

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)



Audit Number: AO-000545

SITE DETAILS

Site: **VST Industries Limited Toopran, Medak**

Address: Kondapur Village And Muppireddypally Village Toopran, Medak district, 502336, Telangana, INDIA

Contact Person: PARIMI KISHORE KUMAR

AWS Reference Number: AWS-000550

Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Gold

Date of certification decision: 2023-Dec-18

Validity of certificate: 2026-Dec-18

AUDIT DETAILS

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

Audit Type(s): Initial Audit

Audit Start Date: 2023-Mar-20

Lead Auditor: Amit Singh

Audit team participants:

Sunil Kumar

Site Participants:

P. Kishore Kumar, Factory EHS Manager

BIJU JOSEPH, Other

S. RANGA RAO, Other

B. VENKATESHWARLU, Other

ASHOK BABU, Other

SANTOSH KUMAR, Other

S. SRIRAM, Other

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ADDITIONAL INFO

Summary of Audit Findings: A total of 52 findings were raised during the certification audit: 4 major non-conformities, 32 minor non-conformities, 16 observations. The major non-conformities were of sufficient concern to warrant the categorisation of the non-conformity as major and related to good water quality status, good water governance, sustainable water balance & Important water related areas.

The Client is requested to perform a root cause analysis and define corrective actions for each of the non-conformities and to submit these to WSAS within 60 days of receipt of the audit report by 16/07/2023.

The major non-conformities must be sufficiently addressed and evidence submitted to WSAS within 90 days of receipt of the report by 16/08/2023.

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

The audit team recommends certification of VST Industries Ltd. - Toopran at Gold level pending approval of the corrective actions plan and closure of the major non-conformities.

CLOSURE OF FINDINGS AND CORRECTIVE ACTION PLAN:

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

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

Scope of Assessment: The scope of services covers the Initial certification audit for assessing conformity of VST Industries Ltd. site in Tupran (Toopran), Hyderabad, INDIA against the AWS International Water Stewardship Standard Version 2.

VST Industries Limited (formerly known as Vazir Sultan Tobacco Company Limited) is one of India's most seasoned cigarette companies with over nine decades of operation. Incorporated on 10 November 1930, VST Industries is involved in manufacturing and marketing several cigarette brands, as well as trading unmanufactured tobacco.

VST Industries is headquartered in Hyderabad, India, catering to market requirements covering 80% of the geographical footprint in India. The manufacturing facilities are located at Toopran and Azamabad, with total workforce across the sites of more than 750 including contract workers. Number of employees at the Toopran site is 105. The primary ingredient for manufacturing is the tobacco leaf. The cured tobacco leaves are sourced from contract farmers located in various states at Andhra Pradesh, Telangana, Karnataka, Gujarat and Maharashtra. Toopran site caters to Primary Manufacturing Division's (PMD) operations, which involve threshing of the procured leaf into stems and laminas. The stems and laminas in their individual lines undergo blending with the different grades and a series of mechanical operations including sieving, cutting, and drying. The blended lamina and stem are appropriately treated before storing in humidified condition. The cut tobacco is then utilized at Azamabad factory involved in Secondary Manufacturing Division's (SMD) operations which involves making, packing, wrapping and dispatch. A portion of the unmanufactured tobacco is exported to buyers in the international market.

The audit was conducted onsite on 20th March to 23rd March 2023. The onsite site visit included the assessment of utilities (including RO plant), process area, canteen, ETP / STP and visit to the villages in the catchment.

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SCORE

47.00

FINDINGS

NUMBER OF FINDINGS PER LEVEL

Observation	16
Minor	32
Major	4

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FINDING DETAILS

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Finding No:	TNR-004118
Checklist Item No:	1.1.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Aug-16
Checklist item:	<p>The physical scope of the site shall be mapped, considering the regulatory landscape and zone of stakeholder interests, including:</p> <ul style="list-style-type: none">- Site boundaries;- Water-related infrastructure, including piping network, owned or managed by the site or its parent organization;- Any water sources providing water to the site that are owned or managed by the site or its parent organization;- Water service provider (if applicable) and its ultimate water source;- Discharge points and waste water service provider (if applicable) and ultimate receiving water body or bodies;- Catchment(s) that the site affect(s) and is reliant upon for water.
Findings:	<p>The catchment identified by the site is an area in close vicinity to the site and has no relation to hydrology or hydrogeology and does not meet the definition of a catchment. As the site's water use is totally dependent on groundwater, the catchment shall be defined by hydrogeology (groundwater aquifer(s) and their recharge areas).</p> <p>The ultimate receiving water body of storm water is not mapped in the layout / evidence. A map or scheme with a piping network was not provided.</p>

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Corrective action:

Updated Corrective action 14.12.2023:

As per Hydrology, We have identified the Catchment as "Haridra River basin" and marked the river basin boundaries along with the site location in the map.

Updated reply: We have done the ground water Catchment identification was based on the Ground water department information and consultation on surrounding areas borewells, rain fall, recharging calculations and industries water consumption and water impact to village areas. According to the ground water department baseline data, we have done hydrogeology study by an approved ground water department hydrogeologist for catchment identification.

They have done assessment in site and surrounding village areas and industries and submitted a report on borewells, rain water harvesting structures and ground water aquifers.

We have attached the Ground water department approved hydrogeologist report as an evidence for catchment identification and for aquifer spread out area from the site area.

The Catchment identification was taken based on the following points defined by ground water department and technical consultants on ground water.

- 1.Site and surroundings areas water data and potential impact assessment from the site
- 2.Geophysical survey by hydrogeologist
- 3.Seasonal Climate and rain fall data of surrounding areas
- 4.Site and outside areas borewells and recharge pits studies
- 5.Geophysical resistivity survey with ground water instruments by hydrogeologist
- 6.Water sampling of both site and village areas
- 7.joint inspection of water bodies
- 8.Land topography
- 9.Site drains system studies for impact identification to surrounding areas.

However the site has consulted ground water department hydrogeologist and once again done Hydrogeological survey and attached the Catchment boundary map for an evidence.

As per that only the catchment is defined and covering Kondapur, Muppireddy pally, Brahmanapally and too pran villages including sub villages for water stewardship improvements.

The water receiving bodies of the storm water from the site are the water bodies in kondapur/mupppireddy pally village which is already identified as IWRA in the catchment layout and initially the storm water is collected in the storm water collection ponds and anything excess goes to the village water bodies at kondapur and muppireddypally, hence we identified the water bodies as IWRA for us and we are monitoring the IWRA's periodically.

Earlier Reply: Initially during Site AWS assessment, the catchment area was taken based on the Approved Telangana Ground water department

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Hydro Geologist report and recommendations on our borewells physiography, climate and rain fall, hydrogeology (Aquifer details) Geophysical Survey and condition of recharging structures and sites nearest potential IWRA.

as per that, the site has done AWS assessment on Kondapur and Muppireddypally Villages and done AWS improvements in schools, grampanchayaths, Anganwadis and industries.

However the site has consulted ground water department hydrogeologist and done Hydrogeological survey and obtaining the documented evidence for our ground water aquifer for defining the Catchment and taken ground water data from Concerned Ground water department on Medak district ground water levels and rain fall data in May 2022 and June 2023 and villages water level measured details from June 2022 to June 2023.

As per Ground water department details the water levels and rain fall were increased in catchment areas in Kondapur and Muppireddypally Villages

In future the site will include some more villages in catchment for further AWS improvement.

Evidence of implementation: Updated reply 14.12.2023:
Dear Madam
We have attached the Catchment "Haridra River Basin" and its Boundaries along with site location Map for evidence of implementation to close the NC.

Updated Reply: Dear Madam
We have attached Ground water department report and Catchment boundaries Map for evidence of implementation to closing the NC.

Dear Madam
We are submitting our below reply to your above comment.

- a. As per the report the catchment aquifer is identified after technical analysis by the expert (not only within the plant but also covered the outside area) and concluded that the aquifer spread out almost 2-3 km around the VST.
- b. Included the storm water receiving body in the map with clear identification

Attachments:
Storm water receiving body in the map

Attachments during first submission

- 1. water piping network layout
- 2. Ground water department details
- 3. Catchment and IWRA Mapping
- 4. Telangana Ground water department Approved Hydrogeologist report on Aquifers for Catchment area Identification, As per the report The Hydrogeologist has concluded that good ground water aquifers were spread-out within the 2kms radiuses.

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Finding No:	TNR-004122
Checklist Item No:	1.2.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Mar-20
Checklist item:	<p>Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall:</p> <ul style="list-style-type: none">- Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people;- Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies;- Provide evidence of stakeholder consultation on water-related interests and challenges;- Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups;- Identify the degree of stakeholder engagement based on their level of interest and influence.
Findings:	<ul style="list-style-type: none">- The site has not identified vulnerable / women / minority / Indigenous people as stakeholders.- The minority groups of nearby villages are not identified.- The industries identified as stakeholders have not been considered in identifying the shared water challenges.- Telangana Ground Water Department was identified as representing the water sources but there is no evidence of communications with this stakeholder. Further stakeholders representative of the site's water sources were not identified.
Corrective action:	<p>Will review the stakeholders and will identify and include all categories of stakeholders like vulnerable/women/ minority in the villages/industries/ indigenous people etc, and</p> <p>Then identify the stakeholders water challenges considering the vulnerable/women/minority & indigenous people and</p> <p>Will document/update the details of the neighbouring industries in the shared water challenges records</p> <p>Our AWS team had approached TSPCB and Ground water departments once again, though they were not permitting to give signatures and photographic evidence, however we will try to take such evidence from the government departments and identify stakeholders of all water sources.</p>
Evidence of implementation:	<ol style="list-style-type: none">1. Included Vulnerable/women/minority/indigenous people as stakeholders in the stakeholders list.2. Shared water challenges record3. Communication with the Telangana Ground water department & PCB

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Audit Number: AO-000545

Finding No: TNR-004123
Checklist Item No: 1.3.2
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Mar-20
Checklist item: Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped
Findings: The site has not mapped on-site rainfall, leakages, storage, run-off, ETP, and STP treated water usage.
Corrective action: Site will map on site rain fall
Evidence of implementation: Site water balance lay out with covering all elements

