

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000390

SITE DETAILS

Site: **ITC Kovai Plant**

Address: Thekkampatti Village, Vivekanandapuram Post, Karmadai Block, Mettupalayam Taluk, Coimbatore district, Tamil Nadu, INDIA

Contact Person: Sanjib Bezbaroa

AWS Reference Number: AWS-000059

Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Platinum

Date of certification decision: 2023-May-08

Validity of certificate: 2026-May-08

AUDIT DETAILS

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

Audit Type(s): Re-Certification Audit

Audit Start Date: 2022-Oct-17

Lead Auditor: Bharat Nagar

Audit team participants:

Amit Singh

Site Participants:

Mr. Venkat Rao, Unit Head

K Saleem, Head Finance

K. Rajkumar, Head Quality

M. Vijayakumar, Head -Human Resource

Murali, Head - Production

Alagiri, Head-Engineering

Raghupathy, Head - EHS

Premaguru, Head- Water Utility

M. Dinesh, Sr. Program Executive- Water

Muralidharan, Sr. Mgr. - Stocks Preparation

R. Veman, Sr. Mgr.- Corporate Energy & Sustainability

Manish Kumar, Program Manager- MSK

Kunjappan, Leader - Quality

Veeraman, Manager- Plantations

Sreejith Nair, Manager - Learning & Development & Admin

Bharat Bhushan Nagar, Lead Auditor

Amit Singh, Local Auditor

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AUDIT TIMES

Dates	Audit from	Duration	Auditor	Description
2022-Oct-17	09:00:00 - 17:30:00	08:30	Amit Singh, Bharat Nagar	
2022-Oct-18	09:00:00 - 17:30:00	08:30	Amit Singh, Bharat Nagar	
2022-Oct-19	09:00:00 - 17:30:00	08:30	Amit Singh, Bharat Nagar	

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ADDITIONAL INFO

Summary of Audit Findings: A total of 26 findings were raised during the certification audit, 4 major non-conformities, 8 minor non-conformities and 14 observations. The major non-conformities were of sufficient concern to warrant the categorization of the non-conformity as major and related to the five outcomes from AWS standard.

The Client is requested to perform a root cause analysis and define corrective actions for each of the non-conformities and to submit these to WSAS within 60 days of receipt of the audit report by 25/3/2023.

The major non-conformities must be sufficiently addressed and evidence submitted to WSAS within 90 days of receipt of the report by 25/04/2023.

Minor non-conformities must be closed out by the time of the next annual audit.

The audit team recommends maintenance of certification of ITC Kovai 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-conformity and submitted the corrective action plan addressing all findings.

Proof of implementation has been requested for the Minors and this will be evaluated during the Surveillance Audit. The client is requested to upload evidence of implementation prior to the Surveillance Audit.

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Scope of Assessment: The scope of services covers the re-certification audit for assessing the conformity of ITC PSPD, Kovai, Distt. Coimbatore, Tamil Nādu state, India against the AWS International Water Stewardship Standard Version 2.0.

ITC's Paperboards and Specialty Papers Division (ITC-PSPD), is amongst the leading names in the business worldwide. With an emphasis on harnessing state-of-the-art technology, the ITC Papers division has emerged as the largest manufacturer of Packaging and Graphic Boards in South Asia. In the endeavor to move up the value chain, its portfolio of products and services has consistently grown over the years. Today, its products and pool of knowledge-based services are much sought-after by discerning customers, both in India and internationally, for sustaining and improving their competitiveness. The ITC PSPD unit is the Client company and is located at Kovai village located 24 km from the main Coimbatore Urban area. Coimbatore airport is the nearest airport serving the facility. The plant has a paper board manufacturing unit using recycled paper with an annual production capacity of 0.1 million tons per annum. The main plant facilities include waste paper recycling and its conversion into paper bond; water intake-point, wastewater and sewage recycling unit; captive power plant, and other associated ancillary units that were included in the assessment.

The facility is located in the PSPD Kovai unit is situated in the Bhavani river basin. So the entire Upper Bhavani basin is taken for study & for long-term interventions (2.3 Lakh Ha). For development initiatives priority area (20,709 Ha) is considered which is the immediate catchment of the Kovai Unit. 29 Micro watersheds are demarcated in Priority area for Execution of Water Stewardship Initiatives, with 8 working panchayats - Thekkampatti, Maradhur, Kemmarampalayam, Kalampalayam, Veliangadu, Tholampalayam, Odanthurai and Nellithurai.

The audit was conducted onsite on 17-19 Oct 2022.

The onsite site visit included the assessment of the PSPD Kovai production facility (including water in-take reservoir, Boiler & Power production, Paper hydro-pulping, Vacuum pump-house, electrical and water utilities, chemical storage area, scrap area, WTP, STP and other IWRAs) and surrounding catchment area villages the facilities [school sanitation project, stake-holder consultation and water storage check dam and ground-water recharging area, site and activities that were visited onsite as part of the audit].

The following external stakeholder interviews were conducted during the audit:

1. Tamilnadu Pollution Control Board; Coimbatore, Tamil Nadu
2. Government higher secondary school , Kovai, Coimbatore, Tamilnadu, India
3. Kalampalayam water user groups association Representative ; Seeliyur Vikkage, Kovai,
4. Sanitation committee representatives; Seeliyur Vikkage, Kovai,
5. Indigenous Community, Seeliyur Vikkage, Kovai,
6. Kalampalayam panchayat, Kovai
7. Bharathi Nagar Water User Group

SCORE

131.00

FINDINGS

NUMBER OF FINDINGS PER LEVEL

Observation	14
Minor	8
Major	4

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FINDING DETAILS

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Finding No:	TNR-001876
Checklist Item No:	1.3.4
Status:	Closed
Finding level:	Major
Due date:	2023-Apr-25
Checklist item:	Water quality of the site’s water source(s), provided waters, effluent and receiving water bodies shall be quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be quantified.
Findings:	During the data analysis, it was observed that Chloride content in ETP treated water (being used in landscaping) has crossed the maximum limit from Jul’21 to Feb’22, which is a violation of consent to operate. Even site did not produce supporting reports and communication with TNPCB.

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Corrective action: Site has complied to the consent conditions including the chloride limit.

Chloride sample testing results available at site were:

Month	Chloride level (in ppm)	Month	Chloride level (in ppm)
Apr-21	497		
May-21	528		
Jun-21	510		
Jul-21	656	Jul-22	558
Aug-21	691	Aug-22	470
Sep-21	822	Sep-22	549
Oct-21	667	Oct-22	562
Nov-21	606	Nov-22	554
Dec-21	726	Dec-22	555
Jan-22	737		
Feb-22	615		
Mar-22	586		

Prior to Jul'22, Consent to operate dated: 18/07/2022 issued by the TNPCB was valid. This consent does not prescribe any limit on the chloride content. Therefore, it was not a critical parameter from the compliance perspective.

However, consent to operate dated: 18/07/2022 issued by TNPCB is valid thereafter. It prescribes 600ppm for paper machine effluent and 1000ppm for power plant effluent. Since the site has only one effluent treatment plant for both paper mill effluent and power plant effluent, lower of the two limits (i.e. 600ppm) on chloride content is now monitored and adhered to. as can be seen in the table above as

- The Chloride content in Treated effluent has not exceeded 600 ppm limit after July'22.

Hence, Unit has complied with CTO.

Corrective Action :

- Since the introduction of prescribed limit on chloride content in effluent from July 2022, the chloride content in the ETP (effluent treatment plant) is being monitored and its compliance tracking is adhered to . (The details of which can be found in attached table and reports) .

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Finding No: TNR-001878
Checklist Item No: 1.3.4
Status: Closed
Finding level: Minor
Due date: 2023-Oct-17
Checklist item: Water quality of the site’s water source(s), provided waters, effluent and receiving water bodies shall be quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be quantified.
Findings: The site was unable to share reports of water Quality report (the latest) of 10 piezo wells.
Corrective action: Site Comment :

- Unit is having a tie-up with TNAU (Tamil Nadu Agriculture University) for monitoring of ground water in and around the own irrigation land. By Annually, TNAU submits the report along with other study parameters in hard copy. The water parameters were well within the limit and site was not able to share the report due to size constraint.

Corrective action:

- Unit is having a tie-up with TNAU (Tamil Nadu Agriculture University) for monitoring of ground water in and around the own irrigation land. TNAU submits the water quality report yearly to the site. This is shared with State Pollution Control Board.
- Site has attached the water quality reports for all 10 piezo wells.

Evidence of implementation:

- Site has attached the water quality reports for all 10 piezo wells.

Finding No: TNR-001879
Checklist Item No: 1.3.5
Status: Open
Finding level: Observation
Checklist item: Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.
Findings: During the audit trail of the plant site area, lubricant drums were found stored in the scrap material area, which could act as a potential source of oil spillage causing surface water runoff pollution. Similarly, no pallets were observed beneath the stored oil drums to arrest any anticipated oil spillage.

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Finding No: TNR-001880
Checklist Item No: 1.3.5
Status: Open
Finding level: Observation
Checklist item: Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.
Findings: During the audit trail of the plant site area, Chemical spillage near the vacuum pump area was observed.

Finding No: TNR-001886
Checklist Item No: 1.3.8
Status: Closed
Finding level: Minor
Due date: 2023-Oct-17
Checklist item: Levels of access and adequacy of WASH at the site shall be identified.
Findings: The site could not provide information on the daily generation of sewage on the plant premises.
Corrective action: Site Comments :

- Unit is having the two Sewage Treatment Plant (STP) inside the plant premises with a capacity of 23 KLD & 50 KLD. STPs are having the flow measurement at discharge point and doesn't have at inlet.
- As per TNPCB Consent Unit to have flowmeter at discharge point which unit was following for compliance. Further, it was directed to connect to ETP inlet to have single discharge from ETP which Unit has complied.

Corrective Action :

- Sewage is first treated in the two Sewage Treatment Plant (STP) inside the plant premises. Treatment sewage is discharged to the Effluent Treatment Plant (ETP) for further treatment. Post the final treatment, the overall effluent meets the discharge water quality norms. (Attached reports for sewage/effluent quality norms.)
- Sewage is measured at the STP discharged outlet that goes to ETP. This is in compliance with TNPCB consent which asks for the STP discharge flowmeter.

Evidence of implementation:

- Sewage quality test reports
- Attached daily data of STP discharge to ETP.

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Finding No:	TNR-001887
Checklist Item No:	1.3.8
Status:	Closed
Finding level:	Minor
Due date:	2023-Oct-17
Checklist item:	Levels of access and adequacy of WASH at the site shall be identified.
Findings:	<p>The site failed to provide evidence information/surveys/studies on ease of access and efforts made to positively influence behaviors; Data related to hand-washing facilities with running potable water, soap, and means of hand drying available per toilet and at every eating, food preparation, and cooking facility were absent.</p> <p>Site has failed to ascertain how many people are expected to use the hygiene facilities and if the timing of use is clustered at specific points in the day during the audit.</p>

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Corrective action:

Site Comments :

- Site has covered basic information about hand washing facilities and dryer available details in AWS manual under the indication number - 1.3.8.
- Total manpower strength of the Unit is close to 880 which includes Company Employees, Managers & Employees of Service Providers.
- Access to water for drinking and washing is provided at all relevant places adequately which is detailed in manual. Further, access to water & wash room is provided at work place area for within reasonable distance in every department. Only 30% of the total manpower come in general shift while balance 70% of them come in three shifts in a day.
- Unit has canteen to provide breakfast & lunch for the total manpower. Breakfast is served only at workplace. For lunch, 90% of shift manpower take lunch at workplace.
- Canteen serves lunch close to 200 people at canteen which is served between 12.30PM to 2.30PM for which adequate WASH facility is provided.

Corrective Action :

- Total manpower strength of the Unit is 880 which includes Company Employees, Managers & Employees of Service Providers. Access to water for drinking and washing is provided at all relevant places adequately which is detailed in manual. Further, access to water & wash room is provided at work place area for within reasonable distance in every department. Unit has canteen to provide breakfast & lunch for the total manpower. Breakfast is served only at workplace. For lunch, 90% of shift manpower take lunch at workplace. Handwashing facilities are also available in the canteen. Handwashing and sanitation facilities are adequate as per the Factories Act and OHS Code 2020. Site has covered basic information about hand washing facilities and dryer available details in AWS manual under the indication number - 1.3.8. However, we will conduct a detailed survey involving own as well as contract employees to understand their concerns on adequacy of WASH facilities.
- Site provides dining facilities in the premises. The canteen has a capacity of about 200 to 250 people. In order to avoid crowding in the canteen, timing has been extended to accommodate everyone, for example, lunch is served from 12:30PM to 2:30PM. Also, it is a continuous process plant which has to be manned continuously. Therefore, workers use dining facilities in a staggered manner.

Evidence of implementation:

- Attached the Manpower strength of the Unit in a month.

