

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000646

SITE DETAILS

Site: **ITD - India Tobacco Division- Ranjangaon**

Address: Plot No. B-27, M.I.D.C, Ranjangaon Industrial Area, Taluka Shirur, 412220, PUNE, Maharashtra, INDIA

Contact Person: Santosh Uttam Kadu

AWS Reference Number: AWS-000565

Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Platinum

Date of certification decision: 2024-Jan-17

Validity of certificate: 2027-Jan-17

AUDIT DETAILS

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

Audit Type(s): Initial Audit

Audit Start Date: 2023-Jul-20

Lead Auditor: Amit Singh

Site Participants:

Sandeep Sharma, General Manager Ranjangaon Factory

Depankar Datta, Sr. Manager Commercial

Pratik Roy, Sr. Manager Engineering

Jagabandhu Samanta, Sr. Manager Human Resources

S. Sai Anjan Surepeddi, Sr. Manager Production

Sachin Phulari, Manager - Welfare

Rohit Mamgain, Assistant Manager Utility

Sai Gowtham Deevi, Programme Executive Watershed MSK

B. Lakshminarayana, Programme Manager Tech. & Engineering MSK

Brahmanand Dabade, Associate Technologist Electronics

Santosh Kadu, Factory EHS Manager

Munesh Saxena, Sr. Programme Manager Tech. & Engineering MSK

Shivendru Mathur, Manager Corporate Sustainability

B. Bharatwaajan, Manager Corporate Sustainability

Goutam Mondal, General Manager - EHS

Navanath Ekatpure, Executive Projects and Services

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ADDITIONAL INFO

Summary of Audit Findings: A total of 17 findings were raised during the certification audit, 2 major non-conformity, 9 minor non-conformities, 6 observations. The major non-conformities were of sufficient concern to warrant the categorisation of the non-conformity as major and related to definition of physical scope and stakeholders.

The site achieved 120 points and therefore the audit team recommends certification of ITD - India Tobacco 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 and minor non-conformity and submitted the corrective action plan addressing all findings.

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

ITC Tobacco Unit has an area of 34 acres and is situated in MIDC Ranjangaon, Shirur Taluka of Pune District. 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 20th July to 22nd July 2023. The onsite visit included the assessment of water treatment facility at site and catchment activities that were visited as part of the audit.

SCORE

120.00

FINDINGS

NUMBER OF FINDINGS PER LEVEL

Observation	6
Minor	9
Major	2

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FINDING DETAILS

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Finding No:	TNR-005714
Checklist Item No:	1.1.1
Status:	Closed
Finding level:	Major
Checklist item:	The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including: <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.
Findings:	The storm water drain points are marked in the piping network. However, the ultimate receiving waterbody is not known.

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Corrective action: Following are the various receiving water bodies for different types of outlet water for the site :-

A) Ultimate receiving water body for storm water

All storm water drain lines are connected to the groundwater recharge pits (which are 19 in number). These pits are also interconnected to one another. These pits also receive rooftop rainwater through swell drains.

a. Under normal conditions, collected storm water is naturally recharged into the groundwater through rain water harvesting pits. Thereby making the ground water as the ultimate receiving water body for storm water. These rainwater harvesting pits are highlighted in Annexure 1A: Updated piping Layout with Site storm water line connected MIDC Storm Water line.

b. Under extreme conditions, when the pits are not able to contain the storm water due to intense short spells of rain, the overflow of these pits is channelled to MIDC's storm water drain through the existing storm water drain at two locations (one at Main entrance gate and other at Material gate). The location of this connection between the storm water drains and MIDC's storm water drain is highlighted in the Annexure 1A: Updated piping Layout with Site storm water line connected MIDC Storm Water line. MIDC's storm water drain is connected to their CETP (refer Annexure 1B: Layout showing Storm water from ITC ITD Ranjangaon to CETP MIDC Ranjangaon). MIDC then uses this water along with other treated water from its CETP for gardening and horticulture purposes where the water is either absorbed by the roots of the plants or seep through the ground and become a part of groundwater.

B) Ultimate receiving water body for treated waste water.

Moreover, as a Zero Effluent Discharge site (as highlighted in site's response to the indicator refer attached Annexure 3: Step-1 Manual Snapshot Page 13 second line highlighted in yellow & Annexure 2: MPCB Consent page-5 condition 1 C), no effluent is release outside the site. Treated wastewater is utilised for on-site gardening, where again it is either absorbed by the plants, evaporates or a small portion of it seeps through the soil, ultimately joining the groundwater making the groundwater again as the ultimate receiving water body. The piping network utilised for circulating treated waste water for gardening is highlighted in the Annexure 1C: Piping layout of ETP Treated water for gardening within the site.

Evidence of implementation: Annexure 1A: Updated piping Layout with Site storm water line connected MIDC Storm Water line.

Annexure 1B Layout showing Storm Water Line from ITC ITD Ranjangaon to CETP MIDC Ranjangaon

Annexure 1C: Piping layout of ETP Treated water for gardening within the site

Annexure 2: MPCB Consent

Annexure 3: Step-1 Manual Snapshot

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Finding No:	TNR-005746
Checklist Item No:	1.2.1
Status:	Closed
Finding level:	Major
Checklist item:	Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall: <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.
Findings:	The site has worked in the catchment villages / with farmers / schools but did not specifically identify the indigenous people, minorities, vulnerable people. It is not clear that the site considered the physical scope to include stakeholders representative of the site's ultimate water source and ultimate receiving water body or bodies. The site did not also identify the ability and/or willingness of stakeholders to participate.

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Corrective action: The site has addressed the findings through the following corrective actions.

A) As highlighted in the root cause analysis section below, the site comprehensively covers all the stakeholders in the catchment, categorizing them based on their work professions and roles/responsibilities rather than community and gender. Moreover, the site is well aware about the demographic data of the catchment, including the proportion of women, minorities and vulnerable groups. The process of gathering this demographic data includes secondary data collection. The site has gathered the demographic data of the region from the last census conducted in the country. According to Population Census Government of India, the scope area has 7% Schedule Caste community, 3% Schedule Tribes community and 90% are other community which includes general, other backward class, minority, etc. Also, as per the Census data, the male population is 53% and female population is 47% in the scope area. Please refer Annexure 1: Demographic profile for the Demographic profile of the scope area. Moreover, to address this finding, the SOP has been updated to explicitly emphasise ITC's approach ensuring clarity on the inclusion of these communities and rationale behind not individually identifying them in the stakeholder identification and disclosure process. This rationale has also been highlighted briefly in the root cause analysis section below. Please refer Annexure 3 Revised AWS/ITD- PUNE/SOP1 for Methodology stakeholder identification and engagement for more details (the recent modifications have been highlighted in yellow)

Overall, the site's objective is to uplift marginalized and weaker sections across the entire community, while simultaneously avoiding any perception of favouritism towards a specific community, race or gender. This approach aims to foster sustainable development and ensuring harmony and peace among the people in the catchment. Hence, the site is already covering all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people indirectly but does not identify them as a separate stakeholder. Some of the examples of how site is helping the marginalized section of the society is provided in the Annexure 5: Site's engagement with vulnerable community (Women) in the catchment.

B) Following are the site's ultimate receiving water body and water source.

- a. Site's ultimate receiving body for storm water line is CETP provided by MIDC, details of the same have been provided in the site's response against the findings of indicator 1.1.1. MIDC is further using this water for gardening and horticulture purposes. Moreover, MIDC has been identified as an important stakeholder and its interest, influence in addressing the challenges as well as its influence on the site has been clearly identified in indicator 1.2.1 and 1.2.2. (Refer to the Annexure 2 Snapshot of Step- Manual (Refer Page 14))
- b. Site's ultimate receiving water body for ETP treated water is the groundwater, as the ETP treated water is being used in gardening within the facility and seeps through the soil to become a part of ground water.
- c. Site's ultimate water source is the Ghod River.

