

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000648

SITE DETAILS

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

Address: ITC Limited, Foods Division, Plot no. D-1, MIDC, Ranjangaon, Taluka-Shirur, 412220, Pune, Maharashtra, INDIA

Contact Person: Sachin Palamwar

AWS Reference Number: AWS-000558

Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Platinum

Date of certification decision: 2023-Nov-20

Validity of certificate: 2026-Nov-20

AUDIT DETAILS

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

Audit Type(s): Initial Audit

Audit Start Date: 2023-Jul-17

Lead Auditor: Amit Singh

Site Participants:

SACHIN PALAMWAR, Factory Manager

SUNIL SINGH, Sr. OPERATION MANAGER

RAJU DAS, Engineering Manager

DEBASHISH PAUL, Assistant Manager - EHS

SHIVENDRU MATHUR, Manager - Sustainability

BHARATWAAJAN BALAJI, Manager - Sustainability

SAI GOWTHAM, Sr. Program Executive

NITESH LUNAWAT, Manager - Sustainability

MUNESH SAXENA, Sr. Program Manager - CSR

SAYALI KADAM, Program Officer - CSR

GOPU KARTHIK REDDY, Program Officer - CSR

SRINIVAS RAI, Sr. Manager - HR

B LAKSHMINARAYANA, Program Manager - SIP

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ADDITIONAL INFO

Summary of Audit Findings: A total of 24 findings were raised during the certification audit, 2 major non-conformity, 11 minor non-conformities and 11 observations.

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 13 November 2023.

The major non-conformities must be sufficiently addressed and evidence submitted to WSAS within 90 days of receipt of the report by 13 December 2023.

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

The audit team recommends certification of ITC Limited Foods Division 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.

Scope of Assessment: The scope of services covers the Initial certification audit for assessing conformity of ITC Limited Foods Division - Ranjangaon against the AWS International Water Stewardship Standard Version 2.

ITC Foods unit is situated in MIDC Ranjangaon, Shirur Taluka of Pune District in plot area of 36 acres and 65000 sq. m. built up and operating since 2008.

MIDC has constructed a water supply scheme for industrial water requirement of MIDC Ranjangaon Industries. The scheme sources water from the Chinchani dam on the Ghod River and supplies 13.8 MLD water in the first phase. The water is purified at a water treatment plant capacity of 27.6 MLD within the MIDC. This assures a 24-hour water supply to industries located in MIDC Ranjangaon.

The audit was conducted onsite on 17th July - 19th July 2023.

The MIDC water intake point, water storage & treatment facility (including domestic RO plant), boiler section (including RO plant for Boiler), fuel storage area, manufacturing/process area, chemical storage area, toilets for WASH interventions at site and wastewater treatment facility were visited during the factory walkthrough and catchment activities (WASH implementations at schools, Water Harvesting Structures, visit to farmlands for efficient & Climate Smart Agriculture practices in Sugarcane, Water User Associations, Individual Household Toilets at Mohalla Committee office, etc.) were visited as part of the audit.

SCORE

127.00

FINDINGS

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NUMBER OF FINDINGS PER LEVEL

Observation	11
Minor	11
Major	2

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FINDING DETAILS

Finding No: TNR-005595
Checklist Item No: 1.1.1
Status: Open
Finding level: Observation
Checklist item: The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including:
- Site boundaries;
- Water-related infrastructure, including piping network, owned or managed by the site or its parent organization;
- Any water sources providing water to the site that are owned or managed by the site or its parent organization;
- Water service provider (if applicable) and its ultimate water source;
- Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies;
- Catchment(s) that the site affect(s) and is reliant upon for water.

Findings: The storm water drain points are marked in the piping network. However, the ultimate receiving waterbody is not known.

The provided piping network is not a complete engineering drawing as the water usage locations are being marked manually.

Finding No: TNR-005881
Checklist Item No: 1.2.2
Status: Open
Finding level: Observation
Checklist item: 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.

Findings: The potential degree of influence in water stewardship between the site and stakeholders has not been identified.

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Finding No:	TNR-005596
Checklist Item No:	1.3.2
Status:	Closed
Finding level:	Minor
Due date:	2024-Jul-17
Checklist item:	Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped
Findings:	The site has not mapped the following: onsite rainfall, total water storage facilities, leakages, evaporation, run-off and treated wastewater storage.
Corrective action:	<p>The Site had analyzed and remapped its water balance which now includes additional details of onsite rainfall, total water storage facilities, leakages and evaporations along with treated wastewater storage capacities.</p> <p>This enhanced water balance assessment aims to ensure a more comprehensive and accurate representation of the site's water management practices. (Refer to the Annexure 1: Revised mapping of Water Balance)</p> <p>As a preventive action- It will be ensured that all components of water balance will be identified and mapped in detail for understanding the site water balance.</p>
Evidence of implementation:	Annexure 1: Revised mapping of Water Balance

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Finding No:	TNR-005604
Checklist Item No:	1.3.3
Status:	Closed
Finding level:	Minor
Due date:	2024-Jul-17
Checklist item:	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.
Findings:	The input water balance does not match with the balance of water distribution to different sections of the plant. The evaporation loss is approximated to be X kL at cooling towers and X kL at ETP. The basis of estimation of evaporation loss is to be provided. The onsite rainfall is not included in estimating the total water balance.
Corrective action:	<p>The site conducted a thorough reassessment of areas where discrepancies between the input water balance and water distribution to various plant sections were identified. Through this evaluation, quantification discrepancies in the affected sections were rectified by addressing the data inaccuracies associated with the faulty water flow meter. (Refer to the Annexure 1: Revised Water Balance)</p> <p>In addition, a standardized process for estimating evaporation losses has been documented, facilitating ongoing assessments of the water balance. These measures ensure more accurate water accounting and management within the site (Refer to the Annexure 2: Methodology of Estimation of Evaporation Losses)</p> <p>As a preventive action- The site will implement proactive measures to maintain the accurate functioning of each water flow meter. Regular monitoring and assessments will be conducted to promptly address any identified inconsistencies.</p> <p>Additionally, the site will highlight the methodology for estimating losses in future water balance evaluations.</p>
Evidence of implementation:	Annexure 1: Revised Water Balance Annexure 2: Methodology of Estimation of Evaporation Losses

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Finding No:	TNR-005606
Checklist Item No:	1.3.5
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Jul-17
Checklist item:	Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.
Findings:	The asset area in the plant consists of various machineries and equipments which are not in use. This is a potential source of pollution to groundwater and runoff discharge outside the plant premises, this area has not been identified and mapped.
Corrective action:	<p>While this area is subject to continuous surveillance by our engineering team and benefits from the protective measure of an RCC flooring that prevents groundwater contamination, we acknowledge the auditor's concerns. (Refer to the Annexure 1: RCC Flooring in the Asset Area). We have duly noted the finding and the site will assess the asset area for any potential source of pollution.</p> <p>As a preventive action- The site will assess the asset area for any potential sources of pollution, including detection of any contamination to the ground / soil. The site will also ensure the integrity of the RCC flooring, and continue its periodic monitoring.</p>
Evidence of implementation:	Annexure 1: Images of RCC Flooring in the Asset Area
Finding No:	TNR-005882
Checklist Item No:	1.3.6
Status:	Open
Finding level:	Observation
Checklist item:	On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.
Findings:	All the IWRA's that the site has identified are water infrastructure, they are not considered IWRA's. It's not a requirement to have an IWRA on-site if there is not any.
Finding No:	TNR-005902
Checklist Item No:	1.3.8
Status:	Open
Finding level:	Observation
Checklist item:	Levels of access and adequacy of WASH at the site shall be identified.
Findings:	The ETP treated water is being used for gardening. However, there is no indication/warning that this tap water is a ETP treated water and should not be used for drinking.

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Finding No:	TNR-005628
Checklist Item No:	1.5.4
Status:	Closed
Finding level:	Minor
Due date:	2024-Jul-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:	It is not clear if a water-related challenge that would be a threat to good water quality status for people or environment has been identified by the site. If yes, then an indication of annual, and where appropriate, seasonal, high and low variances shall be identified.
Corrective action:	<p>According to water quality assessments conducted both by the Maharashtra Pollution Control Board (MPCB) (Refer to the Annexure 1: MPCB Water Quality Assessment of Ghod River near Shirur) and our own primary data collection (Refer to the Annexure 2: Surface Water Quality Assessment in the catchment), various key water quality parameters, such as pH, BOD, COD, and nitrate, are well within the permissible limits in the catchment. However, there are some concerns related to elevated turbidity and TDS levels in the surface water.</p> <p>As a result, water quality is not a major concern for the Ghod River. Nevertheless, the site is actively addressing these water quality concerns in the catchment through its water stewardship initiatives. These efforts include catchment treatment, enhancing biomass as part of biodiversity conservation, and implementing water harvesting measures in the basin. These interventions aim to mitigate issues such as high turbidity, reduce runoff, and enhance groundwater recharge.</p> <p>As a preventive measure- ITC will maintain ongoing monitoring of water quality in the catchment, drawing from various data sources. If water quality becomes a significant concern in the future, the company will adapt its water stewardship plan accordingly to address and mitigate these concerns effectively.</p>
Evidence of implementation:	Annexure 1: MPCB Water Quality Assessment of Ghod River near Shirur) Annexure 2: Surface Water Quality Assessment in the catchment

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Finding No:	TNR-005883
Checklist Item No:	1.5.6
Status:	Closed
Finding level:	Minor
Due date:	2024-Jul-17
Checklist item:	Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.
Findings:	<p>It is not clear which the condition of the identified existing water-related infrastructure is.</p> <p>Planned water-related infrastructure has not been identified, including potential exposure to extreme events.</p>
Corrective action:	<p>The site has taken the initiative to provide a clear identification of the current condition of the dams, which are a significant component of water-related infrastructure within the catchment. This information has been sourced from available secondary data on the Water Resource Development (WRD) website. The condition of all the dams is functional as per the data. (Refer to the Annexure 1: Conditions of the dams and WRD water level and status data in Ghod Basin)</p> <p>Furthermore, the site maintains consistent engagement and collaboration with the WRD. Through these ongoing consultations, the site has gained insight into the WRD's assurance that no new water-related infrastructure projects are planned for the catchment in the foreseeable future.</p> <p>As a preventive measure- The site will maintain continuous monitoring of the condition of water-related infrastructures and will remain in regular communication with the Water Resource Development (WRD). In the event of any new developments regarding water-related infrastructure in the catchment, the site will promptly engage with the WRD to stay informed and responsive</p>
Evidence of implementation:	Annexure 1: Conditions of the dams and WRD water level and status data in Ghod Basin

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Finding No:	TNR-005898
Checklist Item No:	1.5.7
Status:	Closed
Finding level:	Major
Due date:	2023-Dec-13
Checklist item:	The adequacy of available WASH services within the catchment shall be identified.
Findings:	The current status of WASH for the catchment/physical scope is not known. The site shall gather information from relevant authorities to get an overall idea about the catchment. It is not required by site to conduct a study on its own, the data could be available with relevant authorities.