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Finding No:	TNR-001889
Checklist Item No:	1.4.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Oct-17
Checklist item:	The embedded water use of outsourced services shall be identified, and where those services originate within the site’s catchment, quantified.
Findings:	The site could not provide details of WASH usage and water consumption of six finished goods conversion centers located in the catchment.
Corrective action:	Site Comment:

- There are six out sourced finished goods conversion centers. Facilities are meant for converting reels into sheets and packing for dispatch. Process does not require water.
- Packaged water is procured for drinking purpose. Very minimum quantity of water used for domestic purpose and adequate wash room facilities are available at out sourced centers.

Corrective Action :

- There are six out sourced finished goods conversion centers. These facilities cut paper in the reel form to sheets. This process does not require water. However, these facilities will be using water for domestic purposes, e.g. drinking, washrooms etc. This water consumption is not yet monitored. Unit will start monitoring the water Consumption for all Goods Conversion Center.
- In addition, these vendors have signed code of conduct conforming compliance to EHS regulations (e.g. Factories Act) which includes regulatory requirements on WASH.

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Finding No:	TNR-001898
Checklist Item No:	1.5.4
Status:	Closed
Finding level:	Minor
Due date:	2023-Oct-17
Checklist item:	Water quality, including physical, chemical, and biological status, of the catchment shall be identified, and where possible, quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be identified.
Findings:	During the audit, no details on an indication of annual, and where appropriate, seasonal, high, and low variances were found.
Corrective action:	Site conducts Pre & Post Monsoon water quality testing of both surface and sub-surface water. Below are the latest test results. Refer Annexure Pre-Monsoon Water Testing Result (October 2022): Refer Annexure Post- Monsoon Water Test Result (Feb 2023): Seasonal variations in water quality were monitored from the above reports. These were helpful in making decisions on planning interventions in the catchment. Inferences: As per the Pre & Post monsoon test result displayed above physical, chemical and biological parameters are well within limit and also there is no much difference in both test result.
Evidence of implementation:	<ul style="list-style-type: none">Pre and Post Monsoon Water Testing Report

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Finding No:	TNR-001897
Checklist Item No:	1.5.4
Status:	Closed
Finding level:	Major
Due date:	2023-Apr-25
Checklist item:	Water quality, including physical, chemical, and biological status, of the catchment shall be identified, and where possible, quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be identified.
Findings:	During the site data analysis in the AWS manual, it was found that data for surface water and groundwater shows an extremely high presence of nutrients - Phosphorous. This may or may have led to the eutrophication status of surface water bodies. The high presence of phosphorous may be due to the high leaching of fertilizer residues. This same concern was seen for groundwater as well. This may have severe challenges to the water quality in the catchment area and its relevance to the water stewardship plan. The site should put in place a plan to monitor and track the situation.

Corrective action:

Site is aware about the high content of phosphorous in the catchment groundwater which can be mainly attributed to eutrophication of minerals through parent material in catchment. Since 2016, Sustainable Agriculture Intervention is getting practiced in the catchment with objective to optimize water and nutrient usage for higher productivity. In our operation, we regularly do catchment water testing during Pre and post monsoon for getting the real time status of water quality in the catchment. This in turn helps the team in assessing the impacts of their interventions.

The plans were formulated by engaging with different stakeholders like farmers, Tamil Nadu Agriculture University (TNAU), Gram Panchayat, etc. Some of the noteworthy interventions have been as follows

☑ Usage of fertigation schedule instead of normal application during intercultural operation phase.

Through training, ITC has trained catchment farmers regarding fertigation for fertilizer application along with irrigation schedule. Before our intervention, farmers were applying it manually, which could have utilization potential of merely 25-30% and remaining were losing out in form of denitrification or leaching into ground water or Run-off loss in sub-surface water. Through Fertigation, farmers got aware about fertilizer application along with irrigation schedule. This practice increases the fertilizer usage potential as well as check fertilizer loss through leaching and de-nitrification. So, in long run, this practice will reduce the level of nitrogen and phosphorus in surface as well as sub-surface water.

☑ Split dose application:

earlier, farmers were applying entire fertilizer into single dose in case of Coconut & Curry leaf and in 2-3 dose in Banana. This practice also causing the same impact on ground as well as surface water as explained in above point. Under our Sustainable Agriculture Program, we educated farmer to split the fertilizer requirement on monthly basis instead of single bulk dose. This practice impacted in the form of efficient nutrient usage as well as loss termination. So, in long run, this practice will also reduce the level of nitrogen and phosphorus in surface as well as sub-surface water

Reference- Above attached IEC Snap

☑ Fertilizer usage based upon Soil Test Result:

We have divided our catchment area into different Grid (1 Grid=10 Ha) and annually we do soil testing pri and post monsoon to track the organic carbon as well as available nutrient status and train farmer to supplement the soil with existing nutrient gap only. This practice also optimizes nutrient usage as well as curbing nutrient loss. So, in long run, this practice will also reduce the level of nitrogen and phosphorus in surface as well as sub-surface water

☑ Nutrient application through Drone:

We have piloted this during last financial year and now slowly it is picking up in the catchment. Drone application apply nutrient on the leaf, hence its absorption potential got enhanced and simultaneously loss also gets checked as nutrient does not come in contact with soil. So, in long run, this practice will

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also reduce the level of nitrogen and phosphorus in surface as well as sub-surface water

☑ Creation of Managed Aquifer Recharge in the catchment:
Through water stewardship program, we have done renovation/new construction of 550 Water Harvesting Structures. Now, we are focusing on recharging the shallow unconfined aquifer in the catchment through MAR (Managed Aquifer Recharge). It recharges the available wells in the catchment resulting into dilution of ground water, which finally brings down the dissolved phosphate and nitrate percentage in the ground water

☑ Farmer Coverage:
Through above mentioned training, we have trained a total of 2200 farmers in the catchment through direct intervention. So, numbers are significantly high which shows training will impact in positive manner and we will be able to achieve our objective.

Refer 1.5.4: Quality test report catchment – (TWAD)

Refer 1.5.4: Gram Panchayat resolution copy to take up LWM & FSM activity in the villages

Refer 1.5.7: Refer water quality plan

Evidence of implementation: Evidence detailed in Corrective Action Section

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Finding No:	TNR-001899
Checklist Item No:	1.5.7
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Oct-17
Checklist item:	The adequacy of available WASH services within the catchment shall be identified.
Findings:	The data provided does not assess the percentage of the population with access to safe WASH in the communities as well as the impacts, challenges, or barriers to access and opportunities in the communities.
Corrective action:	Refer annexure, Percentage accessibility as well as usage of safe sanitation in the catchment are as,

Corrective Action :

- We conduct regular survey about adequacy of WASH availability and usage in the catchment. We are also assessing the WASH need in the School and Anganwadi in the catchment and proper plans are in place to provide the solution to these problems.
- Following table highlights households having accessibility as per the survey done by the team which was included in indicator 1.5.7 in the manual.
- On the basis of surveys and community discussion, it was highlighted that there are some left of beneficiaries (LOBs) who have a challenge in building toilet in their home due to space constraint. So in order to address this issue, development of Community Toilets is being planned.
- We will adopt a more comprehensive approach towards identifying impacts, challenges, or barriers related to WASH related infrastructures and same would be explicitly mentioned in the subsequent manuals.

Evidence of implementation:	<ul style="list-style-type: none">• Individual Household Toilet (IHHT) usage data in catchment• WASH need assessment in the Schools
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Finding No:	TNR-001953
Checklist Item No:	1.6.1
Status:	Open
Finding level:	Observation
Checklist item:	Shared water challenges shall be identified and prioritized from the information gathered.
Findings:	The site fails to demonstrate share compliances related to WASH Guidance 2022, focusing on - identifying shared water challenges and any existing initiatives aimed at addressing those challenges with a focus upon reflection on WASH's status as a human right and an enabler of economic growth.

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Finding No: TNR-001959
Checklist Item No: 1.8.2
Status: Open
Finding level: Observation
Checklist item: Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.
Findings: It is shown that the SWC (only process) is better than the national benchmark. This has to be revised as it is not the national benchmark but the maximum allowable limit.

Finding No: TNR-001960
Checklist Item No: 1.8.2
Status: Open
Finding level: Observation
Checklist item: Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.
Findings: It is shown that the plant SWC is better than the Global benchmark - The document that which plant is referring to is quite old and should be updated with other corresponding international standards if the national value has not been updated in recent years.

Finding No: TNR-001961
Checklist Item No: 1.8.3
Status: Open
Finding level: Observation
Checklist item: Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.
Findings: The rationale for data sources related to catchment best practices for water quality water to be provided

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Audit Number: AO-000390

Finding No:	TNR-001963
Checklist Item No:	2.1.1
Status:	Open
Finding level:	Observation
Checklist item:	A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments: <ul style="list-style-type: none">- That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes- That the site implementation will be aligned to and in support of existing catchment sustainability plans- That the site’s stakeholders will be engaged in an open and transparent way- That the site will allocate resources to implement the Standard.
Findings:	Water stewardship policy to be displayed in conference room, shop floor, canteen and more common areas.

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Finding No:	TNR-001965
Checklist Item No:	2.3.2
Status:	Closed
Finding level:	Major
Due date:	2023-Apr-25
Checklist item:	A water stewardship plan shall be identified, including for each target: <ul style="list-style-type: none">- How it will be measured and monitored- Actions to achieve and maintain (or exceed) it- Planned timeframes to achieve it- Financial budgets allocated for actions- Positions of persons responsible for actions and achieving targets- Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.
Findings:	Indicators 4 and 5 of the water stewardship plans for the catchment area and their related unit of the measure require re-defining.

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Corrective action:

Site Comments :

Site has identified 5 shared water challenges in the catchment namely Non Uniform flow, ground water availability, Increasing water demand in Agriculture, No proper grey water & faecal sludge management and Water Quality. Point 4 & 5 are pertaining to Ground water quality. Site has segregated into two component based on Physical, Chemical & Biological parameter.

Point 4 – No Proper grey water & faecal sludge management: Due to improper management of household waste, it is contaminating Biological parameter of the surrounding surface water for example E. Coli. Although levels are in permissible limit, we are focusing to reduce the level of E. coli & other Biological parameters.

Point 5 – Water Quality (Chemical parameter): As we noticed Nitrate & Chloride levels are high in 20 % of samples due to chemicals leach out from the farms. It leads eutrophication and causes the eco system. So to address this issue site drive Climate smart Agriculture program in focused catchment.

Corrective Action :

At present, the site has displayed the water stewardship performance in a quantified manner as wall paintings on the walls of the catchment villages (community notice board) and display board at the entry point of the village. Photographs of such displays are readily available with the site and have been attached here for your reference.

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.

In Addition, site conducts Water Mela Annually, where all relevant stakeholders gather, discuss and finalize water stewardship plan of the catchment.

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.

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.

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

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following link:

<https://www.itcportal.com/sustainability/sustainability-reports.aspx>

The necessary evidences to justify the above have been attached in the evidence of implementation

In order to address these points (4 &5), site has partnered with Gram Panchayat, Tamil Nadu Agricultural University, IHS – Indian Institute of Human settlements & NGOs to prevent water quality issues with participatory approach by the all stakeholders.

Evidence of implementation: Revised Water Stewardship Plan for the catchment

Refer 2.3.5 Stakeholder involvement for categorization of Shared water challenges

Refer 2.4.2 Agencies involved to address shared water challenges & Other parameters

Refer 3.1.4 For Stakeholder engagement

Refer 3.6.4 For to address point no 4 & 5 Shared water related challenges with public sector

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)



Audit Number: AO-000390

Finding No:	TNR-001966
Checklist Item No:	2.3.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Oct-17
Checklist item:	A water stewardship plan shall be identified, including for each target: <ul style="list-style-type: none">- How it will be measured and monitored- Actions to achieve and maintain (or exceed) it- Planned timeframes to achieve it- Financial budgets allocated for actions- Positions of persons responsible for actions and achieving targets- Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.
Findings:	The site does not show the relationship between the knowledge acquired through stakeholder engagement and its inclusion in the water stewardship plan as per WASH guidance 2022. For example, the water stewardship strategy shows benchmarking of existing WASH benchmarks in the stewardship area, but is not addressed in the plan.

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Corrective action:

Site Comments :

Site conduct survey at regular interval to assess the WASH need in the catchment through engaging different types of stakeholders.

☑ At Individual level catchment became ODF (Open Defecation Free), but still there are some Left over Beneficiaries (LoBs). Same had been come during community discussion that some beneficiaries do not have toilet because of space constraints, so to include them in plan for WASH adequation in the area, they had been planned through Community Toilet

☑ At Community level, to maintain the WASH adequacy, it came during community discussion to include School under WASH. Through community intervention, we assessed the WASH infra gap in the school and accordingly catchment is planning to cover it in near future;

Corrective Action

- Site conduct survey at regular interval to assess the WASH need in the catchment through engaging different types of stakeholders. On the basis of community discussion, it was identified that building toilets in the community is one of the key areas. So it was incorporated in ITC's Plan. The interventions have supported the households in building toilets wherever possible. However, there are some Left over Beneficiaries (LoBs) who do not have space to build toilets. So in order to address this issue, development of Community Toilets is being planned. so to include them in plan for WASH adequation in the area, they had been planned through Community Toilet.

