

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)



Audit Number: AO-000916

SITE DETAILS

Site: **ITC Limited, India Tobacco Division, Saharanpur, India**
Address: SARDAR PATEL MARG, 247001, SAHARANPUR, Uttar Pradesh, INDIA
Contact Person: Shivendru Mathur
AWS Reference Number: AWS-000570
Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Platinum
Date of certification decision: 2024-Mar-12
Validity of certificate: 2027-Mar-12

AUDIT DETAILS

Audited Service(s): AWS Standard v2.0 (2019)
Audit Type(s): Initial Audit
Audit Start Date: 2023-Nov-28
Lead Auditor: Amit Singh
Audit team participants:
Amit Singh, Lead Auditor

Site Participants:
Harshit Desai, Other
Ajay Yadav, Other
Trinadh Vanimina, Other
Subhendu Dash, Senior Programme Manager, ITC Mission Sunehra Kal
Neha Agarwal, Other
Shivendru Mathur, Other
Prateek Raj, Other
Atharva Godse, Other
Parvez Alam, Other
Mahesh Dhonde, Other
Ronald Grundy, Other
Naved Siddiqui, Factory EHS Manager
Sivanandhan R., Other
Bhabatosh Panda, Other
Jwala Karadiya, Other
Pamish Kumar, Other
Dhanesh Kumar Garg, Other
Sourav Chakravarty, Other

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ADDITIONAL INFO

Summary of Audit Findings: A total of nineteen findings were raised during the certification audit, one major non-conformity, fourteen minor non-conformities, four observations. The major non-conformities were of sufficient concern to warrant the categorization of the non-conformity as major.

The Client was requested to perform a root cause analysis and define corrective actions for each of the non-conformities and to submit these to WSAS within 30 days of receipt of the audit report. The major non-conformities had to be sufficiently addressed and evidence submitted to WSAS within 90 days of receipt of the report. Minor non-conformities must be closed out by the time of the next annual audit.

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

CLOSURE OF FINDINGS AND CORRECTIVE ACTION PLAN:

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

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

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

The facility is in Saharanpur city. It is the northernmost of the districts of Uttar Pradesh and close to the foothills of Shivalik range. well accessed by NH73 connecting Saharanpur city with other parts. Saharanpur is located about 130 kilometres (81 mi) south-southeast from Chandigarh and 170 kilometres (110 mi) north-northeast from Delhi. It has an average elevation of 284 metres. Three major rivers flow in to the study area which are Dhamola, Hindon and Paodhoi.

ITD Saharanpur Factory of ITC Limited is situated in Saharanpur district of Uttar Pradesh. The unit consists of Primary Manufacturing department where cut tobacco is processed and Secondary Manufacturing department for the manufacturing of cigarettes. The main infrastructure apart from the raw material stores, finished goods stores and production blocks, consists of Utility section consisting of ETP, WTP, Boilers, DG sets.

The audit was conducted onsite from 28th November to 1st December 2023.

The site visit included the assessment of borewells, RWH ponds, Water Treatment Plant, Boilers, DG sets, fuel storage area and effluent treatment plant that were visited onsite as part of the audit.

SCORE

130.00

FINDINGS

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NUMBER OF FINDINGS PER LEVEL	
Observation	4
Minor	14
Major	1

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FINDING DETAILS

Finding No:	TNR-008664
Checklist Item No:	1.2.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Feb-11
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:	Based on the study report by external agency, it is mentioned that there are 25 industries nearby within the study area. But, the site has not identified any of the industry as stakeholder.
Corrective action:	Government authorities along with ITC has organised meetings regarding Hindan River basin improvement, whose minutes of meeting and photographs has been attached in the annexure. The Indian herbs one of the local ayurvedic production unit has been in tie up with ITC Saharanpur regarding solid-waste management, whose letter and photographs can be found in the annexure.
Evidence of implementation:	<ul style="list-style-type: none">- Hindan River Basin meeting invitation- Minutes of meeting
Finding No:	TNR-008644
Checklist Item No:	1.3.2
Status:	Closed
Finding level:	Observation
Due date:	2025-Feb-11
Checklist item:	Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped
Findings:	The site should capture the losses within the premises including the evaporation loss from open tanks and the rainwater availability / usage / recharge within the premises.