Site's ultimate discharge point is a part of the site's primary scope area

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and the site's water source is a part of Site's Catchment. (refer Annexure 4: Site's ultimate source, discharge points and the catchment boundary for more details) . And the stakeholder identification covers the entire catchment area, hence one can establish that the ultimate receiving water body and ultimate source are covered in the scope area for stakeholder identification. This clarification which was earlier missing in the SOP has now been added in the SOP to avoid any misconceptions in the future. Please refer Annexure 3 Revised AWS/ITD- PUNE/SOP1 for Methodology stakeholder identification and engagement for more details (the recent modifications have been highlighted in yellow)

Moreover, the site has indeed identified ability and the willingness of the stakeholder to participate and address the challenges as the influence and the interest of stakeholder in addressing these challenges. This has been briefly explained in the Root Cause Analysis sections and appropriate modifications have also been made in the SOP to clarify the same. Please refer Annexure 3 Revised AWS/ITD- PUNE/SOP1 for Methodology stakeholder identification and engagement for more details (the recent modifications have been highlighted in yellow).

Evidence of implementation: Annexure 1: Demographic profile
Annexure 2: Snapshot of Step- Manual (Refer Page 14,17)
Annexure 3 Revised AWS/ITD- PUNE/SOP1 for Methodology stakeholder identification and engagement
Annexure 4: Site's ultimate source, discharge points and the catchment boundary
Annexure 5: Site's engagement with vulnerable community (Women) in the catchment.

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Finding No:	TNR-006642
Checklist Item No:	1.2.2
Status:	Closed
Finding level:	Minor
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:	It was not clear that the site's ultimate water source and ultimate receiving water body for wastewater were considered in stakeholder identification.
Corrective action:	<p>Following are the site's ultimate receiving water body and water source.</p> <p>a) Site's ultimate receiving body for storm water line is CETP provided by MIDC, details of the same have been provided in the site's response against the findings of indicator 1.1.1. MIDC is further using this water for gardening and horticulture purposes. Moreover, MIDC has been identified as an important stakeholder and its interest, influence in addressing the challenges as well as its influence on the site has been clearly identified in indicator 1.2.1 and 1.2.2. (Refer to the Annexure 1: Snapshot of Step- Manual (Refer Page 14))</p> <p>b) Site's ultimate receiving water body for ETP treated water is the groundwater, as the ETP treated water is being used in gardening within the facility and seeps through the soil to become a part of ground water.</p> <p>c) Site's ultimate water source is the Ghod River.</p> <p>All of these points are part of the site's identified catchment area (refer Annexure 3: Site's ultimate source, discharge points and the catchment boundary for more details). And the stakeholder identification covers the entire catchment area, hence one can establish that the ultimate receiving water body and ultimate source are covered in the scope area for stakeholder identification. This clarification which was earlier missing in the SOP has now been added in the SOP to avoid any misconceptions in the future. Please refer Annexure 2: Revised AWS/ITD- PUNE/SOP1 for Methodology stakeholder identification and engagement for more details (the recent modifications have been highlighted in yellow)</p>
Evidence of implementation:	<p>Annexure 1: Snapshot of Step- Manual (Refer Page 14,17)</p> <p>Annexure 2: Revised AWS/ITD- PUNE/SOP1 for Methodology stakeholder identification and engagement</p> <p>Annexure 3: Site's ultimate source, discharge points and the catchment boundary</p>

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Finding No:	TNR-005716
Checklist Item No:	1.3.3
Status:	Closed
Finding level:	Minor
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:	<p>The input water balance does not match with the balance of water distribution to different sections of the plant.</p> <p>The evaporation loss and blowdown loss are merged together, the basis of estimation of evaporation loss and blowdown loss is to be provided.</p> <p>There is a mismatch in the wastewater generation from recycle RO & softener and combined wastewater stream.</p> <p>The calculation of rainwater recharge is estimated with 80% collection efficiency of the rainwater potential. The same needs to be rechecked as the total annual rain is mainly during some days and compared with the hourly capacity of the rainwater harvesting pits.</p>

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Corrective action: Following are the corrective actions taken by the site against each of the findings:-

A) Site has rechecked water balance and has identified that there was one correction in the calculation of ACF reject which was considered as recycle RO inlet instead of ETP Inlet. The input balance is now matching to the distribution of water into different streams. Moreover, to get more clarity directional arrows have been marked in water balance to the lines indicating the flow of water. (Refer to the Annexure -1 Water Balance Chart Reviewed and updated for more details)

B) Though the site had merged the evaporation and blowdown losses while highlighting them in the water balance, there is a standard methodology of estimating them for the cooling tower. Same has been highlighted in (Refer to the Annexure -2 Cooling tower Evaporation & Blowdown loss calculation). Evaporation and blow down losses for other areas which include ACF, Softener, Boiler, Gum Washroom (where hot water is used) and canteen are estimated values based on site internal consumption pattern and certain assumptions. Site has metering at the inputs of these areas and site is working on provision of metering at the input points of ETP which will enable site to get the actual losses.

C) Site has rechecked the mismatch which was present due to ACF reject being calculated in Reject RO Inlet. This has now been corrected.

D) Site's rain water recharge pits are strategically located on the complete periphery of site hence ensuring maximum collection of rain water. Moreover, the rain water recharge pits have been designed with a capacity much higher than rainfall witnessed by the site. Also, in order to account for the factor of collection efficiency, rain water recharge calculation are done as per on ITC Sustainability SOP Annexure 1(e) at Page 81 (Refer to the Annexure 3: Snapshot of ITC Sustainability SOP For rain water Harvesting). The SOP defined the efficiency to be 80% after considering the evaporation losses, spillages and first flush wastage. The SOP also defines surface coefficients which are same as that published by Central Public Work Department. The calculation of rain water harvesting is also attached in Annexure 4: Rain water harvesting potential calculation for FY 22-23.

Evidence of implementation: Annexure -1 Water Balance Chart Reviewed and updated
Annexure -2 Cooling tower Evaporation & Blowdown loss calculation.
Annexure -3 Snapshot of ITC Sustainability SOP For rain water Harvesting
Annexure -4 Rain water harvesting potential calculation for FY 22-23

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Finding No:	TNR-005717
Checklist Item No:	1.5.4
Status:	Closed
Finding level:	Minor
Checklist item:	Water quality, including physical, chemical, and biological status, of the catchment shall be identified, and where possible, quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be identified.
Findings:	The samples from certain locations were collected and tested by the site. However, the collected samples does not represent the complete scenario of the catchment. The site needs to engage with relevant authorities and extract the water quality data of the major streams / groundwater to get representative data. The water quality is being monitored periodically by government authorities.

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Corrective action: The site has incorporated a comprehensive approach towards getting the water quality data in the catchment. This approach involves both primary data as well as secondary data collection.

Since the site lies in the Ghod river basin, a large portion of the catchment is dependent on the Ghod river to meet its water requirements. Hence as a first step, the site engaged with the Maharashtra Pollution Control Board to gather the water quality data of the Ghod River. The site discovered that the Maharashtra Pollution Control Board regularly assesses the water quality of the Ghod River based on parameters such as pH, DO, BOD, COD, Nitrate, and Fecal Chloroform. This data is publicly available on their website for everyone to use. This water quality status indicate that the Ghod River is relatively nonpolluted and in medium to good condition. The water quality status of the Ghod river is a good indication of the water quality in the entire basin. (Refer Annexure 1: MPCB Water Quality Assessment of Ghod River near Shirur for more details)

Subsequently, the site devised a plan to collect water quality data within the catchment to gain a more nuanced understanding of its water quality. However, it encountered a challenge as such data is not readily accessible in public forums.

Henceforth, in an effort to proactively enhance water quality monitoring, the site took the initiative to conduct testing on surface and drinking water by collecting samples from select locations which are a good representative of the area.

For surface water quality, the site extended the assessment to include parameters like TDS and turbidity, which were not previously covered by the PCB's testing. (Refer Annexure 2: Surface Water Quality Assessment in the catchment for more details)

However, in the response against this indicator, the site did not highlight that it did conduct its own water quality testing, particularly when data was not readily available on government websites or from relevant government departments. It's also important to note that this proactive approach does not indicate a lack of engagement with public sector departments for data. The site has actively sought information from public sector sources, and the independent testing serves as a supplementary measure in instances where data from these departments was not readily accessible.