Finding No: TNR-004124
Checklist Item No: 1.3.3
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Mar-20
Checklist item: Site water balance, inflows, losses, storage, and outflows, including indication of annual variance in water usage rates, shall be quantified. Where there is a water-related challenge that would be a threat to good water balance for people or environment, an indication of annual high and low variances shall be quantified.
Findings: The treated wastewater outflow and its usage (ETP & STP separate) is not mapped.
Annual high and low variances (peak/low availability and peak /low demand) and seasonal variance are not quantified, yet would be important given the stakeholder concerns about seasonality.
Corrective action: Site is already maintaining the ETP and STP waste water discharge details and consumption details separately and will identify the seasonal variance quantification and stake holders concerns
Evidence of implementation: ETP and STP out flow, yearly Low and high seasonal variances and stake holder seasonal concerns

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Finding No:	TNR-004127
Checklist Item No:	1.3.4
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Mar-20
Checklist item:	Water quality of the site's water source(s), provided waters, effluent and receiving water bodies shall be quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be quantified.
Findings:	As per ground water NOC, observation wells should be monitored regularly and quality is to be checked twice in a year. However, observation wells are not mentioned in the water quality monitoring plan, nor has evidence of measurements been provided.
Corrective action:	As per Ground water NOC Conditions we made a ground water annual monitoring plan and complied the monitoring of all 5nos wells once in a month wef May 2023 internally with our ground water level instrument and by a third party once in six months and completed ground water quality analysis once in six months with covering all parameters asper IS 10500:2012 by a third party and half yearly ground water compliance report was also submitted to ground water department, Medak will update the same in water quality monitoring report
Evidence of implementation:	1.Half yearly Ground water submission report to ground water department, Medak 2.Ground water Annual Monitoring plan 2023-2024
Finding No:	TNR-004129
Checklist Item No:	1.3.6
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Mar-20
Checklist item:	On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.
Findings:	The site has not identified any IWRA's at site. The site should assess the potential impacts between site and IWRA as there are borewells, rainwater harvesting pits, ETP/STP treated water being used in gardening. The site should refer to the guidance document and understand the definition and importance of IWRAs.
Corrective action:	Site will identify IWRA in site and assessment will be done on potential impacts in between site and IWRAs (if any)
Evidence of implementation:	1.Site IWRA details 2.Asessment report

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Finding No:	TNR-004130
Checklist Item No:	1.3.7
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Mar-20
Checklist item:	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.
Findings:	Water related revenues, and quantification of the social, cultural, environmental, or economic water-related value generated by the site are not identified.
Corrective action:	We already identified Site Annual water related costs and revenues
Evidence of implementation:	Site Annual water related costs details
Finding No:	TNR-004298
Checklist Item No:	1.4.1
Status:	Open
Finding level:	Observation
Checklist item:	The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be identified.
Findings:	The site has mentioned there are no suppliers within the site's catchment, so the embedded water use of primary inputs is not identified, but the catchment identification was not adequate, and it may be that some tobacco is grown in catchment areas. The indicator needs to be revisited after addressing the catchment identification.
Finding No:	TNR-004132
Checklist Item No:	1.4.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Mar-20
Checklist item:	The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.
Findings:	The site shall identify from the list of outsourced suppliers and where water use is within the catchment (once it is re-defined), identify their embedded use of water.
Corrective action:	will review the list once again to ensure whether any outsource supplier is there from the catchment and accordingly identify the embedded use
Evidence of implementation:	Outsourced services List

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Finding No:	TNR-004133
Checklist Item No:	1.5.1
Status:	Closed
Finding level:	Major
Due date:	2023-Aug-16
Checklist item:	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.
Findings:	The site has not identified initiatives of various institutions including catchment plans, water related policies, ongoing and future initiatives with the specified goals relevant to catchment(s), to inform the site how it can act in alignment to and in support of existing water-related initiatives
Corrective action:	Will review the water governance initiatives and will cover and document all water related policies, catchment plans, ongoing & future initiatives and how VST supports the same etc
Evidence of implementation:	Updated Reply: Dear Madam We have attached Catchment AWS initiatives, Policies and goals and latest wash initiatives documents for this NC evidence of implementation.

DEAR MADAM

We are submitting our below reply to your above Comment

a. In our water governance initiatives we had considered not only the village level policies but also the state government policies (Mission bagiradha), ground water department policies, (WLTA act requirement), district level policies (Medak district) etc

b. The minutes of the meeting is attached

Please find the attached documents for catchment review meetings, stake holder meetings, site review meetings and stake holder AWS Review meetings for evidence of the NC.

Documents uploaded during first submission

1. Team awareness on water stewardship
2. Catchment Water whatsapp group
3. Village water policies and meeting photographs

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Finding No:	TNR-004135
Checklist Item No:	1.5.3
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-May-03
Checklist item:	The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.
Findings:	Instead of a catchment water balance, the site has provided only data on water consumption in neighbouring villages and by local companies. Abstraction is only one element of the balance, and it is most likely that the abstraction by these users does not represent all withdrawals from the catchment, as the catchment was not identified correctly. Other elements of the balance were not analysed. The water balance for the re-defined catchment (after addressing the finding on 1.1.1) will need to be provided.
Corrective action:	The Site will prepare the Catchment water balance details
Evidence of implementation:	Catchment water balance details
Finding No:	TNR-004261
Checklist Item No:	1.5.4
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Mar-20
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 site has provided two test reports done by an external laboratory for samples of water bodies and drinking water sources at Kondapur & Muppireddypally villages. Interpretation of results has not been provided and it is not clear to what extent these samples represent catchment quality as the catchment was not identified correctly.
Corrective action:	During preliminary stage of Audit we have collected 2 no's water samples from the catchment IWRA and 4nos drinking water samples from the two villages and done analysis by a external laboratory, Post Audit we made a IWRA and Catchment areas water quality monitoring plan for six monthly basis by a third party and after obtaining the results which will be certified/reviewed by a technical expert to get the actual quality status for taking further improvement.
Evidence of implementation:	Catchment And IWRA water quality plan

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Finding No:	TNR-004262
Checklist Item No:	1.5.5
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Mar-20
Checklist item:	Important Water-Related Areas shall be identified, and where appropriate, mapped, and their status assessed including any threats to people or the natural environment, using scientific information and through stakeholder engagement.
Findings:	The site has identified two lakes, one each at Kondapur & Muppireddypally village. Their status is assigned as 'good' but no reference is provided to information used as a basis for this assessment, and no description to understand how these areas are important, what is their status, what are threats to people or environment. The identification of catchment IWRAs may also need to be expanded once the site re-defines its catchment(s).
Corrective action:	Site will take consultation with technical experts and local stakeholders and update the status with evidence
Evidence of implementation:	IWRA feed back status report
Finding No:	TNR-004137
Checklist Item No:	1.5.6
Status:	Open
Finding level:	Observation
Checklist item:	Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.
Findings:	The status of all infrastructure was identified as good - the site should have a record of evidence and be able to provide explanation for the status. The site should also identify the planned water related infrastructure for the catchment. The identification of relevant infrastructure will need to be reviewed after the catchment is re-defined.
Finding No:	TNR-004136
Checklist Item No:	1.5.7
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Mar-20
Checklist item:	The adequacy of available WASH services within the catchment shall be identified.
Findings:	The information provided by the site indicates number of improved toilets constructed but does not provide information on the adequacy of WASH services in the catchment overall, or at these villages. It is not clear what is the adequacy of WASH services beyond the households covered by the company's CSR activities.
Corrective action:	Site will provide the details for Wash adequacy for catchment
Evidence of implementation:	Catchment Toilets list and adequacy reference document

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Finding No:	TNR-004138
Checklist Item No:	1.5.9
Status:	Open
Finding level:	Observation
Checklist item:	Advanced Indicator The adequacy of WASH provision within the catchments of origin of primary inputs shall be identified.
Findings:	<p>The site has provided summary for the yearwise implementation of improved toilet construction at various villages, including villages in Gadwal and Kurnool districts, and the expenses incurred. However:</p> <ul style="list-style-type: none">- information indicates numbers of improved toilets constructed but does not indicate what is an overall adequacy of of WASH provision in those areas;- It is not clear if Gadwal and Kurnool districts are catchments of origin of primary inputs because clear identification of catchments of origin of primary inputs was not provided to the auditor.
Finding No:	TNR-004139
Checklist Item No:	1.6.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Mar-20
Checklist item:	Shared water challenges shall be identified and prioritized from the information gathered.
Findings:	<p>The site has listed water challenges of different stakeholders and actions to address the challenges - this is information required for the indicator 1.2.1. However:</p> <ul style="list-style-type: none">- It is not clear to what extent they are shared challenges (shared by the site and one or more of its stakeholders) or which challenges are shared challenges.- Many of the stakeholder challenges are worded in a too generic way, making it not clear what the actual challenge is. E.g. 'water quality' and 'water quantity' are identified as challenges for a number of stakeholders but it is not clear which water's quality is a challenge and what exactly about that water quality is a challenge. The broad wording of challenges does not help identifying appropriate collective actions;- The challenges are not prioritised.
Corrective action:	Will Review the documented water challenges and update them with more specific and detailed data and the challenges will be prioritized
Evidence of implementation:	Updated Catchment stake holders Shared water challenges

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Finding No:	TNR-004140
Checklist Item No:	1.6.3
Status:	Open
Finding level:	Observation
Checklist item:	Advanced Indicator Future water issues shall be identified, including anticipated impacts and trends
Findings:	The site has provided a table listing future issues and their anticipated impact on water issues. However, the identification is very generic (e.g. growing population affecting water balance) and does not appear to be based on analysis of data or available public projections (e.g. online tools viz, IWMA tool for ground water availability or the Water Risk filter tool).
Finding No:	TNR-004141
Checklist Item No:	1.7.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Mar-20
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 site's water risk analysis does not indicate the given time frame, potential costs and business impact.
Corrective action:	Site will review the water risk analysis and document the time frame, potential costs and business impacts
Evidence of implementation:	Water risk assessment report
Finding No:	TNR-004142
Checklist Item No:	1.7.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Mar-20
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 opportunities listed are mostly too generic, with a notable exception of an opportunity to install water meters at each borehole, which should help monitor efficiency of each well. Potential savings and business opportunities are not assessed.
Corrective action:	we will review and update potential savings and water related opportunities with clear and specific data and information.
Evidence of implementation:	Risks and opportunities document with incorporating Potential savings and water related opportunities