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Finding No:	TNR-008645
Checklist Item No:	1.3.3
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Feb-11
Checklist item:	Site water balance, inflows, losses, storage, and outflows, including indication of annual variance in water usage rates, shall be quantified. Where there is a water-related challenge that would be a threat to good water balance for people or environment, an indication of annual high and low variances shall be quantified.
Findings:	<p>The site needs to recheck the water balance and provide backup of the metered data for the clarity on negative values, RO permeate and reject values in the water balance.</p> <p>The basis of estimation of rainwater recharge on the available rainwater potential should be provided.</p> <p>The site should also consider different type of losses in the water system while preparing the water balance.</p>
Corrective action:	Agreed. In the earlier provided water balance chart more details on various data like negative values, RO permeate and reject values is added and revised water balance chart is attached as annexure. The rain water recharge from RWH pit is calculated based rainfall data, area of collection and efficiency. The Calculation of rain water recharge potential Q2 of 2022-23 is attached for reference as annexure. The losses in water system are highlighted in the water balance chart.
Evidence of implementation:	<ul style="list-style-type: none">- Updated Water balance chart- Rainwater harvesting recharge estimation method- ETP Logbook Picture
Finding No:	TNR-008647
Checklist Item No:	1.3.6
Status:	Closed
Finding level:	Major
Due date:	2024-May-11
Checklist item:	On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.
Findings:	<p>There are no details provided for the process of categorisation of IWRA's.</p> <p>No evidence has been provided for status of Important Water-Related Areas at site.</p>
Corrective action:	The site has a documented process towards categorization of IWRAs. The categorization matrix for IWRA & updated section 1.3.6 of manual with categorisation matrix of IWRA is attached in annexure. Site will continue to track the status of IWRA in the future and corrective action will be undertaken based on status.
Evidence of implementation:	<ul style="list-style-type: none">- IWRA classification matrix- Updated section 1.3.6 of manual

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Finding No: TNR-008648
Checklist Item No: 1.3.7
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2025-Feb-11
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: There are no details provided for water abstraction / procurement cost related to NOC from Ground water department.
Corrective action: There is no cost involved directly for water extraction other cost like CTO and NOC fees. The cost for water extraction will be paid during the upcoming renewal of the NOCs of the borewells.
Evidence of implementation: - Challan for renewal of NOC of borewell
- Fees Notification by ground water department

Finding No: TNR-008650
Checklist Item No: 1.4.2
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2025-Feb-11
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 should gather information about the transport services for the site staff.
Corrective action: The site has only three local-cab agencies as outsource transport services namely Ram prasad travels (2 Cabs), Pramod travels (2 Cabs) and Manoj travels (1 Cab). Unit has not tracked the embedded water use by them, having a discussion with them we have approximate the below base number:

Cleaning & Washing activities weekly: 5 L/Cab (Approx.) = $5 \times 5 \times 52 = 1300\text{L}$ (1.3KL)
Service of the cab quarterly: 10 L/ Cab (Approx.) = $5 \times 4 \times 10 = 200\text{L}$ (0.2 KL)
Total Number of Cabs: 5 No's
Yearly Water footprint: 1.5 KL, which is the baseline
Unit will track the same along with staff transporter to reduce the water footprint further
Unit has now established the approximate baseline for staff transport provider, will start tracking along with the Cab providers to reduce the water footprint.