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-005718
Checklist Item No: 1.6.1
Status: Closed
Finding level: Minor
Checklist item: Shared water challenges shall be identified and prioritized from the information gathered.
Findings: The submitted evidence was reviewed and no evidence of prioritisation could be found in the shared documents.
The site will need to work on this aspect of the indicator to achieve compliance and describe the process by which prioritisation is undertaken.
Corrective action: The site has indeed identified and prioritized its shared water challenges through a thorough process involving assessments and engagements with various catchment stakeholders, as detailed in the root cause analysis section of the response to this NC.
Evidence of implementation: 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
Annexure 1: MH CAPP Report 2021 abridged
Annexure 2: Ghod Study Report abridged

Finding No: TNR-005738
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: The identified reputational risks are similar but categorised into three different risks.
Reputational risks identification and linkage with the business impact needs to be aligned.

Finding No: TNR-005739
Checklist Item No: 1.7.2
Status: Open
Finding level: Observation
Checklist item: Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.
Findings: The site has not addressed potential savings associated with the opportunities. Potential savings / business opportunities are required to be aligned with the risks.

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Finding No: TNR-006643
Checklist Item No: 1.8.3
Status: Open
Finding level: Observation
Checklist item: Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.
Findings: The identified catchment best practices for water quality are actually not the only best practices for catchment water quality. The site needs to work upon this indicator.

Finding No: TNR-005720
Checklist Item No: 2.3.2
Status: Open
Finding level: Observation
Checklist item: A water stewardship plan shall be identified, including for each target:
- How it will be measured and monitored
- Actions to achieve and maintain (or exceed) it
- Planned timeframes to achieve it
- Financial budgets allocated for actions
- Positions of persons responsible for actions and achieving targets
- Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.
Findings: The 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, it seems difficult to monitor monthly progress of the activities for supply and demand side management.

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Finding No: TNR-005723
Checklist Item No: 3.7.1
Status: Closed
Finding level: Minor
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 did not set indirect water use targets in the water stewardship plan.
Corrective action: The site explored the possibility of setting indirect water use targets with its suppliers. It found that ITC ABD-KGLT (one of the biggest raw material suppliers) has committed to a 2% year on year reduction in Specific Water Consumption. Additionally, the site's packaging material supplier within the catchment M/s Atharva corrugations and M/s Westrock have also now set a target of 2% year on year reduction in specific water consumption (Refer to Annexure 2: Communication on water use target by supplier)
These two targets have been incorporated into our plan (Refer to Annexure 1: Snapshot of Step-3 Manual for more details)
Evidence of implementation: Annexure 1: Snapshot of Step-3 Manual
Annexure 2: Communication on water use target by supplier

Finding No: TNR-005724
Checklist Item No: 3.9.2
Status: Open
Finding level: Observation
Checklist item: Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.
Findings: For certain water conservation initiatives, the water savings have been calculated based on difference in water consumption between the previous year and current year. But there is a difference in production value. The site should work out detailed water savings for each implemented project by presenting details of before and after scenario.

Finding No: TNR-005725
Checklist Item No: 3.9.3
Status: Open
Finding level: Observation
Checklist item: Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.
Findings: The site needs to identify more relevant best practices for catchment water quality and implement the actions.

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Finding No:	TNR-005726
Checklist Item No:	4.3.1
Status:	Closed
Finding level:	Minor
Checklist item:	Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.
Findings:	<p>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.</p>
Corrective action:	<p>The site actively employs diverse methods to communicate its targets and 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>In response to Reviewer's comment: In all of these consultation efforts, the stakeholders review and evaluate site's water stewardship performance. Their feedback refer Annexure 7 & 8 is then incorporate in further action plans. Moreover, within the unit, feedback is received from various stakeholders in EHS meetings and then site evaluates their feedback and subsequently action are taken against them as highlighted in Annexure 9.</p>

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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
- Annexure 7: Request Letter from Gram Panchayat Karde
- Annexure 8: Request Letter from GP Karde for Soil and Moisture Conservation
- Annexure 9: Action against the Feedback received in the EHS meeting

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Finding No:	TNR-005727
Checklist Item No:	4.4.1
Status:	Closed
Finding level:	Minor
Checklist item:	The site's water stewardship plan shall be modified and adapted to incorporate any relevant information and lessons learned from the evaluations in this step and these changes shall be identified.
Findings:	The site is required to redesign the way in which the water stewardship plan is presented in order to showcase the modifications, adaptations and lessons learned.

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Corrective action:

There are various ways in which site is modifying its water stewardship plan as per internal as well as external learnings from stakeholders.

The site has implemented a practice of revisiting its long-term plans every five years, conducting detailed stakeholder consultations through participatory rural appraisal, focus group discussions, key interviews, and site visits to understand priority stakeholder needs. Annual activities are then planned and executed accordingly.

In the immediate catchment, a Core Area Perspective Planning (CAPP) survey was conducted in 2015-16 to identify community priorities, with water scarcity, IHHT (Individual Household Toilets), school infrastructure, and sanitation emerging as major concerns. Focused interventions were subsequently prioritized, including water harvesting, IHHT construction, school infrastructure development, and a Solid Waste Management Program from 2015-16 to 2020-21.

Aligning with ITC's vision for inclusive and sustainable development, a CAPP 2.0 planning session was organized to identify developmental challenges in the immediate catchment for the period of 2021-26. Findings indicated significant changes in developmental needs and priorities, leading to a reframing of plans with a stronger focus on waste management (solid and liquid), digital education, water harvesting, groundwater recharge, school water, and sanitation.

(Refer Annexure 1: MH CAPP Report 2021 abridged for more details) Similarly within the site, periodic review meetings are conducted, such as Branch performance reviews, top management unit reviews, and Central EHS committee meetings, where the water stewardship plan and actions taken are discussed. Stakeholder input is sought, consent obtained, and targets reviewed and modified accordingly. Notably, the commitment to plan redesign, modification, and adaptation based on stakeholder consultation and lessons learned is evident, as demonstrated by the site's responsiveness to challenges such as the increased water requirement during the pandemic. This commitment is reflected in the site's periodic reviews and documented achievements against set targets.

One Such example of modification of water stewardship can be referred through Step-4 Manual indicator 4.1.1 where target for Specific water consumption was modified as per the learning during Covid 19. During Covid 19, domestic water usage increased due to sanitation activities and in the year FY 20-21; the target for specific water consumption was 3.52 KL/MNC, however due to the pandemic, the specific water consumption achieved was 3.71 KL/MNC (more than the target). Hence taking this learning into the picture, the specific water consumption target in FY 21-22 was increased to 3.84 KL/MNC so as to ensure that the target is aligned with the current scenario. (Refer Annexure 2: Step 4 Manual (Refer Page 27-42) for more details)

This shows site commitment towards redesign, modification and adaptations of the plans based on stakeholder consultation and lessons learned time to time.

Response to Reviewer Comment:

The site sets the Targets in its water stewardship plan after extensive

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stakeholder collaboration in the form of surveys and stakeholder meetings during its CAPP Assessments (Refer annexure 1 for CAPP report). These are broad targets with a timeline of 5 years which are then further detailed down to annual plans. The stakeholder feedback that the site receives are around the action plan that the site undertakes to achieve those targets.

Once the CAPP 2.0 was conducted, it was revealed that the community priorities have now been shifted more towards sanitation. As a result the programmes, initiatives and the budgets of the site for water stewardship activities are focussing more on WASH now. (Refer annexure 1 for more details on the stakeholder prioritisation)

The feedback on action plans is received regularly from the stakeholders in form of various request letters (as highlighted in Annexure 3 & 4). These request letters then become a part of the action plan of the site for that year.

In summary the feedback received from the stakeholder is on the lines of smaller action plans which are adequately considered and addressed. Feedback received from the stakeholders is not on the AWS Targets that are mentioned in the water stewardship plan.