- Moreover, at Community level, to maintain the WASH adequacy, it came during community discussion to include School under ITC's WASH initiatives. Through community intervention, we assessed the WASH infra gap in the school and subsequently plan was developed to address this.

- These initiatives are a few examples of how stakeholder engagement has led to planning of WASH related interventions in the catchment.
- The plan currently does not highlight this aspect of WASH related interventions and stakeholder engagement process. This is being comprehensively looked into and the plan will be modified in future to address the necessary requirements.

Evidence of implementation:

- Community Toilet need Survey analysis
- WASH need assessment in the Schools

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Alliance for Water Stewardship (AWS)

Audit Number: AO-000390

Finding No:	TNR-001967
Checklist Item No:	2.4.1
Status:	Open
Finding level:	Observation
Checklist item:	A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.
Findings:	The site fails to categorize the identified water risks developed in coordination with relevant public-sector and infrastructure agencies as adaptive and mitigative types.
Finding No:	TNR-001969
Checklist Item No:	3.1.1
Status:	Open
Finding level:	Observation
Checklist item:	Evidence that the site has supported good catchment governance shall be identified.
Findings:	Findings from the impact assessment report to be shared.
Finding No:	TNR-001971
Checklist Item No:	3.3.2
Status:	Open
Finding level:	Observation
Checklist item:	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.
Findings:	Deviation of 17% recorded against planned annual target of 5% reduction in SWC, which requires attention.

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Audit Number: AO-000390

Finding No: TNR-001972
Checklist Item No: 3.6.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2023-Oct-17
Checklist item: 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.
Findings: The site has failed to demonstrate compliances related to WASH Guidance 2022 – Evidence of improvements to the provision of drinking water, toilets, washing facilities, hygienic areas for food and drink consumption and potentially showers, as well as awareness raising and training, and any additional efforts to positively influence behaviours. Evidence on Measures taken to improve WASH provision at the site take account of gender, work schedules and incentive structures – as explained below – as well as any other special needs.
Corrective action: Site Comments :

- The new WASH guideline was released on 5th August 2022.
- Unit has registered for AWS re certification audit in the month of Sep’22
- As a continuous journey, Unit has taken a various activity on WASH requirements, however revised guideline compliance is not covered in the manuals due to shortest time.

Corrective Action :

- As a continuous journey, unit has taken a various activity on WASH requirements, and will cover the requirements as mentioned in the new WASH Guidance 2022 in subsequent AWS manuals.

Evidence of implementation: NA

Finding No: TNR-001978
Checklist Item No: 3.8.1
Status: Open
Finding level: Observation
Checklist item: Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.
Findings: Share evidence of engagement with the vulnerability group.

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Alliance for Water Stewardship (AWS)

Audit Number: AO-000390

Finding No:	TNR-001983
Checklist Item No:	4.2.1
Status:	Closed
Finding level:	Major
Due date:	2023-Apr-25
Checklist item:	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.
Findings:	The site water emergency system lacks to conduct a root-cause analysis of the year’s emergency incident(s) and the site’s response to the incident(s) to be evaluated and proposed preventative and corrective actions and mitigations against future incidents to be identified.
Corrective action:	<p>Site Comments :</p> <ul style="list-style-type: none">• 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 with risk level. 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 reported in the site’s annual sustainability report. It is reviewed by Unit & at Divisional level.• However, Site Emergency incident(s) and the site’s response to the incident(s) are not to be evaluated and proposed preventative and corrective actions and mitigations against future incidents are not identified. <p>Corrective Action :</p> <ul style="list-style-type: none">• Site has identified all potential water-related emergency scenarios in the On-site water emergency response plan (OSWERP) which the site may face in the future and has also identified suitable action plans against each of the identified potential scenario with risk level. This OSWERP shall help the site to be ready to handle any future water-related emergencies.• Site has developed a new procedure (Document number OP-39, Ver No 01 Dated: 01.04.2023) for conducting root-cause analysis. In addition, details of water-related incidents, if any, are reported in ITC’s public disclosures such as CDP Climate change. For example, cyclone incident in the Eastern Part of India is disclosed in CDP Climate Change 2021.• OSWERP highlights what responses are required if the disaster occurs. Site will conduct preparedness check to evaluate response against water emergencies. Subsequently, corrective actions based on the learnings from preparedness check will be incorporated in the OSWERP.

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- Evidence of implementation:
- Unit On-site water emergency response plan (OSWERP)
 - SWRR - Significant Water Risk Registers
 - Procedure for Root cause analysis for any of the site’s water related emergencies (OP 39)
 - Screenshot of CDP Climate Change 2021

Finding No: TNR-001984
Checklist Item No: 4.3.1
Status: Open
Finding level: Observation
Checklist item: Consultation efforts with stakeholders on the site’s water stewardship performance shall be identified.
Findings: Share methodology for measuring effectiveness of the site’s engagement process?
Share feedback from Indigenous and socially vulnerable groups.

Finding No: TNR-001985
Checklist Item No: 4.4.1
Status: Open
Finding level: Observation
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: Share list of lessons learned from the evaluations.

Finding No: TNR-001986
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: Specific legal compliances carried by respective designated persons should be mentioned.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000390

Report Details

Report	Value
Report prepared by	Bharat Nagar
Report approved by	Lurdes Guerra
Report approved on (Date)	23 January 2023

Surveillance

Proposed date for next audit
2023-Oct-16

Stakeholder Announcements

Date of publication	Location
20/09/2022	Coimbatore
21/09/2022	AWS and WSAS Website

Comment Refer to School sanitation program pictures; water harvesting structure site at Barathi nagar water group and stakeholder consultation conducted at various locations of catchment area.

Catchment Information

Catchment Information

The facility is located in the PSPD Kovai unit is situated in the Bhavani river basin. So the entire Upper Bhavani basin is taken for study & for long-term interventions (2.3 Lakh Ha). Bhavani river sub-basin, with watershed of more than 6200 km, is part of the Cauvery basin that covers parts of Tamil Nadu, Kerala and Karnataka. Siruvani, Kundah and Moyyar are the key tributaries of Bhavani. The Bhavani, a second longest tributary of Cauvery, is a picturesque perennial river, rising in Attappadi valley in Kerala. It enters Tamil Nadu near Mannar and traverses from West to East for over 217 Km. It principally receives runoff from the South-West monsoon and occasional floods during North-East Monsoon. In Tamil Nadu, the river passes through Nilgiris, Coimbatore and Erode districts and finally confluences into Cauvery near Bhavani Township.

As specified in introduction, water security study is undertaken at two set of scales a) Periya Pallam Sub Basin b) Upper Bhavani Basin (Up to Bhavani Sagar dam sans Moyyar river catchment). The study area covers approximately 2305 sq. km (marked as yellow in Figure 2) of the Upper Bhavani basin up to Bhavani Sagar dam (sans Moyyar catchment) and elevation ranging from 2634m to 261m above mean sea level. Geographical extent of the area is 76.444 E to 77.109 Longitude and 11.083 N to 11.429 N Latitude. The Upper Bhavani sub-basin selected for the research (as part of this project) falls, largely in two districts, Nilgiris and Coimbatore. The ITC Focus area is Periya Pallam tributary catchment, located in Mettupalayam Taluk of the Coimbatore district.

Comment For more details refer to the AWS manual and reports of WWF.

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Client Description and Site Details

Client/Site Background

ITC's Paperboards and Specialty Papers Division (ITC-PSPD), is amongst the leading names in the business worldwide. With an emphasis on harnessing state-of-the-art technology, the ITC Papers division has emerged as the largest manufacturer of Packaging and Graphic Boards in South Asia. In the endeavor to move up the value chain, its portfolio of products and services has consistently grown over the years. Today, its products and pool of knowledge-based services are much sought-after by discerning customers, both in India and internationally, for sustaining and improving their competitiveness. The ITC PSPD unit is the Client company and is located at Kovai village located 24 km from the main Coimbatore Urban area. Coimbatore airport is the nearest airport serving the facility. The plant has a paper board manufacturing unit using recycled paper with an annual production capacity of 0.1 million tons per annum. The main plant facilities include waste paper recycling and its conversion into paper bond; water intake-point, wastewater and sewage recycling unit; captive power plant, and other associated ancillary units.

Comment For more details refer to the AWS manual and reports of WWF.

Summary of Shared Water Challenges

Summary of Shared Water Challenges

1. Non-Uniform ecological Flows
2. Declining Groundwater availability in the Catchment
3. Increasing Water demand in Agriculture
4. Climate change risk felt by beneficiaries
5. No Proper grey Water & Faecal sludge Management
6. Ground Water Quality

Comment THE SUMMARY OF SHARED WATER CHALLENGES IS LISTED BELOW taken from the AWS manual available in the documents section.

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

Comment This site has only one plant occupying the defined local catchment area.

0.1.1.2 *The scope of the proposed certification shall be under the control of a single management system.*



Yes

Comment The scope of the proposed certification is under the control of ITC management, who is the owner of the proposed facility under audit consideration.

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

Comment The scope of the proposed certification is homogeneous with respect to primary production system, water management, product or service range, and the main market structures.

1 STEP 1: GATHER AND UNDERSTAND

1.1 *Gather information to define the site’s physical scope for water stewardship purposes, including: its operational boundaries; the water sources from which the site draws; the locations to which the site returns its discharges; and the catchment(s) that the site affect(s) and upon which it is reliant.*

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

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



Yes

Comment

Evidence:

1. AWS Audit Manual
2. WWF Bhawani River catchment Area Report
3. Bhawani River Map
4. Water CTO issued by TNPCB
5. The piping network from the village revenue department and approved drawings dated 05.03.2010, signed by the revenue inspector and village administrative officer

Assessment:

6. Water Withdrawal Agreement.

The site is located in the Bhawani River catchment area. The ITC PSPD unit is the Client company and is located at Kovai village located 24 km from the main Coimbatore Urban area. Coimbatore airport is the nearest airport serving the facility. The plant has a paper board manufacturing unit using recycled paper with an annual production capacity of 0.1 million tons per annum. The water intake point is provided by the Bhawani river, from where water is conveyed via pipeline. The main plant facilities include waste paper recycling and its conversion into paper bond; water intake point, The plant includes a wastewater and sewage recycling unit; a captive power plant, and other associated ancillary units as water infrastructure. The site is a zero liquid discharge site as per the regulatory permissions issued by the TNPCB. The scope of physical infrastructure assessment includes the following:

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 wastewater service provider (if applicable) and ultimate receiving water body or bodies;
- Catchment(s) that the site affect(s) and is reliant upon for water.

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

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1.2.1	<p><i>Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall:</i></p> <ul style="list-style-type: none"> - <i>Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people;</i> - <i>Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies;</i> - <i>Provide evidence of stakeholder consultation on water-related interests and challenges;</i> - <i>Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups;</i> - <i>Identify the degree of stakeholder engagement based on their level of interest and influence.</i> 	 No
Comment	<p>Evidence:</p> <ol style="list-style-type: none"> 1. AWS Manual 2. Report by Corporate division water shed audit report (COODU) 3. Report by Corporate division water shed audit report (RDO WASH) <p>Assessment:</p> <p>The site has presented segmentation and the process of engaging with stakeholders. Stakeholder Identification is carried out as per the unit Stakeholder Identification & Engagement Procedure (AWS/PSPD Kovai/SOP/3), Which lays down the basis of stakeholders identification and their degree of engagement basis.</p> <p style="text-align: right;">Finding No: TNR-001870</p>	
1.2.2	<p><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></p>	 Yes
Comment	<p>Evidence:</p> <ol style="list-style-type: none"> 1. AWS Manual 2. Report by Corporate division water shed audit report (COODU) 3. Report by Corporate division water shed audit report (RDO WASH) 4. Water Wuthdrawal Permit. <p>Assessment:</p> <p>The site has presented an Identification of the Stakeholder's level of influence on the site and vice-versa is carried out as per the unit's Stakeholder identification & Engagement procedure (AWS/PSPD Kovai/SOP/3) which lays down the basis for identifying the level of influence between the stakeholders and site.</p>	
1.3	<p><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></p>	
1.3.1	<p><i>Existing water-related incident response plans shall be identified.</i></p>	 Yes
Comment	<p>Evidence:</p> <ol style="list-style-type: none"> 1. AWS Manual 2. On-site Water Emergency Response Plan <p>Assessment:</p> <p>The site has presented an On-site Water Emergency Response Plan (Refer to Attached OSWERP Document) which provides details of Existing water-related incident response plans.</p>	
1.3.2	<p><i>Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped</i></p>	 Yes

