Obs.

**Comment** The site has developed a plan to address the risk identified rather on a catchment scale as opposed to local scale, this refers to long term resilience. The structure of this is a table sharing more than an actual plan. The site has more than enough evidence to prove the site has achieved conformity but presents only a small amount of information. See Step 2 PDF for Evidence.

#### 2.4.2 *Advanced Indicator*

*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.*



Yes

**Comment** The site has selected two risks to base the plan on. There is no evidence of linkage to the Karnataka Climate Change report for the region. At the audit it appears the risks were just selected from the Environmental Reports commissioned for all other activities in the catchment.

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

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

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



Yes

**Comment** The site has been involved in many projects which supported good water governance in the catchment. The site has been working with multiple stakeholders on a collaborative basis since 2017, to improve water governance in the catchment. Water user groups are promoted to plan, implement & manage water resources

Partnerships:

- Study partner: Geovale
- Implementing partner: MYRADA
- Technical partner: Watershed Development Department, Agriculture, Horticulture, Forest
- Tank User Groups (16), Agri Business centres (2) & relevant Gram Panchayats (7) have been involved in all stages of planning & implementation

ITC Manual Step 3 PDF as evidence.

**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** ITC recognises the rights of others. This can be seen in the activities to uplift the lives of the communities as a whole, with regards to the rights of the vulnerable, due to studies undertaken to identify the "ultra poor" and measures taken to ensure their access to water. The site has provided evidence of the Core Area Perspective Plan as evidence.

ITC recognizes the rights to water of farmers & local community.

- WASH facilities
- Water availability for agriculture
- Water availability for drinking
- Water for livestock feeding
- Water for cultural obligations

The water stewardship plan has been specifically designed to recognize these rights by having various interventions.

- Supply side interventions- recognizes the rights to water of Communities
- Demand side interventions- recognizes the rights to water of Communities
- Interventions on WASH in the catchment- recognizes the rights to water of local community

ITC Manual Step 3 PDF as evidence.

**3.1.3** *Advanced Indicator  
Evidence of improvements in water governance capacity from a site-selected baseline date shall be identified.*



Yes








**Comment** The site created an internal water committee responsible for achieving the water stewardship goals of the site. An organogram has been provided which has a scope of work relating to water on the site. See ITC Manual Step 3 PDF as evidence.  
Similarly for the catchment ITC instigated the formation of 15 Tank User groups in villages who meet to discuss and manage the water infrastructure in the villages. The main purpose of the water user groups is to create a sense of ownership of water resources so as to maintain them on self reliance basis through generating maintenance fund and to promote judicious water use. The groups have KPIs and this structure has provided capacity building amongst the group and individuals and demonstrates good governance.

**Score** 2

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<b>3.1.4</b>	<i>Advanced Indicator</i> <i>Evidence from a representative range of stakeholders showing consensus that the site is seen as positively contributing to the good water governance of the catchment shall be identified.</i>	 Yes
Comment	The site has provided letters from a range of stakeholders with whom the site has interacted with on contributing to good water governance, see attached evidence. See ITC Manual Step 3 PDF as evidence.	
Score	2	
<b>3.2</b>	<i>Implement system to comply with water-related legal and regulatory requirements and respect water rights.</i>	
<b>3.2.1</b>	<i>A process to verify full legal and regulatory compliance shall be implemented.</i>	 Yes
Comment	The site has a monthly signed off legal register. Legal compliance is supported by a third party service provider. The register is generated by the site, verified by the head office Legal Team. This is further audited by the Corporate Legal Team. Compliance reports are submitted to the Karnataka State Pollution Control Board. The coming online system will bring real-time notifications and tracking for submissions. See ITC Manual Step 3 PDF as evidence.	
<b>3.2.2</b>	<i>Where water rights are part of legal and regulatory requirements, measures identified to respect the water rights of others including Indigenous peoples, shall be implemented.</i>	 Yes
Comment	At the Site-level, water related rights defined include the compliance with The Karnataka Factories Rules 1969 and IS 1172:1993. (as identified in Indicator 1.3.8).  Within the catchment the site has well documented evidence for respecting the water rights of others.  See ITC Manual Step 3 PDF as evidence.	
<b>3.3</b>	<i>Implement plan to achieve site water balance targets.</i>	
<b>3.3.1</b>	<i>Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.</i>	 Yes
Comment	The site presented data showing the annual performance against water balance as evidence of progress towards meeting water balance.  The site has also catchment targets for which performance over years has been provided. See ITC Manual Step 3 PDF as evidence.	
<b>3.3.2</b>	<i>Where water scarcity is a shared water challenge, annual targets to improve the site's water use efficiency, or if practical and applicable, reduce volumetric total use shall be implemented.</i>	 Yes
Comment	The site has set a target of 5% reduction per annum and per their own internal Water Ratio metric. See ITC Manual Step 3 PDF as evidence.	
<b>3.3.3</b>	<i>Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.</i>	 Yes
Comment	There is no legally binding obligation to re-allocate water for the site.	
<b>3.3.4</b>	<i>Advanced Indicator</i> <i>The total volume of water voluntarily re-allocated (from site water savings) for social, cultural and environmental needs shall be quantified.</i>	 Yes