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Finding No:	TNR-004144
Checklist Item No:	1.8.1
Status:	Open
Finding level:	Observation
Checklist item:	Relevant catchment best practice for water governance shall be identified.
Findings:	So far the best practices are limited to actions that the site planned to implement as part of the initial AWS implementation. The site should revisit all best practice identifications.
Finding No:	TNR-004147
Checklist Item No:	1.8.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Mar-20
Checklist item:	Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.
Findings:	Monitoring of water levels at wells between the site and IWRAs was suggested as best practice, but monitoring of water levels is not done by the site at own observation wells, or in the vicinity of the plant, in order to better understand the water balance, and such practice is not suggested.
Corrective action:	Site will monitor the 5nos borewells water levels once in a month as per ground water NOC and record will be maintained
Evidence of implementation:	1.Catchment water balance 2.Site Water balance 3.Borewells water levels report
Finding No:	TNR-004290
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 site has mentioned about using a lower quality water for domestic purposes which will reserve higher quality water for essential purposes. However, the plant itself is using ETP / STP treated water for gardening and using freshwater for domestic purposes

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Finding No:	TNR-004265
Checklist Item No:	1.8.4
Status:	Open
Finding level:	Observation
Checklist item:	Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.
Findings:	The identification of status of IWRAs and risks to them was insufficient in 1.5.5., therefore identification of best practices on IWRAs should be revisited once the analysis about IWRAs is improved.
Finding No:	TNR-004151
Checklist Item No:	2.1.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Mar-20
Checklist item:	A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments: <ul style="list-style-type: none">- That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes- That the site implementation will be aligned to and in support of existing catchment sustainability plans- That the site's stakeholders will be engaged in an open and transparent way- That the site will allocate resources to implement the Standard.
Findings:	The following commitments are not covered in the policy: <ul style="list-style-type: none">- 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
Corrective action:	Site will review cover and update the water stewardship policy by incorporating the catchment sustainability plans & engagement of stakeholders in open and transparent way
Evidence of implementation:	Updated Water stewardship policy

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)



Audit Number: AO-000545

Finding No:	TNR-004288
Checklist Item No:	2.3.1
Status:	Open
Finding level:	Observation
Checklist item:	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.
Findings:	It is noted that the strategy includes a statement about a limited impact of the largest share of the site's withdrawal (the 70% of withdrawal that's used for cooling). However, usage in utilities where water gets evaporated and not returned to the catchment, may also have an impact depending on the catchment. While the catchment is not appropriately defined and its balance not clearly evaluated (indicators 1.1.1 and 1.5.3) such statement is premature and may be misleading.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000545

Finding No:	TNR-004152
Checklist Item No:	2.3.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2023-Aug-16
Checklist item:	<p>A water stewardship plan shall be identified, including for each target:</p> <ul style="list-style-type: none">- How it will be measured and monitored- Actions to achieve and maintain (or exceed) it- Planned timeframes to achieve it- Financial budgets allocated for actions- Positions of persons responsible for actions and achieving targets- Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.
Findings:	<p>The plan's structure is not in line with the requirements and needs to be revised:</p> <ul style="list-style-type: none">- Currently the plan is a mix of regular actions and quantified goals mentioned somewhere in the plan but not as targets towards which the actions would be aligned, i.e. the structure of the plan is not in line with the requirement of having targets (quantifiable, with monitoring indicators) and then actions listed for achieving those targets- Financial budgets allocated for actions are not included- Timeframes often indicate 'ongoing', which do not allow clear evaluation- Responsibilities are often assigned to a team rather than clear positions- It seems difficult to track the continual improvement.
Corrective action:	<p>we have updated water stewardship plan with covering financial budgets, time frames and specific responsibilities</p>
Evidence of implementation:	<p>Updated Reply: Dear Madam We have reviewed the Water stewardship plan and updated the requirements. Attached reviewed Water stewardship plan for evidence of implementation.</p> <p>Dear Madam We are submitting the Reviewed Water Stewardship Plan with mentioning clear responsibility, financial budgets allocation for AWS and Current status with document evidence.</p>

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000545

Finding No:	TNR-004153
Checklist Item No:	2.4.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-May-03
Checklist item:	A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.
Findings:	The site has presented mitigation options for various types of risks identified, which essentially list types or categories of actions that would be helpful but it is not an actual plan. No element of it was prepared in coordination with relevant agencies.
Corrective action:	Site will review and update the water risk mitigation actual and practical plans with types of categories in coordination with relevant stakeholders/agencies.
Evidence of implementation:	1.Site mitigation risk register 2.Training Record
Finding No:	TNR-004199
Checklist Item No:	3.1.1
Status:	Open
Finding level:	Observation
Checklist item:	Evidence that the site has supported good catchment governance shall be identified.
Findings:	Evidence and feedback forms of site engagement with relevant authorities shall be provided. And compliance with this indicator will need to be revised once the issue on catchment identification is resolved
Finding No:	TNR-004201
Checklist Item No:	3.1.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Mar-20
Checklist item:	Measures identified to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be implemented.
Findings:	The site has not identified vulnerable communities, minorities, etc. The site need to focus on identifying and engaging with the minorities to identify measures to respect the water rights.
Corrective action:	Site will identify vulnerable communities, minorities to identify in respect the water rights
Evidence of implementation:	Updated Stakeholders list and feed back forms from the Vulnerable communities and minorities

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000545

Finding No:	TNR-004202
Checklist Item No:	3.1.3
Status:	Open
Finding level:	Observation
Checklist item:	Advanced Indicator Evidence of improvements in water governance capacity from a site-selected baseline date shall be identified.
Findings:	<ul style="list-style-type: none">- The baseline is described by status with no dates/periods indicated.- The site has tabulated roles and responsibilities of catchment governance team. However, the responsibilities of government authorities (TSPCB and GWD) were not prepared in consultation with them.- Responsibilities of Women groups are defined for the catchment governance team. But, during audit it was found that the women groups have not been identified as stakeholders nor any discussion was held with them.
Finding No:	TNR-004204
Checklist Item No:	3.2.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Mar-20
Checklist item:	A process to verify full legal and regulatory compliance shall be implemented.
Findings:	<p>The evidence provided fails to capture compliance with the following requirements:</p> <ol style="list-style-type: none">1. Ground water NOC: monitoring of monthly groundwater levels from observation wells and quality monitoring twice in a year.2. Consent for Operation: CFO mentions that the site should treat the sewage wastewater and utilise the STP treated water in gardening. At plant entry gate, site has installed soak pit for sewage system instead of combining the discharge of same with the plant STP.
Corrective action:	<p>We will review the Ground water NOC and TSPCB CFO Conditions</p> <ol style="list-style-type: none">1.As per Ground water NOC Conditions, We have complied the monitor of all 5nos wells once in a month wef May 2023 internally with our ground water level instrument and by a third party once in six months and water quality once in six months with covering all parameters as per IS 10500:2012 by a third party and half yearly ground water compliance report was submitted to ground water department, Medak and which is incorporated in the Master list of Legal and Other Requirements.2.As per TSPCB CFO conditions we have laid the piping system from toilet at gate no.2 to STP.
Evidence of implementation:	<ol style="list-style-type: none">1.Half yearly ground water compliance report along with water levels and water quality reports2.Photographs of the pipeline system from toilet to STP3.Updated Master list of Legal and Other Requirements

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000545

Finding No:	TNR-004206
Checklist Item No:	3.3.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Mar-20
Checklist item:	Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.
Findings:	The site has tabulated the completion status of the actions set in Water Stewardship Plan but no data or evidence was provided on the implementation to date on the goal to have a 5% yearly reduction in the site's water use ratio. One of the actions is exploring water saving initiatives for site to meet water ratio stretched targets and the status is completed but no list of initiatives was provided. It is also not clear what are these stretched targets. Some actions listed for water balance are not on water balance.
Corrective action:	Compiling the data for water reduction and status and review status of all objects set in WSP goals
Evidence of implementation:	Dear Madam We are submitting the attached documents for Water Consumption Excel Spread sheet for the year 2021 and 2022, Water Consumption log book for the year 2021 and 2022, and Site water saving initiatives along with details for your Comment.
Finding No:	TNR-004208
Checklist Item No:	3.3.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Mar-20
Checklist item:	Where water scarcity is a shared water challenge, annual targets to improve the site's water use efficiency, or if practical and applicable, reduce volumetric total use shall be implemented.
Findings:	The site has set target to improve site's water ratio by 5% reduction every year. The status is mentioned as completed and continuous but no data or evidence was provided on the dynamic of water use ratio nor evidence on activities performed to reduce the water use.
Corrective action:	We will regularly document the efforts made and update the status of the consumption/reduction
Evidence of implementation:	Water Consumption Record

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)



Audit Number: AO-000545

Finding No:	TNR-004211
Checklist Item No:	3.4.1
Status:	Open
Finding level:	Observation
Checklist item:	Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.
Findings:	<p>The site's water stewardship plan does not include any quantifiable targets on water quality. The water quality actions set for site in the water stewardship plan are the mandatory requirements being required to fulfill the regulatory requirements rather than improvement actions. The status is stated as completed.</p> <p>One of the actions listed on water quality is 'Maintenance and improvement of WASH onsite', however no IWRA on site is identified in 1.3.6, therefore it is not clear what the status indication of 'completed and continuous' actually means.</p>