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Comment	<p>Evidence:</p> <ol style="list-style-type: none"> 1. AWS Manual 2. WWF Study on the catchment area of Bhawani River. 3. Geovale study on Efficiency of Engineered intervention on groundwater. <p>Assessment:</p> <p>The site has been assessed on following aspects: Site water balance, including inflows, losses, storage, and outflows, which has been mapped.</p>	
1.3.3	<p><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></p>	 Yes
Comment	<p>Evidence :</p> <ol style="list-style-type: none"> 1. AWS Manual. 2. CTO document issued by TNPCB for water . <p>Assessment:</p> <p>The site has been assessed for following details: Site water balance, inflows, losses, storage, and outflows, including indication of annual variance in water usage rates, which has been quantified. Site has also identified water-related challenge that would be a threat to good water balance for people or environment. Site has also provided data indicating annual high and low variances.</p>	
1.3.4	<p><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></p>	 No
Comment	<p>Evidence :</p> <ol style="list-style-type: none"> 1. AWS Manual. 2. CTO document issued by TNPCB for water . 3. WWF STUDY 4. Geovale study on ground water 5. Annual Moinitoring Report_TNPCB 6. Recent Water Quality Monitoring Report <p>Assessment:</p> <p>The site has been assessed for follwing details:</p> <p>Water quality of the site's water source(s), provided waters, effluent and receiving water bodies has been quantified. Where there is a water-related challenge that is a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances has been quantified and presented.</p> <p>Drinking water is tested quarterly by a third party as per IS10500. This was evidenced via reports drinking water (canteen) and drinking water (waste paper area).</p> <p>Effluent treated water quality tests were observed from SAP records for last three months; this was compared with TNPCB norms in consent.</p> <p style="text-align: right;">Finding No: TNR-001876 Finding No: TNR-001877 Finding No: TNR-001878</p>	
1.3.5	<p><i>Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.</i></p>	 No

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Comment Evidence:
 1. AWS Manual.
 2. CTO document issued by TNPCB for water .
 3. Site visit pictures on spilled chemicals, oil storage drums, lubricate drums stored in open area and

Assessment:
 The site has been assessed for Potential sources of pollution during site visit and mapped, including chemicals used or stored on site.

Finding No: TNR-001879

Finding No: TNR-001880

1.3.6 *On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.* 🔍
Obs.

Comment Evidence :
 1. AWS Manual.
 2. CTO document issued by TNPCB.

Assessment:
 The site has been assessed for identification of On-site Important Water-Related Areas including its mapping and a description of their status including Indigenous cultural values.

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

Comment Evidence :
 1. AWS Manual.
 2. CTO document issued by TNPCB.

Assessment:
 The site has presented details of nnual water-related costs, revenues, and a description or quantification of the social, cultural, environmental, or economic water-related value generated by the site, which has been identified and and used in the evaluation of the plan in 4.1.2 indicator. No direct water related revenue is generated since site does not produce water related goods.

Value creation is identified. Costs related to water have been arrived at from SAP and Water Cost back-ups.

1.3.8 *Levels of access and adequacy of WASH at the site shall be identified.* ❌
No

Comment Evidence :
 1. AWS Manual.

Assessment:
 The site has been assessed for Levels of access and adequacy of WASH at the site, whose details are present as per compliance of Factory Act of India and other building codes.

Finding No: TNR-001886





Finding No: TNR-001887

1.4 *Gather data on the site’s indirect water use, including: its primary inputs; the water use embedded in the production of those primary inputs the status of the waters at the origin of the inputs (where they can be identified); and water used in out-sourced water-related services.*

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1.4.1	<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	<p>Evidence: 1. AWS Manual.</p> <p>Assessment: The site has been assessed for following details: - Primary input is waste paper which are from outside the watershed area and thus, this is considered as none.</p>	
1.4.2	<i>The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.</i>	 in progress
Comment	<p>Evidence: 1. AWS Manual. 2. LCA Report_2018</p> <p>Assessment: The site has been assessed for following details:</p> <p>The site mentions that here are six finished goods conversion centers located in the catchment. However, since this activity does not require water, Only Minimal quantity of water is used for domestic purpose.</p> <p style="text-align: right;">Finding No: TNR-001889</p>	
1.4.3	<i>Advanced Indicator The embedded water use of primary inputs in catchment(s) of origin shall be quantified.</i>	 Yes
Comment	<p>Evidence : 1. AWS Manual. 2. CTO issued by TNPCB for water. 3. LCA treport _2015 & 2018</p> <p>Assessment: The site has been assessed for following details:</p> <p>LCA report for 2018 shows that blue water consumption is 4891 litres for 1 ton of CBWB paperboard at ITC PSPD, Kovai Plant. There is a scope for reduction in water consumption leading to better water impacts .</p>	
Score	7	
1.5	<i>Gather water-related data for the catchment, including water governance, water balance, water quality, Important Water-Related Areas, infrastructure, and WASH</i>	
1.5.1	<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>	 No

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Comment Evidence :
1. AWS Manual.
2. CTO document issued by TNPCCB.
3. Geovale Groundwater Report .
4. Corporate Divisional audit reports fpr WASH- RDO & COODU NGOs

Assessment:

The site has been assessed for following details:

Agencies and responsibilities have been identified and recorded.

Goals identified are discussed under water stewardship plans.

Finding No: TNR-001890

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


Yes

Comment Evidence :
1. AWS Manual.
2. CTO document issued by TNPCCB for air and water.
3. Water Drawal Report
4. Recent water quality Report

Assessment:

The site has been assessed for following details:

Valid copies of CTO for air & water, water drawal report and water quality are evidenced. Monthly tracking and reviewing of Statutory Compliance is done and validated by Engg Head and primary and secondary manager responsible.

Agencies and responsibilities have been identified and recorded.

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 Evidence :
1. AWS Manual.
2. Recent water quality monitoring Report
3. WWF study
4. CTO for water issued by TNPCCB

Assessment:

The site has been assessed for following details:

Water scarcity has been quantified and referenced to the WWF Report Pg. no. 78

1.5.4 *Water quality, including physical, chemical, and biological status, of the catchment shall be identified, and where possible, quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be identified.*


No

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Comment Evidence :

1. AWS Manual.
2. WWF Study Report.
3. Recent Water Quality Report
4. CTO for water issued by TNPCCB.
5. Water Withdrawal report

Geovale Groundwater Report

Assessment:

The site has been assessed for ground and surface water samples. Phosphorous values are recorded high. E Coli values are found due to sewage water ingress at conoor drain.

Finding No: TNR-001897
Finding No: TNR-001898

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

Comment Evidence :

1. AWS Manual.
2. WWF study Report.
3. Geovale ground water Report.
4. Corporate divisional audit reports for COODU & RDO NGO.
5. CTO issued for water by TNPCCB

Assessment:

The site has been assessed for :
IWRAs have been identified and mapped and status has been assessed and documented.

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

Comment Evidences:

1. AWS Manual.
2. WWF study Report.
3. Geovale ground water Report.
4. Corporate divisional audit reports for COODU & RDO NGO.
5. CTO issued for water by TNPCCB

Assessment:

The site has been assessed for:
The site has provided details of existing and planned water-related infrastructure. Potential exposure to water risk has been broadly divided into technical, Institutional, regulatory, financial & socio-economic. The above classifications are defined by considering Flood, excess rainfall, Earthquakes, drought, delayed monsoon, labor shortage during peak season, and lack of water storage facilities.

1.5.7 *The adequacy of available WASH services within the catchment shall be identified.* ➔
in progress

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Comment Evidence :
 1. AWS Manual.
 2. WWF study Report.
 3. Geovale ground water Report.
 4. Corporate divisional audit reports for COODU & RDO NGO.
 5. Irular Tribes study.

Assessment:
 The site has a shared catchment area existing WASH infrastructure description, defining existing access in terms of water accessibility for WASH, creation of additional WASH infrastructure etc.


Finding No: TNR-001899

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

Comment Evidence :
 1. AWS Manual.
 2. WWF study Report.
 3. Geovale ground water Report.
 4. Corporate divisional audit reports for COODU & RDO NGO.
 5. Irular Tribes study.

Assessment:
 The site provides a list of all studies and projects on catchment-level water-related data collection. on page No 68-70 of the attached AWS manual. objectives selected are based upon external studies conducted in catchment area.

Score 7


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

Comment Evidence:
 1. AWS Manual.
 2. Stdy conducted by WWF
 3. Stdy conducted by Geovale obn ground water.
 4. Irular Tribes study.
 2. CTO document issued by TNPCB.

Assessment:
 The site has provided details of the adequacy of WASH provision within the catchments of origin of primary inputs on pages No 71-72 of the AWS manual. ommunity need analysis of catchment for FY 2016-16 and FY 2021-22 are captured. 80% HHs segregate the waste at HHs level and around 25 % HHs practice home composting.

Score 4

1.6 *Understand current and future shared water challenges in the catchment, by linking the water challenges identified by stakeholders with the site's water challenges.*

1.6.1 *Shared water challenges shall be identified and prioritized from the information gathered.*  Obs.

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Comment Evidence :
1. AWS Manual.
2. WWF Report
3. Geovale groundwater Report.
4. Irular tribes study.

Assessment:
The site has shared details of shared water challenges and their prioritization on pages No 73-78 of the attached AWS manual. Industrial data has been prepared with forecast for usage of water for agriculture, industrial and municipal usages.

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

Comment Evidence:
1. AWS Manual.
2. WWF Report
3. Geovale Groud water Report.
4. Irular tribes report.
5. TNPCB annual report.

Assessment:
The site has mentioned identified initiatives to address shared water challenges on pages No 79-80 of the attached AWS manual. It include demand water management, agriculture water consumption optimization and capacity building.

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

Comment Evidence:
1. AWS Manual.
2. WWF Report
3. Geovale Groud water Report.
4. Irular tribes report.
5. TNPCB annual report.

Assessment:
The site has shared details of identified Future water issues, including anticipated impacts and trends on pages No 82-83 of the attached AWS manual. It is shown that that water use specially in agriculture is increasing by around 55% by 2026 compared to 2016. For other sector, increase is not as much expected as like agriculture.

The site submits that To monitor the water quality, they will do half yearly water testing, i.e- Pre and post monsoon and based upon the result we will plan for mitigation plan through close consultation with catchment area stakeholders. Another test we are going to conduct in March 2023.

Score 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

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Comment Evidence:
 1. AWS Manual.
 2. WWF Report
 3. Geovale Groud water Report.
 4. Irular tribes report.
 5. TNPCB annual report.

Assessment:
 The site has presented some case studies on Potential water-related social impacts from the site on pages No 85-87 of attached AWS manual. the site documents that that due to improved agriculture trainings and water use optimization, farmer saved Rs. 1.5 Lakhs in his 1.5 acres of land. Currently we are covering around 4000 beneficiaries in the catchment So, there is significant socioeconomic impact created in the catchment. Till date, around 3000 IHHT has been formed by ITC in the catchment and catchment is having IHHT in around 14,000 HHs, but as a serious WASH volunteer, site have done mass awareness regarding toilet usage as per survey done by sanitation committee and local NGO team, our toilet usage is around 98% usage by all family members.

Also, in water quality testing report, we can clearly see that biological contamination in surface water is well within permissible limit, which also supports the positive impact of toilet usage in the catchment.

Score 4

1.7 *Understand the site’s water risks and opportunities: Assess and prioritize the water risks and opportunities affecting the site based upon the status of the site, existing risk management plans and/or the issues and future risk trends identified in 1.6.*


1.7.1 *Water risks faced by the site shall be identified, and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.* 
Yes

Comment Evidence:
 1. AWS Manual.
 2. CTO issued by TNPCB for water.
 3. TNPCB Annual report.

Assessment:
 The site has provided adequate mapping details of water risks into
 1. Physical risk
 2. Regulatory risk
 3. Reputational risk

The associated aspects like including the likelihood and severity of impact within a given timeframe, potential costs and business impact. are also mentioned on page No 88-94 of attached AWS manual.

Risk is being assessed through stakeholder engagement in the catchment related to Water and WASH practices. Prior to that, the site finalize the risk parameters and against that, stakeholders scores on some fixed scale to quantify the risk and finally it is being selected based upon the score, which defines the severity of that particular risk in the catchment.

1.7.2 *Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.* 
No

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Comment Evidence:
 1. AWS Manual.
 2. CTO issued by TNPCB for water.
 3. TNPCB Annual report.
 4. Corporate divisional audit report for WASH work done by COODU & RDO
 5. Irular rtibews study

Assessment:
 The site has mentioned details of this indicator on pages No 88-94 of the attached AWS manual. the site submnits that :
 ASH-related infrastructures are covered 100 % at the site level
 There is no absenteeism due to in adequacy of WASH
 No compliant from any of the Stakeholders (Managers , Employees & ESP's) in Central EHS Committee.
 Also Peoples are frequently covered by WASH related training
 Hence business is greeting benefits on nil absenteeism against WASH related issues.