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Comment	The site reallocates water towards the neighbouring warehouse for their garden watering. The site has plans to develop a rainwater harvesting project next door, this has been budgeted for but not yet implemented.	
Score	3	
<b>3.4</b>	<i>Implement plan to achieve site water quality targets</i>	
<b>3.4.1</b>	<i>Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.</i>	Yes
Comment	The site presented data for the water quality monitoring progress for the last three years. See ITC Manual Step 3 PDF as evidence.	
<b>3.4.2</b>	<i>Where water quality is a shared water challenge, continual improvement to achieve best practice for the site's effluent shall be identified and where applicable, quantified.</i>	Yes
Comment	The site is a zero discharge site, all water is re-used. The site treats to better than the local state standard. Best practice is reuse and not discharge. Continual improvement is not necessary in this case.	
<b>3.5</b>	<i>Implement plan to maintain or improve the site's and/or catchment's Important Water-Related Areas.</i>	
<b>3.5.1</b>	<i>Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.</i>	Yes
Comment	The site has a maintenance plan for the internal IWRAs identified on site. There is a water tank cleaning schedule, preventive maintenance of tanks.  For the catchment the site has listed the interventions put in place for maintenance of the tanks/wells/recharge zone and streams.  See ITC Manual Step 3 PDF as evidence.	
<b>3.5.2</b>	<i>Advanced Indicator 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.</i>	Yes
Comment	The site has mapped the number and location of the IWRAs which they have improved the status of over the recent years. Maps, tables and pictures are available in ITC Manual Step 3 PDF. The site has excellent performance in this area.	
Score	6	
<b>3.5.3</b>	<i>Advanced Indicator 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 Areas in the catchment shall be identified.</i>	Yes
Comment	The site has presented data on engagement with stakeholders. The site has letters from stakeholders confirming the positive contributions towards the improvement of IWRAs.	
Score	2	
<b>3.6</b>	<i>Implement plan to provide access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers at all premises under the site's control.</i>	