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000545

Finding No:	TNR-004213
Checklist Item No:	3.5.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Mar-20
Checklist item:	Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.
Findings:	The site has mentioned several actions in the water stewardship plan to maintain catchment IWRA's, which were to be implemented from November 2022 onwards. However, only two water quality test reports were provided and no evidence on further actions.
Corrective action:	<p>"The site has planned and increased IWRA sampling by a third party once in a six months with covering all the parameters as per IS 10500 and after obtaining the results will document all the other actions points</p> <p>The Site has done the following initiatives towards IWRA Improvement</p> <ol style="list-style-type: none">1.Creating awareness by conducting training programmes by NGO and Site AWS Team among all the village population about the IWRA Safe guarding and maintain good sanitation at IWRA areas2.Doing periodical inspections of IWRA by the AWS team in coordination with local village stakeholders and capturing photographs3.near to the water bodies, VST had Displayed Instructions for safe guarding the water bodies4.Made a IWRA Quality plan with increased the no of samples to evaluate the quality of IWRA test results by a approved Environmental Laboratory5.The Site has initiated to construct and support the villages with a central drainage system and awareness programmes on WASH to protect the IWRA's (prior to the involvement of VST the catchment areas are not having the proper drainage system and most of the people are not aware about the importance of WASH,) <p>All the other actions which are implemented will be documented and periodically reviewed the status "</p>
Evidence of implementation:	<ol style="list-style-type: none">1.IWRA Quality plan2.Water test reports3.Training reports/photos on WASH in schools/ anganwadis/villages etc4.IWRA Inspection reports5.water bodies protection display boards6.Water initiatives supported by VST"
Finding No:	TNR-004218
Checklist Item No:	3.7.1
Status:	Open
Finding level:	Observation
Checklist item:	Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.
Findings:	The site should consider adding the indirect water use targets to the water stewardship plan going forward.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000545

Finding No:	TNR-004289
Checklist Item No:	3.7.2
Status:	Open
Finding level:	Observation
Checklist item:	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.
Findings:	The site has mentioned there are no suppliers and service providers within the catchment however the analysis of embedded water use of its services needs to be addressed (see 1.4.2) and then this indicator needs to be revisited
Finding No:	TNR-004219
Checklist Item No:	3.9.1
Status:	Closed
Finding level:	Major
Due date:	2023-Aug-16
Checklist item:	Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.
Findings:	<p>The actions taken to achieve these best practices for catchment Water Governance does not show the proper linkage. The site has defined responsibilities of various stakeholders, however the responsibilities of government authorities have been defined without consulting the authorities.</p> <p>Site needs to provide the evidence against the completed best practices, including interaction with relevant authorities and institutions.</p>
Corrective action:	We have put further efforts to convince the government authorities for submission of signatures and photos for evidence, finally they taken the AWS consultation document for our AWS improvements and signed on the consultation with Stake holder document
Evidence of implementation:	<p>DEAR MADAM</p> <p>We are submitting and attaching the document evidence for Catchment review meetings along with Minutes, Stake holders review meetings and Review meetings with Government authorities MOM and acknowledgement and site review meetings towards for AWS Commitment.</p> <p>Further kindly note that AWS review meetings will be half yearly basis and due in the month of September 2023 and March 2024 as per meeting schedule.</p>

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000545

Finding No:	TNR-004221
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:	The site has identified several best practices towards achieving best practice and the status against these are mentioned as completed, indicating there can be no further improvements. However, auditing activities indicate that's not the case. E.g. refer to the findings on 1.8.2. and 3.2.1.
Finding No:	TNR-004222
Checklist Item No:	3.9.3
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-May-08
Checklist item:	Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.
Findings:	The site need to address the following chemical contamination sources (photographs attached): <ul style="list-style-type: none">- Chances of spillage of traces of HFO (during rains) from tray placed below the HFO unloading pipe.- Handwashing at plant main gate
Corrective action:	Site will provide the bund wall around the HSD transfer pumps to avoid the contamination and planned to remove the temporarily provided washing provision at main gate and will provide permanent hand wash facility with controlled pipeline
Evidence of implementation:	Photographs of HSD Unloading pumps area and Main gate area

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)



Audit Number: AO-000545

Finding No:	TNR-004223
Checklist Item No:	3.9.4
Status:	Closed
Finding level:	Major
Due date:	2023-Aug-08
Checklist item:	Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.
Findings:	Best practice table lists six actions on IWRA's and the status is marked as completed but no evidence was provided beyond the initial water quality test reports.
Corrective action:	We will show the document evidence of all actions for IWRA and complete review of documentation requirements on AWS
Evidence of implementation:	<p>Dear Madam</p> <p>We are submitting and attaching IWRA Water quality along with details of the periodicity, locations etc and catchment water user groups, meetings details along with participants attendance for commitment towards AWS implementation</p> <p>Kindly note that Village catchment water review meetings the all local people will write the minutes in the local language for their clear understanding.</p>

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000545

Finding No:	TNR-004226
Checklist Item No:	4.1.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Mar-20
Checklist item:	Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.
Findings:	<p>The site has not provided evidence on how it has evaluated achieved performance against targets in site's water stewardship plan for the below targets, where status is mentioned as completed:</p> <p>1h Communicate to suppliers to get vendor water management techniques as good water stewards</p> <p>2a Complete a social impact assessment on sustainable water usage and consumption - social impact assessment report to be shared</p> <p>2b Improve water resources management at catchment level</p> <p>2d Improve site's water ratio by 5% reduction each year - Baseline data vs current data vs future reduction target is not captured</p> <p>2e Explore water saving initiatives for site to meet water ratio stretched targets - What are these water ratio stretched targets?</p> <p>4a IWRA assessment & monitoring by NGO / Environmental Experts - assessment report to be shared</p>
Corrective action:	We shall Compile all the data for all the objectives set in the plan and review status of all objectives set in WSP goals

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000545

Evidence of implementation: 1h. Within the catchment we do not have vendors and suppliers, we have done shared water challenges of all stakeholders within the catchment and also identified future issues and challenges of catchment stakeholders, in future if any suppliers or vendors identified within the catchment we will obtain the vendors water management techniques and evaluate their details.

2a. As per the guidance document we understood and prepared the social impact assessment

2b. We have created AWS awareness in catchment area by our water governance assessment, water and wash trainings, displayed water sign boards, water quality, IWRA Safe guarding.

after these improvements, the catchment areas were started AWS points review in their quarterly review meetings and maintaining the MOM and attendance records. Attached Catchment AWS Review meetings MOM and attendance and catchment water policies etc.

2d. Attached water reduction data for 5% and excel spread sheets and water ration stretched targets.

2e. Attached Water savings initiatives along with details and water stretched targets for 2023-24

2f. Initially we have done 2nos samples of IWRA and 4nos catchment water samples and tested by our MOEF approved laboratory.

after this we made a Catchment IWRA Water quality plan and wherein we have increased the sample testing and comply 2nos samples from the each IWRA on half yearly basis which will be due in September 2023 for the period April to September and March 2024 for the period October 2023 to March 2024. After getting the IWRA Samples results which will be examined and assessed by a technical Environmental expert.

attached IWRA water quality plan for 2023-24, IWRA test reports and Catchment water sample reports for evidence.

Attached Reviewed Water stewardship plan and included with clear responsibilities, current achieved status and financial budgets allocation.

Finding No: TNR-004227

Checklist Item No: 4.1.2

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2024-Mar-20

Checklist item: Value creation resulting from the water stewardship plan shall be evaluated.

Findings: Value creation is worded as actions implemented rather than value generated.

Corrective action: Site will review value creation and update the evaluation

Evidence of implementation: Updated Value creation document

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000545

Finding No: TNR-004291
Checklist Item No: 4.1.3
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Mar-20
Checklist item: The shared value benefits in the catchment shall be identified and where applicable, quantified.
Findings: The site has listed potential benefits to the catchment but they are worded in a very generic way and are potential rather than actual shared value benefit achieved to date.
Corrective action: Site will review and update the shared value benefits along with actual status
Evidence of implementation: Catchment benefits with Status

Finding No: TNR-004228
Checklist Item No: 4.3.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Mar-20
Checklist item: Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.
Findings: Evidence was not provided that the site has consulted on the site's performance.
Corrective action: Site will document the consultation efforts on the WSP performance
Evidence of implementation: WSP performance efforts document

Finding No: TNR-004230
Checklist Item No: 4.4.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Mar-20
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 needs to highlight the lessons learned from the evaluations and this has not been provided.
Corrective action: Site will review the Water stewardship plan and update the lessons learned
Evidence of implementation: Updated Water Stewardship Plan

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000545

Finding No:	TNR-004231
Checklist Item No:	5.2.1
Status:	Open
Finding level:	Observation
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 to relevant stakeholders as to how the WSP contribute to the AWS outcomes.
Finding No:	TNR-004232
Checklist Item No:	5.3.1
Status:	Open
Finding level:	Observation
Checklist item:	A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.
Findings:	The site need to evaluate quantified performance against the targets.
Finding No:	TNR-004233
Checklist Item No:	5.4.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Mar-20
Checklist item:	Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.
Findings:	The site's engagement with the government authorities and public sector agencies is very limited.
Corrective action:	Will Review the complete Stakeholders identification & engagement and ensure the adequacy of the stakeholders engagement process covering all relevant stakeholders including government authorities
Evidence of implementation:	List of Stakeholders

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000545

Finding No: TNR-004214
Checklist Item No: 5.5.1
Status: Closed
Finding level: Major
Due date: 2023-Aug-16
Checklist item: Any site water-related compliance violations and associated corrections shall be disclosed.
Findings: The incidents have not been reported or disclosed. The site is required to present its procedures for reporting compliance violations.
Corrective action: We already had the disclosure in the website on the compliance violations and shown the list of water incidents to the Auditor during the Audit.

Evidence of implementation: Updated Reply on 22nd Nov 2023
Dear Madam
We have uploaded the revised document for Actual Non compliance, Site action and disclosure on the website for your review and close the finding.

Updated Reply:
Dear Madam
1.We have procedure for legal and other requirements compliance and online legal compliance manager tool, which is periodically reviewed by our Top management.
2.We have reviewed the Legal and other requirements procedure and disclosed a document for procedure of Legal and other requirements and Non compliances along with corrective action taken in our website.

Documents evidence for implementation:
1.Reviewed procedure for identification of legal and other requirements and AWS Non compliances disclosure along with correction action and current status
2.Evidence for AWS Non Compliances disclosure in the website.

Dear Madam
We are submitting the evidence for disclosing of Compliance Violations by displaying the compliance violations at prominent areas in the factory. The above mentioned Non Compliances were closed.
Please consider the attached evidence photographs for closing the NC.