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Corrective action:

To assess the current status of WASH in the catchment, the site employs the following methods:

1. Primary Study through Core Area Perspective Plan (CAPP)

Assessments: Detailed assessments are conducted in collaboration with NGOs to comprehensively understand the primary scope area of the catchment. These assessments cover various aspects, including the socioeconomic profile, demographic details, and development priorities. They also provide firsthand information about the current status of WASH in the primary scope area of the catchment. The initial CAPP assessment was conducted in 2015-2016, followed by a revised CAPP assessment in 2020-21 to identify the current challenges related to WASH. These CAPP assessments play a pivotal role in shaping our water stewardship plan and our interventions related to WASH within the catchment. The CAPP study was shared with / displayed to the auditor during the audit site visit.

2. Secondary Study through Publicly Available Resources and Government Data: In addition to primary assessments, the site refers to secondary sources for WASH-related information, such as government websites. Notable engagements and sources include:

a. Engagement with the District Swachh Bharat Mission (SBM) Officer to understand the current status of WASH, with a specific focus on open defecation in the catchment. According to the officer, under the Government of India's flagship program 'Swachh Bharat Mission,' three blocks (Shirur, Junnar, Ambegaon) of Pune district, and two blocks (Parner and Shrigonda) of Ahmednagar were declared open defecation-free on March 31, 2017, and March 31, 2018, respectively. (Refer to Annexure 1: Email for SBM Officer highlighting the ODF status of concerned locations)

b. Utilization of reliable secondary sources of information from government websites, including:

a. Jal Jivan Mission Village Profile Har Ghar Jeevan Dashboard: According to this dashboard, the village-wise tap water connection status for all five blocks in the catchment is 66%. The individual block-wise status is as follows: Shirur - 78%, Junnar - 64%, Ambegaon - 76%, Shrigonda - 49%, and Parner - 60%. (Refer to Annexure 2: Screenshots of the village profile dashboard for Tap water connection and the address of the website)

b. Jal Jivan Mission School Har Ghar Jeevan Dashboard: The dashboard indicates that the status of schools with tap water supply in catchment districts is 100%. (Refer to Annexure 3: Screenshots of the school dashboard for status of schools with tap water supply and the address of the website)

This comprehensive approach allows the site to gather in-depth information about the current state of WASH in the catchment, ensuring a well-informed and effective response.

As a preventive measure-

The site will continue engaging with relevant stakeholders in the catchment to identify WASH-related requirements. Additionally, the site will continue to foster relationships with government officials and uphold a continuous monitoring process for WASH data on publicly available government websites to collect secondary data. This approach ensures the site's dedication to acquiring comprehensive and up-to-date

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information for WASH assessments in the catchment.

Evidence of implementation: Annexure 1: Email for SBM Officer highlighting the ODF status of concerned locations
Annexure 2: Screenshots of the village profile dashboard for Tap water connection and the address of the website
Annexure 3: Screenshots of the school dashboard for status of schools with tap water supply and the address of the website

Finding No: TNR-005633
Checklist Item No: 1.6.1
Status: Closed
Finding level: Minor
Due date: 2024-Jul-17
Checklist item: Shared water challenges shall be identified and prioritized from the information gathered.
Findings: The shared water challenges has not been prioritized.
Corrective action: The site has indeed identified and prioritized its shared water challenges through a process involving assessments and engagements with various catchment stakeholders, as detailed in the root cause analysis section of the response to this NC.

It is acknowledged that the response did not explicitly state that the identified challenges were already high-priority challenges as determined by the stakeholders. Moving forward, the site is committed to explicitly specifying this important detail in its future responses

As a preventive measure-
Going forward, the site will maintain its current approach of identifying and prioritizing shared water-related challenges through the Core Area Perspective Plan (CAPP) assessments and ongoing engagement with stakeholders and NGO partners. Furthermore, the site will take steps to explicitly emphasize its methodology for identifying and prioritizing these shared water challenges in its responses to this indicator in the future. This proactive measure will help prevent any potential confusion regarding the site's approach to addressing shared water challenges.

Evidence of implementation: Annexure 1: MH CAPP Report 2021 abridged
Annexure 2: Ghod Study Report abridged

Finding No: TNR-005886
Checklist Item No: 1.7.1
Status: Open
Finding level: Observation
Checklist item: Water risks faced by the site shall be identified, and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.
Findings: Potential costs have not been estimated in monetary terms.

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Finding No:	TNR-005639
Checklist Item No:	1.7.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Jul-17
Checklist item:	Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.
Findings:	<p>The site has not identified potential savings (in monetary terms) associated with the opportunities and it is not clear how the assessment is going to be done.</p> <p>The site could include water opportunities where the site can involve for collective action.</p>
Corrective action:	<p>Site shall rework on the approach for complying to this indicator. Site will identify and present the opportunities with addressing all aspects of it like potential savings from these opportunities, quantifying the potential savings wherever feasible and practical, highlighting the business opportunities emanating from the opportunities identified.</p> <p>As a preventive measure- Site shall review and relook at AWS guidance document to develop a better understanding of addressing the indicator requirement to achieve compliance. Moving forward the site will work on improving the presentation of the opportunities and its associate aspects including quantification of potential opportunities</p>
Finding No:	TNR-005888
Checklist Item No:	1.8.4
Status:	Open
Finding level:	Observation
Checklist item:	Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.
Findings:	Refer to observation for indicator 1.3.6. The site doesn't have IWRA's inside its boundaries.

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Finding No: TNR-005673
Checklist Item No: 2.3.2
Status: Closed
Finding level: Major
Due date: 2023-Dec-13
Checklist item: A water stewardship plan shall be identified, including for each target:

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

Findings:

- It is not clear the frequency of monitoring of the actions.
- Not all targets are clear: the site should compile in one file the WSP and the evaluation of the WSP shown for indicator 4.1.1.
- The end date of each activity is unclear. The site just indicates by 2024, by 2025...but this is general.
- For the catchment targets it is not clear which actions will be implemented in 2023.
- The site should review target 4 for the site (refer to indicator 1.3.6).
- Links between proposed actions and targets with Best Practices have not been created in the WSP.
- There are not indirect water use targets set in the water stewardship plan (refer to indicator 3.7.1).
- The site has mentioned that for catchment, monthly progress is captured through master list of MSK ground team, quarterly progress is validated through external finance audit & annual progress verified by external sustainability audit. However, this is not set in the Water Stewardship Plan.

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Corrective action:

The site has undertaken a review of its AWS plan, and based on this review, it aims to ensure that the revisions made to the plan provide a transparent representation of its content, monitoring schedules, targets, and completion dates.

Finding: It is not clear the frequency of monitoring of the actions.
Corrective Action: Every AWS target for the unit has been meticulously outlined, complete with designated monitoring frequencies and responsible reviewers. (Refer to Annexure 1: Revised Water Stewardship Plan)

Finding: Not all targets are clear: the site should compile in one file the WSP and the evaluation of the WSP shown for indicator 4.1.1.
Corrective Action: The definition of the targets which were unclear has been enhanced and clarified (Refer to Annexure 1: Revised Water Stewardship Plan). A single file has been created with the revised targets, with the evaluation of the water stewardship plan performance for the year 2022-23. (Refer to Annexure 2: Evaluation of Water Stewardship Plan)

Finding: The end date of each activity is unclear. The site just indicates by 2024, by 2025...but this is general.
Corrective Action: The site has explicitly indicated the end date for every activity within the WSP plan, rendering it more target-oriented and precise in terms of completion. (Refer to Annexure 1: Revised Water Stewardship Plan)

Finding: For the catchment targets it is not clear which actions will be implemented in 2023.
Corrective Action: The actions for the catchment targets have been definitively outlined, specifying the objectives for the year 2023. (Refer to Annexure 1: Revised Water Stewardship Plan)

Finding: The site should review target 4 for the site (refer to indicator 1.3.6).
Corrective Action: In line with the finding identified in indicator 1.3.6, the site will reassess the identification of IWRA. The site has revised this target to focus on maintaining and enhancing the state of water-related infrastructure. This will pertain to improving the condition from "good" to "excellent," which corresponds to a rating increase from 3/4 to 5. (Refer to Annexure 1: Revised Water Stewardship Plan)

Finding: Links between proposed actions and targets with Best Practices have not been created in the WSP.
Corrective Action: The action plan in water stewardship plan for site and catchment is based on the identified best practices in criteria 1.8. (Refer to Annexure 1: Revised Water Stewardship Plan and annexure 2: Best Practices as identified in criteria 1.8)

Finding: There is not indirect water use targets set in the water stewardship plan (refer to indicator 3.7.1).
Corrective Action: The site has investigated the potential for establishing

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indirect water usage targets with their suppliers and has identified that the Raw meal supplier can commit to a 2% reduction in their water usage by March 31, 2024. Water stewardship plan has also been modified accordingly. (Refer to Annexure 1: Revised Water Stewardship Plan)

Finding: The site has mentioned that for catchment, monthly progress is captured through master list of MSK ground team, quarterly progress is validated through external finance audit & annual progress verified by external sustainability audit. However, this is not set in the Water Stewardship Plan.

Corrective Action: The site has included the in-practice monthly progress evaluation through master list of MSK ground team, quarterly progress validation through external finance audit, and annual progress verification by external sustainability audit as the "Measuring & Monitoring mechanism in the Revised Water Stewardship plan. Furthermore, the evidence of these audits was meticulously presented during the audit itself. (Refer to Annexure 1: Revised Water Stewardship Plan)

As a preventive measure-
The site's water stewardship plan will undergo continuous monitoring, and any modifications to the plan in future will include specific end dates, monitoring procedures, and clearly defined outcomes

Evidence of implementation: Annexure 1: Revised Water Stewardship Plan
Annexure 2: Evaluation of Water Stewardship Plan
Annexure 3: Best Practices as identified in criteria 1.8

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Finding No: TNR-005676
Checklist Item No: 2.4.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Jul-17
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: A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies has not been identified. The requirement of the indicator is to develop a plan to address external risks outside of the site's direct control and particularly for those risks associated with dependence on public infrastructure.
Corrective action: In accordance with the indicator requirement, the site has taken the necessary steps to enhance the response by presenting the information in the form of a table. This table now explicitly highlights the plans developed in collaboration with the respective agencies and departments, thus ensuring a comprehensive and structured representation of the collaborative efforts in addressing water-related challenges. (Refer to the Annexure 1: Revised Table of Plan to address Water risks)

As a preventive measure-
The site will continue to collaborate with different agencies and departments to address the identified water risks.
In future responses, the site will ensure to provide the necessary information about the plans also that serve as the foundation for these collaborative efforts.
Evidence of implementation: Annexure 1: Revised Table of Plan to address Water risks

Finding No: TNR-005892
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: The site has been involved in many initiatives alongwith multiple stakeholders in the catchment which supported good water governance.