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<b>3.6.1</b>	<i>Evidence of the site's provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers onsite shall be identified and where applicable, quantified.</i>	 Yes
Comment	Drinking fountains are provided to staff with clean water which is tested on a daily basis. There are toilets which reach only the minimum number required by the government. These have already been identified in and quantified in Indicator 1.3.8 and 3.2.2. See pictures attached. ITC Manual Step 3 PDF	
<b>3.6.2</b>	<i>Evidence that the site is not impinging on the human right to safe water and sanitation of communities through their operations, and that traditional access rights for indigenous and local communities are being respected, and that remedial actions are in place where this is not the case, and that these are effective.</i>	 Yes
Comment	All catchment level watershed interventions under supply side management & demand side management part of the water stewardship plan are voluntary in nature and have been planned based on stakeholder engagement.  Evidences presented for 2.3.2, 2.3.5, 2.4.1, 2.4.2, 3.1.1-3.1.4, 3.5.1-3 should justify this. Site does not on impinge on human rights to safe water and sanitation of any stakeholder, and therefore there are no remedial actions to show case. ITC Manual Step 3 PDF	
<b>3.6.3</b>	<i>Advanced Indicator 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.</i>	 Yes
Comment	The site has a well developed programme of working with schools to improve WASH situation throughout the catchment. See attached document.	
Score	3	
<b>3.6.4</b>	<i>Advanced Indicator: 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.</i>	 Yes
Comment	See evidence provided of work in schools. Same evidence as previous indicator. Whilst the site is working with public sector agencies and also is an advocate for changes there is still room for more work to be done.	
Score	2	
<b>3.7</b>	<i>Implement plan to maintain or improve indirect water use within the catchment:</i>	
<b>3.7.1</b>	<i>Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.</i>	 Obs.
Comment	There are no indirect water use targets in the water stewardship plan.	
<b>3.7.2</b>	<i>Evidence of engagement with suppliers and service providers, as well as, when applicable, actions they have taken in the catchment as a result of the site's engagement related to indirect water use, shall be identified.</i>	 Yes
Comment	The site has engagement with the maida supplier (fine flour) to encourage water reduction programmes, including implementing water efficiencies and training in WASH. Training and awareness sessions with the maida supplier in the catchment are undertaken by the site to spread awareness on efficient water use in their operations. The water consumption trend of the maida supplier has shown signs of reduction due to water conservation initiatives adopted by them at their production facility. The supplier is working towards improving water use efficiency and water quality at their site. ITC Manual Step 3 PDF for evidence.	

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<b>3.7.3</b>	<i>Advanced Indicator</i> <i>Actions taken to address water related risks and challenges related to indirect water use outside the catchment shall be documented and evaluated.</i>	 Yes
Comment	The site has the evidence for the maida supplier and also the Ratna, laminate on the noodle packet and also a second Mohini Corporation which is a second maida supplier. The site has helped them understand their development challenges including the water risks to the site. Increased access to sanitation provided. The site has provided evidence of the packaging supplier which is outside the catchment, see attached, where the risks have been identified, documented and evaluated. ITC Manual Step 3 PDF for evidence.	
Score	5	
<b>3.8</b>	<i>Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have.</i>	
<b>3.8.1</b>	<i>Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.</i>	 Yes
Comment	The site has evidence of extensive engagement with owners of water infrastructure throughout the catchment on the status of shared water infrastructure. Letters have been provided as evidence.  ITC Manual Step 3 PDF for evidence.	
<b>3.9</b>	<i>Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.</i>	
<b>3.9.1</b>	<i>Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.</i>	 Yes
Comment	Use evidence from the ITC Manual. Best Practice has been achieved and should be shared. Actions are many throughout the villages within the catchment and working with the local public sector agencies. ITC Manual Step 3 PDF for evidence.	
<b>3.9.2</b>	<i>Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.</i>	 Yes
Comment	Catchment interventions have had a positive impact to the catchment water balance as water levels of well have increased since intervention have been implemented.  For the site they have presented a table showing the impact of the interventions on water use reductions. ITC Manual Step 3 PDF for evidence.	
<b>3.9.3</b>	<i>Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.</i>	 Yes