Attachments submitted in first submission
1.WATER INCIDENT RESPONSE PLAN
2.LIST OF WATER INCIDENTS
3.PROCEDURE FOR LEGAL&OTHER REQUIMENTS&EVOLUTION OF COMPLIANCE AND ROR

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000545

Finding No:	TNR-004217
Checklist Item No:	5.5.2
Status:	Closed
Finding level:	Minor
Due date:	2024-Mar-20
Checklist item:	Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.
Findings:	The site is required to document the corrective actions to prevent future occurrences for the regulatory violations.
Corrective action:	<p>Apart from the documented sop for legal compliance and periodic reviews and evaluation of the compliance,</p> <p>We updated the sop with the following corrective actions</p> <ol style="list-style-type: none">1. awareness trainings planned on the legal & other compliance requirements to concern staff2. tieup with third party legal experts and agencies for periodic updates on the changes in the legal & other compliance obligations3. periodidc review of the non compliances if any and intitiating corrective action plan for the same <p>the corrective action plan for the previous non compliances is documented and attached</p> <p>"</p>
Evidence of implementation:	<p>1.REVIEWED PROCEDURE FOR LEGAL AND OTHER REQUIREMENTS AND DISCLOSED THE AWS NON COMPLIANCES ALONG WITH CORRECTIVE ACTION IN THE WEBSITE.</p> <p>2.ONLINE COMPLIANCE MANAGER TOOL AND LATEST CHECKLIST</p> <p>3.ANNUAL MONITORING PLAN FOR LEGAL AND OTHER REQUIREMENTS COMPLIANCE AND TRACKING</p>

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000545

Report Details

Report	Value
Report prepared by	Amit Singh
Report approved by	Neringa Pumputyte
Report approved on (Date)	18 May 2023

Surveillance

Proposed date for next audit
2024-Mar-19

Stakeholder Announcements

Date of publication	Location
23/02/2023	WSAS website
23/02/2023	AWS website
23/02/2023	VST website
23/02/2023	Local WhatsApp group of Stakeholders

Catchment Information

Catchment Information

During the audit, the site has identified nearby villages (Kondapur and Muppireddypally), 1 km from site as the catchment area.
In the revised document provided after the onsite audit, the catchment area is expanded but the basis of selection of catchment is not clearly defined.
Comment The basis of selection of catchment area is not defined.

Client Description and Site Details

Client/Site Background

VST Industries Limited (formerly known as Vazir Sultan Tobacco Company Limited) is one of India's most seasoned cigarette companies with over nine decades of operation. VST Industries is involved in manufacturing and marketing several cigarette brands, as well as trading unmanufactured tobacco.
The VST has manufacturing facilities at Azamabad and Toopran (Telangana).
The Toopran site is a zero liquid discharge plant. The site is certified to ISO 14001 and ISO 45001 management systems. The site has created 4 rainwater harvesting pits amounting to a combined rainwater harvesting potential of 2200 cu.m.

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000545

Summary of Shared Water Challenges

Summary of Shared Water Challenges

The site has identified the following water related challenges of concern to stakeholders:

1. Impact of development on significant water places / IWRA's.
2. Water quality of the IWRA's (Lakes - Muppireddypally / Kondapur)
3. Over-extraction of water resources.
4. Increasing risk of drought and water scarcity including climate change.
5. Flood risk.

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

0.1.1 Eligibility Criteria

0.1.1.1 The site(s) occupy one catchment OR an exception has been granted.

Q
Obs.

Comment The site's has identified two nearby villages (Kondapur and Muppireddypally) as catchment. This is not in line with the definition of a catchment - please refer to the finding on 1.1.1.

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

✓
Yes

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

✓
Yes

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)


Audit Number: AO-000545

1 STEP 1: GATHER AND UNDERSTAND

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

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

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

 in progress

Comment The physical scope of the site is mapped with 5 nos. of borewells, rainwater pits, ETP, STP and storm water discharge points. There are no wastewater discharge points as the site is a zero liquid discharge industry and utilises the treated wastewater in gardening. However, the ultimate receiving water body of storm water is not mapped in the layout / evidence. A map pr scheme with a piping network was not provided.
The site has identified two nearby villages as catchment areas:
1. Muppireddypally
2. Kondapur
The identified catchment has no relation to hydrology or hydrogeology and does not meet the definition of a catchment.

Finding No: TNR-004118

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.

 in progress


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Comment The stakeholders have been identified considering the influence level of stakeholders on VST and VST on stakeholders.
The site has established engagement with key stakeholders such as TSPCB, Ground Water Deptt., Gram Panchayat Kondapur, Gram Panchayat Muppireddypally, Livon Techno farms, Kanya Builders, Global Aluminium, Anganwadi and Govt. school in Kondapur and Muppireddypally, etc.
Vulnerable, women, minority, and Indigenous people have not been considered in the stakeholder identification.
Identification of stakeholder water challenges is done not for all stakeholders.
In terms of stakeholders representative of water sources, only Telangana Ground Water Department was identified - this entity provides NOC for installation of borewells / groundwater usage. However, there is no evidence of communications with this stakeholder, and further stakeholders representative of the site's water sources were not identified.

Finding No: TNR-004122


1.2.2 *Current and potential degree of influence between site and stakeholder shall be identified, within the catchment and considering the site's ultimate water source and ultimate receiving water body for wastewater.*  **Yes**

Comment Potential degree of influence between the site and the stakeholders is identified.

1.3 *Gather water-related data for the site, including: water balance; water quality, Important Water-Related Areas, water governance, WASH; water-related costs, revenues, and shared value creation.*


1.3.1 *Existing water-related incident response plans shall be identified.*  **Yes**

Comment The site has an onsite emergency response plan for water specifically. The plan identifies what should be done in each type of incident and the responsible officer.

1.3.2 *Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped*  **in progress**


Comment The site has mapped the total water abstraction / consumption, consumption in different sections, corresponding wastewater generation from different sections.

Finding No: TNR-004123

1.3.3 *Site water balance, inflows, losses, storage, and outflows, including indication of annual variance in water usage rates, shall be quantified. Where there is a water-related challenge that would be a threat to good water balance for people or environment, an indication of annual high and low variances shall be quantified.*  **in progress**


Comment The site has tabulated the monthly water abstraction / consumption, consumption in different sections, corresponding wastewater generation from different sections.

Finding No: TNR-004124

1.3.4 *Water quality of the site's water source(s), provided waters, effluent and receiving water bodies shall be quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be quantified.*  **in progress**

Comment The borewell water is tested quarterly by external agency.
RO inlet and outlet is tested monthly by external agency.
Drinking water is tested monthly by external agency.
ETP inlet and outlet is tested monthly by external agency.
STP inlet and outlet is tested monthly by external agency.








Finding No: TNR-004127

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

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Comment	The site has identified the potential sources of pollution at site including chemical storage area.	
1.3.6	<i>On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.</i>	 in progress
Comment	The site has not identified any IWRA's at site.	
		Finding No: TNR-004129
1.3.7	<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>	 in progress
Comment	The site has prepared annual water and wastewater related costs, including costs for treating water and maintaining water-related infrastructure, and costs of AWS implementation. However, social, cultural, environmental, or economic water-related value generated by the site has not been described or quantified.	
		Finding No: TNR-004130
1.3.8	<i>Levels of access and adequacy of WASH at the site shall be identified.</i>	 Yes
Comment	The site has mapped WASH facilities such as male / female urinals and toilets, handwashing points and water coolers available at site. The numbers are as per Factories Act, 1948.	
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>	 Obs.
Comment	The site has mentioned there are no suppliers within the site's catchment, so the embedded water use of primary inputs is not identified, but the catchment identification was not adequate, and it may be that some tobacco is grown in catchment areas. The indicator needs to be revisited after addressing the catchment identification.	
1.4.2	<i>The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.</i>	 in progress
Comment	The embedded water use of outsourced services is not identified.	
		Finding No: TNR-004132
1.4.3	<i>Advanced Indicator The embedded water use of primary inputs in catchment(s) of origin shall be quantified.</i>	 Obs.
Comment	The site has provided standard data for indirect water use intensities for certain crops, without a reference to the sources of the data. There is no quantification of actual use in the catchments of origin. The embedded water use by primary inputs shall be studied and quantified.	
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>	 closed

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Comment	The site has prepared a document of Governance team consisting of local stakeholders and defined the responsibilities of various stakeholders. This does not meet the requirement of this indicator, especially given the catchment was identified too narrowly.	Finding No: TNR-004133
1.5.2	<i>Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.</i>	 Yes
Comment	The site has prepared a detailed document for "PROCEDURE FOR LEGAL & OTHER REQUIREMENTS & EVOLUTION OF COMPLIANCE AND REGISTER OF REGULATIONS".	
1.5.3	<i>The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.</i>	 in progress
Comment	The site has prepared a sheet with average daily water consumption for Kondapur village, Muppireddypally village, M/s Global Aluminium Ltd., M/s Livon Techno Foams and M/s Kamya Builders. This misses the concept of catchment water balance.	Finding No: TNR-004135
1.5.4	<i>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.</i>	 in progress
Comment	The site has provided test reports done by an external laboratory for samples of water bodies and drinking water sources at Kondapur & Muppireddypally villages. Interpretation of results has not been provided and it is not clear to what extent these samples represent catchment quality as the catchment was not identified correctly, and a receiving water body for stormwater was not identified.	Finding No: TNR-004261
1.5.5	<i>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.</i>	 in progress
Comment	The site has identified two lakes, one each at Kondapur & Muppireddypally village. Their status is assigned as 'good' but no reference is provided to information used as a basis for this assessment, and no description to understand how these areas are important, what is their status, what are threats to people or environment.	Finding No: TNR-004262
1.5.6	<i>Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.</i>	 Obs.
Comment	The site has identified the existing water related infrastructure at the site, at two nearby villages, and at nearby companies. The infrastructure is listed and its status is assigned (all infrastructure is marked as having good status). Planned infrastructure has not been identified. The identification of relevant infrastructure will need to be reviewed after the catchment is re-defined.	
1.5.7	<i>The adequacy of available WASH services within the catchment shall be identified.</i>	 in progress
Comment	The site has provided data on improved toilet facilities construction implemented by the company as its CSR activities at Kondapur & Muppireddypally villages in 2016-17 and 2017-18. This provides information on number of improved toilets constructed but does not provide information on the adequacy of WASH services in the catchment overall, or at these villages.	Finding No: TNR-004136