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Finding No: TNR-008654
Checklist Item No: 1.5.3
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2025-Feb-11
Checklist item: The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.
Findings: It is not clear for which period the catchment water balance is prepared. Also, there are no details as to how the input (recharge components) and output (groundwater draft) components have been arrived.
Corrective action: The water study was conducted by Geovale was during the period 2018-2020 (mentioned in Pg. 124). The water balance study of the catchment area which was conducted by Geovale mentioned in chapter 5 of report (Pg. 93-115). The method used:
$$\text{Dynamic Groundwater Storage Available} = (\text{Recharge from precipitation} + \text{Recharge from other sources}) - (\text{Groundwater discharge} + \text{Groundwater abstraction})$$

On the basis of implementation agriculture, industry and domestic are the three prime stake holders. These three components combine interpretation for the "Draft" of the groundwater assessment unit. Mainly, out of the total draft, agriculture sector accounts for 85%, domestic for 10% and industrial sector for remaining 5%. Dynamic ground water resource components and their estimation methodology as per GEC,2015 are presented in Table 28 (Pg. 94)
Evidence of implementation: - Geovale report (marked the important responses in yellow)

Finding No: TNR-008663
Checklist Item No: 1.5.5
Status: Closed
Finding level: Observation
Due date: 2025-Feb-11
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 identified IWRA - Horticulture Plantation areas can not be considered as this is not identified as an IWRA.

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Finding No: TNR-008658
Checklist Item No: 1.5.6
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2025-Feb-11
Checklist item: Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.
Findings: The site needs identify other water-related infrastructures in the catchment with their condition and potential exposure to extreme events.
Corrective action: The period is already available in the manual as referenced in corrective action and the details of input and output components of ground water is mentioned in the Geovale report
Other than Identified IWRAs, study conducted by WAPCOS Ltd. under ministry of Jal shakti, potential areas for establishment of STPs were identified (Ref. Geovale report Pg. 172). STPs are Planned under the smart city program wherein 1 STP is completed & functional in best condition (38 MLD- Malhipur village, Panjabi Barat Ghar Nalla), 1 more is under evaluation. Site is constantly raising awareness among people and is in continues touch with the municipal corporation to fast track the process. Once these recommended STPs becomes operational, site will start to track their conditions and potential exposure to extreme environment.

Evidence of implementation: - Geovale Report

Finding No: TNR-008660
Checklist Item No: 1.8.2
Status: Closed
Finding level: Observation
Due date: 2025-Feb-11
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: The site should elaborate the demand management in agriculture

Finding No: TNR-008661
Checklist Item No: 1.8.4
Status: Closed
Finding level: Observation
Due date: 2025-Feb-11
Checklist item: Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.
Findings: The identified best practice for Horticulture Plantation areas can not be considered as this is not identified as an IWRA.

Evidence of implementation: - Updated Shared water challenges table
- Farmer & scientist interaction

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Finding No:	TNR-008665
Checklist Item No:	2.3.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Feb-11
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>Site has listed specific shared water challenge against each target for site and catchment. The mentioned shared water challenges in some cases are not related to the identified shared water challenge, e.g. "Increasing water intensive crops in the area reducing the Rainfed Cultivation". The same is to be checked and updated.</p> <p>Site has mentioned that one of their RM supplier has set a target to reduce Specific Water Consumption by 2 % Year on Year. This indicator is about site's target to reduce indirect water use which would be a combination of total indirect water use by the site (which could be a mix of all the suppliers) and then setting of targets.</p>
Corrective action:	<p>The Water risk identified in the table of 2.3.2 has been updated in the table 1.6.1. of shared water challenges & same is attached in annexure. The site has identified and prepared matrix of major RM Suppliers. The site has started the engagement with one of the key RM suppliers to address the indirect use and will slowly expand its coverage to other suppliers and Raw material Suppliers.</p>
Evidence of implementation:	<ul style="list-style-type: none">- Updated Shared water challenges table- Farmer & scientist interaction