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Comment	<p>Qualitative improvements have been implemented in the effluent treatment plant, oil traps, oil filters, sand filter and UV lights are considered best practice. Second stage RO is best practice not compliance.</p> <p>The water provided for drinking is better quality than that which legislation requires.</p> <p>Several agricultural practices have led to indirect improvement in water quality.</p> <p>ITC Manual Step 3 PDF for evidence.</p> <p>Refer 1.8.3 for identified best practices for both site and catchment. Best practices adopted by the site for improvement in water quality both for domestic water quality as well as for treated waste water quality are listed below:</p> <ol style="list-style-type: none"><li>1. Use of individual RO units at each drinking water centres to provide purified drinking water</li><li>2. Monitoring of the drinking water parameters with in-house and third party certified laboratories to constantly keep track of the water quality.</li><li>3. For improving treated water quality, installation of fat traps/ oil skimmer to reduce the oil and grease load in the effluent. This reduces the effluent load into the ETP for primary treatment thereby effecting the improvement in treated water quality.</li><li>4. Preventive maintenance of the Effluent treatment plant is being carried out to ensure efficient treatment of the waste water and to maintain the treated water parameters well within the prescribed norm of KSPCB and to continuously improve on it.</li></ol>	
<b>3.9.4</b>	<i>Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.</i>	 Yes
Comment	<p>Same as previous indicator on IWRA. The site has a comprehensive programme for the maintenance of IWRAs on site, including maintenance of WTPs, ETP, Rain Water collection pond, tanks etc.</p> <p>With regards to the catchment the site also has implemented the enhancement of IWRAs (tank dams, open wells, check dams) all of which improves access to water for the villages, across the catchment, evidence has been provided in ITC Manual Step 3 PDF for evidence.</p>	
<b>3.9.5</b>	<i>Actions towards achieving best practice related to targets in terms of WASH shall be implemented.</i>	 Yes
Comment	<p>These have already been discussed in detail in Indicators 1.8.5, 3.6.3 &amp; 3.6.4. All activities taken up for improving WASH in the catchment, as showcased in 3.6.3 &amp; 3.6.4 are based on best practices recommended by Swachh Bharat Guidelines by Ministry of Urban Development.</p> <p>Best practices in 1.8.5 is covered in 3.6.3 &amp; 3.6.4</p> <p>At site level, actions are being taken to implement best practices to achieve targets related to WASH such as implementation of a robust system of housekeeping of the WASH facilities. Dedicated expert agency BVG India Ltd. has been deployed to continuously maintain the hygiene and cleanliness of the WASH facilities. All toilet facilities are cleaned every half an hour by trained professionals through defined checklists and records maintained.</p> <p>ITC Manual Step 3 PDF for evidence</p>	
<b>3.9.6</b>	<i>Advanced Indicator Achievement of identified best practice related to targets in terms of good water governance shall be quantified.</i>	 Yes
Comment	<p>The site has presented evidence to support very good performance on this indicator. The site works consistently with all levels of government and public sector agency and water user groups in villages all for the better management of water across the catchment. See ITC Manual Step 3 PDF for evidence.</p>	
Score	6	
<b>3.9.7</b>	<i>Advanced Indicator Achievement of identified best practice related to targets in terms of sustainable water balance shall be quantified.</i>	 Yes



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Comment	<p>The is a signed agreement between Myrad and ITC to implement the catchment activities.</p> <p>Number of tank dams etc.... Budget allocations and targets have been provided for Myrad activities towards improving the catchment water balance. The achievements of these projects have been quantified. The best practices have already been quantified in the 3.3.1 and 3.9.2. ITC Manual Step 3 PDF for evidence.</p> <p>For the site, installation of second RO system. The quantity of water rejected has been reduced as this water can now go to second stage RO system and can used in process. This was a target set by the site to achieve zero discharge status. Many more examples are available in ITC Manual Step 3 PDF.</p> <p>Implementation of aerators on taps- 60% reduction in this area. Condensate from the steamer is now recovered, filtered and used for cleaning of lines. The noodle fryer requires cleaning and the water used is combined with caustic heavy water and re-u-sed. See ITC manual.</p> <p>Toilets are flushed with ETP water.</p>		
Score	6		
<b>3.9.8</b>	<b>Advanced Indicator</b> <i>Achievement of identified best practices related to targets in terms of water quality shall be quantified</i>		Yes
Comment	<p>The site has provided evidence under 3.4.1. and in the ITC Manual Step 3 PDF there is a table which documents the targets for water quality and the results of the water testing performed over time.</p> <p>The site could improve scoring by providing additional evidence to support the table provided.</p>		
Score	4		
<b>3.9.9</b>	<b>Advanced Indicator</b> <i>Achievement of identified best practices related to targets in terms of the site's maintenance of Important Water-Related Areas have been implemented.</i>		Yes
Comment	<p>The site has presented data under 3.5.1, 3.5.2 and 3.5.3 where they have set targets for the development of ponds, tanks, check dams, borewell rehabilitation etc in villages int he catchment and have provided data on the number which ave been achieved.</p> <p>The auditors were able to witness some of these in practice in the villages during the catchment tours. ITC Manual Step 3 PDF</p>		
Score	6		
<b>3.9.10</b>	<b>Advanced Indicator</b> <i>Achievement of identified best practice related to targets in terms of WASH shall be quantified.</i>		Yes
Comment	<p>The site has presented evidence under 3.6.3 and 3.6.4. The site has presented extensive evidence of Best Practice interventions at schools, however the site has not provided the information on the targets and achieving these in relation.</p>		
Score	2		
<b>3.9.11</b>	<b>Advanced Indicator</b> <i>A list of efforts to spread best practices shall be identified.</i>		Yes
Comment	<p>The site has provided evidence to show that they have worked extensively to spread Best Practice in water stewardship throughout the catchment, the main interactions have been around Water User Groups meeting and street games for locals, organised by NGO and gram panchayat, The projects which are best practice and are shared with them have been listed in the ITC Manual Step 3 PDF.</p>		
Score	3		