Evidence of implementation: Annexure 1: MH CAPP Report 2021 abridged
Annexure 2 : Step 4 Manual (Refer Page 27-42)
Annexure 3: Request Letter from Gram Panchayat Karde
Annexure 4: Request Letter from GP Karde for Soil and Moisture Conservation

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Finding No:	TNR-005728
Checklist Item No:	5.2.1
Status:	Closed
Finding level:	Minor
Checklist item:	The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.
Findings:	The Site is required to disclose the complete water stewardship plan and how they contribute to the AWS Outcomes to relevant stakeholders.
Corrective action:	<p>The site actively presented diverse methods to communicate its AWS progress and outcomes to large stakeholders through:</p> <ol style="list-style-type: none">1. Stakeholder Meeting: 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 plan and 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 plans & 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 planned activities and the progress achieved thus far. (Refer to the Annexure 5: Ghod Water Stewardship Programme Brochure) <p>Response to the Reviewer Comment: A translated version has been attached in Annexure 6, highlighting how the plan, progress and linkage to AWS outcomes is being communicated to the different stakeholders. This is a sample document, and similar disclosures are made in other villages in the catchment also.</p> <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>
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: Translated Plan Progress and linkage to AWS Outcome

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Finding No:	TNR-005762
Checklist Item No:	5.3.1
Status:	Closed
Finding level:	Minor
Checklist item:	A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.
Findings:	<p>The site was unable to provide evidence as to what information was disclosed to the communities, the evidence of only the meeting with stakeholders is provided.</p> <p>The site needs to provide evidence of the information disclosed at previous interactions or demonstrate compliance to the indicator by subsequent disclosure of water stewardship performance, including quantified performance against targets as per the requirement of the indicator.</p>

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Corrective action:

The site actively employs diverse methods to communicate its targets and progress on the water stewardship plan to various stakeholders. Some of these engagement methods include:

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)
5. Resolution meetings to communicate the progress towards water stewardship. (Refer to Annexure 7: Biodiversity plantation resolution from Mangrul GP & Annexure 8 School Wash- Hand wash station resolution from Nimgaon Bhogi School)

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.

Response to the Reviewer Comment:

A translated version has been attached in Annexure 9, highlighting how the plan, progress (including quantified performance) and linkage to AWS outcomes is being communicated to the different stakeholders. This is a sample document, and similar disclosures are made in other villages in the catchment also.

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.

Evidence of implementation: Annexure 1: Activity Disclosure at Darodi Village
Annexure 2A: Water stewardship progress resolution from Chincholi GP
Annexure 2B: 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
Annexure 7: Biodiversity plantation resolution from Mangrul GP
Annexure 8: School WASH- Hand wash station resolution from Nimgaon Bhogi School
Annexure 9: Translated Plan Progress and linkage to AWS Outcome

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Report Details

Report	Value
Report prepared by	Amit Singh
Report approved by	Ruth Wandera
Report approved on (Date)	19 October 2023

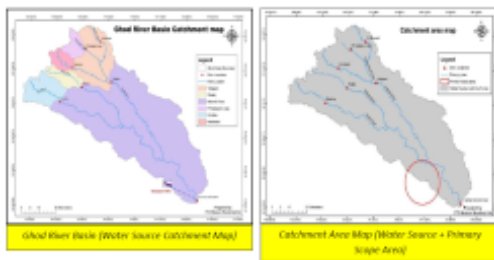
Surveillance

Proposed date for next audit
2024-Jul-19

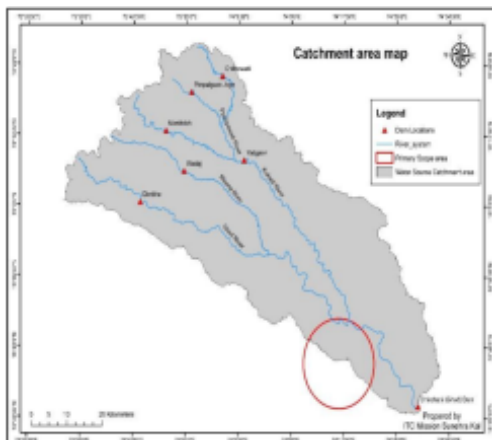
Stakeholder Announcements

Date of publication	Location
22/05/2023	Local Newspaper
12/05/2023	AWS Website
12/05/2023	WSAS Website

Catchment Information



Catchment Area Map.png



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Scope Area.png



Primary Scope area.png

Catchment Information

ITC had engaged with the subject experts to understand hydrology and geo hydrology of entire Ghod River Basin. Entire Ghod river 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 Joga 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.png

Client/Site Background

ITD - India Tobacco division plant is situated in MIDC Ranjangaon, Shirur Taluka of Pune District in the state of Maharashtra. ITC Tobacco Unit has an area of 34 acres. The water requirement of site is met by MIDC supply.

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 site has identified stakeholder's and listed their water related challenges. The shared water challenges are listed below:

- Increasing risk of drought
- Water scarcity in Chinchani Dam
- No water supplies due to rupture of MIDC water line
- Water scarcity leading to impact on production for industries
- Water Quality concerns leading to environmental impact
- Treated Water Quality (Discharge in the catchment)
- No water: Production will be affected & hence Employment
- Lack of water for WASH
- Water scarcity leading to business impact
- Water scarcity leading to impact on farmers livelihood
- Water scarcity will affect the production
- Water Quality for process and domestic use
- Water scarcity leading to impact on crops yield
- Poor WASH Facilities leading to health concern
- Water quality issues leading to health concerns
- Water security and challenges to water - related social and environmental rights
- Shortage of water supply for irrigation, industrial and drinking purpose
- Reduced base flow leading to reduced green coverage
- Severe drought can lead to forest fires and threaten the survival of flora and fauna
- Scarcity of water supply can impact their raw material (Sugarcane)

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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
0.1.1.2	<i>The scope of the proposed certification shall be under the control of a single management system.</i> ✔ Yes
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

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1 STEP 1: GATHER AND UNDERSTAND

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

Finding No: TNR-005714

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

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



closed

Comment The site 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. 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. Treated effluent is used for gardening within the site premises and it is not discharged outside the facility. The storm water drains from the site are marked in a map but the ultimate receiving water bodies are not known.

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 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.

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

1.2.1 *Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall:*

- Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people;
- Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies;
- Provide evidence of stakeholder consultation on water-related interests and challenges;
- Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups;
- Identify the degree of stakeholder engagement based on their level of interest and influence.