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Finding No:	TNR-008887
Checklist Item No:	2.4.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Feb-11
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:	<p>The plan to mitigate all the identified water risks have not been identified. For example, at indicator 1.5.6 - site has mentioned about issues related to sewage infrastructure in the catchment.</p> <p>The requirement of the indicator is to develop a plan to address external risks outside of the site's direct control and particularly for those risks associated with dependence on public infrastructure.</p> <p>The site has outlined the associated activities to mitigate each risk and the public agency they are collaborating with along with evidence of collaboration.</p>
Corrective action:	<p>Saharanpur has been identified as one of the cities to be developed under the smart city program by Govt. of India. As the part of smart city plan, Upgradation of various public infrastructure has been identified by the Municipal corporation. Site is collaborating with municipal corporation in raising awareness, technical inputs on separation of waste from water stream and engagement with Mohalla committee on responsible use of sewage infra, which has been evidenced through minutes of meetings and during the course of audit. The mitigation plan for the identified risk which has not been mentioned in the scope will be prepared and evaluated in consultation with Municipal Corporation.</p>
Evidence of implementation:	<ul style="list-style-type: none">- Updated Table for Water risk including Sewage infrastructure- Mohalla committee engagement letter regarding sewage

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Finding No: TNR-008888
Checklist Item No: 3.5.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2025-Feb-11
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 should provide evidence of annual checking of physical condition of storage wells as mentioned in the manual.
Corrective action: The existing drainage system is not sufficient to cater for the sewage demand of the city, due to urbanization and expansion of city beyond its limit. The expansion is mainly due to migration of people from rural to urban area. Under smart city program of Saharanpur, the old drainage system is being enhanced. Since the upgradation of drainage system is under progress and part of the smart city plan, hence the tracking of same was planned to be included post completion of the project by the municipal corporation.
The IWRAs and other water related areas such as storage tanks are being checked twice a year pre and post monsoon. The relevant checklist along with its status for assessing the physical condition has been now updated and attached in annexure.
Evidence of implementation: - Checklist
- PO Copy of the work done

Finding No: TNR-008889
Checklist Item No: 3.9.2
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2025-Feb-11
Checklist item: Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.
Findings: The evidence related to water conservation initiatives (including the before and after water consumption scenario for each implementation) at site are to be provided as evidence.
Also, the site had undergone water audit study by external agency in 2021 and have suggested water conservation opportunities for the site. The are no details provided about implementations of these water conservation opportunities.
Corrective action: Site acknowledge the finding. There were some water conservation initiatives that were carried out after the audit of 2021. The Order copy of these projects can be found in the annexure.
Evidence of implementation: - Water saving projects
- Order copy of projects
- 2021 Water audit report

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Finding No:	TNR-008674
Checklist Item No:	4.3.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Feb-11
Checklist item:	Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.
Findings:	<p>The site has not presented evidence relating to consultation efforts on the water stewardship performance. The site is required to provide evidence that the water stewardship performance was shared with stakeholders for consultation /feedback on the performance.</p>
Corrective action:	<p>The site actively employs diverse methods to communicate its progress on the water stewardship plan to various stakeholders on regular basis & feedback is documented, some of these engagement methods include:</p> <ol style="list-style-type: none">1. Stakeholder's workshops & Meetings: Village level, Gram panchayat level, Farmer Field school & district level.2. Events: Like Annual stakeholders meet, Water Day, environment day, world Toilet Day, Inauguration of the new works etc.3. Letter of Correspondence: Like request letter for works, Work completion, Feedback etc.4. Appreciation: Appreciation from district Level and state Govt. <p>These feedback from the stakeholder has been considered for AWS plan and action:</p> <ol style="list-style-type: none">1. From the order of govt. on sanitation facility for PWD students in local school shall be made whose circular was sent to all the basic education department and the basic education department being one of the stakeholders of ITC, want ITC CSR team to get involved in it and received a request letter for the same as well, as a result is now actively involved in building toilets as well as facilities for PWD students in 5 schools within the catchment area.2. Discussion with MNREGA official regarding the Amrit Sarovars (Pond Development) done by ITC MSK team whose evidences can be found in Annexure. <p>The site will continue ongoing engagement with relevant stakeholders and will continue to emphasize the progress achieved on the water stewardship plan & getting their feedback during these interactions. In future responses to the indicator, the site will ensure of providing more documentation evidences about stakeholder's consultation feedback & its inclusion on the site's water stewardship performance, including the effectiveness of the site's engagement process.</p>
Evidence of implementation:	<ul style="list-style-type: none">- Appreciation letter by school- Appreciation & completion letter by gram Pradhan- Appreciation by stakeholders on water balance & water governance- Appreciation tweet by CDO & ministry of Jal Shakti Govt. India- WUG & FFS meetings minutes- Farmer scientist interaction meeting minutes and pictures- Wall painting for interventions and AWS plan vs progress discloser in catchment village