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1.5.8	<i>Advanced Indicator</i> <i>Efforts by the site to support and undertake catchment level water-related data collection shall be identified.</i>	 Yes
Comment	The site is in process of having meetings with the stakeholders for WASH awareness, water stewardship initiative and to gather water related information of catchment area. The site has shared site data to other industries and gathered WASH and water related infrastructure data for sites within the catchment and for Kondapur and Muppireddypally villages. It has also gathered information on water use in the villages and by neighbouring companies.	
Score	4	
1.5.9	<i>Advanced Indicator</i> <i>The adequacy of WASH provision within the catchments of origin of primary inputs shall be identified.</i>	 Obs.
Comment	The site has provided summary for the yearwise implementation of improved toilet construction at various villages, including villages in Gadwal and Kurnool districts, and the expenses incurred. However: - information indicates numbers of improved toilets constructed but does not indicate what is an overall adequacy of WASH provision in those areas; - It is not clear if Gadwal and Kurnool districts are catchments of origin of primary inputs because clear identification of catchments of origin of primary inputs was not provided to the auditor.	
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>	 in progress
Comment	The site has listed water challenges of different stakeholders and actions to address the challenges - this is information required for the indicator 1.2.1. However: - It is not clear to what extent they are shared challenges (shared by the site and one or more of its stakeholders) or which challenges are shared challenges. - Many of the stakeholder challenges are worded in a too generic way, making it not clear what the actual challenge is. E.g. 'water quality' and 'water quantity' are identified as challenges for a number of stakeholders but it is not clear which water's quality is a challenge and what exactly about that water quality is a challenge. The broad wording of challenges does not help identifying appropriate collective actions; - The challenges are not prioritised.	
	Finding No: TNR-004139	
1.6.2	<i>Initiatives to address shared water challenges shall be identified.</i>	 Yes
Comment	The site has mentioned the actions / initiatives to address the water challenges.	
1.6.3	<i>Advanced Indicator</i> <i>Future water issues shall be identified, including anticipated impacts and trends</i>	 Obs.
Comment	The site has provided a table listing future issues and their anticipated impact on water issues. However, the identification is very generic (e.g. growing population affecting water balance) and does not appear to be based on analysis of data or available public projections (e.g. online tools viz, IWMA tool for ground water availability or the Water Risk filter tool).	
1.6.4	<i>Advanced Indicator</i> <i>Potential water-related social impacts from the site shall be identified, resulting in a social impact assessment with a particular focus on water.</i>	 Yes

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Comment	The site has listed their potential negative social impact categories and assessed risk of these social impacts. This is only partially meeting the requirement of the indicator as explained in the Guidance. The site's positive social impact via improved toilet construction is not taken into account in the assessment.	
Score	2	
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>	in progress 
Comment	The site has identified risks related to water quantity, water quality, flood risk and water governance. Against each risk, the site has mentioned the action, type of risk, likelihood and severity of impact. An attempt has been made to prioritize the risks. Given time frame is not indicated, potential costs and business impact are not identified.	
		Finding No: TNR-004141
1.7.2	<i>Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.</i>	in progress 
Comment	The site has provided a short table with some opportunities to consider for water quantity, water governance and the actions for opportunities with an attempt to describe benefits.	
		Finding No: TNR-004142
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>	Obs. 
Comment	The site has identified and listed best practice for site and catchment water governance but so far the best practices are limited to actions that the site planned to implement as part of the initial AWS implementation. The site should revisit all best practice identifications.	
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>	in progress 
Comment	The site has listed various initiatives as water balance best practice for site and catchment. It is notable that as part of identification of best practices the site identified 'Periodic Monitoring the bore wells which are between the operational site and the lakes as an 'early warning' approach to detect any influences from the site (e.g. on water levels or quality) that could impact the Lakes'. However, monitoring of water levels is not done by the site at own observation wells, or in the vicinity of the plant, in order to better understand the water balance, and such practice is not suggested or implemented.	
		Finding No: TNR-004147
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 some best practices for the site and for the catchment.	
1.8.4	<i>Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.</i>	Obs. 

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Comment	The site has listed various points as best practice for site maintenance of Important Water-Related Areas such as monitoring the water quality data for the IWRA's, zero discharge from the plant, organising and strengthening Water user groups, and supporting public communication initiatives. It is noted that the identification of status of IWRAs and risks to them was insufficient in 1.5.5., therefore identification of best practices on IWRAs should be revisited once the analysis about IWRAs is improved.	
1.8.5	<i>Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.</i>	<div> Yes</div>
Comment	The site has identified best practices on WASH for the site and for the catchment.	

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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	<i>A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:</i> <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. 	 in progress
Comment	<p>The site has publicly disclosed (at VST website) AWS policy and commitment towards Water stewardship and AWS certification.</p> <p>The organizational commitment that is signed and publicly disclosed (also attached as evidence) includes the following commitments amongst others:</p> <ul style="list-style-type: none"> - Involve our employees and contract workers in water conservation initiatives and provide all required resources for effective water stewardship implementation and compliance - Monitor, measure, report the progress and performance of water conservation and management initiatives in compliance with internationally recognized protocols and communicate approach and achievements to relevant stakeholders. 	<p>Finding No: TNR-004151</p>
2.1.2	<i>Advanced Indicator</i> <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>	 Obs.
Comment	<p>The policy document is signed by the organization's senior-most executive - Managing Director and publicly disclosed. However, no Advanced Indicator points can be awarded against this indicator as the Core Indicator (2.1.1) on commitment is not in compliance.</p>	
2.2	<i>Develop and document a process to achieve and maintain legal and regulatory compliance.</i>	
2.2.1	<i>The system to maintain compliance obligations for water and wastewater management shall be identified, including:</i> <ul style="list-style-type: none"> - Identification of responsible persons/positions within facility organizational structure - Process for submissions to regulatory agencies. 	 Yes
Comment	<p>The site has prepared a detailed document for "PROCEDURE FOR LEGAL & OTHER REQUIREMENTS & EVOLUTION OF COMPLIANCE AND REGISTER OF REGULATIONS". The EHS manager is given the responsibility to maintain compliance obligations for water and wastewater management.</p>	
2.3	<i>Create a water stewardship strategy and plan including addressing risks (to and from the site), shared catchment water challenges, and opportunities.</i>	

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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.*  Obs.

Comment The site has developed a water specific strategy with a vision to be a sustainable manufacturer of Cut tobacco with Water stewardship as one of the key priority and deliver positive impact to support water secure world enabling prosperity for People, Cultures, Business & Nature.
The site's goal is to ensure the sustainable use of water in balance with the local context and to have safe water available for all.

It is noted that the strategy includes statements about limited impact of the largest share of the site's withdrawal (the 70% of withdrawal that's used for cooling). However, usage in utilities where water gets evaporated and not returned to the catchment, may also have an impact depending on the catchment. While the catchment is not appropriately defined and its balance not clearly evaluated, such statement is premature and may be misleading.

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.  in progress

Comment The site has prepared a water stewardship plan with a descriptive part and a table. The tabulated part includes:
Goals, which are actually AWS outcome areas
- Actions
- Indicators
- Responsible, which is often a team
- Timeline, which for most of the plan is 'ongoing'

In site the text and table there are some quantified targets like 5% reduction every year of the site's water use intensity, although the wording is not clear whether that encompasses all of the site's water use or part of it. However this is mentioned as an indicator and not a target. Actions the site plans on water savings are listed separately, not in support of the water use intensity reduction goal. The strategic goals listed earlier in the document also include items like:

- rainwater harvesting potential equivalent to over 3 times the net water consumption in own operations by 2030;


- reach 100% people with water, sanitation systems and health/hygiene education.

However these goals/targets are not included in the water stewardship plan, therefore it is not clear how the plan is meant to help the site achieve these strategic goals goals.

I.e. overall the plan's structure is not in line with the requirements. Actions with the timeframe 'continuous' or 'ongoing' indicate regular actions that the site needs to do, e.g. monitoring activities, and would be more suited to be in a monitoring plan.

Financial budget allocations are not mentioned, it is mentioned that resources are allocated each year for maintaining the plan.

Finding No: TNR-004152

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

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Comment	The site has started to be involved with the nearby industries (other sites) within the catchment for promoting awareness on WASH and gathering data on water use. The activities currently appear to be more about awareness raising and gathering information rather than shared activities or partnership with those sites. For full points for this indicator, the site should strive to develop partnerships or shared activities.	
Score	4	
2.3.4	Advanced Indicator <i>The site's partnership/water stewardship activities with other sites in another catchment(s) (either under same corporate structure or with another corporate site) shall be identified.</i>	 No
Comment	The site has listed the installations of toilets done by VST in another catchment of primary inputs, i.e. tobacco has been listed in document with some values of investment. However, this indicator is about partnership with other sites that would work on some elements on water stewardship. In this case, the indicator would apply to the site's partnership with its suppliers. Evidence of such partnerships was not presented. In terms of the site's effort to improve WASH in other catchments, evidence was not provided that the villages where toilets were installed, are in the catchments of the site's primary inputs. And the evidences for the implementation were not provided.	
2.3.5	Advanced Indicator <i>Stakeholder consensus shall be sought on the site's water stewardship plan. Consensus should be achieved on at least one target. A list of targets that have consensus and in which stakeholders are involved shall be identified.</i>	 Yes
Comment	The site has collected agreements from stakeholders on the site's efforts on WASH training at schools and in nearby villages, testing the quality of two lakes and formation of stakeholder team in the nearby area. The current consensus was achieved on actions, not targets. This indicator will need to be revisited once the water stewardship plan is re-structured.	
Score	7	
2.4	Demonstrate the site's responsiveness and resilience to respond to water risks	
2.4.1	Advanced Indicator <i>A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.</i>	 in progress
Comment	The site has presented mitigation options for various types of risks identified, which essentially list types or categories of actions that would be helpful but it is not an actual plan. Finding No: TNR-004153	
2.4.2	Advanced Indicator <i>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.</i>	 No
Comment	No such plan was presented	