Site will continue to track any WASH related complaints during Central EHS Committee Meeting (Where all Stake holders are part of WASH discussion).

Finding No: TNR-001958


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

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

Comment Evidence:
 1. AWS Mnaual
 2. WWF study.
 3. Geovale Groundwater study.
 4. Irular tribes study.

Assessment:
 The site has identified and mentioned relevant catchment best practices for water governance on pages No 96-98 of attached AWS manual. Best practice in the catchment is identified on the basis of felt need of the beneficiaries. Based upon that, we analyze the potential activity through existing secondary literature and customize the same as per our area need through close consultation with stakeholders.



Best practices regarding good water governance in the catchment includes activities for Soil organic carbon enrichment and tracking water quality.

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

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Comment	<p>Evidence :</p> <ol style="list-style-type: none"> 1. AWS Manual. 2. CTO issued for water by TNPCB. 3. Pulp-paper audit guidance. 4. TGM_Pulp_Paper Report <p>Assessment:</p> <p>The site mentions both catchment and on-site Relevant sector and/or catchment best practices for water balance (either through water efficiency or less total water use) on pages No 100-102 of the attached AWS manual. The identified best practices include:</p> <ol style="list-style-type: none"> 1. Rain water harvesting in existing & new water harvesting structures 2. land treatment. 3. demand management in agriculture 4. WASH 	
1.8.3	<i>Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.</i>	 Yes
Comment	<p>Evidence:</p> <ol style="list-style-type: none"> 1. AWS Manual. 2. CTO issued for water by TNPCB. 3. Geovale Report 4. WWF report 5. latest water quality Report <p>Assessment:</p> <p>The relevant best practices for catchment areas for water quality have been identified and mentioned on pages No 103-106 of the AWS manual attached in the document section. The best practices include:</p> <ol style="list-style-type: none"> 1. Organising and strengthening Water user groups: 2. Water conservation by restoration of water harvesting structures: 3. Biomass improvement 4. Water Literacy among farmers: 5. Water Quality 6. WASH 	
1.8.4	<i>Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.</i>	 No
Comment	<p>Evidence:</p> <ol style="list-style-type: none"> 1. AWS Manual. 2. CTO issued for water by TNPCB. 3. Geovale Report 4. WWF report 5. latest water quality Report <p>Assessment:</p> <p>Relevant catchment best practices for site maintenance of Important Water-Related Areas have been identified and mentioned in detail on pages No 106-107 of the attached AWS manual. As per site assessment, best practices for IWRA maintenance are:</p> <ol style="list-style-type: none"> 1. Regular awareness campaign at village level to sensitize members of community on Sanitation – Health – Hygiene. 2. Promotion of Sanitation Committees for effective implementation of the program at each village. 3. Collaborating with Government departments thru various schemes (SBM, MNREGS) for implementing Sanitation & SWM Program 4. Use of various IEC & Communication tools to bring a behavioral change among community members. 5. Contribution by beneficiaries & village Institutions for WASH support in Schools & Anganwadi's & SWM in villages. 6. WASH Infrastructures per Swachh Vidyalaya guidelines 	

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Finding No: TNR-001962

1.8.5	<i>Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.</i>	 Yes
Comment	<p>Evidence:</p> <ol style="list-style-type: none">1. AWS Manual.2. CTO issued for water by TNPCB.3. Geovale Report4. WWF report5. latest water quality Report6. Irular Tribal studies <p>Assessment:</p> <p>Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services has been identified and details are presented on Pages No 107-108 of the attached AWS manual.</p> <p>The site mentions that equitable to adequate WASH for catchment area beneficiaries- In WASH, they are directly responsible for sanitation and hygiene and here we take care of the community sanitation through proper planning and saturation mode in individual as well as cluster level. Regarding water supply, the site ensure that it should reach to all household through thei engagement with Panchayat administration. this ensure that adequate WASH facility should be delivered to all beneficiaries in equitable manner.</p>	

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.

 Obs.

Comment Evidence:
 1. AWS Manual.
 2. CTO document issued by TNPCB for water .
 3. WWF Report
 4. Geovale groundwater quality report
 5. Irular tribal report

Assessment:
 The site has shared a copy of the signed and publicly disclosed site statement OR organizational document on pages No 111-116 of the attached AWS manual. during an audit, it was physically also verified.

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.

 Yes

Comment Evidence:
 1. AWS Manual

Assessment:
 The site has presented the required document on the page No 116 of the AWS manual. the same was also physically verified during the audit.

Score 1

2.2 *Develop and document a process to achieve and maintain legal and regulatory compliance.*

2.2.1 *The system to maintain compliance obligations for water and wastewater management shall be identified, including:*
- Identification of responsible persons/positions within facility organizational structure
- Process for submissions to regulatory agencies.

 Yes

Comment The site has presented the details of the system to maintain compliance obligations for water and wastewater management shall be identified, including:
 - Identification of responsible persons/positions within the facility's organizational structure
 - Process for submissions to regulatory agencies.
 The details are presented on Pages No 113& 117 of the attached AWS manual.

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

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



Yes

Comment

Evidence:

1. AWS Manual

Assessment:

The site has presented the required document on the page No 116 of the AWS manual. the same was also physically verified during the audit. Water Strategy is the Policy and Commitment., while mission, Vision and goals for onsite and catchment areas are included in the document.

A document of Water stewardship defining the overarching mission, vision, and goals of the organization towards good water stewardship in line with this AWS Standard is detailed on Pages No 117-119 of the attached AWS manual.

Finding No: TNR-001966

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

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



No

Comment

Evidence:

1. AWS Mnaual
2. Irular tribes Report.
3. WWF report
4. Geovale groundwater Report
5. Water drawal report
6. TNPCB issued CTO for water
7. TNPCB Annual report

Assessment:

A detailed water stewardship plan has been presented on pages No 122-125 of the attached AWS manual. this conforms to the following:

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

- How it will be measured and monitored
- Actions to achieve and maintain (or exceed) it
- Planned timeframes to achieve it from 2016-17 to 2021-22
- Financial budgets allocated for actions
- Positions of persons responsible for actions and achieving targets
- Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.

Measurement & Monitoring - monthly progress captured through master list of MSK ground team, quarterly progress is validated external finance audit & annual progress verified by external sustainability audit.




Finding No: TNR-001964

Finding No: TNR-001965

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2.3.3	<p><i>Advanced Indicator</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.</p>	 Yes
Comment	<p>Evidence:</p> <ol style="list-style-type: none"> 1. AWS Mnaual 2. Irular tribes Report. 3. WWF report 4. Geovale groundwater Report 5. Water drawal report 6. TNPCB issued CTO for water 7. TNPCB Annual report <p>Assessment: ITC Kovai factory is the only Entity situated in this catchment. Hence No site's partnership/water stewardship activities with other sites within the same catchment (which may or may not be under the same organizational ownership) are possible.</p>	
Score	4	
2.3.4	<p><i>Advanced Indicator</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.</p>	 Yes
Comment	<p>Evidence:</p> <ol style="list-style-type: none"> 1. AWS Mnaual 2. Irular tribes Report. 3. WWF report 4. Geovale groundwater Report 5. Water drawal report 6. TNPCB issued CTO for water 7. TNPCB Annual report <p>Assessment: The site has mentioned that similar programs are being implemented in the other 3 Districts. Such as Pudukkottai, Chennai & Theni with the Implementing partner called DHAN, HIHI & DRDCT of Tamilnadu state. details are posted on pages No 126-127 of the attached AWS manual. Also refer to Corporate division audit report on water stewardship program at Kovai.</p>	
Score	4	
2.3.5	<p><i>Advanced Indicator</i> 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.</p>	 Yes

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Comment Evidence:

1. AWS Mnaual
2. Irular tribes Report.
3. WWF report
4. Geovale groundwater Report
5. Water drawal report
6. TNPCB issued CTO for water
7. TNPCB Annual report
8. RDP_P&B 2022-23

Assessment:

Relevant examples of this indicator for both catchment and on-site are provided on Pages No 128-132 of the AWS manual. MoUs are in place with COODU and Imayam (NGOs) for overall plan agreed upon with individual anchayat WUGs signed by ITC and NGO.

For site: EHS Targets for the year are discussed in Safety Committee Meetings in the presence of Unit Head, Functional heads, and Representatives from each department including service provider employees and consensus is obtained. This includes discussion on the specific water consumption target for the site. evidenc eenclosed is an MoM issued on 31/03/2022 .

for catchment - Water User Group Meetings/ Grama Sabha meetings are used to discuss specific action items at village level for relevant targets. For each target- consensus is taken at village level which adds up to the aggregate catchment level target.

Score 7

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.*

 No

Comment Evidence:

1. AWS Manual.
2. CTO document issued by TNPCB for water.
3. water drawal report.
4. WWF Study
5. Geovale groundwater study
6. TNPCB issued

Assessment:

The site has presented a mitigation plan for identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies on the page No 133 of the AWS manual. These risks are categorized into physical, regulatory and reputational risks.

Finding No: TNR-001967

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

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Comment	Evidence : 1. AWS Manual. 2. CTO document issued by TNPCB.
	Assessment: The site has presented 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 on pages No 134-136 of the AWS manual.
Score	6

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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

Evidence:

1. AWS Manual.
2. WWF Study
3. Geoval Groundwater study
4. Corporate Division Audit-COODU
5. Corporate Division Auit-WASH -RDO

Assessment:

The site has been working with multiple stakeholders on a collaborative basis since 2015, to improve water governance in the catchment and has shared evidence supporting good catchment governance as shared on pages No 147-155 of the AWS Manual.

The site has been working with multiple stakeholders on a collaborative basis since 2015, to improve water governance in the catchment.

Partnerships:

- Knowledge partner: WWF-India, IUCN, BISA - CIMMYT
- Implementing partners: COODU, IMAYAM, RDO
- Technical partners: Gandhi gram University, Tamil Nadu Agricultural university and Avinashilingam Krishi Vignan Kendra and with support of Government departments like Water Resource, Agriculture, Horticulture, Forest etc.
- Relevant Gram Panchayats have been involved in all stages of planning & implementation.

Institution building:

- Site has also been working towards creating/ strengthening grass root level institutions- SHGs & WUGs, and agribusiness centre for complementing its water stewardship efforts in the catchment. Till date 65 SHGs and 45 WUGs have been formed. WUGs meet once a month and Involving in all activities are involved in making bye laws which concern the ownership and maintenance of local water bodies.

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

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Comment Evidence :
 1. AWS Manual.
 2. WWF Study
 3. Geoval Groundwater study
 4. Corporate Division Audit-COODU
 5. Corporate Division Auit-WASH -RDO
 6. Irular tribes study

Assessment:
 The site has been able to identify and report Irular Tribes as local indigenous people and has taken Measures identified to respect the water rights as detailed on Pages No 155-156 of the AWS manual. Also refer to study report on Irular tribes for improving livelihood in document section.

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

Comment Evidence :
 1. AWS Manual.
 2. WWF Study
 3. Geoval Groundwater study
 4. Corporate Division Audit-COODU
 5. Corporate Division Auit-WASH -RDO


Assessment:
 The water goals created as part of the Green Policy (these are aligned to/ complement the goals created as part of the AWS Water Stewardship Plan for the Site. The water goals created as part of the Green Policy (these are aligned to/ complement the goals created as part of the AWS Water Stewardship Plan for the Site) are listed below:

- Reduce Specific Water Consumption by 5% Year on Year through internal & external studies
- Enhance capabilities of Employees through Lean Manufacturing Methodology.
- Maximise reuse and recycle of processed water
- Increase the capacity of Rain Water Harvesting & augmenting groundwater around the site.

The site has presented evidence of improvements in water governance capacity from a site-selected baseline date on pages No 157-159 of the AWS manual.

For catchment area, The site has been working towards creating/ strengthening grass root level institutions- SHGs & WUGs for complementing its water stewardship efforts in the catchment. Till date 73 SHGs and 31 WUGs have been formed.



Score 2

3.1.4 *Advanced Indicator* 
Yes
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.