However, none of these actions relate to targets and actions explicitly specified in the WSP.

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Finding No:	TNR-005698
Checklist Item No:	3.3.1
Status:	Open
Finding level:	Observation
Checklist item:	Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.
Findings:	There could be a linkage between reduction of specific water consumption and water conservation implementations at site due to which the specific water consumption has improved.
Finding No:	TNR-005893
Checklist Item No:	3.4.1
Status:	Closed
Finding level:	Minor
Due date:	2024-Jul-17
Checklist item:	Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.
Findings:	From the WSP, this action "Strengthen solid waste recycling positive status X lakh HHs" is linked with water quality, but the status of progress has not been identified.
Corrective action:	<p>The site demonstrates a clear recognition of the significance of solid waste management as an integral component in achieving and maintaining good water quality within the catchment. As part of these efforts, the site has made notable progress by extending solid waste management coverage to X households, constructing X Individual Household Toilets, and developing X School Toilets up until the 2022-23 period within the primary scope area.</p> <p>These endeavors play a crucial role in mitigating pollution generated in the form of solid waste, greywater, and blackwater, thereby contributing to the overall enhancement of water quality in the catchment. (Refer to the Annexure 1: Progress towards SWM and WASH Infrastructure)</p> <p>The site will ensure to report this progress in the relevant indicators in the future responses.</p> <p>As a preventive measure- The site will maintain its efforts in the field of Solid Waste Management and will ensure that progress in this area is reported in accordance with the indicator's requirements. These solid waste management initiatives are vital for achieving and maintaining good water quality in the catchment.</p>
Evidence of implementation:	Annexure 1: Progress towards SWM and WASH Infrastructure

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Finding No: TNR-005895
Checklist Item No: 3.5.1
Status: Open
Finding level: Observation
Checklist item: Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.
Findings: -Please refer to indicator 1.3.6 for on-site IWRA's.

Finding No: TNR-005704
Checklist Item No: 3.7.1
Status: Closed
Finding level: Minor
Due date: 2024-Jul-17
Checklist item: Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.
Findings: The site shall consider adding the indirect water use targets to the water stewardship plan going forward.
Corrective action: The site investigated the potential of establishing water usage targets with its suppliers and identified that the raw meal supplier, has the capacity to commit to a 2% reduction in their water usage by March 31, 2024. (Refer to the Annexure 1: Communication from the supplier regarding the target)
Hence, the site has now established an indirect water use target in its water stewardship plan. (Refer to the Annexure 2: Revised Water Stewardship Plan)

As a preventive measure-
The site will conduct regular monitoring, on a quarterly basis, with the designated raw material supplier to track progress toward water reduction goals. Additionally, the site will offer assistance, including methods and ideas, as needed to help the supplier achieve these targets.
Evidence of implementation: Annexure 1: Communication from PP Foods regarding the target
Annexure 2: Revised Water Stewardship Plan

Finding No: TNR-005899
Checklist Item No: 4.1.2
Status: Open
Finding level: Observation
Checklist item: Value creation resulting from the water stewardship plan shall be evaluated.
Findings: This indicator refers to value creation for the implementing organization. The value creation/benefits for stakeholders/catchment are identified in indicator 4.1.3.

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Audit Number: AO-000648

Finding No:	TNR-005711
Checklist Item No:	4.3.1
Status:	Closed
Finding level:	Minor
Due date:	2024-Jul-17
Checklist item:	Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.
Findings:	The site has not presented evidence relating to consultation efforts on the water stewardship performance. The site is required to provide evidence that the water stewardship performance has been shared with stakeholders and they have been consulted on the performance.
Corrective action:	<p>The site actively employs diverse methods to communicate its progress on the water stewardship plan to various stakeholders. Some of these engagement methods include:</p> <ol style="list-style-type: none">1. Stakeholder Discussions and Workshops: The site organizes discussions, meetings, and workshops on significant occasions like World Water Day, to engage with stakeholders and discuss water stewardship performance of the site. These discussions are organized village-wise and the same site's progress is disclosed accordingly. (Refer to Annexure 1, 2 & 3: Activity Disclosure at Darodi Village, Garkhindi Village and Karde Village)2. Wall Paintings: The site uses wall paintings in villages to showcase its progress towards the water stewardship program. (Refer to the Annexure 4: Wall Painting highlighting progress in Sonesangvi Village)3. Brochures: Various brochures are distributed to highlight all the water stewardship activities and the progress achieved thus far. (Refer to the Annexure 5: Ghod Water Stewardship Programme Brochure)4. ITC's Annual Sustainability Report: The site's consolidated progress in the entire Ghod River basin is prominently featured in ITC's Annual Sustainability Report. (Refer to Annexure 6: ITCs Annual Sustainability Report 2023) <p>While these communication initiatives are actively undertaken, it is acknowledged that they were not sufficiently emphasized in the response to the indicator. In future responses, the site will ensure to provide a clearer and more comprehensive account of these engagement efforts.</p> <p>As a preventive measure- The site will continue ongoing engagement with relevant stakeholders and will continue to emphasize the progress achieved on the water stewardship plan during these interactions. In future responses to the indicator, the site will ensure that these communication efforts are appropriately highlighted to provide a more comprehensive view of its engagement activities.</p>
Evidence of implementation:	Annexure 1: Activity Disclosure at Darodi Village Annexure 2: Activity Disclosure at Garkhindi Village Annexure 3: Activity Disclosure at Karde Village Annexure 4: Wall Painting highlighting progress in Sonesangvi Village Annexure 5: Ghod Water Stewardship Programme Brochure Annexure 6: ITCs Annual Sustainability Report 2023

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Audit Number: AO-000648

Finding No: TNR-005900
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: The site has not incorporated yet any relevant information and lessons learned from their evaluations at its Water Stewardship Plan: to be verified at the first surveillance.

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Audit Number: AO-000648

Report Details

Report	Value
Report prepared by	Amit Singh
Report approved by	Monserath Zamora
Report approved on (Date)	13 September 2023

Surveillance

Proposed date for next audit
2024-Jul-16

Stakeholder Announcements

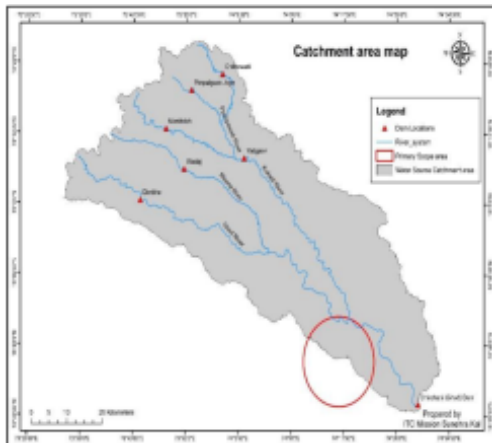
Date of publication	Location
22/05/2023	Local Newspaper
12/05/2023	AWS Website
12/05/2023	WSAS Website
Comment	<p>The audit dates were rescheduled, there is a mismatch between the stakeholder announcements and actual audit dates.</p> <p>The link for publication of the Stakeholder Announcement at AWS website is: https://a4ws.org/wp-content/uploads/2023/07/AWS-000558-ITC-Foods-Ranjangaon-2023-Stakeholder-Announcement.pdf</p> <p>The link for publication of the Stakeholder Announcement at WSAS website is: https://watersas.org/wp-content/uploads/2023/05/ITC-Ranjangaon-StakeAnn-Draft-AWS-000558.pdf</p> <p>The publication of the Stakeholder Announcement in the local newspaper has been attached to the report.</p>

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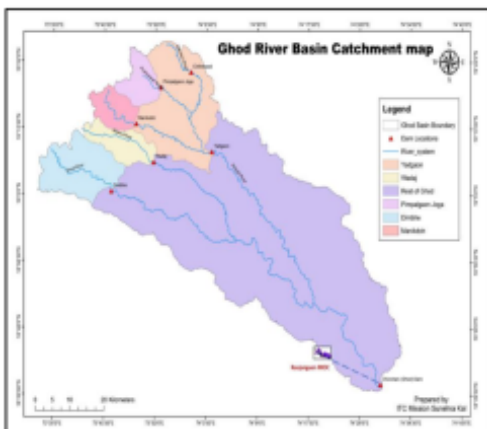
Alliance for Water Stewardship (AWS)

Audit Number: AO-000648

Catchment Information



Scope Area.png



Ghod River Catchment.png

Catchment Information

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Alliance for Water Stewardship (AWS)

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ITC had engaged with the subject experts to understand hydrology and geo hydrology of entire Ghod River Basin. This basin has been considered as the Water Source Catchment for the site, from where ITC Factory receives water through MIDC.

The total Catchment that the site affects and is reliant upon for water is 391,843 Ha (9.68 lakh acres) covering 461 villages. Primary Scope area covers 41 villages within the 10 Kms radius of the factory and is considered as Primary scope area which consists of 60249 ha area where ITC is focusing on Water, Sanitation & Hygiene (WASH) and Water Stewardship activities.

Ghod basin is a sub basin of the Upper Bhima basin, which in turn is a sub basin of Krishna basin. Kukadi is a major tributary of Ghod. There is a reservoir at Ghod Dam near Chinchani which is located in the upstream of confluence of Ghod with Bhima, and forms the last flow control structure on Ghod. The whole catchment of Ghod (including Ghod and Kukadi sub basins) up to Ghod (or Chinchini) Dam is approx. 3500 km² or 350,000 Ha.

The sub basins of Ghod and Kukadi are the basins of respective rivers up to the confluence with its tributary Kukadi, just upstream of Ghod Dam.

The Ghod sub basin consists of the catchment of main Ghod as also of a smaller tributary called Mina. The major structures/reservoirs in the sub basin are Dimbe Dam on Ghod and Wadaj Dam on Mina. The Kukadi sub basin consists of main Kukadi river and a smaller tributary called Pushpavati. The major structures/reservoirs on the two rivers upstream of the confluence point are Manikdoh on Kukdi and Pimplegaon Joge on Pushpavati. Another major structure/reservoir, Yedgaon, is located downstream of the confluence point.

Ghod (or Chinchini) dam is located approximately 30 km downstream of the confluence of Ghod and Kukadi. Apart from this the entire stretches of both rivers from the upstream dams of Dimbe, Wadaj, Mainkdoh and Pimplegaon Joga and from Yedgaon to the confluence point of both rivers there are a number of KT Weirs or diversion (pick up) weirs that impound water for lift/canal schemes for irrigation as well as household water supply.

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Client Description and Site Details



Site Boundaries ITC Foods.png

Client/Site Background

ITC's Branded Packaged Foods business is one of the fastest growing foods businesses in India under popular brands - Aashirvaad, Bingo! Sunfeast, Fabelle, Sunbean, Yippee! Kitchens of India, B Natural, ITC Master Chef, Farmland, mint-o, Candyman and GumOn. The Foods business is today represented in multiple categories in the market - Staples, Spices, Biscuits, Confectionery & Gums, Snacks, Noodles & Pasta, Beverages, Dairy, Ready to Eat Meals, Chocolate, Coffee and Frozen Foods.