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3	STEP 3: IMPLEMENT - Implement the site's stewardship plan and improve impacts		
3.1	Implement plan to participate positively in catchment governance.		
3.1.1	Evidence that the site has supported good catchment governance shall be identified.		Obs.
Comment	The site has engaged with nearby industries and villages for capacity building, awareness, support in WASH, etc. However, compliance with this indicator will need to be revised once the issue on catchment identification is resolved. The engagement with relevant authorities also requires attention.		
3.1.2	Measures identified to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be implemented.		in progress
Comment	The site has not worked upon this indicator to identify measures to respect the water rights of minority people and others in the catchment.		
	Finding No: TNR-004201		
3.1.3	Advanced Indicator Evidence of improvements in water governance capacity from a site-selected baseline date shall be identified.		Obs.
Comment	The site has tabulated baseline, efforts and evidence (implementation) that includes elements like forming a stakeholder group in the local area and setting a whatsapp group.		
3.1.4	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.		Yes
Comment	The site has engaged with stakeholders (industries and villages) to form a catchment governance team comprising of village panchayats, anganwadis, schools, industries. The updates are being shared in WhatsApp group comprising of governance team. The evidence showing consensus from stakeholders is submitted. However, this indicator will need to be revisited once the catchment identification issue is resolved		
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.		in progress
Comment	The process to verify full legal and regulatory compliance has been documented. But, the document fails to capture the following conditions: 1. Ground water NOC: monitoring of monthly groundwater levels from observation wells and quality monitoring twice in a year. 2. Consent for Operation: CFO mentions that the site should treat the sewage wastewater and utilise the STP treated water in gardening. At plant entry gate, site has installed soak pit for sewage system instead of combining the discharge of same with the plant STP.		
	Finding No: TNR-004204		
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	There are no water rights which are part of legal and regulatory requirements.		

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3.3	<i>Implement plan to achieve site water balance targets.</i>	
3.3.1	<i>Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.</i>	 in progress
Comment	The site has tabulated the completion status of the actions set in Water Stewardship Plan but no data or evidence was provided on the goal to have a 5% yearly reduction in the site's water use ratio.	
		Finding No: TNR-004206
3.3.2	<i>Where water scarcity is a shared water challenge, annual targets to improve the site's water use efficiency, or if practical and applicable, reduce volumetric total use shall be implemented.</i>	 in progress
Comment	The site has set target to improve site's water ratio by 5% reduction every year. The status is mentioned as completed and continuous but no data or evidence was provided on the dynamic of water use ratio nor evidence on activities performed to reduce the water use.	
		Finding No: TNR-004208
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 legal binding on site for re-allocation of water to social, cultural or environmental needs.	
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>	 N/A
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>	 Obs.
Comment	The site's water stewardship plan does not include any quantifiable targets on water quality. The water quality actions set for site in the water stewardship plan are the mandatory requirements being required to fulfill the regulatory requirements rather than improvement actions. The status is stated as completed. For the catchment and site, the following additional actions have been initiated by site: - Periodically monitor water quality of lakes in the catchment area. - Maintenance and improvement of WASH onsite - but no WAS on site is identified, therefore it is not clear what the status indication of 'completed and continuous' actually means	
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	The site is maintaining the effluent quality as per the legal or regulatory requirements and has listed actions it is implementing. Quantification is not provided.	
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>	 in progress

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Comment The plant has mentioned N.A. against the response to this indicator but as per Guidance this indicator is applicable to both the on-site and catchment IWRAs. The site has mentioned several actions in the water stewardship plan to maintain catchment IWRAs, which were to be implemented from November 2022 onwards. However, no evidence was provided on implementation other than the two water quality test reports.

Finding No: TNR-004213

3.5.2 *Advanced Indicator*
Evidence of completed restoration of non-functioning or severely degraded Important Water-Related Areas including where appropriate cultural values from a site-selected baseline date shall be identified. Restored areas may be outside of the site, but within the catchment.


N/A

3.5.3 *Advanced Indicator*
Evidence from a representative range of stakeholders showing consensus that the site is seen as positively contributing to the healthy status of Important Water-Related Areas in the catchment shall be identified.



Obs.

Comment The shared evidences as consensus by stakeholders does not mention that the site is seen as positively contributing to the healthy status of Important Water-Related Areas in the catchment.

Score 2


3.6 *Implement plan to provide access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers at all premises under the site's control.*

3.6.1 *Evidence of the site's provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers onsite shall be identified and where applicable, quantified.*


Yes


Comment The site has provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers on site.

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


Yes

Comment No indication was found that the site would be impinging on the human rights to safe water and sanitation of communities.


3.6.3 *Advanced Indicator*
A list of actions taken to support the provision to stakeholders in the catchment of access to safe drinking water, adequate sanitation and hygiene awareness shall be identified.


N/A

Comment The site has taken following actions at the catchment for access to safe drinking water, adequate sanitation and hygiene awareness:
- RO plant installation at Kondapur village
- Installation of additional required toilets in Kondapur and Muppireddypally villages
- Training and awareness sessions on WASH for village / school children / anganwadi's
- Promoting awareness on WASH, Water conservation, etc. in the WhatsApp group of stakeholders.

Score 5

3.6.4 *Advanced Indicator:*
In catchments where WASH has been identified as a shared water challenge, evidence of efforts taken with relevant public-sector agencies to share information and to advocate for change to address access to safe drinking water and sanitation shall be identified.


Yes

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Comment	The site has engaged with the panchayat secretary of Kondapur village and Sarpanch of Muppireddypally village. The WASH related implementations at catchment (Kondapur and Muppireddypally village) has mostly been prior to site establishment of Water Stewardship policy as CSR activity. The site shall engage with public sector agencies to identify the current status of access to sanitation of the people in the whole catchment.	
Score	4	
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>	 Obs.
Comment	In the water stewardship plan, no indirect water use targets have been set.	
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>	 Obs.
Comment	The site has mentioned there are no suppliers and service providers within the catchment however the analysis of embedded water use of its services needs to be addressed.	
3.7.3	<i>Advanced Indicator Actions taken to address water related risks and challenges related to indirect water use outside the catchment shall be documented and evaluated.</i>	 No
Comment	The site has mentioned the crop is being sourced from farmers outside the catchment and the crop is a rain fed crop. However, no water related risk analysis for indirect water use outside the catchment was provided and no other evidence on this indicator	
3.8	<i>Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have.</i>	
3.8.1	<i>Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.</i>	 Yes
Comment	There are no shared water-related infrastructure identified by site.	
3.9	<i>Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.</i>	
3.9.1	<i>Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.</i>	 closed
Comment	The site has identified several best practices towards water governance and the status against these are mentioned as completed. If all the identified points are achieved, it indicates there is no scope of improvement.	
Finding No: TNR-004219		
3.9.2	<i>Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.</i>	 Obs.
Comment	The site has identified several best practices towards achieving best practice and the status against these are mentioned as completed, indicating there can be no further improvements. However, auditing activities indicate that's not the case. E.g. refer to the findings on 1.8.2. and 3.2.1.	

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3.9.3	<i>Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.</i>	 in progress
Comment	<p>The site has identified actions to achieve the best practices for site as well as catchment separately.</p> <p>For site, one of the best practices mentioned is :</p> <ul style="list-style-type: none"> - zero fuel/chemical spills and fuel/chemical contamination in the environment. (chemical control plan). However, during site visit it was observed that there are chances of chemical contamination in the ground. <p style="text-align: right;">Finding No: TNR-004222</p>	
3.9.4	<i>Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.</i>	 closed
Comment	<p>No IWRA identified at site. Two IWRA's (lakes at kondapur and muppireddypally village) identified at catchment. Best practice table lists six actions on IWRAs and the status is marked as completed but no evidence was provided beyond the initial water quality test reports.</p> <p style="text-align: right;">Finding No: TNR-004223</p>	
3.9.5	<i>Actions towards achieving best practice related to targets in terms of WASH shall be implemented.</i>	 Yes
Comment	<p>The site has listed the following actions for achieving the best practices:</p> <p>For Site</p> <ul style="list-style-type: none"> - Preparation of schedule and checklists for house keeping of toilets - Annual Training schedule for site - Ordering for printing of small pocket writeups - Scheduled Review meetings - WASH risk assessment & WASH feedback from employees - Completion of toilet for /female & disabled <p>For Catchment</p> <ul style="list-style-type: none"> - Training to village operator on operation & maintenance of water plant - Study of the requirements in the schools/ anganwadi's on WASH infrastructure - Training schedule for catchment and then facilitation of trainings 	
3.9.6	<i>Advanced Indicator</i> <i>Achievement of identified best practice related to targets in terms of good water governance shall be quantified.</i>	 No
Comment	<p>Achievement of identified best practice related to targets in terms of good water governance is not quantified.</p>	
3.9.7	<i>Advanced Indicator</i> <i>Achievement of identified best practice related to targets in terms of sustainable water balance shall be quantified.</i>	 No
Comment	<p>Achievement of identified best practice related to targets in terms of sustainable water balance is not quantified.</p>	
3.9.8	<i>Advanced Indicator</i> <i>Achievement of identified best practices related to targets in terms of water quality shall be quantified</i>	 No
Comment	<p>Achievement of identified best practice related to targets in terms of water quality is not quantified.</p>	
3.9.9	<i>Advanced Indicator</i> <i>Achievement of identified best practices related to targets in terms of the site's maintenance of Important Water-Related Areas have been implemented.</i>	 No