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<b>3.9.12</b>	<b>Advanced Indicator</b> <i>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.</i>	 Yes
Comment	The site has prepared a table showing the collective actions and the role played by ITC and the institutions and the people involved from the entities. See ITC manual.	
Score	Well documented. 10	
<b>3.9.13</b>	<b>Advanced Indicator</b> <i>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.</i>	 Yes
Comment	Increased soil carbon through intercropping, mulching. Many interventions have led to slow improvement. ITC facilitated the soil testing. The tests show that soil carbon increased by 0.1% through interventions.  Farmer's field school have led to increased yields by 25 % and reduced the cultivation cost by 30%.  Agri business centres developed for the hire of farm equipment, cultivators, threshers and seed drills. Everyone has access to the equipment needed for farming more efficiently. The equipment reduced the cultivation cost by 45% Farmers have more disposable income, switching to ragi will save them money and reduce the amount of water used.  Micro irrigation practice are a requirement of ITC involving in restoration of water infrastructure. Water meters have been installed to track flows however, as farmers are only supplied with power for a limited number of hours per day, irrigation is often restricted to when the power is on.  Changes to irrigation practices over 615 ha has led to 1 M m3 of water saving.  Government bodies have provided letters to give support to the work done by ITC.  Impact due to interventions have included increased in ground water levels and borewell discharge average of 20m increase across 26 borewells. Discharge rates from have increased by 0.19 l/psec Previously defunct boreholes began yielding = 48 because of the interventions facilitated by ITC.	
Score	ITC Manual Step 3 PDF. 8	

4		STEP 4: EVALUATE - Evaluate the site's performance.
4.1	<i>Evaluate the site's performance in light of its actions and targets from its water stewardship plan and demonstrate its contribution to achieving water stewardship outcomes.</i>	
4.1.1	<i>Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.</i>	 Yes
Comment	<p>The site has presented a table for the site in the ITC Manual which tracks the targets in the plan and the result for the year. There are 5 targets and results shown, the site is not currently evolving the targets very much the evolution is to move from 4 to 5 targets. The performance is evaluated during third party ISO audits.</p> <p>For the catchment there are 13 targets set, also not changing each year, instead they do the same activities, however, they extend them further afield each year. The site engaged two expert agencies to implement the actions and targets of the WS Plan. Stakeholder engagement is conducted continuously throughout the year to understand performance and evolve the interventions. The WASH institute/local authorities/accountants then will also evaluate the interventions and verify the activities and monies spent. The site presented screen shots of the reports and letters of appreciation from the recipients. ITC Manual Step 4 PDF.</p>	
4.1.2	<i>Value creation resulting from the water stewardship plan shall be evaluated.</i>	 Yes
Comment	<p>The site has presented a table in the ITC manual where they have captured the economic, environmental and social/cultural value created in their WS activities. This has been presented for the catchment and the site. The site has saved considerable amount of money by water efficiency interventions and this has resulted in less water drawn from groundwater than they would have previously. For example the planting of 4450 trees they have created an indigenous forest for the future. ITC Manual Step 4 PDF.</p>	
4.1.3	<i>The shared value benefits in the catchment shall be identified and where applicable, quantified.</i>	 Yes
Comment	<p>The site has presented 4 main areas where they have identified shared value or all in the catchment.</p> <ul style="list-style-type: none"> <li>a. increased ground water levels</li> <li>b. Water augmentation and recharge at catchment villages</li> <li>c. Impact on organic carbon levels of the soil.</li> <li>d. increase in children's enrolment in schools due to improved wash facilities.</li> </ul> <p>ITC Manual Step 4 PDF.</p>	
4.1.4	<i>Advanced Indicator</i> <i>A governance or executive-level review, including discussion of shared water challenges, water risks, and opportunities, and any water-related cost savings or benefits realized, and any relevant incidents shall be identified.</i>	 Yes
Comment	<p>The site has an annual review performed by the Exec Vice President of each site for all of the requirements, division management review.</p> <p>For the catchment, this is done at village level, catchment level (gram panchayat 5 in the 5 km radius) and senior management of ITC level. Presentations and Minutes from these meetings are available.</p>	
Score	3	
4.2	<i>Evaluate the impacts of water-related emergency incidents (including extreme events), if any occurred, and determine the effectiveness of corrective and preventative measures.</i>	