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Comment	The site has prepared 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 stakeholders have been prioritised based on their interest and tabulated in the table. The evidence of engagement with various stakeholders are shared as evidence. Unit's Stakeholder identification & Engagement procedure is based on (AWS/ITD-PUNE/SOP 1) which lays down the basis of engagement levels with each stakeholder.	Finding No: TNR-005746
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>	 closed
Comment	The site has prioritised the stakeholders based on the methodology for stakeholder identification. The evidence of engagement with various stakeholders at site and catchment level are also provided including engagement with Water Resource Deptt. and Forest Deptt.	Finding No: TNR-006642
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>	 Yes
Comment	The site has mapped basically the site water balance with inflow from MIDC, collection of rain water, raw water storage tank, water usage areas, discharge to ETP and usage of ETP treated water in gardening.	
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 an annual water balance based on monthly average water consumption data per day. They have provided the accounting for inflow water from MIDC, use of collected rainwater and submeters installed at various sections of plant along with 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 March 2023. However, the variation of water consumption is not correlated to the production.	Finding No: TNR-005716
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	<p>Water quality of the site's raw water, drinking water and ETP treated water is being tested. The site has a defined structure for carrying out water quality testing in the inhouse laboratory and external NABL accredited laboratory:</p> <ol style="list-style-type: none"> 1. Daily Raw Water quality testing by Inhouse laboratory and monthly by external laboratory 2. Quarterly 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 <p>The annual variances for various parameters of the raw water and ETP treated water have been plotted in graphs which shows the trend of various parameters.</p>	
1.3.5	<p><i>Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.</i></p>	 Yes
Comment	<p>The site has mapped the areas which are potential sources of pollution on site for polluting water such as HSD Tank, LSHS Tank, Boiler chemical storage area, WTP area, ETP chemical storage, Oil storage area, Canteen dishwasher chemical storage, Casing storage tanks, Transformer yard, MHE maintenance area, Casing and flavor storage room, Mentholation room, Engg. Store.</p>	
1.3.6	<p><i>On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.</i></p>	 Yes
Comment	<p>List of important water related areas at the site with its conditions:</p> <ol style="list-style-type: none"> 1. Rain water Harvesting Sumps: Unit has 19 rainwater collection sumps with dimensions of 5 meter * 4 meter with a depth of 2 meters and provided with perforated recharge tubes of 30-meter depth and water holding capacity of 40 cubic meters. Excellent condition as per the rating criteria with a rating of 5 out of 5 2. Rain water storage tanks: Unit has two rain water storage tanks of 13.30 m2 and 16.475 m2 with a depth of 2 m which has a total storage capacity of 59 m3, which is utilized for factory usage. Excellent condition with Rating - 5 3. Water Storage tanks: Water tanks of total capacity 4253 KI is used to store water, apart from two Separate Tanks (1015 KL) for Fire Fighting systems. Excellent condition with Rating - 5 4. Water Treatment plant: Raw water is treated before distribution to individual consumption points in the water treatment plant of the site. Excellent condition with Rating - 5 5. Effluent treatment plant: ETP of 180 KLD capacity is present in the unit to treat the process effluents/waste water/Sewage waste and convert into treated water as per prescribed limits. Excellent condition with Rating - 5 	
1.3.7	<p><i>Annual water-related costs, revenues, and a description or quantification of the social, cultural, environmental, or economic water-related value generated by the site shall be identified and used to inform the evaluation of the plan in 4.1.2.</i></p>	 Yes
Comment	<p>The site has calculated the annual water purchase and drainage cost, WTP operational & maintenance cost, ETP operational & maintenance cost, Risk mitigation - Water testing cost, Total water Heating and cooling cost.</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>	
1.3.8	<p><i>Levels of access and adequacy of WASH at the site shall be identified.</i></p>	 Yes
Comment	<p>The site has mapped and tabulated the drinking water and toilet facilities available the site and have compared the toilet & drinking water facilities available against the requirement mandated as per Factories Act, 1948; Maharashtra Factories Rules 1963 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>	

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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	The site has identified their primary inputs for the factory and there are two suppliers which are located in the catchment. The primary input supplier is M/s WestRock India Pvt Ltd, M/s ATHARVA CORRUGATIONS Pvt. Ltd. (site procures 63% & 9% of all CFCs respectively from these two vendors), who supplies CFCs (Corrugated Fiberboard Cartons) to the unit used as a packing material for cigarette packs. The water consumption details and quality of the water used is monitored at the supplier side. Both the suppliers have provided water consumption details including the SWC of their plants indicating the continuous involvement of ITD factory with the suppliers for water and WASH related data / awareness.	
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	The site receives food for its employees from a canteen service vendor (M/s Chef's Corner) situated within the catchment. The supplier has provided water intake data for last four years and drinking water quality test report.	
1.4.3	<i>Advanced Indicator The embedded water use of primary inputs in catchment(s) of origin shall be quantified.</i>	 Yes
Comment	One of the major raw material required in the process of cigarette manufacturing is tobacco and same is obtained through Agri-Business Division (another business division under ITC Limited). The site procures cut tobacco from Agri-Business Division through 3 Green Leaves Threshing Units located in Anaparti (AGLT), Chirala (CGLT) and Mysore (KGLT). The water consumption and SWC trends of the three GLT's for the past three years are provided. ABD team also monitors the water withdrawn for irrigation for tobacco cultivation both at the nursery as well as the main field stage for the tobacco procurement. Site has also gathered water related data of water-based glue from one of the supplier M/s HB Fuller India Adhesives Pvt. Ltd. The site has shared the water consumption and SWC data of the primary inputs.	
Score	5	
1.5	<i>Gather water-related data for the catchment, including water governance, water balance, water quality, Important Water-Related Areas, infrastructure, and WASH</i>	
1.5.1	<i>Water governance initiatives shall be identified, including catchment plan(s), water-related public policies, major publicly-led initiatives under way, and relevant goals to help inform site of possible opportunities for water stewardship collective action.</i>	 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	

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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
- It will be compulsory for the consumer to keep one good tested meter in spare with him for replacing existing out of order water meter
- It shall be the duty of the consumer to maintain in good condition the water meter so fixed
- Drinking water quality to be tested as per BIS standard from govt. approved lab once in 6 months

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

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 is 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. However, the study was conducted based on data of 2016-17 and the scenario would have been changed by now.

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 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. The site has also collected samples of drinking water for Junnar & Shirur region and were tested. The site has also gathered water quality data for Ghod river from the website of government authority - MPCB.

Finding No: TNR-005717

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 mentioned against the IWRA's.

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1.5.6	<i>Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.</i>	🔍 Obs.
Comment	<p>Ghod basin has high density of 5 major dams (Dimbhe, Manikdoh, Wadaj, Pimpalgaon Joga, Yadgaon) in the foothills of Western Ghats, which meet the needs of entire basin and also acts as back-up reservoirs for Chinchani (Ghod Dam).</p> <p>The site has also estimated an exposure of all these dams to extreme weather events. Extreme events were broadly divided into technical, Institutional & socio economic. Above classifications are defined by considering flood, excess rainfall, earthquake, drought, delayed monsoon, labour shortage during peak season, lack of water storage facilities.</p> <p>Complete</p> <p>The site has mentioned that the infrastructure related to dams, rivers and main canals are maintained by Water Resource Department, however the condition of the water-related infrastructure is not identified.</p>	
1.5.7	<i>The adequacy of available WASH services within the catchment shall be identified.</i>	✅ Yes
Comment	<p>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).</p> <p>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).</p> <p>With these two surveys major priorities/issues related to WASH are as follows:</p> <ul style="list-style-type: none"> • Insufficient sanitation facilities (individual / Common) • Poor and insufficient WASH infrastructure facilities in schools • Poor & inadequate waste management (Solid as well as Liquid) in village 	
1.5.8	<i>Advanced Indicator Efforts by the site to support and undertake catchment level water-related data collection shall be identified.</i>	✅ Yes
Comment	<p>The site has undertaken various studies to gather catchment level water-related data. Following study were conducted:</p> <ol style="list-style-type: none"> 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 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 	
Score	5	
1.5.9	<i>Advanced Indicator The adequacy of WASH provision within the catchments of origin of primary inputs shall be identified.</i>	🔍 Obs.
Comment	<p>The site the major primary input i.e. cut tobacco is procured from three GLTs. ITC has conducted a Core Area Perspective Plannig (CAPP) study to identify the adequacy of aspects of provision of WASH facilities in Chirala and Anarpati catchment from which the site receives raw material leaf from Agri business Division.</p> <p>There are no details of the current status of WASH provision in the identified region.</p>	

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1.6	<i>Understand current and future shared water challenges in the catchment, by linking the water challenges identified by stakeholders with the site's water challenges.</i>	
1.6.1	<i>Shared water challenges shall be identified and prioritized from the information gathered.</i>	 closed
Comment	The site has identified the shared water challenges in the catchment through the study of available reports, through engagement with NGOs and government authorities. The process of identification of shared water challenges has been defined and are listed below: <ul style="list-style-type: none"> - 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 	
		Finding No: TNR-005718
1.6.2	<i>Initiatives to address shared water challenges shall be identified.</i>	 Yes
Comment	The site has listed the initiatives planned to mitigate 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 to address the shared water challenges.	
1.6.3	<i>Advanced Indicator Future water issues shall be identified, including anticipated impacts and trends</i>	 Yes
Comment	In Ghod basin study, the demand side future water issues/requirement were identified as listed below: <ol style="list-style-type: none"> 1. Projecting Future Domestic Water Demands in the Basin 2. Projecting Future Livestock Water Demand in the Basin 3. Projecting Future Industrial Water Demand in the Basin 4. Projecting Future Agriculture Water Demand in the Basin 	
Score	3	
1.6.4	<i>Advanced Indicator Potential water-related social impacts from the site shall be identified, resulting in a social impact assessment with a particular focus on water.</i>	 Yes
Comment	The site has identified potential water-related social impacts are listed below. At site level: Site has no effluent discharge, so no social impact from site is identified. At Catchment Level: Promotion of water use efficiency in major crops of basin - sugarcane & 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 prioritised the water risks (as low, medium or high), alongwith the timeframe, likelihood and severity of impact, impact on business and potential costs. The risks have been categorised as physical risks, regulatory risk and reputational risk.	