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Comment	<p>Evidence :</p> <ol style="list-style-type: none"> 1. AWS Manual. 2. WWF Study 3. Geoval Groundwater study 4. Corporate Division Audit-COODU 5. Corporate Division Auit-WASH -RDO <p>Assessment: The site has shared multiple pieces of evidence in form of letters, news clippings of local media, reports, and MoM as 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 on pages No 160-168 of AWS manual.</p>	
Score	2	
3.2	<i>Implement system to comply with water-related legal and regulatory requirements and respect water rights.</i>	
3.2.1	<i>A process to verify full legal and regulatory compliance shall be implemented.</i>	 Yes
Comment	<p>Evidence:</p> <ol style="list-style-type: none"> 1. AWS Manual. 2. WWF Study 3. Geoval Groundwater study 4. Corporate Division Audit-COODU 5. Corporate Division Auit-WASH -RDO <p>Assessment: The site shares the list of persons responsible and the list of duties and processes for verifying full legal and regulatory compliance on pages No 168-170 of AWS manual. Systems are in place to track statutory compliance- checks and balances via audits. SOP for Legal Compliance details the procedure.</p>	
3.2.2	<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	<p>Evidence:</p> <ol style="list-style-type: none"> 1. AWS Manual. 2. WWF Study 3. Geoval Groundwater study 4. Corporate Division Audit-COODU 5. Corporate Division Auit-WASH -RDO 6. IRULAR TRIBAL STUDY <p>Assessment: The site has shared measures identified and implemented to respect the water rights of others including Indigenous peoples in both catchment and onsite areas on pages No 171-176 of attached AWS manual. A refernce case study of Mrs Rangammal, 65 years old woman doing agriculture & Livestock activities in 1.5 acres land for her livelihood is presented. She lives at Neelampathy village of Tholoampalayam Panchayat.</p>	
3.3	<i>Implement plan to achieve site water balance targets.</i>	

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3.3.1	<i>Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.</i>	 Yes
Comment	<p>Evidence :</p> <ol style="list-style-type: none"> 1. AWS Manual. 2. WWF Study 3. Geoval Groundwater study 4. Corporate Division Audit-COODU 5. Corporate Division Auit-WASH -RDO 6. IRULAR TRIBAL STUDY 7. Methodolgy -(AWS/ PSPDKovai/ SOP-1) 8. Specific Water Sustainability Report <p>https://www.itcportal.com/sustainability/sustainability-integrated-report-2022/ITC-Sustainability-Integrated-Report2022.pdf)</p> <p>Assessment:</p> <p>The site has shared the status of progress towards meeting water balance targets set in the water stewardship plan for the last 5 years 2015-2016 to 2021-2022 on pages 176-180 of the AWS manual. Methodology for progress tracking against targets are detailed in the SOP for Monitoring & Evaluation (AWS/ PSPDKovai/ SOP-1). Specific Water consumption is audited by third party & Values are published in ITC Sustainability report</p> <p>https://www.itcportal.com/sustainability/sustainability-integrated-report-2022/ITC-Sustainability-Integrated-Report2022.pdf)</p>	
3.3.2	<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	<p>Evidence:</p> <ol style="list-style-type: none"> 1. AWS Manual. 2. WWF Study 3. Geoval Groundwater study 4. Corporate Division Audit-COODU 5. Corporate Division Auit-WASH -RDO 6. IRULAR TRIBAL STUDY 7. Life Cycle Study_2018 8. Paper-Pulp Audit Manual 9. CTO issued for Water by TNPCB 10,. <p>https://www.itcportal.com/sustainability/sustainability-integrated-report-2022/ITC-Sustainability-Integrated-Report2022.pdf)</p> <p>Assessment:</p> <p>The site has shared the annual targets to improve the site's water use efficiency or if practical and applicable, reduce volumetric total use shall be implemented., as part of the shared water challenge on the page No 181 of the AWS manual. Specific water consumption has been shown to reduce from 9.6% -8.9% for production.</p>	
3.3.3	<i>Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.</i>	 Yes

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Comment	<p>Evidence:</p> <ol style="list-style-type: none"> 1. AWS Manual. 2. WWF Study 3. Geoval Groundwater study 4. Corporate Division Audit-COODU 5. Corporate Division Auit-WASH -RDO 6. IRULAR TRIBAL STUDY 7. CEEW -Water Rellocating study 8. Tamilnadu water policy <p>Assessment:</p> <p>The site has no binding under reallocation of water, but the site Unit has been supplying Treated raw water to 5-6 families located in the nearby forested area, voluntarily, since they are not covered by public water supply infrastructure. details are shared on pages No 182 of AWS manual. Unit Has the consented quantity of 6600 M3 / day , which can be drawn from the Bhavani river as per government (PWD) Agreement . How ever unit has taken various initiatives to reduce 181 fresh water consumption from river. With that Unit could able to reallocate the fresh water to local formers for their basis needs. Unit has been supplying Treated raw water to 5-6 families located in the nearby forested area, voluntarily, since they are not covered by public water supply infrastructure.</p>	
3.3.4	<p><i>Advanced Indicator</i></p> <p><i>The total volume of water voluntarily re-allocated (from site water savings) for social, cultural and environmental needs shall be quantified.</i></p>	 Yes
Comment	<p>Evidence:</p> <ol style="list-style-type: none"> 1. AWS Manual. 2. WWF Study 3. Geoval Groundwater study 4. Corporate Division Audit-COODU 5. Corporate Division Auit-WASH -RDO 6. IRULAR TRIBAL STUDY 7. Recent water quality study <p>Assessment:</p> <p>Since 2010, the site has been supplying treated water to 5-6 families located in the nearby forested area, voluntarily, since they are not covered by public water supply infrastructure. The annual water supply started from 5000 liters per annum in 2016-17 to 15700 liters per annum in 2022. The details are provided on pages No 182-185 of AWS manual.</p>	
Score	6	
3.4	<i>Implement plan to achieve site water quality targets</i>	
3.4.1	<p><i>Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.</i></p>	 Yes

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Comment	<p>Evidence :</p> <ol style="list-style-type: none"> 1. AWS Manual. 2. WWF Study 3. Geoval Groundwater study 4. Corporate Division Audit-COODU 5. Corporate Division Auit-WASH -RDO 6. IRULAR TRIBAL STUDY 7. Recent water quality study <p>Assessment:</p> <p>The status of progress towards meeting water quality targets set in the water stewardship plan from 2016- 2022 has been mentioned on pages No 186-188 of the AWS manual. The data has been shared for both catchment and on-site locations.</p> <p>Effluent water quality is maintained well below the Norms – online monitoring is done by TNPCB & CPCB, and annual data is verified by third-party sustainability audit.</p> <p>In Catchment as reference CPCB & BIS Standards for drinking water BIS 1500:2012 monitoring surface & ground water quality once in 6 month (Post & Pre monsoon). It has been carried out from 21-22 FY.</p>	
3.4.2	<p><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></p>	 Yes
Comment	<p>Evidence:</p> <ol style="list-style-type: none"> 1. AWS Manual. 2. TNPCB Water monitoring study 3. CTO issued by TNPCB for water <p>Assessment:</p> <p>The site has provided details on water quality as a shared water challenge, and focusing on continual improvement to achieve best practices for the site’s effluent shall be identified and where applicable quantified. the details are provided on pages No 188-192 of AWS manual.</p> <p>Water Quality is identified as a shared water challenges. Site is a zero effluent discharge unit. No untreated effluent is discharged outside the site’s boundary.</p> <p>Site has a well-defined system for monitoring of the treated effluent parameters both in-house and through third party certified laboratories. Treated effluent is being monitored as per defined frequency before being used reused for gardening and toilet flushing.</p>	
3.5	<p><i>Implement plan to maintain or improve the site’s and/or catchment’s Important Water-Related Areas.</i></p>	
3.5.1	<p><i>Practices set in the water stewardship plan to maintain and/or enhance the site’s Important Water-Related Areas shall be implemented.</i></p>	 Yes

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Comment Evidence:
 1. AWS Manual.
 2. TNPCB Water monitoring study
 3. CTO issued by TNPCB for water

Assessment:

The site has identified practices set in the water stewardship plan to maintain and/or enhance the site’s Important Water-Related Areas and has implemented them. details are provided on pages No 193-196 of the AWS manual.


Site has a system in place for maintenance of its IWRA’s Maintenance Plan of IWRAs in the site , which include Raw water Storage Tanks; Effluent Treatment Plant and Water Treatment Plant . Similar system is also mentioned for catchment area with target compliance update as well.

3.5.2 *Advanced Indicator* 
Yes
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.

Comment Evidence:
 1. AWS Manual.
 2. WWF Study
 3. Geoval Groundwater study
 4. Corporate Division Audit-COODU
 5. Corporate Division Auit-WASH -RDO
 6. IRULAR TRIBAL STUDY
 7. Life Cycle Study_2018
 8. Paper-Pulp Audit Manual
 9. CTO issued for Water by TNPCB
 10,.
<https://www.itcportal.com/sustainability/sustainability-integrated-report-2022/ITC-Sustainability-Integrated-Report2022.pdf>

Assessment:
 The site has presented cases of Evidence of completed restoration of non-functioning or severely degraded Important Water-Related Areas. According to the site 3872 Hectares of land Treatment (Trench cum Bund), 178 Loose boulder check dams, 329 farm ponds, 190 mini percolation tanks and 86 check damns have been created/renovated since 2015 (these numbers have been verified by third-party audits, both financial and sustainability). Details are provided on pages No 197-201 of AWS manual attached in document section. Corporate division audit report on water stewardship program at Kovai.

Score 6

3.5.3 *Advanced Indicator* 
Yes
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.

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Comment	<p>Evidence:</p> <ol style="list-style-type: none"> 1. AWS Manual. 2. WWF Study 3. Geoval Groundwater study 4. Corporate Division Audit-COODU 5. Corporate Division Auit-WASH -RDO 6. IRULAR TRIBAL STUDY 7. Life Cycle Study_2018 8. Paper-Pulp Audit Manual 9. CTO issued for Water by TNPCB 10, . <p>https://www.itcportal.com/sustainability/sustainability-integrated-report-2022/ITC-Sustainability-Integrated-Report2022.pdf)</p> <p>Assessment:</p> <p>The site has provided 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. The details are provided on pages No 201-209 of AWS manual.</p> <p>Annually, various aspects of the Water Stewardship Initiatives are shared during Water Melas and Multi-stakeholder committee meetings and feedback is requested from stakeholders. Soil Organic carbon % and Run off days increase are cited as examples of continuous improvement for last 5 years with trends shown.</p>
Score	2
3.6	<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>
3.6.1	<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> 🚩 in progress
Comment	<p>Evidence :</p> <ol style="list-style-type: none"> 1. AWS Manual. 2. CTO issued for Water by TNPCB <p>Assessment:</p> <p>Details on the site's provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers onsite has been provided on pages No 210-212 of the AWS manual.</p> <p>Access to drinking water and toilets comparison of existing against compliance provided against the requirements mandated as per Factories Act, 1948 (Section 18) & Latest THE OCCUPATIONAL SAFETY, HEALTH AND WORKING CONDITIONS CODE, 2020</p> <p style="text-align: right;">Finding No: TNR-001972 Finding No: TNR-001973</p>
3.6.2	<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> ❌ No

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Comment Evidence:
1. AWS Manual.
2. CTO issued for Water by TNPCB
3. Irular Tribes study.
4. Geoval Groundwater study
5. Corporate Division Audit-COODU
5. Corporate Division Auit-WASH -RDO

Assessment:

The site has provided evidence that the site is not impinging on the human right to safe water and sanitation of communities through their operations, that traditional access rights for indigenous and local communities are being respected, and that remedial actions are in a place where this is not the case, and that these are effective. details are provided on pages No 212-214. Additionally ITC being engaged with Sanitation work, Drinking Water Facilities, Hand Wash & Hygiene practices since 2013 in Catchment. So far ITC MSK constructed Nos 2695 Toilets in the catchment to address the sanitation gap, Nos 5 Schools on Water, Sanitation & Hygiene practices (Including menstrual hygiene. Evidence for the mentioned activities is attached in annexure document – 3.6.2 (1,2,3) of the attached AWS manual.

Finding No: TNR-001974

3.6.3

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.



Yes

Comment

Evidence:
1. AWS Manual
2. CTO issued by TNPCB for water
3. Geoval Groundwater study
4. Corporate Division Audit-COODU
5. Corporate Division Auit-WASH -RDO

Assessment:

The site has provided details of the list of actions taken to support the provision to stakeholders in the catchment of access to safe drinking water, adequate sanitation, and hygiene awareness on pages No 214 -218 of the AWS manual.

As per site details, a holistic stakeholder management approach, has been adopted for working towards improving WASH in the catchment.

A brief summary of the initiatives is provided below:

In the surrounding panchayats of Thekkampatty, Kemmarampalayam, Kalampalayam, Maruthur, Veliyangadu, Tholampalayam & Nellithurai ITC is working communities on WASH for all communities, including tribal community.

Work has been done towards creating awareness among the residents & bringing about behavioral change towards safe sanitation in convergence with Swachh Bharat Mission.

In the last 7 Years, ITC Mission Sunehra Kal has supported 2695 Beneficiaries in constructing safe sanitation facilities.

100% of the project villages has been declared Open Defecation Free (ODF), with 99% of HHs, 98% of adult females & 95% of adult males using toilets.

This has also enabled Karamadai block in achieving ODF status.

Score

5

3.6.4

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.



No

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Comment Evidence:
 1. AWS Manual
 2. CTO issued by TNPCB for water
 3. Geoval Groundwater study
 4. Corporate Division Audit-COODU
 5. Corporate Division Auit-WASH -RDO

Assessment:
 The site has shared 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 in the catchment, where WASH is a shared water challenge. details are provided on pages No 219-220 of AWS manual.