ITC Ltd. Foods division Ranjangaon plant is situated in MIDC Ranjangaon, Shirur Taluka of Pune District in the state of Maharashtra. The site has a plot area of 36 acres and 65000 sq. m. built up area. The plant is in operation since 2008. The water requirement of site is supplied by MIDC. The site is involved in manufacturing of food products under two brands - noodles in the brand name of YiPpee! and snacks in the brand name of BINGO!

MIDC has constructed a water supply scheme for industrial water requirement of MIDC Ranjangaon Industries. The scheme sources water from the Chinchani dam on the Ghod River and supplies 13.8 MLD water in the first phase. The water is purified at a water treatment plant capacity of 27.6 MLD within the MIDC and supplied to the industries in the MIDC including ITC Foods factory.

Summary of Shared Water Challenges

Summary of Shared Water Challenges




The shared water challenges are listed below:

- Post monsoon water deficit in basin
- High water demand in Agriculture
- High Groundwater draft
- High Drinking water and Industrial Use
- Lack of WASH & water quality

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0.1 General Requirements for Single Sites, Multi-Sites and Groups		
0.1.1	<i>Eligibility Criteria</i>	
0.1.1.1	<i>The site(s) occupy one catchment OR an exception has been granted.</i>	 Yes
Comment	The site is located in a single catchment: Ghod River Basin.	
0.1.1.2	<i>The scope of the proposed certification shall be under the control of a single management system.</i>	 Yes
Comment	The site and scope of the proposed certification is under the control of a single management system.	
0.1.1.3	<i>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.</i>	 Yes
Comment	The site and scope of the proposed certification is homogeneous with respect to the primary production system, water management, and product range, and the main market structures.	

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1 STEP 1: GATHER AND UNDERSTAND	
1.1	<i>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.</i>
1.1.1	<p><i>The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including:</i></p> <ul style="list-style-type: none"> - 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.
Comment	<p>The site is located at MIDC Ranjangaon in Shirur Taluka of Pune District. The site boundaries are defined in a map and different sections of plant are highlighted.</p> <p>The site receives water from the water treatment facility located within the MIDC, a water supply scheme for industrial water requirement of MIDC Ranjangaon Industries. The scheme sources water from the Chinchani dam on the Ghod River. The site discharges the treated wastewater to a common effluent treatment plant operated by MIDC which in turn use this water for gardening purposes in a dedicated land for horticulture. The storm water drains from the site are marked in a map but the ultimate receiving water bodies are not known.</p> <p>ITC had engaged experts to conduct a study to understand hydrology and geo hydrology of entire Ghod River Basin, from where the site receives water after treatment at MIDC. Ghod river basin has 6 irrigation dams under Kukadi Irrigation Project being run by Water Resource Department, GoM. The total Catchment that the site affects and is reliant upon for water is X Ha (9.68 lakh acres) covering X villages. Primary Scope area covers X villages within the 10 km radius of the factory and is considered as Primary scope area which consists of X Ha area where ITC is focusing on Water, Sanitation & Hygiene (WASH) and Water Stewardship activities.</p>
1.2	<i>Understand relevant stakeholders, their water related challenges, and the site's ability to influence beyond its boundaries.</i>
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"> - Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people; - Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies; - Provide evidence of stakeholder consultation on water-related interests and challenges; - Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups; - Identify the degree of stakeholder engagement based on their level of interest and influence.

Q
Obs.

✓
Yes

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Comment	The site has prepared a methodology for stakeholder identification. Based on the methodology, the stakeholders have been listed and prioritized based on their interest and influence in addressing the water related challenges at the site and catchment level. The evidence of engagement with various stakeholders has been identified at site and catchment level including engagement with WRD and Forest Deptt.	
1.2.2	<i>Current and potential degree of influence between site and stakeholder shall be identified, within the catchment and considering the site's ultimate water source and ultimate receiving water body for wastewater.</i>	🔍 Obs.
Comment	Current degree of influence has been identified, however the potential degree of influence in water stewardship between the site and stakeholders has not been identified.	
1.3	<i>Gather water-related data for the site, including: water balance; water quality, Important Water-Related Areas, water governance, WASH; water-related costs, revenues, and shared value creation.</i>	
1.3.1	<i>Existing water-related incident response plans shall be identified.</i>	✅ Yes
Comment	The site has an On-Site Water Emergency Response Plan (OSWEP) for water specifically. The plan includes water emergency management cell for which the duties have been defined - what should be done in each type of incident and by whom.	
1.3.2	<i>Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped</i>	✅ closed
Comment	The site has mapped basically the site water balance with inflow from MIDC, raw water storage tank, water usage areas and discharge to ETP. However, the site has not mapped the following: on-site rainfall, total water storage facilities, leakages, evaporation, run-off and treated wastewater storage.	
	Finding No: TNR-005596	
1.3.3	<i>Site water balance, inflows, losses, storage, and outflows, including indication of annual variance in water usage rates, shall be quantified. Where there is a water-related challenge that would be a threat to good water balance for people or environment, an indication of annual high and low variances shall be quantified.</i>	✅ closed
Comment	The site has created a water balance per day based on monthwise average water consumption data per day. They have provided the accounting for inflow water from MIDC and submeters installed at various sections of plant alongwith the corresponding wastewater generation from different sections. The site has also tracked the annual variance of water consumption and the maximum water consumption is during the month of January 2023. However, the reason for maximum consumption during January (i.e. winter season) is not correlated to the production. The input water balance does not match with the balance of water distribution to different sections of the plant. The evaporation loss is approximated to be X kL at cooling towers and X kL at ETP. The basis of estimation of evaporation loss is to be provided. The onsite rainfall is not included in estimating the total water balance.	
	Finding No: TNR-005604	
1.3.4	<i>Water quality of the site's water source(s), provided waters, effluent and receiving water bodies shall be quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be quantified.</i>	✅ Yes

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Comment The site has a defined structure for carrying out water quality testing in the inhouse laboratory and external NABL accredited laboratory:

1. Daily Raw Water quality testing by Inhouse laboratory
2. Half Yearly Drinking Water quality testing by external NABL Accredited laboratory
3. Effluent Treated Wastewater - Daily testing at Internal laboratory and Monthly testing at External MPCB approved laboratory
4. Half Yearly Process Water testing at External NABL Accredited laboratory

The annual variances for various parameters of the ETP treated water have been plotted in graphs which shows all the parameters are under the prescribed limit.

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

Comment The site has mapped the areas which are potential sources of pollution on site for polluting water such as HSD Tank, LSHS Tank, WTP chemicals, ETP chemicals, Veg Oil, Transformer oil, Lubrication & Hydraulic oil, Hazardous waste/chemicals. Proper bund wall, dyke wall, contamination / spill kits have been provided to control pollution from these areas.

Finding No: TNR-005606

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 List of important water related areas at the site with its conditions:

1. Water Treatment plant: Raw water is treated before distribution to individual consumption points in the water treatment plant of the unit. Good condition as per the rating criteria with a rating of 4 out of 5
2. Fire Water Tank: Fire water tanks of capacity X Kl (2 Nos.) is used to store the water used in the hydrant lines across the plant premises. Good condition with Rating - 4
3. Raw water tanks: Raw water tanks of capacity X Kl (2 Nos.) is used to store the water which is filled after filling the fire water tank and used for further process. Good condition with Rating - 4
4. Effluent treatment plant: ETP of X KLD capacity is present in the unit to treat the process effluents/wastewater and convert into treated water which is then used for gardening and toilet flushing within the unit and part of it is sent to Central ETP outside site premises. Good condition with Rating - 4
5. SFB RO Water Tank: RO water tank is placed in SFB (Solid Fuel Boiler) with capacity of 20KL for feeding of boiler water for steam production. Good condition with Rating - 3
6. Underground water collection pit: Unit has one underground water collection pit size 2m x 2m and 10ft height where the MIDC water is collected and pumped to Fire Water Tank for storage. Good condition with Rating - 4
7. Overhead Tank: Unit has an overhead tank of capacity X KL which feeds the Domestic requirement (Not drinking) and Atta process. Good condition with Rating - 4
8. Process Water storage tank: Process water tanks of capacity X Kl (2 Nos.) is used to provide the water for the processing of PC, Noodle and FS Lines. Good condition with Rating - 4





All the IWRA's that the site has identified are water infrastructure, they are not considered IWRA's. It's not a requirement to have an IWRA on-site if there is not any.

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

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Comment	<p>The site has calculated the annual cost for purchase of water, treatment of water and wastewater, chemical costs, maintenance costs, energy costs for pumping of water and wastewater at the water treatment plant and effluent treatment plant.</p> <p>The site has also developed a description of the social, cultural, economic and environmental value generated by the site. However, no quantification has been done for the value generation by site.</p> <p>There is no direct water related revenue generated since site does not produce water related goods.</p>	
1.3.8	<i>Levels of access and adequacy of WASH at the site shall be identified.</i>	 Obs.
Comment	<p>The site has mapped and tabulated the drinking water and toilet facilities available at the site and has compared the toilet & drinking water facilities available against the requirement mandated as per Maharashtra Factories Rules 1963 and IS 1172:1993 which shows adequate facilities are available against the requirement.</p> <p>The samples (photographic evidence) of urinals, water closet, hand wash and hand driers, drinking water points are provided as evidence.</p>	
1.4	<i>Gather data on the site's indirect water use, including: its primary inputs; the water use embedded in the production of those primary inputs the status of the waters at the origin of the inputs (where they can be identified); and water used in out-sourced water-related services.</i>	
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>The site has identified their primary inputs for the factory and there are two suppliers which are located in the catchment, the Rice Meal and Maida (Refined Wheat). The site has worked with two suppliers on their water consumption practices and also on the water quality checks being performed by the supplier.</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>	 Yes
Comment	<p>The site receives food for its employees from a canteen service vendor situated inside the catchment. The supplier has provided water intake data for last two years and drinking water quality test report.</p>	
1.4.3	<i>Advanced Indicator The embedded water use of primary inputs in catchment(s) of origin shall be quantified.</i>	 No

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Comment The following primary inputs are originated outside the site's catchment (catchment of origin):

- Potato
- CFC (Corrugated fibre cardboard)
- Wheat

However, the embedded water use of these primary inputs has not been quantified. It is not clear where these primary inputs come from (where is the vendor located?).

To understand the indirect water use of the products manufactured by Foods Business a water footprint inventory study was undertaken in 2017 which covered Noodles being manufactured in the Ranjangaon Factory. The calculations have been repeated for 2022-23 data by considering the base data of primary inputs - Crop (KL) & Packaging (KL) as same and varying Specific water intake data for both the years. There is a reduction in Water footprint per ton of product from X m3/ton in year 2016-17 to X m3/ton in year 2022-23.