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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>	🔍 Obs.
Comment	The site has identified water related opportunities and categorised under physical risks, regulatory risk and reputational risk including how the site may participate. Potential benefits to business have been listed against the risks. There are no details about the assessment and prioritization.	
1.8	<i>Understand best practice towards achieving AWS outcomes: Determining sectoral best practices having a local/catchment, regional, or national relevance.</i>	
1.8.1	<i>Relevant catchment best practice for water governance shall be identified.</i>	✅ Yes
Comment	The site has identified best practice in governance through their own commissioned studies and discussion with the government authorities. The same are listed below: - 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	The site has identified various best practices for site and catchment as listed below: At Site Level: 1. Site has developed Rainwater Harvesting Sumps for ground water recharge 2. Site has adopted mechanized cleaning of equipment and Solar PV Modules 3. Site has Waterless urinals in toilets and aerated nozzles for taps 4. Site used sensor-based water taps in all the washrooms 5. Site do condensate recovery from Primary Manufacturing department processes at Steam treated stem and dryers 6. Site has substituted Soft Water with ETP Treated Water for Trench Cleaning 7. Rain Water Harvesting Collection & Reuse of Harvested Rain Water 8. Replacement of water jet spray through compressed air in PMD to Humifog system for maintaining Relative Humidity in the area At Catchment Level: Supply Side Interventions - 1. Water Harvesting structures 2. Ground water recharge structures 3. Catchment/Land treatment Demand Side Interventions: 1. Demand management in Agriculture 2. 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>	🔍 Obs.
Comment	The site has identified various best practices for site and catchment as listed below: At Site Level: 1. Use of RO units and UV treatment to provide pure drinking water 2. Robust mechanism to keep check on the water quality 3. Use of specific technology like to improve BOD levels like installing ozonation plant. At Catchment Level: - 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>	✅ Yes

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Comment The site has identified various best practices for site and catchment as listed below:
At Site Level:
- Checking for Leakages/physical damages if any in the storage tanks and repairing the same
- Checking the physical condition of storage wells
- Maintenance of all rotating equipment's, blowers, pumps, meters etc.
- Cleaning of Filter water tank, RO water tank. Membrane replacement of Main RO Plant & Second Stage RO Plant. Maintenance of Transfer Pumps
- Cleaning of Equalization Tank, Treated water Tank, Collection Tank by Removal of Sludge deposits
At Catchment Level:
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

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 site and catchment 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.
At Catchment level:
1. Awareness amongst the village level community on Sanitation - Health and Hygiene activities
2. WASH and SLWM programme in 41 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>A signed and publicly disclosed site statement is identified signed by Unit Head and EVP - Technical (India Tobacco Division) covering the following commitments:</p> <ul style="list-style-type: none"> - That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes - That the site implementation will be aligned to and in support of existing catchment sustainability plans - That the site's stakeholders will be engaged in an open and transparent way - That the site will allocate resources to implement the Standard. <p>The site has displayed copy of Water Stewardship Policy and Commitment at various locations on site including the entrance of the site. The copy of same has been attached as evidence.</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 Water Stewardship Policy and Commitment signed by senior executives of the organisation.</p> <p>One copy is signed by EVP Technical - (Corporate Level - ITD) and Other copy signed by Unit Head - India Tobacco Division, Ranjangaon, Pune</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

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Comment The site has a defined system of capturing and monitoring all applicable legal and regulatory compliance obligations through a legal register checklist. Also Head office is monitoring on monthly basis compliances with their current status via I-comply portal. All compliance obligations related to water and waste water management are identified and monitored in the legal register checklist of the site. This legal register checklist is reviewed on a monthly frequency. There is also an online legal and regulatory compliance management system used for regular tracking and monitoring of compliances. The following document (Final_ITC_ITD_Pune_-_AWS_certification_Manual_-_Step_2) provides information on Identification of responsible persons/positions within facility organizational structure on page 6.

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

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



Yes

Comment The site has developed a water specific strategy which has a vision and mission and separate Goals for site and catchment.

Vision: Ensure water security for all stakeholders for Today & Tomorrow.

Mission: Ensure water security for all stakeholders and to make catchment as water positive, ensuring positive water balance, strengthening water governance at catchment and site & adopting sustainable water use at site by adopting water efficient manufacturing practices and follow reduce, re-use and recycle of water conservation.

Goals:

Organisation Goals:

- 40% reduction in Specific Water Consumption
- Creation of Rainwater Harvesting Potential equivalent to over 5 times the Net Water Consumption from Operations
- All Sites in High Water Stressed Areas to be certified as per the International Water Stewardship Standard by AWS
- Ensure Water Security for All Stakeholders through Watershed Development & Managed Aquifer Recharge
- Improve Crop Water Use Efficiency in Agri Value Chains through Demand Side Management Interventions

At Site Level:

- Reduce specific water consumption on a continual basis by improving water use efficiency
- Continuous monitoring and maintaining treated waste water quality as per statute.
- To maximize the re-use of rainwater or recharge of into the ground
- Create awareness on responsible water consumption

At Catchment Level:

- Ensure sustainable supply side interventions through surface water harvesting and enhancing ground water recharge
- Promote Water Use efficient demand side management practices and climate smart agriculture practices in the catchment
- Promote catchment restoration practices- biodiversity conservation
- Strengthen Water related governance and institutions in the catchment
- Equitable & adequate WASH facility in primary focus area beneficiaries
- Regular monitoring the water quality in catchment.

Information regarding this is found here

'Final_ITC_ITD_Pune_-_AWS_certification_Manual_-_Step_2' page 9 & 10.

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

🔍
Obs.

Comment The site has prepared water stewardship plan, separately for the site and the catchment. The targets set in the WSP for site are:
 1. To achieve Specific water consumption of 2.55 kL/MNC by 2030 by reducing Specific Water Consumption of 3.1% Year on Year
 2. Ensuring ETP treated water quality parameters are well below the defined MPCB norms
 3. To maintain 100% reuse and recycle of treated waste water
 4. 100% employees to be covered under trainings & other events to create awareness on responsible water consumption
 5. Ensuring 100% ground water recharge through recharge pits OR reuse of rain water
 The targets set in the WSP for catchment are:
 1. Supply Side Management
 - Creation of rainwater harvesting potential
 - Biodiversity conservation
 2. Demand Side Management
 - Water Demand Management
 3. Adequacy of WASH services - Strengthen solid waste recycling

2.3.3 *Advanced Indicator*
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.

✔️
Yes

Comment The site's partnership/water stewardship activities with ITC Foods Division, Ranjangaon located in the same catchment have been identified as the site has been jointly working with another ITC group company - ITC Foods 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 ITC Foods and MSK team.
 The site has presented ITC's Ghod River Basin Water Stewardship Programme in World Environment Day 2022 organised by Ranjangaon Industries Association.
 Joint event on WASH & Water stewardship awareness in Mhase BK Village in primary scope area

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 coordinates with two of the AWS Platinum certified sites (ITC Kovai and ITC Malur) for understanding, planning and implementing the water stewardship activities in its site and catchment.
 ITD- Tobacco Division with all its five cigarette factories as a whole formed Planning Task force and is working on reduction in Specific water consumption targets as a part of Sustainability 2.0 by 2030. Team has identified best practices within the factories and benchmarking it for replicating in other factories if not implemented or partially implemented with future interventions required to reach the Target.