Out of 16243 HHs, 87% of the HHs are segregating their waste (Organic & Dry) ; and 66% of the HHs are managing wet waste at Source / Community / at village level reducing transportation of waste to processing yard. Through project, have promoted 3432 Nutrition / Kitchen garden were residents use their own compost to nurture these plants.
 Through regular awareness & behaviour change programme, popularized on sage of toilets by entire households. Due to programme impacts below figure is the evidence of IHHT usage.

Finding No: TNR-001977

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

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

Comment Evidence:
 1. AWS Manual
 2. CTO issued by TNPCB for water
 3. Geoval Groundwater study
 4. Corporate Division Audit-COODU
 5. Corporate Division Auit-WASH -RDO

Assessment:
 There are no targets w.r.t Indirect water use in the water stewardship plan. Since the unit is completely dependent on recyclable paper. No significant water usage in related to indirect water usage (Refer to page No 221 of AWS manual).

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

Comment Evidence:
 1. AWS Manual
 2. CTO issued by TNPCB for water
 3. Green co Policy
 4. Greenco Rating system

Assessment:
 Not applicable since there are no suppliers in the catchment. The finishing goods service providers in the catchment do not have any operations which involve water consumption (Refer Page No 221 of AWS manual).

3.7.3 *Advanced Indicator
 Actions taken to address water related risks and challenges related to indirect water use outside the catchment shall be documented and evaluated.* ✔
Yes

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Comment	<p>Evidence:</p> <ol style="list-style-type: none"> 1. AWS Manual 2. WWF Study 3. Corporate divisional audit studies on WASH <p>Assessment:</p> <p>The site has shown evidence of actions taken to address water-related risks and challenges related to indirect water use outside the catchment shall be documented and evaluated. Extensive engagement with suppliers was taken up as part of GreenCo certification in 2018- of which water was a major focus area. All the initiatives under this were fully verified by CII & Unit was awarded platinum certification.</p> <p>(Refer Green Supply Chain Module – ITC PSPD Unit Kovai Works & Approach) in the document section and AWS manual page No 222 - 225.</p>
Score	6
3.8	<i>Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have.</i>
3.8.1	<i>Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.</i>
Comment	<p>Evidence:</p> <ol style="list-style-type: none"> 1. AWS Manual 2. WWF Study 3. Corporate divisional audit studies on WASH <p>Assessment:</p> <p>The site has shown evidence on engagement, and the key messages relayed with confirmation of receipt. Evidence in form of appreciation letter, MoMS, discussions, productivity reports and other modes of communications are provided as an evidence of engagement.</p>
3.9	<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>
3.9.1	<i>Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.</i>
Comment	<p>Evidence:</p> <ol style="list-style-type: none"> 1. AWS Manual 2. Corporate divisional audit studies on WASH 3. TNPCB Water monitoring study. 4. CTO issued for water by TNPCB <p>Assessment:</p> <p>The site has listed Actions towards achieving best practices, related to water governance, as applicable for implementation on pages No 231 to 233 of the AWS manual. Institution Promotion – Water user group, Agri business center ; Multi stakeholder Meeting (Government Officials, CBOs {WUG, Women SHG}) and Annual meeting stakeholder workshops are some related examples provided.</p>
3.9.2	<i>Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.</i>


Yes





Yes


Yes

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Comment	<p>Evidence:</p> <ol style="list-style-type: none"> 1. AWS Manual 2. Corporate divisional audit studies on WASH 3. TNPCB Water monitoring study. 4. CTO issued for water by TNPCB <p>Assessment:</p> <p>The site has listed Actions toward achieving best practices, related to targets in terms of water balance for implementation are listed in detail on pages No 233-238 of the AWS manual. Supply and demand side interventions for catchment area and multiple water conservation projects for on-site has been mentioned .</p>	
3.9.3	<p><i>Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.</i></p>	 Yes
Comment	<p>Evidence:</p> <ol style="list-style-type: none"> 1. AWS Manual 2. Corporate divisional audit studies on WASH 3. TNPCB Water monitoring study. 4. CTO issued for water by TNPCB <p>Assessment:</p> <p>The site has listed actions towards achieving best practices, related to targets in terms of water quality and its implementation is listed on Page No 239 in conjunction with page No 102-104 of AWS manual.</p> <p>For onsite, 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"> 1. Use of individual RO units at each drinking water centres to provide purified drinking water 2. Monitoring of the drinking water parameters with in-house and third party certified laboratories to constantly keep track of the water quality. 3. For improving treated water quality, Unit installed Disc Filter , Drum Screen parabolic screen , Energy Efficient Aerators to reduce effluent COD & BOD load in the treated effluent. 	
3.9.4	<p><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></p>	 Yes
Comment	<p>Evidence:</p> <ol style="list-style-type: none"> 1. AWS Manual 2. Corporate divisional audit studies on WASH 3. TNPCB Water monitoring study. 4. CTO issued for water by TNPCB <p>Assessment:</p> <p>The site lists actions towards achieving best practices, related to targets in terms of the site's maintenance of Important Water-Related Areas and its implementation on pages No 243 to 247 of the AWS manual.</p> <p>Site has a system in place for maintenance of its IWRA's Maintenance Plan of IWRAs in the site.</p>	
3.9.5	<p><i>Actions towards achieving best practice related to targets in terms of WASH shall be implemented.</i></p>	 Yes

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Comment	<p>Evidence:</p> <ol style="list-style-type: none"> 1. AWS Manual 2. Corporate divisional audit studies on WASH 3. TNPCB Water monitoring study. 4. CTO issued for water by TNPCB <p>Assessment:</p> <p>The site lists actions towards achieving best practices related to targets in terms of WASH and its implementation on pages No 247 to 251 of the AWS manual.</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 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>For catchment: in the surrounding panchayats of Thekkampatty, Kemmarampalayam, Kalampalayam, Maruthur, Veliyangadu, Tholampalayam & Nellithurai ITC is working communities on WASH for all communities, including tribal community. In the last 7 Years, ITC Mission Sunehra Kal has supported 2695 Beneficiaries in constructing safe sanitation facilities. 100% of the project villages has been declared Open Defecation Free (ODF), with 99% of HHs, 98% of adult females & 95% of adult males using toilets. This has also enabled Karamadai block in achieving ODF status.</p>	 Yes
3.9.6	<p><i>Advanced Indicator</i></p> <p><i>Achievement of identified best practice related to targets in terms of good water governance shall be quantified.</i></p>	 Yes
Comment	<p>Evidence:</p> <ol style="list-style-type: none"> 1. AWS Manual 2. Corporate divisional audit studies on WASH 3. TNPCB Water monitoring study. 4. CTO issued for water by TNPCB 5. WWF-Study 6. Geovale groundwater study 7. Irular Tribal study <p>Assessment:</p> <p>The site has presented evidence of quantified achievement of identified best practices related to targets in terms of good water governance on the page No 253 of the AWS manual.</p> <p>52 Vibrant Water User Groups are promoted in Catchment, WATSAN 20, Self Help Group 65 & Multi stakeholder committee, Annual Workshops with all stakeholders is conducted since last 5 years with participants of 600 stakeholders (Average Nos of last 5 Years) per annum.</p>	 Yes
3.9.7	<p><i>Advanced Indicator</i></p> <p><i>Achievement of identified best practice related to targets in terms of sustainable water balance shall be quantified.</i></p>	 Yes

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Comment Evidence:
 1. AWS Manual
 2. Corporate divisional audit studies on WASH
 3. TNPCB Water monitoring study.
 4. CTO issued for water by TNPCB
 5. WWF-Study
 6. Geovale groundwater study
 7. Irular Tribal study

Assessment:
 The site has presented evidence of quantified achievement of identified best practices related to targets in terms of sustainable water balance on pages No 254 -257 and on pages 176-180 of the AWS manual.

As per site, 3872 Hectares of land Treatment (Trench cum Bund), 178 Loose boulder check dams, 329 farm ponds, 190 mini percolation tanks and 86 check dams have been created/renovated since 2015 (these numbers have been verified by third-party audits, both financial and sustainability). Detailed analysis of the efficacy of structures have also been carried out in an Efficacy Monitoring Assessment, done by Geovale in 2019-20. Progress against various targets are also available in progress brochure, video etc. Methodology for progress tracking against targets are detailed in the SOP for Monitoring & Evaluation (AWS/ PSPD Kovai/ SOP-1).

Score 8

3.9.8 *Advanced Indicator* 
Yes
Achievement of identified best practices related to targets in terms of water quality shall be quantified


Comment Evidence:
 1. AWS Manual
 2. Corporate divisional audit studies on WASH
 3. TNPCB Water monitoring study.
 4. CTO issued for water by TNPCB
 5. WWF-Study
 6. Geovale groundwater study
 7. Irular Tribal study

Assessment:
 The site has presented evidence of quantified achievement of identified best practices related to targets in terms of water quality on pages No 258 - 260 of the AWS manual.

Effluent water quality is maintained well below the Norms – online monitoring is done by TNPCB & CPCB, and annual data is verified by third-party sustainability audit.

In Catchment as reference CPCB & BIS Standards for drinking water BIS 1500:2012 monitoring surface & ground water quality once in 6 month (Post & Pre monsoon). It has been carried out from 21-22 FY.



Score 8

3.9.9 *Advanced Indicator* 
Yes
Achievement of identified best practices related to targets in terms of the site's maintenance of Important Water-Related Areas have been implemented.

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Comment	<p>Evidence:</p> <ol style="list-style-type: none"> 1. AWS Manual 2. Corporate divisional audit studies on WASH 3. TNPCB Water monitoring study. 4. CTO issued for water by TNPCB 5. WWF-Study 6. Geovale groundwater study 7. Irular Tribal study <p>Assessment:</p> <p>The site has presented implementation details of achievement of identified best practices related to targets in terms of the site's maintenance of Important Water-Related Areas on pages No 261 and pages No No 197-201 and on pages No 201-209 of AWS manual.</p> <p>As per site, 3872 Hectares of land Treatment (Trench cum Bund), 178 Loose boulder check dams, 329 farm ponds, 190 mini percolation tanks and 86 check damns have been created/renovated since 2015 (these numbers have been verified by third-party audits, both financial and sustainability). Detailed analysis of the efficacy of structures have also been carried out in an Efficacy Monitoring Assessment, done by Geovale in 2019-20. Progress against various targets are also available in progress brochure, video etc. Methodology for progress tracking against targets are detailed in the SOP for Monitoring & Evaluation (AWS/ PSPD Kovai/ SOP-1).</p>	
Score	8	
3.9.10	<p><i>Advanced Indicator</i> <i>Achievement of identified best practice related to targets in terms of WASH shall be quantified.</i></p>	 Yes
Comment	<p>Evidence:</p> <ol style="list-style-type: none"> 1. AWS Manual 2. Corporate divisional audit studies on WASH 3. TNPCB Water monitoring study. 4. CTO issued for water by TNPCB 5. WWF-Study 6. Geovale groundwater study 7. Irular Tribal study <p>Assessment:</p> <p>the site has shared details of the achievement of identified best practices related to targets in terms of WASH and its quantification on pages No 214 -218 and No 219-220 of the AWS manual.</p> <p>In the surrounding panchayats of Thekkampatty, Kemmarampalayam, Kalampalayam, Maruthur, Veliyangadu, Tholampalayam & Nellithurai ITC is working communities on WASH for all communities, including tribal community.</p> <p>Work has been done towards creating awareness among the residents & bringing about behavioral change towards safe sanitation in convergence with Swachh Bharat Mission. In the last 7 Years, ITC Mission Sunehra Kal has supported 2695 Beneficiaries in constructing safe sanitation facilities. 100% of the project villages has been declared Open Defecation Free (ODF), with 99% of HHs, 98% of adult females & 95% of adult males using toilets. This has also enabled Karamadai block in achieving ODF status.</p>	
Score	4	
3.9.11	<p><i>Advanced Indicator</i> <i>A list of efforts to spread best practices shall be identified.</i></p>	 Yes

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Comment Evidence:
 1. AWS Manual
 2. Corporate divisional audit studies on WASH
 3. TNPCB Water monitoring study.
 4. CTO issued for water by TNPCB
 5. WWF-Study
 6. Geovale groundwater study
 7. Irular Tribal study

Assessment:
 The site has shared a list of efforts to spread best practices on pages No 261- 264 of the AWS manual. The site has been continuously working towards creating awareness and engaging with relevant stakeholders through various initiatives. These include engagement with farmers for trainings & Farmer Field Schools to demonstrate best practices in agriculture and water-use, engagement with local communities on WASH awareness, engagement with supply chain members on water-use efficiency etc. These have already been discussed under specific indicators.


Score 3

3.9.12 *Advanced Indicator* 
Yes
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.