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Comment	The site has performed water quality test of samples from the two identified IWRAs in the catchment and the schedule of further tests is indicated to be six months. There are no details provided in terms of maintenance of IWRAs.	
3.9.10	Advanced Indicator <i>Achievement of identified best practice related to targets in terms of WASH shall be quantified.</i>	 Yes
Comment	The site has identified best practices in terms of WASH at site and catchment. For site, the targets in terms of WASH have been quantified as sufficient no. of toilets for the staff. For catchment, it is mentioned that 100% households in Kondapur and Muppireddypally villages are having toilets. Site has provided training / awareness programs were organised for WASH. RO plant was installed at Kondpaur village for safe water to the villagers, schools and anganwadis.	
Score	4	
3.9.11	Advanced Indicator <i>A list of efforts to spread best practices shall be identified.</i>	 Yes
Comment	Site has formed a WhatsApp group with stakeholders as its members. Relevant information is being shared with the stakeholders. Periodic meeting with the stakeholders are also conducted to discuss about the initiatives being taken by site and suggestions of stakeholders. However, the government authorities are missing in the stakeholder discussions.	
Score	3	
3.9.12	Advanced Indicator <i>A list of collective action efforts, including the organizations involved, positions of responsible persons of other entities involved, and a description of the role played by the site shall be identified.</i>	 Yes
Comment	The site has identified the following collective action efforts of VST and its stakeholders: 1. Close & periodic monitoring of the IWRA water quality (lakes in Muppireddypally & Kondapur), although it is not clear how testing water samples is a collective action 2. WASH -Toilets 3. WASH-promoting awareness in the village/school children/anganwadis's 4. Facilitating or contributing to multi-stakeholder governance platforms or Whatsapp group 5. WASH- RO plant setup in Kondapur 6. Drip irrigation & water conservation in cultivation of tobacco by farmers in Guntur area The site has made efforts to involve stakeholders for successful implementation of the activities planned for catchment area. Actions where the site has acted on its own should not be counted as collective effort for this advanced indicator, however, therefore partial points are awarded.	
Score	7	
3.9.13	Advanced Indicator <i>Evidence of the quantified improvement that has resulted from the collective action relative to a site-selected baseline date shall be identified and evidence from an appropriate range of stakeholders linked to the collective action (including both those implementing the action and those affected by the action) that the site is materially and positively contributing to the achievement of the collective action shall be identified.</i>	 No
Comment	For each collective action effort of VST and stakeholders, the site should have set a baseline date with the existing status and then compare / quantify the achievements on the efforts with relevant evidence to show that the site is materially and positively contributing to the achievement of the collective action.	

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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>		in progress
Comment	<p>Site has mentioned the status as completed against almost for every target / action. The site need to update the targets so that there are targets for continual improvement. The site should also report on how the actions have contributed in achieving AWS outcomes.</p> <p>Finding No: TNR-004226</p>		
4.1.2	<i>Value creation resulting from the water stewardship plan shall be evaluated.</i>		in progress
Comment	<p>The site has identified following value creation and categorised them into Social / Economic / Environmental:</p> <ul style="list-style-type: none"> - Improving water quality of the lakes & ground water with ZLD approach : this is regulatory requirement for site - Improving water balance through water conservation, storm water collection, rain water harvesting and recharging with storm water - Training & promoting awareness to the village people, schools children, anganwadi's, & other industries in the catchment/ farmers in catchment of origin on water conservation, WASH etc. - Training & promoting awareness in the farmers the catchment of origin on drip irrigation, water conservation, WASH etc - Provision of toilets in the villages - in Kondapur & Muppireddypally - Provision of drinking water plant in the Kondapur village in the catchment - Periodic monitoring of the water quality of the water bodies (two lakes) in Kondapur & Muppireddypally <p>The basis of categorisation of benefit value is not provided.</p> <p>Finding No: TNR-004227</p>		
4.1.3	<i>The shared value benefits in the catchment shall be identified and where applicable, quantified.</i>		Obs.
Comment	<p>The site has listed potential benefits to the catchment but they are worded in a very generic way and are potential rather than actual shared value benefit achieved to date.</p>		
4.1.4	<i>Advanced Indicator A governance or executive-level review, including discussion of shared water challenges, water risks, and opportunities, and any water-related cost savings or benefits realized, and any relevant incidents shall be identified.</i>		Yes
Comment	<p>A water stewardship committee review meeting was performed by Vice-President (Technical) on 15.03.2023. The minutes of meeting mentions a number of agenda points including review on WSP, AWs policy, display boards on water / WASH, stakeholder review meetings, status of legal / compliance obligations related to water, shared water challenges, risks and opportunities, water cost benefit analysis, and water relevant incidents. However, the minutes indicate only completion of various agenda points and no insight into what discussions revealed, any challenges, lessons learned or similar, raising a doubt about the extent of the review, therefore full points are not yet awarded.</p>		
Score	3		
4.2	<i>Evaluate the impacts of water-related emergency incidents (including extreme events), if any occurred, and determine the effectiveness of corrective and preventative measures.</i>		

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4.2.1	<i>A written annual review and (where appropriate) root-cause analysis of the year's emergency incident(s) shall be prepared and the site's response to the incident(s) shall be evaluated and proposed preventative and corrective actions and mitigations against future incidents shall be identified.</i>	 Yes
Comment	The site has identified water related incidents at site for the last one year and tabulated each incident with root cause analysis, corrective action and the timeline to address each water related incident. The water related incidents were mainly due to leakages at valve, gland packing failure and pump operations.	
4.3	<i>Evaluate stakeholders' consultation feedback regarding the site's water stewardship performance, including the effectiveness of the site's engagement process.</i>	
4.3.1	<i>Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.</i>	 in progress
Comment	The site has shared stakeholders feedback on the activities of VST being performed with respect to water stewardship, benefits to site and general observations as evidence against the indicator. Evidence was not provided that the site has consulted in the site's performance. Finding No: TNR-004228	
4.3.2	<i>Advanced Indicator The site's efforts to address shared water challenges shall be evaluated by stakeholders. This shall include stakeholder reviewing of the site's efforts across all five outcome areas, and their suggestions for continual improvement.</i>	 Obs.
Comment	The site has shared the minutes of stakeholder review meeting as evidence. The meeting was held at site on 28.02.2023 during which the EHS Manager has briefed the stakeholders about the following: - Water Stewardship and Awareness - World Water Day celebrations - Water Stewardship plan for 2022-23 and status - Site and catchment Water Stewardship achievements - Violations by VST - VST Water Stewardship Committee details As per criteria requirement, the stakeholders shall review the site's efforts across all five outcome areas and provide their suggestions for continual improvement.	
4.4	<i>Evaluate and update the site's water stewardship plan, incorporating the information obtained from the evaluation process in the context of continual improvement.</i>	
4.4.1	<i>The site's water stewardship plan shall be modified and adapted to incorporate any relevant information and lessons learned from the evaluations in this step and these changes shall be identified.</i>	 in progress
Comment	The site's water stewardship plan states that the Water Stewardship plan shall be tracked and updated annually. However, the site needs to highlight the lessons learned from the evaluations and this has not been provided. Finding No: TNR-004230	

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5	STEP 5: COMMUNICATE & DISCLOSE - Communicate about water stewardship and disclose the site's stewardship efforts	
5.1	Disclose water-related internal governance of the site's management, including the positions of those accountable for legal compliance with water-related local laws and regulations.	
5.1.1	The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.	Yes
Comment	The disclosure of the site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations is publicly accessible at VST website with the hierarchy between those accountable for water and the senior leadership of organisation.	
5.2	Communicate the water stewardship plan with relevant stakeholders.	
5.2.1	The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.	Obs.
Comment	From the stakeholders feedback form, it is clear that the site has shared the water stewardship plan with relevant stakeholders and have also uploaded the same at VST website.	
5.3	Disclose annual site water stewardship summary, including: the relevant information about the site's annual water stewardship performance and results against the site's targets.	
5.3.1	A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.	Obs.
Comment	The site's water stewardship performance against the Water Stewardship Plan has been disclosed by uploading the same at VST website. However, the evaluation in the plan is against actions, not targets. Quantified performance has not been evaluated against the targets.	
5.3.2	Advanced Indicator The site's efforts to implement the AWS Standard shall be disclosed in the organization's annual report.	No
Comment	Evidence was not provided of the disclosure in annual report	
5.3.3	Advanced Indicator Benefits to the site and stakeholders from implementation of the AWS Standard shall be quantified in the organization's annual report.	No
Comment	The benefits to site and stakeholders from implementation of the AWS Standard has not been quantified and evidence of disclosure in annual report not provided.	
5.4	Disclose efforts to collectively address shared water challenges, including: associated efforts to address the challenges; engagement with stakeholders; and co-ordination with public-sector agencies.	
5.4.1	The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.	Yes
Comment	The site's shared water-related challenges and efforts made to address these challenges have been disclosed by site at VST website.	

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5.4.2	<i>Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.</i>	 in progress
Comment	The site has presented a table mentioning the efforts made by site to engage stakeholders (villages, school/anganwadi, industries) and the supporting evidence. Finding No: TNR-004233	
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>	 closed
Comment	The site has mentioned that there was no water-related compliance violation. However, the site has not complied with the following water-related compliance requirements: 1. Monthly level monitoring of observation wells and reporting to Ground Water deptt. as per NOC. 2. Water quality monitoring of observation wells (twice in a year) as per NOC. 3. As per Consent for Operation, the site should treat the sewage wastewater in STP and utilise the STP treated water in gardening. At plant entry gate, site has installed soak pit for sewage system instead of combining the discharge of same with the plant STP. Finding No: TNR-004214	
5.5.2	<i>Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.</i>	 closed
Comment	The site did not record any water related compliance violation, hence no corrective actions were undertaken during the review period. Finding No: TNR-004217	
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
Comment	No water related compliance violations that may pose a significant risk and threat to human, or ecosystem health were recorded.	

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Photographic Evidence from Audit

Yes

Comment

The photographic evidence from audit of below mentioned locations are attached as evidence:
Borewell 1
Borewell 2
Borewell 3
Borewell 4
Borewell 5
Chemical storage
Drinking water cooler
Handwashing at main gate
HFO storage area
Recharge Pit 1
Recharge Pit 2
Recharge Pit 3
Soak pit area near plant entry gate



B.W 3.jpg



Chemicals storage.jpg



B.W 2.jpg

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Recharge Pit 1.jpg



B.W 1.jpg



B.W 5.jpg

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HFO storage area.jpg



Drinking water cooler.jpg

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Storage Drum.jpg



Recharge Pit 2.jpg



B.W 4.jpg



Recharge Pit 3.jpg