Score 4

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2.3.5 *Advanced Indicator* ✔
Yes
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.

Comment At site level - specific water consumption targets are being discussed / reviewed in annual CEHS and other meetings.
 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)
 • Acknowledgement of the water stewardship plan from RIA
 • 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.* ✔
Yes

Comment The site has listed activities for mitigation of identified risks along with the agencies involved.
 The site has also shared details of MoU's mentioning the major objectives of the engagement.
 The site has outlined the associated activities to mitigate each risk and the public agency they are collaborating with along with evidence of collaboration.

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"
 There is a plan (in coordination with relevant authorities) to mitigate or adapt to water risks associated with climate change projections.

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>	 Yes
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 	
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 & 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.</p> <p>The water stewardship plan has been specifically designed to respects the rights of everyone 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 <p>The site has outlined that the catchment activities include backward castes and minorities.</p>	
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>Site has formulated the AWS Policy on 7th April 2023, post that site has also developed a Water Committee in April 2023 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, 42 BMCs, 58 SMCs, 58 Child cabinets and 38 JFMCs strengthened / made active in terms of maintaining all records, conducting regular meetings, decision making, implementing activities, etc.</p>	
Score	2	
3.1.4	<i>Advanced Indicator 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

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Comment 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:

- 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 - Eaton and Britannia
- 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
- Engagement with Agri Dept Scheme Convergence Workshop & Farmer Training

Score 2

3.2 *Implement system to comply with water-related legal and regulatory requirements and respect water rights.*

3.2.1 *A process to verify full legal and regulatory compliance shall be implemented.*



Yes

Comment 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 by responsible managers which is being reviewed and updated on a monthly frequency by the site. Additionally, compliance reports are made by utility Manager 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.

3.2.2 *Where water rights are part of legal and regulatory requirements, measures identified to respect the water rights of others including Indigenous peoples, shall be implemented.*



Yes

Comment At the Site-level, water related rights defined include the compliance with The Maharashtra Factories Rules 1963; THE OCCUPATIONAL SAFETY, HEALTH AND WORKING CONDITIONS CODE, 2020 and IS 1172:1993. 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.

3.3 *Implement plan to achieve site water balance targets.*

3.3.1 *Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.*



Yes

Comment The site has 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 *Where water scarcity is a shared water challenge, annual targets to improve the site's water use efficiency, or if practical and applicable, reduce volumetric total use shall be implemented.*








Yes




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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 from the baseline value of 3.7 m3/ton (in year 2018-19) to 2.89 m3/ton (in year 2022-23) against the target of 3.27 m3/ton.	
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 for the site to re-allocate water.	
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>	 Obs.
Comment	The site treated water is used to fulfill the environment needs for gardening/irrigation within the site premises as stated in MPCB consent to operate. As such, the site has not re-allocated any fresh water for social, cultural and environmental needs.	
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>	 Yes
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.	
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
Comment	Site is a zero effluent discharge unit. No untreated effluent is discharged outside the site's boundary. Site has a well-defined system for monitoring of the treated effluent parameters both in-house and through third party certified laboratories. The site has implemented following action in ETP Plant to improve the Treated Effluent Water Quality: Ozone Treatment for disinfection to improve ETP water parameters.	
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>	 Yes
Comment	The site has a defined maintenance plan for the internal IWRA's identified on site. There is a maintenance schedule as below: Raw water storage tanks - Biennial Rain water harvesting sumps - Annual Rain water storage tanks - Biennial Water treatment Plant - As per Maintenance calendar Effluent Treatment Plant - As per Maintenance calendar At Catchment Level, the responsibility for maintenance of IWRA's has been set for community as structures were handed over by ITC to the community.	






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3.5.2	<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>	 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	<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>	 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
Comment	<p>The site has provision of adequate access to drinking water and toilets and are compared to 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.</p>	
3.6.2	<i>Evidence that the site is not impinging on the human right to safe water and sanitation of communities through their operations, and that traditional access rights for indigenous and local communities are being respected, and that remedial actions are in place where this is not the case, and that these are effective.</i>	 Yes
Comment	<p>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.</p> <p>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.</p>	

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3.6.3	<i>Advanced Indicator</i> <i>A list of actions taken to support the provision to stakeholders in the catchment of access to safe drinking water, adequate sanitation and hygiene awareness shall be identified.</i>	 Yes
Comment	The site has engaged with the villages and schools for WASH initiatives at the catchment. A summary of the initiatives is provided below: <ul style="list-style-type: none"> • Covered 100 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 • Till 2022-23, ITC Mission Sunehra Kal has covered 20143 households under Solid Waste Management activities • Constructed 331 individual household toilets and the project villages have been declared Open Defecation Free (ODF) • Strengthen 58 child cabinets and 58 School Development Management Committees in immediate catchment 	
Score	5	
3.6.4	<i>Advanced Indicator:</i> <i>In catchments where WASH has been identified as a shared water challenge, evidence of efforts taken with relevant public-sector agencies to share information and to advocate for change to address access to safe drinking water and sanitation shall be identified.</i>	 Yes
Comment	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	2	
3.7	<i>Implement plan to maintain or improve indirect water use within the catchment:</i>	
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	There are no indirect water use targets set in the water stewardship plan Finding No: TNR-005723	
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	The site has engaged with Canteen food service provider from Dec'22 and suppliers on water stewardship requirements from Jan'23 in the catchment to provide water consumption data. (copy of mail and data is provided as evidence) Also, training and awareness sessions were undertaken by the site to spread awareness on efficient water use in their operations and WASH practices.	
3.7.3	<i>Advanced Indicator</i> <i>Actions taken to address water related risks and challenges related to indirect water use outside the catchment shall be documented and evaluated.</i>	 Yes

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Comment The major suppliers for the site outside the catchment are the tobacco leaf suppliers. The site procures cut tobacco internally from ITC's Agri Business Division (ABD) located in three areas namely Mysore, Chirala and Anaparti. ABD carries out continuous risk-assessments and implements interventions as a part of its holistic two-pronged approach involving both - demand-side management to improve irrigation efficiency and supply-side management to revive traditional water harvesting and recharge structures in areas of cultivation. The interventions at the farm level are listed below:

- Varieties tolerant to biotic & abiotic stress
- Sub soiling
- Biological interventions
- Tray Seedling
- Water Scheduling
- Drip Irrigation & Fertigation
- Smart Irrigation
- Drone Technology

Additionally, ABD has also taken interventions in its factories the three GLTs (from where the cut tobacco is provided to Ranjangaon unit) to reduce their water consumption.

Score 5

3.8 *Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have.*

3.8.1 *Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.*


Yes

Comment The site has provided evidence of extensive engagement with owners of water infrastructure throughout the catchment on the status of shared water infrastructure. The evidence include:

- Acknowledgement letters by Deputy Conservatory of Forest (DCF) and Secretary (CAD)
- Confirmation receipt and the request made for the WASH related interventions in the school

3.9 *Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.*

3.9.1 *Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.*


Yes

Comment The site has implemented many actions throughout the villages within the catchment and working with the local public sector agencies. Refer the attachments for evidence.

3.9.2 *Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.*


Obs.

Comment At site level, site has implemented various water conservation initiatives resulting into reduction in Specific water consumption. At catchment level, the site has implemented many actions throughout the villages within the catchment and working with the local public sector agencies. Refer the attachments for evidence.

3.9.3 *Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.*


Obs.