Comment Evidence:
 1. AWS Manual
 2. Corporate divisional audit studies on WASH
 3. TNPCB Water monitoring study.
 4. CTO issued for water by TNPCB

Assessment:
 The site provides details of 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 on pages No 265-266 of the AWS manual. These include various person with their name and position and organizations listed in tabular form.

Score 8

3.9.13 *Advanced Indicator* 
Yes
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.

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Comment	<p>Evidence:</p> <ol style="list-style-type: none">1. AWS Manual2. Corporate divisional audit studies on WASH3. TNPCB Water monitoring study.4. CTO issued for water by TNPCB5. WWF Study6. Water Sustainability study conducted by third parties <p>Assessment:</p> <p>The evidence related to this indicator has been listed on the page No pages No 147-155; pages No 201-209 and on pages No 219-220 of the AWS manual. It is evident that quantified improvement 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.</p>
Score	5


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4 STEP 4: EVALUATE - Evaluate the site's performance.

4.1 Evaluate the site's performance in light of its actions and targets from its water stewardship plan and demonstrate its contribution to achieving water stewardship outcomes.


4.1.1 Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.  No

Comment Evidence:
1. AWS Manual
2. Corporate divisional audit studies on WASH
3. TNPCB Water monitoring study.
4. CTO issued for water by TNPCB
5. WWF Study
6. Geovale groundwater study.
7. Irular Tribal study
8. Third party sustainability study

Assessment:
The site presents an evaluation of Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes on pages No 271-285 of the AWS manual.


The site's performance against the water stewardship targets are evaluated in third party audits of ISO certifications, national award competitions like IPTAA, CII, Divisional management committee reviews and internal reviews of the site management.

Finding No: TNR-001980
Finding No: TNR-001981

4.1.2 Value creation resulting from the water stewardship plan shall be evaluated.  Yes

Comment Evidence:
1. AWS Manual
2. Corporate divisional audit studies on WASH
3. TNPCB Water monitoring study.
4. CTO issued for water by TNPCB
5. WWF Study
6. Geovale groundwater study.
7. Irular Tribal study
8. Sustainability Report 2022



Assessment:
The site shared details of value creation from water stewardship on pages No 286-291 of the AWS manual or both onsite and catchment areas. These include review at internal and external forums on water quality, water stewardship targets and onsite water management performance.

4.1.3 The shared value benefits in the catchment shall be identified and where applicable, quantified.  Yes

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Comment	<p>Evidence:</p> <ol style="list-style-type: none"> 1. AWS Manual 2. TNPCB Water monitoring study. 3. CTO issued for water by TNPCB 4. Sustainability Report 2022 5. Monitoring & Evaluation Methodology (AWS/PSPD Kovai/SOP1). <p>Assessment:</p> <p>The site has evidence related to the identification and quantification of shared water benefits provided on pages No 291 - 293. Evaluation of the value creation/ benefits are carried out as per the Monitoring & Evaluation Methodology (AWS/PSPD Kovai/SOP1). The identification & description of cost, savings and benefits are detailed.</p>	
4.1.4	<p><i>Advanced Indicator</i></p> <p><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></p>	 Yes
Comment	<p>Evidence:</p> <ol style="list-style-type: none"> 1. AWS Manual 2. TNPCB Water monitoring study. 3. CTO issued for water by TNPCB 4. Sustainability Report 2022 5. Monitoring & Evaluation Methodology (AWS/PSPD Kovai/SOP1). <p>Assessment:</p> <p>The site has shared details of a governance or executive-level review of the water stewardship program including a discussion of shared water challenges, water risks, and opportunities, any water-related cost savings or benefits realized, and any relevant incidents on pages No 294-295 of the AWS manual.</p> <p>At present, as described in the Monitoring & Evaluation methodology (AWS/ PSPD Kovai/ SOP1), site's water-targets, costs and savings are discussed in various executive committees with relevant stakeholders (division/ corporate). In future, the system for a more comprehensive review would be instituted</p>	
Score	3	
4.2	<p><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></p>	
4.2.1	<p><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></p>	 No
Comment	<p>Evidence :</p> <ol style="list-style-type: none"> 1. AWS Manual. 2. CTO document issued by TNPCB. 3. Water Emergency Response Plan. 4. Water Risjk Register <p>Assessment:</p> <p>The site has prepared a system for water emergency response and mapping of water risk register. Refer to the attached Water Risk Register and AWS manual page No 296-297.</p> <p style="text-align: right;">Finding No: TNR-001983</p>	
4.3	<p><i>Evaluate stakeholders' consultation feedback regarding the site's water stewardship performance, including the effectiveness of the site's engagement process.</i></p>	

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4.3.1	<i>Consultation efforts with stakeholders on the site’s water stewardship performance shall be identified.</i>	 Yes
Comment	<p>Evidence :</p> <ol style="list-style-type: none"> 1. AWS Manual. 2. CTO document issued by TNPCB. 3. Sustainability Report 2022 4. Corporate divisional audit report for WASH works of COODO & RDO 5. Irular Tribal Report <p>Assessment:</p> <p>The site has shared details of identified consultation efforts with stakeholders on the site’s water stewardship performance on pages No 298-304 of the attached AWS manual.</p> <p>Site has formed multi-stake holder committee, Multi-stakeholder committees, where various partners come together in these committee for planning of water-related activities, technical discussions, disclosure of progress against the relevant water-stewardship targets as well as to enable sharing of learnings and experiences and to promote and appraise concerned stakeholders on linkages, rules & regulations. Visual and written modes of communication.</p>	
4.3.2	<i>Advanced Indicator</i> <i>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>Evidence:</p> <ol style="list-style-type: none"> 1. AWS Manual. 2. CTO document issued by TNPCB. 3. Sustainability Report 2022 4. Corporate divisional audit report for WASH works of COODO & RDO 5. Irular Tribal Report <p>Assessment:</p> <p>The site has shared review evidence Karamdai Block of Coimbatire district on shared water challenges by stakeholders including stakeholder review of the site’s efforts across all five outcome areas, and their suggestions for continual improvement on pages No 302- 305. the stakeholder collaboration efforts include disclosure of relevant targets, progress against targets to the stakeholders and their feedback, which are incorporated into the Water Stewardship Plan.</p>	
Score	6	
4.4	<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>	
4.4.1	<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>	 Yes

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Comment

Evidence:

1. AWS Manual.
2. CTO document issued by TNPCB.
3. Sustainability Report 2022
4. Corporate divisional audit report for WASH works of COODO & RDO
5. Irular Tribal Report

Assessment:

The site has shared evidence of this indicator on pages No 306-308 of the AWS manual.

The Monitoring & Evaluation methodology (Ref: AWS/ PSPD Kovai/ SOP1) is designed by taking into account the importance of disclosure to relevant stakeholders and their feedback/ inputs in the decision making process. Example of 2018-19 plan has been cited as an evidence.


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


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

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

Comment Evidence:
 1. AWS Manual.
 2. CTO document issued by TNPCB.
 3. Sustainability Report 2022

Assessment:
 The site has shared evidence of disclosing the site’s water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations with stakeholders on pages No 311-312 of the AWS manual. According to site, The Water Manager of the site is responsible to ensure compliance to the water related laws and regulations as part of the site’s internal governance structure for water stewardship. Organogram details are also provided.


5.2 *Communicate the water stewardship plan with relevant stakeholders.*

5.2.1 *The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.*  Yes

Comment Evidence:
 1. AWS Manual.
 2. CTO document issued by TNPCB.
 3. Sustainability Report 2022
 4. Geovale Report
 5. WWF report
 6. Corporate WASH Audit Reports
 7. TNPCB Water monitoring Report

Assessment:
 The site has shared communication evidence of the water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes to relevant stakeholders on pages No 313-316 of the AWS manual . Evidences from multiple communication letter, field information boards, display boards, wqall paintings in catchment area are provided as an evidence.

5.3 *Disclose annual site water stewardship summary, including: the relevant information about the site’s annual water stewardship performance and results against the site’s targets.*

5.3.1 *A summary of the site’s water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.*  Yes

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Comment Evidence:
 1. AWS Manual.
 2. CTO document issued by TNPCB.
 3. Sustainability Report 2022
 4. Geovale Report
 5. WWF report
 6. Corporate WASH Audit Reports
 7. TNPCB Water monitoring Report

Assessment:
 The site has shared details of sharing a minimum of annual frequency of the site’s water stewardship performance, including quantified performance against targets has been detailed on pages No 317-319 of the AWS manual.

The requirement under Indicator 5.3.1 to annually provide a summary of the site’s water stewardship performance applies to the WASH component of the Water Stewardship Plan, as it does to other parts of the plan. Summary of site’s water stewardship performance, including progress against targets are made publicly available in the printed brochure, provided to every attendee of the annual Multi-stakeholder meeting.

Wall writings including in local language in key locations in the villages, are also used to make the water stewardship performance publicly available to local communities. (Ref. 5.3.1). A summary of site’s water stewardship efforts is also part of ITC’s annual sustainability report.

5.3.2 *Advanced Indicator* ✔ Yes
The site’s efforts to implement the AWS Standard shall be disclosed in the organization’s annual report.

Comment Evidence:
 1. AWS Manual.
 2. Sustainability Report 2022

Assessment:
 The site has shared details of sharing a minimum of annual frequency of the site’s water stewardship performance, including quantified performance against targets has been detailed on pages No 317-319 of the AWS manual.

A summary of site’s water stewardship efforts is also part of ITC’s annual sustainability report. Proof of sharing the site’s efforts to implement the AWS Standard’s disclosure in the organization’s annual report is shared on page No 319 of the AWS manual in the sustainability report of ITC.

Score 1

5.3.3 *Advanced Indicator* ✔ Yes
Benefits to the site and stakeholders from implementation of the AWS Standard shall be quantified in the organization’s annual report.

Comment Evidence :
 1. AWS Manual.
 2. Corporate divisional WASH Audit reports
 3. Annual sustainability Report





Assessment:
 The site has been assessed for providing proof of detailing Benefits to the site and stakeholders from the implementation of the AWS Standard shall be quantified in the organization’s annual report. Are shown on the page No 320-322 of AWS manual.

In the company’s annual sustainability report, ITC Kovai water stewardship implementation efforts are presented in the form of a detailed case study.

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Score	1	
5.4	<i>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.</i>	
5.4.1	<i>The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.</i>	 Yes
Comment	<p>Evidence:</p> <ol style="list-style-type: none"> 1. AWS Manual. 2. Corporate divisional WASH Audit reports 3. Annual sustainability Report <p>Assessment:</p> <p>The site has provided proof of disclosure of the site's shared water-related challenges and efforts made to address these challenges is mentioned on pages No 322-325 of the AWS manual.</p> <p>The Site's shared water challenges and efforts made to address part of the disclosure made at the Multi-stakeholder meetings and the Sustainability report.</p>	
5.4.2	<i>Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.</i>	 Yes
Comment	<p>Evidence:</p> <ol style="list-style-type: none"> 1. AWS Manual. 2. Corporate divisional WASH Audit reports 3. Annual sustainability Report 4. TNPCB annual Report 5. CTO issued by TNPCB related to water. <p>Assessment:</p> <p>The site has produced evidence on efforts made by the site to engage stakeholders and coordinate and support public-sector agencies, which are included on pages No 326-328 of the AWS manual. A table shows the stakeholder segmentation and list of activities conducted as a measure for efforts.</p>	
5.5	<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>	
5.5.1	<i>Any site water-related compliance violations and associated corrections shall be disclosed.</i>	 Yes
Comment	<p>Evidence:</p> <ol style="list-style-type: none"> 1. Sustainability Report 2022. 2. AWS Manual. 3. CTO issued by TNPCB for water. <p>Assessment:</p> <p>The site has shared procedure for sharing any site water-related compliance violations and associated corrections on the page No 329 of the AWS manual.</p>	
5.5.2	<i>Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.</i>	 Yes

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Comment	<p>Evidence: 1. Sustainability Report 2022. 2. AWS Manual. 3, CTO issued by TNPCB for water.</p> <p>Assessment: The site has shared procedure on necessary corrective actions taken by the site to prevent future occurrences on Page No 329 of the AWS manual. Till date there are no site water-related compliance violations. Necessary corrective actions shall be taken by the site in case of any violations is covered in On-site Water Emergency Reponses Plan.</p>	
5.5.3	<p><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></p>	 Yes
Comment	<p>Evidence: 1. Sustainability Report 2022. 2. AWS Manual. 3, CTO issued by TNPCB for water.</p> <p>Assessment: The site has shared a procedure on 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 its public disclosure on Page No 329 of the AWS manual.</p> <p>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.</p> <p>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.</p>	

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Photographic Evidence from Audit



E-hazardous waste stored in open.jpg



Oil drums without pallet stored in open.jpg



Yes

Comment Some photographic evidence of the site has been attached, which was observed during the site visit.



chemical spillage near vaccum pump station.jpg

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Lubricant drums without pallet stored in open.jpg

Previous Findings

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

✔
Yes