The basis of calculation of water footprint of crop and packaging is not accessible from the shared documents. It is not likely that the crop and packaging water footprint would remain same for 10 years as the data used in estimating crop and packaging water footprint is of 2010.

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

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


Yes

Comment The site has identified and tabulated Stakeholder wise (Government authorities) Public Policies (including water related policies) with Public-led Initiatives. The site has continuously engaged with various relevant authorities which had led to improvements within the catchment. The public led initiatives of following authorities have been listed:

- MIDC, Ranjangaon, Maharashtra
- Water Resource Department, Govt. of Maharashtra
- Forest department, Govt of Maharashtra
- Agriculture Department, Govt of Maharashtra
- Maharashtra Pollution Control Board

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 The site has tabulated applicable water related legal and regulatory requirements as mentioned below:

- Obtain consent to establish for any new or altered outlet for the discharge of sewerage or effluent.
- Treatment of waste water to meet stipulated standards and the effluent discharge shall not exceed consent conditions.
- Submission of Analytical Results of treated waste water every 30 days.
- Drinking water quality to be tested as per BIS standard from govt. approved lab once in 6 months.
- It shall be the duty of the consumer to maintain in good condition the water meter so fixed.

There are no legally bounded water rights (related to drinking, domestic and agricultural purposes) at the catchment level with respect to site.

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

Comment The site has undergone an Expert level study of the GHOD river basin to develop catchment water balance. Based on the report, it is evident that the Ghod basin has a positive water balance on annual basis, but in post monsoon season it there is a highly deficit, which makes it necessary to hold more water within the basin during monsoon season and release in post-monsoon season. While there is a need to increase water storage both within surface and sub-surface areas, the available storage in the dams is getting reduced due to siltation.

From the above, it is evident that the site is aware of the status of the catchment water balance.

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

Comment The site has arranged a collection of surface water samples from different villages in the catchment from Ghod River, Kukadi River, Meena River upstream, downstream, riverbanks and from drainage, in total - 14 such samples were collected and tested. From the results TDS and Turbidity have exceeded permissible limits.

The site has collected and tested samples of drinking water for Junnar & Shirur region.

Also, the site has gathered water quality data for Ghod river from the website of government authority - MPCB: <https://www.mpcb.gov.in/water-quality/Pune/17>. The Water Quality Index for 2022 and 2023 shows a good to excellent quality status, including physical, chemical, and biological parameters.

It is not clear if a water-related challenge that would be a threat to good water quality status for people or environment has been identified by the site. If yes, then an indication of annual, and where appropriate, seasonal, high and low variances shall be identified.

Finding No: TNR-005628

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 As per the detailed study conducted to assess the condition of surface and geo-hydrology of basin and recommendation of study as well as community consultation, the following important water related areas are identified:

- Surface Water Storage- Dams/ Tanks
- Underground aquifers
- Commons and Private waste land
- Forest (Junnar, Otur, Ghodegaon Forest range)
- Rivers & Tributaries (Ghod, Meena, Kukadi, Pushpavati/Aar)

The status of the IWRA's have been identified.

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

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Comment Ghod basin has 5 major dams (Dimbhe, Manikdoh, Wadaj, Pimpalgaon Joga, Yadgaon). The site has estimated an exposure of all these dams to extreme weather events since all the listed dams are situated in the Pune district in Maharashtra, the site has referred to the State-Wise District Vulnerability Report published by CEEW. This report states that the probable extreme weather events in the district are Flood and Drought and the exposure of the district to extreme weather events like flood and droughts is very high.

Complete infrastructure related to dams, rivers (like Ghod, Kukadi, Pushpavathi and Meena rivers) and main canals are maintained by the Water Resource Department.

It is not clear which the condition of the identified existing water-related infrastructure is.

Planned water-related infrastructure has not been identified, including potential exposure to extreme events.

Finding No: TNR-005883

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

Comment In 2015-16, CAPP study was conducted by ITC for the state of Maharashtra to understand the community priorities and issues. Major priorities of community in 2015-16 were water scarcity (1st priority), IHHT (2nd priority), School infrastructure (3rd priority) and sanitation (8th & 9th priorities). Subsequently, CAPP 2.0 study was done to identify the developmental challenges and issues of the core area through a bottom-up approach for preparing a perspective plan for 5 year, i.e. 2021-26. The key findings from the survey are, there is a significant change in the developmental needs and priorities such as, sanitation (solid and liquid waste management – 1st priority), Safe Drinking water (2nd priority), Health care (3rd priority), water scarcity (8th Priority) and Public Sanitation (10th priority).

With these two surveys major priorities/issues related to WASH are as follows:

- Insufficient sanitation facilities (individual / Common)
- Poor and insufficient WASH infrastructure facilities in schools
- Poor & inadequate waste management (Solid as well as Liquid) in village

The site has been engaging continuously with various stakeholders in the catchment for the adequacy of WASH facilities.

However, the current status of WASH for the catchment/physical scope is not known. The site shall gather information from relevant authorities to get an overall idea about the catchment. It is not required by site to conduct a study on its own, the data could be available with relevant authorities.

Finding No: TNR-005898

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

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Comment The site has undertaken various studies to gather catchment level water-related data. Following study were conducted:

1. Detailed study of Surface hydrology and Geo-hydrology in Ghod River Basin - Implementation strategy to achieve water security.
2. Core Area Perspective Plan (CAPP) of Catchment 2015-16 & 2021-22 - Socio economic status of Community, including access to WASH.
3. Impact Assessment of Sugarcane in Ghod River Basin - Impact assessment of practices promoted by ITC in Sugarcane crop.
4. Demand side management practices of water use in Agriculture in Pune & Ahmednagar districts of Maharashtra - To document the water, use efficient practices in Sugarcane & Onion crops as a part of demand side management practices promoted in Ghod River Basin.

These documents were shared with stakeholders wherever required and also some of them were published on a website.

Score 6

1.5.9 *Advanced Indicator*
The adequacy of WASH provision within the catchments of origin of primary inputs shall be identified. No

Comment The site has mentioned that it procures one of the primary inputs through one of the supplier which lies outside the catchment in Hosur region.

ITC has conducted a Core Area Perspective Plannig (CAPP) study in the Hosur region in the year 2015 to focus on analysis of key issues identified as causes for backwardness and proposes suitable interventions for improving the socio-economic outcomes in clusters chosen for intervention in the district.

There are no details of the current status of WASH provision in the identified region.

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.* closed

Comment The site has identified the shared water challenges in the catchment through the study of available reports and through engagement with NGOs and government authorities. The process of identification of shared water challenges has been defined and are listed below:

- Post monsoon water deficit in basin
- High water demand in Agriculture
- High Groundwater draft
- High Drinking water and Industrial Use
- Lack of WASH & water quality

However, the shared water challenges has not been prioritized.

Finding No: TNR-005633





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

Comment The site has listed the initiatives planned to address shared water challenges in catchment level alongwith the corresponding focus area. The site has shown deep understanding of the issue which is evident from the work performed in the catchment.

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1.6.3	<i>Advanced Indicator</i> <i>Future water issues shall be identified, including anticipated impacts and trends</i>	 Yes
Comment	In Ghod basin study, the following demand side future water issues were identified, including anticipated impacts and trends: projecting future domestic, livestock, industrial and agriculture water demands in the basin.	
Score	Furthermore, the site has also used WRI Aqueduct tool to map the water stress and water supply in the MIDC Ranjangaon area. The projected change in water stress has been highlighted in High Category (i.e. 40 to 80% change). 3	
1.6.4	<i>Advanced Indicator</i> <i>Potential water-related social impacts from the site shall be identified, resulting in a social impact assessment with a particular focus on water.</i>	 Yes
Comment	The site has identified the following potential water-related social impacts from the site: -At site level: 1. Impact of effluent discharge from ETP to CETP. 2. The site water use may restrict the availability of water to local communities and/or small farmers. -At Catchment Level: Promotion of water use efficiency in major crops of basin - sugarcane and onion. The site's proactive programmes on data collection and addressing shared challenges are providing a net benefit to the community.	
Score	4	
1.7	<i>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.</i>	
1.7.1	<i>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.</i>	 Obs.
Comment	The site has identified and prioritized the water risks, alongwith the timeframe, likelihood and severity of impact, impact on business and potential costs. The risks have been categorised as: physical, regulatory, reputational and litigation risks. However, potential costs have not been estimated in monetary terms.	
1.7.2	<i>Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.</i>	 in progress
Comment	The site has identified water related opportunities and categorised under physical, regulatory and reputational risks. The site has not identified potential savings (in monetary terms) associated with the opportunities and it is not clear how the assessment is going to be done. The site could include water opportunities where the site can involve for collective action. Finding No: TNR-005639	
1.8	<i>Understand best practice towards achieving AWS outcomes: Determining sectoral best practices having a local/catchment, regional, or national relevance.</i>	

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1.8.1	<i>Relevant catchment best practice for water governance shall be identified.</i>	 Yes
Comment	<p>The site has identified best practice in water governance through their own commissioned studies and discussion with the government authorities. The same are listed below:</p> <ul style="list-style-type: none"> - Capacity building of Water User Associations - Capacity building of Biodiversity Management Committees - Capacity building of Joint Forest Management Committees - Strengthening of Child Cabinets and School Management Committees - Capacity building and technical support of Gram Panchayats 	
1.8.2	<i>Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.</i>	 Yes
Comment	<p>The site has identified various best practices for site and catchment as listed below:</p> <p>At Site Level:</p> <ol style="list-style-type: none"> 1. Use of RO reject water in peeler. 2. Use of Pre-washer starch recovery water in Peeler. 3. Boiler RO plant Reject to use in potato pumping station. 4. Boiler RO plant Reject to use in Ash Quenching. 5. Boiler Condensate recovery. 6. Water Shower Nozzles in Noodle Seasoning. 7. Awareness and Administrative control. 8. Water Saving nozzles system for Taps (hand wash water). 9. Use of ETP treated water used in Admin Toilets. 10. Auto Floor Cleaning machine. <p>At Catchment Level: Supply Side Interventions:</p> <ol style="list-style-type: none"> 1. Water Harvesting structures. 2. Ground water recharge structures. 3. Catchment/Land treatment. <p>Demand Side Interventions:</p> <ol style="list-style-type: none"> 4. Demand management in Agriculture. 5. Soil Health Improvement. 	
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>The site has identified various best practices for site and catchment as listed below:</p> <p>At Site Level:</p> <ul style="list-style-type: none"> - An online monitoring system is installed in ETP treatment tank for Real time monitoring of the parameters. - Water Quality Testing Structure to test various water and wastewater at different intervals <p>At Catchment Level:</p> <ul style="list-style-type: none"> - Trash Mulching - Micro Irrigation - Catchment treatment & WHSs - Decentralize waste water treatment 	
1.8.4	<i>Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.</i>	 Obs.