Comment The site has identified actions towards achieving best practice for water quality for site as well as catchment. 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 *Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.*


Yes

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Comment	The site has implemented actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas such as periodic cleaning and maintenance of water storage tanks and continuous monitoring of ETP parameters at site level and removal of silt at 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 to achieve targets related to WASH such as implementation of a robust system of housekeeping of the WASH facilities. has been working towards improving WASH in the catchment. A brief summary of the initiatives is provided below: <ul style="list-style-type: none">• ITC is working on 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 presented evidence to support good performance on this indicator. 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. Till 2022-23 - 127 WUAs, 42 BMCs, 58 Child cabinets and 38 JFMCs strengthened.	
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

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Comment The site has quantified the identified best practice related to targets in terms of water balance. At Site Level:

1. Installation of Waterless Urinals. Installation of aerated nozzles in the taps (implemented in 2018-19) Water savings/annum - 1351 kL
2. Optimization of RO Process Water in PMD (implemented in 2019-20), Water Saving/Annum - 266 kL
3. Condensate recovery improvement from 38% to 44% (implemented in 2019-20), Water Saving/Annum - 348 kL
4. Optimization of blowdown in AHUs, reuse of AC Condensate Drain low water TDS Water and replacement of old evaporative cooling pads (implemented in 2019-20), Water Saving/Annum - 1668 kL
5. Strategic initiatives in operation of HVAC (implemented in 2021-22), Water Saving/Annum - 830 kL
6. Mechanized cleaning of Solar PV panels (implemented in 2021-22), Water Saving/Annum - 405 kL
7. Mechanized cleaning of AHU filters (implemented in 2021-22), Water Saving/Annum - 405 kL
8. Stringent Administrative Controls (implemented in 2021-22), Water Saving/Annum - 234 kL
9. Reuse the humifog collected drain water (implemented in 2021-22), Water Saving/Annum - 80 kL
10. Utilization of RO Reject & PSF backwash water in washrooms for flushing (implemented in 2021-22), Water Saving/Annum - 35 kL
11. Usage of ETP treated water for PMD trench cleaning (implemented in 2021-22), Water Saving/Annum - 280 kL
12. Installation of new recycle RO (implemented in 2022-23), Water Saving/Annum - 1177 kL

At catchment level, the site has identified Supply side interventions (Water Storage created and Biodiversity area) and Demand side interventions. The site needs to provide more details on the quantified savings for the water conservation implementations at the site level as to provide the water consumption before & after the implementation for each project.

Score 8

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

Comment The site needs to gather more data in terms of catchment water quality and quantify the achieved targets. To gather more data for catchment water quality, site needs to engage with the relevant authorities, etc.

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:

1. Water Harvesting Structures Created Additional Water Potential Created: 1.10 MCM
2. Recharge Structures constructed: 1994 Nos.
3. Biodiversity Conservation area: 20301 hectares
4. Trained 59 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


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Comment The site has presented extensive evidence of Best Practice interventions at schools and has quantified the interventions done at schools and anganwadis related to WASH. Also, ITC is implementing Solid Waste Management activities in 41 villages (Primary Scope area) and covered 20143 Households and created awareness on waste segregation and sanitation activities.


Score 4

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

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 suppliers and service providers 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
- 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*  Yes
A list of collective action efforts, including the organizations involved, positions of responsible persons of other entities involved, and a description of the role played by the site shall be identified.

Comment 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 along with their designation. The evidence of engagement is also provided.

Score 14

3.9.13 *Advanced Indicator*  Yes
Evidence of the quantified improvement that has resulted from the collective action relative to a site-selected baseline date shall be identified and evidence from an appropriate range of stakeholders linked to the collective action (including both those implementing the action and those affected by the action) that the site is materially and positively contributing to the achievement of the collective action shall be identified.

Comment The evidence from Impacting Stakeholder about site being seen as positively contributing to the achievement were identified and listed below:

- 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
- There are various video testimonials highlighting how site is positively contributing to the achievement of collection actions against shared water challenges.

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	Stakeholder engagement is continuous throughout the year to understand performance and evolve the interventions for achieving the target. The site has presented a table which tracks the performance against the targets in the plan. The performance is evaluated against the 5 targets set in the water stewardship plan. The performance is evaluated during third party audits. For the catchment, the site presented summary of achievements against the targets for supply side management, demand side management and WASH targets which shows year wise implementations in the catchment.
✔ Yes	
4.1.2	<i>Value creation resulting from the water stewardship plan shall be evaluated.</i>
Comment	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 and environmental value creation water conservation interventions which has resulted from water savings.
✔ Yes	
4.1.3	<i>The shared value benefits in the catchment shall be identified and where applicable, quantified.</i>
Comment	The site has identified shared values benefit that have resulted as a result of site water stewardship & WASH interventions and are listed below: 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
✔ Yes	
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	The site has mentioned that for catchment level, reviews are done both at village level, catchment level and ITC's senior management levels. The reviews are carried out in defined periodicity. At site level, an executive level review to the Executive Vice President of the division is carried out annually by the site wherein water related challenges, risks, opportunities, water costs, savings or benefits are presented and discussed. The presentation of UNIT PLAN REVIEW BY EVP. is provided. The site needs to share evidence of the meeting with the EVP along with the details of executives present in the meeting.
🔍 Obs.	
4.2	<i>Evaluate the impacts of water-related emergency incidents (including extreme events), if any occurred, and determine the effectiveness of corrective and preventative measures.</i>

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- 4.2.1** *A written annual review and (where appropriate) root-cause analysis of the year's emergency incident(s) shall be prepared and the site's response to the incident(s) shall be evaluated and proposed preventative and corrective actions and mitigations against future incidents shall be identified.* ✔
Yes

Comment The site has mentioned that there were no water-related emergency incidents at the site. 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 site has a system of reporting & 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 during workshops or 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-005726

- 4.3.2** *Advanced Indicator* 🔍
Obs.
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.

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 provide 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.* ✔
closed

Comment For site level: Unit's Monitoring & Evaluation Methodology is designed by considering the importance of disclosure to relevant stakeholders and their feedback / inputs in the decision-making process.
For catchment level: ITC organises Core Area Perspective Planning in every five years in all villages of Primary Scope Area. These CAPP exercises are main evaluation and consultation process for the catchment water stewardship plans refinement in every five years. The aspiration of community and change in priority can be understood from both the CAPP need assessment comparison.

It seems there have been no modification in the WSP as the above approach / methodology does not mention about modification in water stewardship plan. The site would have had many learnings but was not able to demonstrate in the water stewardship plan.

Finding No: TNR-005727

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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> ✔ Yes
Comment	The site has displayed on a sign board at the factory main gate (evidence provided) with regards to water-related compliance, along with positions of staff as part of disclosure. The Utility Incharge 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> ✔ closed
Comment	The site has mentioned that it discloses the water stewardship plan through various mediums like: <ul style="list-style-type: none"> <input type="checkbox"/> Murals and Wall Paintings in village highlighting the Plan, Progress and the AWS Outcome <input type="checkbox"/> Water Budgeting Display Board that highlights the water balance and how much deficit needs to be addressed <input type="checkbox"/> Brochures that highlight the plan and progress are created & circulated among different stakeholders <input type="checkbox"/> Various awareness events organised on important days like World Water Days, where the site' stewardship plan is discussed in details However, there are no evidence to show that complete water stewardship plan has been shared with all related stakeholders. <p style="text-align: right;">Finding No: TNR-005728</p>
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> ✔ closed
Comment	At catchment level, the frequency of meetings with stakeholders for disclosure of water stewardship performance are as follows: <ol style="list-style-type: none"> 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 No information is provided for site level and stakeholders other than above. <p style="text-align: right;">Finding No: TNR-005762</p>
5.3.2	<i>Advanced Indicator</i> <i>The site's efforts to implement the AWS Standard shall be disclosed in the organization's annual report.</i> ✔ Yes
Comment	ITC's water stewardship journey and efforts are disclosed every year in the company's Annual Sustainability Report. The Annual Sustainability report mentions about 8 no. of sites (lying-in high-water stress regions) to be AWS certified by 2024 and all the sites by 2035.

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Score	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 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, murals and wall paintings.	
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 had any water-related compliance violations.	
5.5.2	<i>Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.</i>	✔ Yes
Comment	The site did not record any water related compliance violation, hence no corrective actions were undertaken during the review period.	
5.5.3	<i>Any site water-related violation that may pose significant risk and threat to human or ecosystem health shall be immediately communicated to relevant public agencies and disclosed.</i>	✔ Yes

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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