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<b>4.2.1</b>	<i>A written annual review and (where appropriate) root-cause analysis of the year's emergency incident(s) shall be prepared and the site's response to the incident(s) shall be evaluated and proposed preventative and corrective actions and mitigations against future incidents shall be identified.</i>	 Yes
Comment	<p>No water-related incidents were recorded at the site in the year previous.</p> <p>Site has identified all potential water-related emergency scenarios in the On-site water emergency response plan (OSWERP) and identified suitable action plans against each identified potential scenario. This OSWERP shall help the site to be ready to handle any future water-related emergency scenarios. Details of such water-related incidents if any are also reported in the site's annual sustainability reporting framework.</p>	
<b>4.3</b>	<i>Evaluate stakeholders' consultation feedback regarding the site's water stewardship performance, including the effectiveness of the site's engagement process.</i>	
<b>4.3.2</b>	<i>Advanced Indicator 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.</i>	 Yes
Comment	<p>See ITC Manual. Stakeholder consultation groups in villages occur via water user groups on a monthly basis. Also at catchment level the issues are being evaluated every 6 months. At government department level officials are invited to visit the projects in the catchment, usually only once a year.</p> <p>Meeting minutes and registers are used to capture the feedback from these groups.</p> <p>When projects are handed over to villages/WUG/gram panchayat there is a project file presented and they have to sign acceptance of the receiving the new infrastructure.</p> <p>The site's evidence is not in English except for one document. The document appears to be meeting minutes which includes suggestions for continual improvement but not evaluation of the site's efforts.</p>	
Score	2	
<b>4.3.1</b>	<i>Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.</i>	 in progress
Comment	<p>The site has presented photos from meeting where ITC has engaged with stakeholders meetings held on special days (World Water Day, Environment Day, World Soil Day etc). The site has not presented evidence relating to consultation efforts on the water stewardship performance.</p> <p><b>Finding No: TNR-000942</b></p>	
<b>4.4</b>	<i>Evaluate and update the site's water stewardship plan, incorporating the information obtained from the evaluation process in the context of continual improvement.</i>	
<b>4.4.1</b>	<i>The site's water stewardship plan shall be modified and adapted to incorporate any relevant information and lessons learned from the evaluations in this step and these changes shall be identified.</i>	 in progress
Comment	<p>The site has not presented the plan in as a separate plan, they have given tables which seems to suggest they are part of a larger plan. The site has had many learnings but not be able to demonstrate how the plan has evolved as a result from the evaluations.</p> <p><b>Finding No: TNR-000729</b></p>	