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Comment The site has identified various best practices for the IWRA's in the catchment as listed below:

- Water Harvesting / Recharge Structures - Once in 3-4 years remove the silt accumulated in the structure and apply the same in field
- Catchment Treatment and biodiversity conservation
- Conservation and protection of plot




Refer to observation for indicator 1.3.6. The site doesn't have IWRA's inside its boundaries.

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

Comment The site has identified various best practices for WASH as listed below:

- At site level:
 1. Implementation of a robust system of housekeeping of the WASH facilities.
 2. Ensuring adequate drinking water and sanitation facilities for the workforce.
 3. Using of ETP treated water in urinals for flushing.
 4. Automatic Floor Cleaning Machine.
- At Catchment level:
 1. Awareness amongst the village level community on Sanitation – Health and Hygiene activities
 2. WASH and SLWM programme in X villages (10 Km radius) of Shirur block.
 3. Awareness creation to children on WASH activities at schools
 4. Construction of Child friendly school infra related to WASH like Handwash and toilets as per Swachh Vidyalaya guidelines
 5. Use of IEC, wall paintings, cleanliness drives, street plays and communication tools to bring behavioral change in community members
 6. Contribution and involvement of SMC (School Management Committee) and community for construction of WASH infra at Schools.
 7. Collaborating with Government departments thru various schemes (SBM) for implementing Sanitation & SWM Program
 8. Promotion of Mohalla/Ward Committees for effective implementation of the SWM program at each village.
 9. LWM and FSM activities for further reduction of sewage contamination into natural stream in the catchment
 10. Capacity building of Gram Panchayats on Solid & Liquid Waste Management Planning & implementation.




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2	STEP 2: COMMIT & PLAN - Commit to be a responsible water steward and develop a Water Stewardship Plan	
2.1	<i>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.</i>	
2.1.1	<p><i>A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:</i></p> <ul style="list-style-type: none"> - <i>That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes</i> - <i>That the site implementation will be aligned to and in support of existing catchment sustainability plans</i> - <i>That the site's stakeholders will be engaged in an open and transparent way</i> - <i>That the site will allocate resources to implement the Standard.</i> 	 Yes
Comment	<p>The site has displayed a copy of the Water Stewardship Policy and Commitment at various locations on site including the entrance of the site.</p> <p>The Policy includes the commitments as per the standard requirement and it was signed by the Unit Head of ITC Foods Ranjangaon on 18.08.2022.</p>	
2.1.2	<p><i>Advanced Indicator</i></p> <p><i>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.</i></p>	 Yes
Comment	<p>The site has displayed two copies of the Water Stewardship Policy and Commitment signed by senior executives of the organisation.</p> <p>One copy was signed by the Executive Vice President of ITC Foods Division, on 22.08.2022 and the other copy was signed by the Unit Head - ITC Foods Division, Ranjangaon, Pune.</p> <p>The Water Stewardship Policy is publicly displayed near the entry gate of the site.</p>	
Score	1	
2.2	<i>Develop and document a process to achieve and maintain legal and regulatory compliance.</i>	
2.2.1	<p><i>The system to maintain compliance obligations for water and wastewater management shall be identified, including:</i></p> <ul style="list-style-type: none"> - <i>Identification of responsible persons/positions within facility organizational structure</i> - <i>Process for submissions to regulatory agencies.</i> 	 Yes
Comment	<p>The site has a defined system to maintain all compliance obligations related to water and wastewater management. The related compliances are monitored in the legal register checklist of the site. This legal register checklist is reviewed monthly. The responsibility is defined for different compliances.</p> <p>There is also a online legal and regulatory compliance management system used for regular tracking and monitoring of compliances.</p> <p>The site has identified the responsible positions within the facility organizational structure and the process for submissions to regulatory agencies.</p>	

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2.3	<i>Create a water stewardship strategy and plan including addressing risks (to and from the site), shared catchment water challenges, and opportunities.</i>	
2.3.1	<i>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.</i>	 Yes
Comment	The site has developed a water specific strategy which has a vision and mission and separate Goals for site and catchment.	
2.3.2	<i>A water stewardship plan shall be identified, including for each target:</i> <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. 	 closed
Comment	<p>The site has prepared a water stewardship plan, separately for the site and the catchment.</p> <p>The plan includes for each target:</p> <ul style="list-style-type: none"> -How actions will be measured and monitored: it is not clear the frequency of monitoring of the actions. -Not all targets are clear: the site should compile in one file the WSP and the evaluation of the WSP shown for indicator 4.1.1. -Actions and description -Planned time-frames to achieve actions/targets: the end date of each activity is unclear. The site just indicates by 2024, by 2025...but this is general. -Financial budgets allocated for actions -Positions of persons responsible for actions -The link between each target and the AWS outcomes <p>For the catchment targets it is not clear which actions will be implemented in 2023.</p> <p>The site should review target 4 for the site (refer to indicator 1.3.6).</p> <p>Links between proposed actions and targets with Best Practices have not been created in the WSP.</p> <p>There are not indirect water use targets set in the water stewardship plan (refer to indicator 3.7.1).</p> <p>The site has mentioned that for catchment, monthly progress is captured through master list of MSK ground team, quarterly progress is validated through external finance audit & annual progress verified by external sustainability audit. However, this is not set in the Water Stewardship Plan.</p> <p style="text-align: right;">Finding No: TNR-005673</p>	
2.3.3	<i>Advanced Indicator</i> <i>The site's partnership/water stewardship activities with other sites within the same catchment (which may or may not be under the same organisational ownership) shall be identified and described.</i>	 Yes

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Comment The site has been jointly working with another ITC group company - ITD (Indian Tobacco Division) located in the MIDC (within the catchment) alongwith the catchment team (also known as ITC MSK team). The site has shared evidence of meeting with ITD and MSK.

The site has presented ITC's Ghod River Basin Water Stewardship Programme in World Environment Day 2022 under by Ranjangaon Industries Association.

ITD & FBD joint event on WASH & Water stewardship awareness in Mhase BK Village in primary scope area.

The site presented ITC's Climate Smart Agriculture Programme in World Environment Day 2023 under Climate Change theme Celebrated by Ranjangaon Industries Association.

Score 4

2.3.4 *Advanced Indicator*

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.



Yes

Comment A knowledge sharing session was organized in Sept 2022, wherein the best practices in ITC Ghod River basin were discussed with the program officers of different catchments where ITC is taking water stewardship activities.

The site has engaged with AWS Platinum certified site - ITC Malur, to help the site team to better plan their stewardship activities. Summary of discussion of meeting held on 3rd March 2023 with ITC Malur are:

1. Water stewardship activities that can be done in Site as well in catchment
2. Water initiatives done in site as well as in catchment
3. Water stewardship plan and way forward plan to achieve the targets
4. ITC Malur's experience and methodology of implementation for water interventions in site

Score 4

2.3.5 *Advanced Indicator*

Stakeholder consensus shall be sought on the site's water stewardship plan. Consensus should be achieved on at least one target. A list of targets that have consensus and in which stakeholders are involved shall be identified.



Yes

Comment At Catchment Level, meetings are conducted at village level with Gram Panchayat and beneficiaries to discuss specific action items at village level for relevant targets. Some of the consensus are highlighted below:

- Consensus from beneficiaries for construction of water harvesting structures (Water Balance & IWRA)
- Consensus and acknowledgement from ZP school (WASH)
- Consensus achieved from WRD for our plan of training WUA (Water Governance)

Based on the stakeholder interaction during the catchment visit and supporting evidence, it is quite clear that the targets for catchment - supply and demand side management activities are in consensus with the stakeholders.

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.*



in progress

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Comment The site has listed activities for mitigation of identified risks alongwith the agencies involved. The site has also shared details of MoU's mentioning the major objectives of the engagement.

However, a plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies has not been identified. The requirement of the indicator is to develop a plan to address external risks outside of the site's direct control and particularly for those risks associated with dependence on public infrastructure.

Finding No: TNR-005676

2.4.2 *Advanced Indicator* 
Yes
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.

Comment In the catchment, agriculture is a major source of income. Climate variability has a major impact on crop yields and thus on farmers' livelihoods. The watershed is highly vulnerable to various weather risks due to climate change. These risks range from delayed monsoon, drought, excessive rainfall, erratic rainfall, hailstorms, etc.

ITC had partnered with Borlaug Institute of South Asia (BISA) to develop "Adaption strategies for managing current and future climate risk in agriculture in the state of Maharashtra". This study covered Ghod River Basin all five blocks of Ahmednagar and Pune Districts along with recommendation for across Maharashtra districts.

Score 6





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3	STEP 3: IMPLEMENT - Implement the site's stewardship plan and improve impacts	
3.1	<i>Implement plan to participate positively in catchment governance.</i>	
3.1.1	<i>Evidence that the site has supported good catchment governance shall be identified.</i>	Q Obs.
Comment	<p>The site has been involved in many initiatives alongwith multiple stakeholders in the catchment which supported good water governance since the report on study for Ghod water basin. The site has provided enough evidence to confirm that the site has partnered with various stakeholders to support good catchment governance.</p> <p>Some of the partnerships are as follows:</p> <ul style="list-style-type: none"> • Study partner: CII & ACWADAM • Implementing partners: AFARM, BAIF, DSC and FINISH • Public Private Partnerships: Water Resource Department, GoM and Forest Department, GoM • Technical/Knowledge partners: VSI, KVKs, ICAR – DOGR, CGIAR – CCAFS. • Scale up partners: Sugarcane factory supervisors and Agriculture Department <p>However, none of these above actions relate to targets and actions explicitly specified in the WSP.</p>	
3.1.2	<i>Measures identified to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be implemented.</i>	✔ Yes
Comment	<p>The site has mentioned that it respects the rights to water of farmers and local community in the catchment area as the catchment covers indigenous people from all sections of community like tribes, other backward castes (OBCs), minorities, etc, as stakeholders with respect to the water rights and accordingly activities are planned and implemented across the catchment considering village as a whole unit.</p> <p>The water stewardship plan has been specifically designed to respect these rights by having various interventions:</p> <ul style="list-style-type: none"> -Supply side interventions- Catchment treatment, water harvesting structures and managed aquifer recharge structures. -Demand side interventions- Promoting water use efficient practices in Agriculture. -Interventions on WASH in the catchment- Creating awareness to community and children at schools on WASH activities and construction child friendly WASH structures at schools. 	
3.1.3	<i>Advanced Indicator Evidence of improvements in water governance capacity from a site-selected baseline date shall be identified.</i>	✔ Yes
Comment	<p>The site had formed a Water Governance Committee on 31.07.2022 with important members responsible for achieving the water stewardship goals of the site. The responsibility for monitoring catchment activities are being defined among the Water committee members.</p> <p>Upto year 2022-23 127 WUAs, X BMCs, X SMCs, X Child cabinets and X JFMCs strengthened/made active in terms of maintaining all records, conducting regular meetings, decision making, implementing activities, etc.</p>	
Score	2	

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3.1.4	<i>Advanced Indicator</i> <i>Evidence from a representative range of stakeholders showing consensus that the site is seen as positively contributing to the good water governance of the catchment shall be identified.</i>	 Yes
Comment	<p>The site has engaged with different stakeholders for the water stewardship activities in the catchment. The following evidence of engagement from different range of stakeholders with whom the site has interacted with on contributing to good water governance:</p> <ul style="list-style-type: none"> - Letter From Section Officer on WUA Training - WUAs Training on On-farm & Off-farm WUE_MoM Mhase - Training of Onion Farmers thru ICAR-DOGR - MOM of discussion and Attendance Sheet - Acknowledgement Letter from WRD Secretary for National Water Award - Acknowledgement letter from DCF to ITC, Forest department GoM - Training on Agriculture by KVK - Engagement with Agri Dept for Cascading Training of Agri Dept Staff Parner <p>Also the commitment on water governance activities have been shown during the stakeholder interviews.</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>Site has a defined system in place to review and track all applicable water related legal and regulatory compliance via a legal register/checklist. All applicable legal and regulatory compliances are identified and listed in the legal register/checklist with defined responsibility which is being reviewed and updated on a monthly frequency by the site.</p> <p>Additionally, compliance reports of effluent discharge to CETP are made by Unit Team member and sent to State pollution control board on monthly basis. The site also uses a online portal for tracking of regulatory compliances. Any changes in the regulation is reflected on the Portal in the form of regulatory update.</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>At the Site-level, water related rights defined include the compliance with The Maharashtra Factories Rules 1963 and IS 1172:1993.</p> <p>At catchment level, as of now there is no legal requirements of water rights by the site to be complied. Although ITC respects the rights to water of Farmers & Local community for WASH Facilities, Water Availability for Agriculture & Drinking. Specific initiatives under supply side & demand side management have been undertaken to support farmers and local community in the catchment.</p>	
3.3	<i>Implement plan to achieve site water balance targets.</i>	
3.3.1	<i>Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.</i>	 Obs.

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Comment	The site has tabulated annual performance against water balance as evidence of progress towards meeting water balance. There has been continuous improvement in the specific water consumption of the site.	
	For catchment, the progress towards additional rainwater harvesting potential created, biodiversity conservation area coverage and water demand management have been compared against the set targets.	
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	The site has set target of 40% reduction in specific water consumption from the baseline year 2018-19 to 2030. By year 2022-23, there has been a significant reduction in site SWC year on year and in 2022-23 by 33%.	
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
Comment	There is no legally binding obligation to re-allocate water for the site. But, the site is allocating certain amount of ETP treated water for gardening purposes on site.	
3.3.4	<i>Advanced Indicator The total volume of water voluntarily re-allocated (from site water savings) for social, cultural and environmental needs shall be quantified.</i>	 Yes
Comment	Site does not supply water to nearby village communities for social or cultural needs but is using the ETP treated water for environmental benefits like gardening within the site, helping in creating and maintain the green cover in the factory.	
Score	The site has quantified the total volume of water from 2020 to 2023. 6	
3.4	<i>Implement plan to achieve site water quality targets</i>	
3.4.1	<i>Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.</i>	 closed
Comment	At site level: effluent water quality is maintained well below the Norms and annual data is verified by third-party sustainability audit. Monthly test report of treated wastewater is also being carried out by external agency and submitted to Maharashtra Pollution Control Board. At catchment level: the site has undertaken surface and drinking water quality assessment of certain locations and is planning to continue the same at an annual frequency. The site has also started gathering data from relevant government authorities to capture more details about the catchment. From the WSP, this action "Strengthen solid waste recycling positive status X lakh HHs" is linked with water quality, but the status of progress has not been identified.	
	Finding No: TNR-005893	
3.4.2	<i>Where water quality is a shared water challenge, continual improvement to achieve best practice for the site's effluent shall be identified and where applicable, quantified.</i>	 Yes

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Comment	<p>The treated wastewater at ETP is either being used inhouse for gardening and toilet flushing or being discharged to CETP located outside the plant premises.</p> <p>For better control on ETP performance, an online treated effluent water monitoring system is installed at the ETP outlet. If the parameters exceed above a pre-set defined value, the system will divert the outlet water to equalization tank via auto valve mechanism and repeat the treatment process and it will continue till the parameters are lowered within the limit.</p>	
3.5	<i>Implement plan to maintain or improve the site's and/or catchment's Important Water-Related Areas.</i>	
3.5.1	<i>Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.</i>	 Obs.
Comment	<p>At Catchment Level, the responsibility for maintenance of IWRAs has been set for community as structures were handed over by ITC to the community.</p> <p>-Please refer to indicator 1.3.6 for on-site IWRA's.</p>	
3.5.2	<p><i>Advanced Indicator</i> <i>Evidence of completed restoration of non-functioning or severely degraded Important Water-Related Areas including where appropriate cultural values from a site-selected baseline date shall be identified. Restored areas may be outside of the site, but within the catchment.</i></p>	 Yes
Comment	<p>The site has constructed/renovated 555 Water harvesting structures and 1994 Ground water recharge structures constructed from 2015-16 to 2022-23. The comparison of before and after scenario of the projects are provided as evidence. Some of them are listed below:</p> <ul style="list-style-type: none"> - Large tank at Pargaon Tarf, Junnar block - Recharge pit at Karde, Shirur block - Check Dam at Uralgaon, Shirur block - Large tank at Garkhindi, Parner block - Minor tank at Malthan, Shirur block - Check Dam at Dahiwadi, Shirur block - Recharge pit at Padali Ranjangaon, Parner block - Recharge pit at Darodi, Parner block - Check Dam at Malthan, Shirur block - Large tank at Gulunchwadi, Junnar block 	
Score	6	
3.5.3	<p><i>Advanced Indicator</i> <i>Evidence from a representative range of stakeholders showing consensus that the site is seen as positively contributing to the healthy status of Important Water-Related Areas in the catchment shall be identified.</i></p>	 Yes
Comment	<p>It was quite evident from the stakeholder discussions that ITC has supported in contributing towards a healthy status of IWRAs. There are video testimonials by stakeholders, letters from stakeholders, awards by industry associations, etc. confirming the positive contributions towards the improvement of IWRAs.</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>	 Yes

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Comment The site has provision of adequate access to drinking water and toilets and are compared against the requirements mandated as per Factories Act, 1948 (Section 18) & The Occupational Safety, Health and Working Conditions Code, 2020 which exceeds the minimum requirements.

Unit is annually submitting the compliance as per the factories act in the LMS portal. Also, form 27 is submitted annually with required WASH details.

3.6.2 *Evidence that the site is not impinging on the human right to safe water and sanitation of communities through their operations, and that traditional access rights for indigenous and local communities are being respected, and that remedial actions are in place where this is not the case, and that these are effective.* ✔
Yes

Comment At catchment level supply side management & demand side management interventions planned and implemented in both primary scope area and water source catchment as part of the water stewardship plan are voluntary in nature and have been planned based on stakeholder engagement.

The evidences presented for 2.3.2, 2.3.5, 2.4.1, 2.4.2, 3.1.1-3.1.4, 3.5.1 justify this.

Therefore, the site does not impinge on human rights to safe water and sanitation of any stakeholder, and therefore there are no remedial actions to show case.

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 The site has engaged with the villages and schools for WASH initiatives at the catchment. A summary of the initiatives is provided below:

- Covered X schools under WASH activities like construction of toilets (separate for boys & girls), handwash station in the schools and also conducted training to students on WASH.
- Work has been done towards creating awareness among the residents & bringing about behavioural change towards safe sanitation in convergence with Swachh Bharat Mission.
- Until 2022-23, ITC Mission Sunehra Kal has covered X households under Solid Waste Management activities.
- Constructed X individual household toilets and the project villages have been declared Open Defecation Free (ODF).
- Strengthen X child cabinets and X School Development Management Committees in immediate catchment.

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.* ✔
Yes

Comment ITC has identified WASH as a critical shared water challenge after CAPP (Core Area Perspective Plan) Assessment. The site has been working with the local authorities such as Gram Panchayats for improving WASH in the catchment in collaboration with various committees such as School Management Committees. The site is working on improving Schools & Anganwadis WASH infrastructures in Zillah Parishad schools in coordination with Block Development Officer and Zila Parishad.






Score 4

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

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3.7.1	<i>Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.</i>	 closed
Comment	<p>There are no indirect water use targets in the water stewardship plan.</p> <p>The site shall consider adding the indirect water use targets to the water stewardship plan going forward.</p> <p style="text-align: right;">Finding No: TNR-005704</p>	
3.7.2	<i>Evidence of engagement with suppliers and service providers, as well as, when applicable, actions they have taken in the catchment as a result of the site's engagement related to indirect water use, shall be identified.</i>	 Yes
Comment	<p>The site has engaged with raw material suppliers and canteen food service provider in the catchment to provide water consumption data (copy of mail is provided as evidence).</p> <p>Also, training and awareness sessions were undertaken by the site to spread awareness on efficient water use in their operations and WASH practices.</p>	
3.7.3	<i>Advanced Indicator Actions taken to address water related risks and challenges related to indirect water use outside the catchment shall be documented and evaluated.</i>	 No
Comment	<p>The site procures one of the major primary inputs through one of the supplier which lies outside the catchment in Hosur region of Tamil Nadu in the year 2015.</p> <p>The site has mentioned about WASH interventions done in the region and future plan.</p> <p>The details related to actions taken to address water related risks and challenges related to indirect water use were not provided.</p>	
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>	 Yes
Comment	<p>The site has provided evidence of extensive engagement with owners of water infrastructure throughout the catchment on the status of shared water infrastructure. The evidence include:</p> <ul style="list-style-type: none"> - Acknowledgement letters by and Deputy Conservatory of Forest (DCF) and Secretary (CAD). - Confirmation of receipt and the request made for the WASH related interventions in the school. 	
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>	 Yes
Comment	<p>The site has implemented many actions throughout the villages within the catchment and working with the local public sector agencies.</p>	
3.9.2	<i>Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.</i>	 Yes

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Comment	The actions towards achieving best practice, related to targets in terms of water balance for the Supply side interventions, Demand side interventions and Biodiversity conservation at the catchment have been implemented.	
	For site, a no. of actions have been mentioned implementation of which has resulted in water savings.	
3.9.3	<i>Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.</i>	 Yes
Comment	The actions towards achieving best practice for water quality have been implemented. For catchment, several agricultural practices and have led to indirect improvement in water quality.	
3.9.4	<i>Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.</i>	 Yes
Comment	The site has implemented actions towards achieving best practice at the catchment: -Water Harvesting Structures (such as Checkdam, Stop dams, Large Tanks & Minor Structures).	
3.9.5	<i>Actions towards achieving best practice related to targets in terms of WASH shall be implemented.</i>	 Yes
Comment	At site level, actions are being taken to implement best practices related to WASH such as implementation of a robust system of housekeeping of the WASH facilities. The site has been working towards improving WASH in the catchment. A brief summary of the initiatives is provided below: -Improving Schools & Anganwadis WASH infrastructures. -Promoting Institutions (SMC/Mothers committee) to Plan, implement & manage infrastructures. -Work has been done towards creating awareness among the residents & bringing about behavioural change towards safe sanitation in convergence with Swachh Bharat Mission.	
3.9.6	<i>Advanced Indicator Achievement of identified best practice related to targets in terms of good water governance shall be quantified.</i>	 Yes
Comment	The site has quantified the chievement of identified best practices related to good water governance. The site works consistently with different levels of authorities, public sector agency and water user groups in villages all for the better management of water across the catchment.	
Score	8	
3.9.7	<i>Advanced Indicator Achievement of identified best practice related to targets in terms of sustainable water balance shall be quantified.</i>	 Yes
Comment	The site has quantified the identified best practice related to targets in terms of water balance. The water savings per annum for each project have been quantified.	
Score	8	
3.9.8	<i>Advanced Indicator Achievement of identified best practices related to targets in terms of water quality shall be quantified</i>	 Yes
Comment	The achievement of identified best practices related to water quality have been quantified by the site.	