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5	STEP 5: COMMUNICATE & DISCLOSE - Communicate about water stewardship and disclose the site's stewardship efforts		
5.1	Disclose water-related internal governance of the site's management, including the positions of those accountable for legal compliance with water-related local laws and regulations.		
5.1.1	The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.		Obs.
Comment	The site has presented an organogram for the factory with regards to water-related compliance, this is displayed on a sign board at the main gate, along with positions of staff.		
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.		in progress
Comment	The site has disclosed the outcomes of the water-related projects which have been implemented by having a painted wall with the outcomes there is no link to the AWS Outcomes. The actual water stewardship plan has not be disclosed.		
	Finding No: TNR-000730		
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.		closed
Comment	The site has annual Stakeholder meeting for disclosure of water stewardship activities, these are department officials, local communities, local authorities. The site was unable to provide evidence as to what information was disclosed to the communities, provided only evidence of the meeting with stakeholders.		
	Finding No: TNR-000944		
5.3.2	Advanced Indicator The site's efforts to implement the AWS Standard shall be disclosed in the organization's annual report.		Yes
Comment	ITC Sustainability Report is published annually. The is a national report for India. Director's Annual Report has to have environmental report in it. See ITC Manual Step 5 for Evidence.		
Score	1		
5.3.3	Advanced Indicator Benefits to the site and stakeholders from implementation of the AWS Standard shall be quantified in the organization's annual report.		Yes
Comment	Same report as above. See ITC Manual Step 5 for Evidence.		
Score	1		
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.		

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<b>5.4.1</b>	<i>The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.</i>	 Yes
Comment	The site discloses to the Village level, Catchment level and State Level in the same annual stakeholder disclosure meetings. The site presented several newspaper articles documenting the meetings.	
<b>5.4.2</b>	<i>Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.</i>	 Yes
Comment	The site presented a table which shows the listed public sector stakeholders engaged in, the work in which the co-ordination took place. There is presented a list of the type of evidence held of that co-ordinations. MOUs, letters, minutes etc.	
	Some examples of evidence have been included in the ITC Manual Step 5.	
<b>5.5</b>	<i>Communicate transparency in water-related compliance: make any site water-related compliance violations available upon request as well as any corrective actions the site has taken to prevent future occurrences.</i>	
<b>5.5.1</b>	<i>Any site water-related compliance violations and associated corrections shall be disclosed.</i>	 Yes
Comment	There have currently not been any water-related compliance violations documented by the site. This has been verified through other external third party audits, legal requirements for public disclosure and internal ITC management practices.	
	The issue of compliance around the unused boreholes permitting requires investigation.	
<b>5.5.2</b>	<i>Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.</i>	 Yes
Comment	Corrective actions are not necessary as there have not been any compliance violations.	
<b>5.5.3</b>	<i>Any site water-related violation that may pose significant risk and threat to human or ecosystem health shall be immediately communicated to relevant public agencies and disclosed.</i>	 Yes
Comment	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. Based on the stringent practices and systems in the site related to zero effluent discharge, robust water quality treatment and monitoring systems, multilevel validations by third parties chances of violation causing significant risk and threat to human or ecosystem are very less. Site shall continuously monitor the best practices and are well prepared to handle any on-site water related emergency that can pose a significant risk and threat to human or ecosystem health and will communicate to all public agencies through defined reporting protocols. ITC Manual Step 5	

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### Photographic Evidence from Audit



ETP Equalization Tank .JPG



ETP Tanks (2).JPG



Steam condensate recovery tank.JPG



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## Alliance for Water Stewardship (AWS)

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Flowmeter- Raw water.JPG



Hand wash station (1).JPG



ETP Secondary clarifier tank.JPG



WSAS

2 Quality Street North Berwick, EH39 4HW, UNITED KINGDOM



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## Alliance for Water Stewardship (AWS)

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Raw water tank.JPG



Flowmeter Canteen.JPG



Rain water collection pond.JPG



2nd Raw water storage tank.JPG



ETP Aeration Tank.JPG

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Flowmeter for Filtered water to Process.JPG



Urinals in Toilets.JPG



Raw water tank (1).JPG



ETP Tanks (1).JPG

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Basin.jpg

✓  
Yes



RO plant.JPG



Factory Boundary.jpg