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Score 8

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

Comment The site has quantified the following best practices adopted for improving IWRA's:


1. Water Harvesting Structures Created Additional Water Potential Created: X MCM.
2. Recharge Structures constructed: X Nos.
3. Biodiversity Conservation area: X hectares.
4. Trained X Forest officers on Soil Moisture Conservation activities from Junnar, Otur and Ghodegaon ranges.

Score 8

3.9.10 *Advanced Indicator*
Achievement of identified best practice related to targets in terms of WASH shall be quantified. 
Yes

Comment Achievements against WASH & other Basic Infrastructures support to Schools have been quantified.


Score 4

3.9.11 *Advanced Indicator*
A list of efforts to spread best practices shall be identified. 
Yes

Comment The site has made substantial efforts to spread best practices both at site level and catchment level. The same are listed below:

- Engagement with RM Suppliers and Neighbouring Industries to provide training on AWS plan and Water saving methods.
- Jointly organised session with Ranjangaon Industries Association
- Water User Group meeting & trainings
- Farmers Field School Meetings
- Joint Forest Management Committee Trainings
- Biodiversity Management Committee Trainings
- Creation of Child Cabinet & School Management Committee
- Village gram Sabha
- Participatory Rural Appraisal
- Workshops
- Celebration of Important days: World water day, Farmer Day & Environment Day
- News Papers to spread awareness

Score 3

3.9.12 *Advanced Indicator*
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. 
Yes


Comment The site has prepared a table showing the collective actions and the role played by ITC and the institutions with name of the people involved from the entities alongwith their designation. The evidence of engagement is also provided.

Score 14

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3.9.13	<i>Advanced Indicator</i> <i>Evidence of the quantified improvement that has resulted from the collective action relative to a site-selected baseline date shall be identified and evidence from an appropriate range of stakeholders linked to the collective action (including both those implementing the action and those affected by the action) that the site is materially and positively contributing to the achievement of the collective action shall be identified.</i>	 Yes
Comment	<p>The evidence from Impacting Stakeholder about site being seen as positively contributing to the achievement were identified and listed below:</p> <ul style="list-style-type: none">- Feedback from Water User Associations, WRD Section Officers & WRD Secretary- Feedbacks from Biodiversity Management Committee members- Acknowledgement letter from DCF- Meeting minutes of SMC meeting and List of SMC & Child cabinet- Training report, Letter from BDO- Appreciation letters from GPs, NOC of individual beneficiary & GPs on Supply Side Management- Farmer Training Meeting Minutes & Master list on Demand side Interventions <p>There are various video testimonials highlighting how site is positively contributing to the achievement of collection actions.</p>	
Score	10	

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4 STEP 4: EVALUATE - Evaluate the site's performance.	
4.1	<i>Evaluate the site's performance in light of its actions and targets from its water stewardship plan and demonstrate its contribution to achieving water stewardship outcomes.</i>
4.1.1	<i>Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.</i>
Comment	<p>The site has presented a table which tracks the performance against the targets in the plan. The performance is evaluated against the 4 targets set in the water stewardship plan. The performance is evaluated during third party audits.</p> <p>For the catchment, the site presented summary of achievements against the targets for supply side management, demand side management and WASH targets which shows yearwise implementations in the catchment.</p>
4.1.2	<i>Value creation resulting from the water stewardship plan shall be evaluated.</i>
Comment	<p>The site has presented a table where they have captured the economic, environmental and social value created in their WS activities. This has been presented separately for the catchment and the site. The site has created considerable economic value water conservation interventions and this has resulted in reduced water drawn from the MIDC.</p>
4.1.3	<i>The shared value benefits in the catchment shall be identified and where applicable, quantified.</i>
Comment	<p>The site has identified the shared value benefits in the evidence provided for 4.1.2. Additionally the site has identified others:</p> <ul style="list-style-type: none"> a. Improvement in ground water levels b. Additional Water storage at catchment villages c. Water Use Efficiency in Sugarcane d. Increase in children's enrolment in government schools <p>The site has quantified some shared value benefits in the catchment.</p>
4.1.4	<i>Advanced Indicator 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>
Comment	<p>At site level, an annual executive-level review is conducted for the business unit Executive Vice President to present and discuss water-related challenges, risks, opportunities, water costs, savings, or benefits. Agenda points for the review meetings include water conservation and Energy. The site should focus on discussion of shared water challenges, water risks, and opportunities, any water-related cost savings or benefits realized, and any relevant incidents.</p>
4.2	<i>Evaluate the impacts of water-related emergency incidents (including extreme events), if any occurred, and determine the effectiveness of corrective and preventative measures.</i>
4.2.1	<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>

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Comment The site has mentioned that there are no water-related emergency incidents at the site till date. However, the 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.

Details of such water-related incidents if any are also reported in the site's annual sustainability reporting framework. Apart from this, the site has a system of reporting and investigation of incidents doing root cause analysis as per Corporate EHS (environment, Health and Safety) guidelines.

4.3 *Evaluate stakeholders' consultation feedback regarding the site's water stewardship performance, including the effectiveness of the site's engagement process.*

4.3.1 *Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.*



closed

Comment The site has presented evidence of some important stakeholder's engagement and consultations at Catchment level including stakeholder meetings/workshops held on special days (World Water Day, Environment Day, etc. The site has not presented evidence relating to consultation efforts on the water stewardship performance.

Finding No: TNR-005711

4.3.2 *Advanced Indicator
The site's efforts to address shared water challenges shall be evaluated by stakeholders. This shall include stakeholder reviewing of the site's efforts across all five outcome areas, and their suggestions for continual improvement.*



No

Comment The site highlights the progress and efforts taken up during stakeholder review meetings and also highlights the progress on the wall using murals as shown in the evidence.

However, the site is required to provided evidence of stakeholder reviewing of the site's efforts across all five outcome areas, and their suggestions for continual improvement.

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

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



Obs.

Comment The site has not incorporated yet any relevant information and lessons learned from their evaluations at its Water Stewardship Plan: to be verified at the first surveillance.

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5 STEP 5: COMMUNICATE & DISCLOSE - Communicate about water stewardship and disclose the site's stewardship efforts	
5.1	<i>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.</i>
5.1.1	<i>The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.</i>
Comment	The site has displayed on a sign board at the factory main gate with regards to water-related compliance, along with positions of staff as part of disclosure. The EHS 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.
5.2	<i>Communicate the water stewardship plan with relevant stakeholders.</i>
5.2.1	<i>The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.</i>
Comment	The site has mentioned that it discloses the water stewardship plan through various mediums like: -Murals and Wall Paintings in village highlighting the Plan, Progress and the AWS Outcome. -Water Budgeting Display Board that highlights the water balance and how much deficit needs to be addressed. -Brochures that highlight the plan and progress are created & circulated among different stakeholders. -Various awareness events organised on important days like World Water Days, where the site's stewardship plan is discussed in details.
5.3	<i>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.</i>
5.3.1	<i>A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.</i>
Comment	At catchment level, the frequency of meetings with stakeholders for disclosure of water stewardship performance are as follows: 1. GP, Community and farmers - Yearly once 2. NGOs- Implementing Partners - Quarterly 3. Water Resource Department - Quarterly 4. Forest Department - Yearly once 5. Agriculture department - Yearly once At Site level, during annual meet with top executives, an overview of efforts and achievements in managing water resources effectively and responsibly is highlighted alongwith water stewardship progress.
5.3.2	<i>Advanced Indicator The site's efforts to implement the AWS Standard shall be disclosed in the organization's annual report.</i>

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Comment	ITC's water stewardship journey and efforts are disclosed every year in the company's Annual Sustainability Report.	
Score	Report 2023: ITC-Sustainability-Integrated-Report-2023.pdf (itcportal.com). 1	
5.3.3	<i>Advanced Indicator</i> <i>Benefits to the site and stakeholders from implementation of the AWS Standard shall be quantified in the organization's annual report.</i>	 Yes
Comment	In the company's annual sustainability report, ITC's water stewardship implementation efforts are presented. The various benefits which are derived from the site's water stewardship interventions are quantified. Pl. refer page no. 122 of 127 of Annual Sustainability report 2023.	
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	The site has disclosed the shared water challenges and efforts made to address these challenges to the stakeholders through different meetings at Village level (WUAs, FFS-Meetings, Wall paintings, Brochures etc.), and Catchment level (Multiple stakeholder meeting/workshops, events like World Water Day/Environment Day etc.). Information disseminated to relevant stakeholders through village wise implementations through meetings, WhatsApp group, Pamphlets/brochures.	
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	The site has shared evidence of engagement with the following stakeholders: 1. Forest Department - MoU, Acknowledgement letter and meetings 2. Department of Agriculture - Meeting Minutes and training reports 3. Water Resource Department - MoU, Acknowledgement letter and meetings 4. Vasantdada Sugar Institute - MoU, Report, field visits and meetings 5. ICAR - DOGR - MoU, Report, field visits and meetings 6. Farmers/community - NOC, Meeting minutes, photos and trainings 7. Gram Panchayaths - NOC, Meeting minutes, photos and trainings 8. KVK Narayangaon - Meeting Minutes, Joint workshops & trainings 9. Raw material suppliers, service providers - Mail communication, Physical Meeting. 10. MIDC Water supplier - Water supply agreement. 11. Maharashtra state pollution control Board - Compliance letter along with reports	
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	The site has not reported any water-related compliance violations till date. This is also reported annually in the sustainability data management system by the site.	
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 The site did not record any water related compliance violation, hence no corrective actions were undertaken during the review period.

5.5.3 *Any site water-related violation that may pose significant risk and threat to human or ecosystem health shall be immediately communicated to relevant public agencies and disclosed.*



Yes

Comment No water related compliance violations that may pose a significant risk and threat to human, or ecosystem health were recorded. 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.

Photographic Evidence from Audit



Yes