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Finding No:	TNR-008675
Checklist Item No:	4.4.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Feb-11
Checklist item:	The site's water stewardship plan shall be modified and adapted to incorporate any relevant information and lessons learned from the evaluations in this step and these changes shall be identified.
Findings:	The site is required to redesign the way in which the water stewardship plan is presented in order to showcase the modifications, adaptations and lessons learned so as to modify the water stewardship plan.
Corrective action:	<p>The site has undergone CAPP study twice in 2015-16 & 2020-21. From the CAPP study ITC was able to find out the lack areas in the water stewardship plan, hence modify the stewardship plan from CAPP 1.0 to CAPP 2.0. As per village level meeting, workshop & expert institution suggestion incorporated time to time. The site sets the Targets in its water stewardship plan after extensive stakeholder collaboration in the form of surveys and stakeholder meetings during its CAPP Assessments. These are broad targets with a timeline of 5 years which are then further detailed down to annual plans. The stakeholder feedback that the site receives are around the action plan that the site undertakes to achieve those targets. The feedback on action plans is received regularly from the stakeholders in form of various request letters. These request letters then become a part of the action plan of the site for that year. In summary the feedback received from the stakeholder is on the lines of smaller action plans which are adequately considered and addressed. Feedback received from the stakeholders is not on the AWS Targets that are mentioned in the water stewardship plan.</p> <p>The next 5-year plan is scheduled to start on 2026 where the plan will be modified based on outcome of the CAPP 3.0 study.</p> <p>The modification, Adaption and lessons learned from both the CAPP studies are presented as a form of matrix and attached in the annexure. Unit will further improvise on reporting the changes on water stewardship plan based on the studies.</p>
Evidence of implementation:	<ul style="list-style-type: none">- CAPP report 1.0- CAPP report 2.0- CAPP1.0 vs CAPP 2.0- Modification, Adaption and Lessons Learned matrix- Updated section of manual 4.4.1- letter for drinking water facilities establishment from DM and from court

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Finding No: TNR-008667
Checklist Item No: 5.2.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2025-Feb-11
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 should disclose the water stewardship plan (and how the water stewardship plan contributes to AWS Standard outcomes) of site with the relevant stakeholders including the government authorities.
Corrective action: The communication on site water stewardship plan is shared with stakeholders during periodic EHS refresher training. The evidence of same is attached in annexure. However, to further strengthen the area unit will carry out specific drive to develop deep understanding in AWS standards and outcomes. Also, site shares periodic reports on water quantity and quality to relevant stakeholders like UPPCB and groundwater dept. The evidence of same is also attached as annexure.
Evidence of implementation: - EHS refresher training record
- Water quantity/quality information to relevant govt. Authorities

Finding No: TNR-008668
Checklist Item No: 5.3.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2025-Feb-11
Checklist item: A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.
Findings: No information is provided for site level and stakeholders other than catchment level stakeholders.
The site needs to provide evidence of the information disclosed at previous interactions to demonstrate compliance to the indicator by subsequent disclosure of water stewardship performance, including quantified performance against targets as per the requirement of the indicator.
Corrective action: • Service Providers:
We have communicated our performance on Water Stewardship plan like Water conservation, Water Quality, 100% recycle and reuse via contractor/service provider EHS Meetings
Evidence of implementation: - EHS training meeting minutes discussing water stewardship plan & progress
- Photographs of meeting

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Report Details

Report	Value
Report prepared by	Amit Singh
Report approved by	Juan Carlos Ceron
Report approved on (Date)	12-02-2024

Surveillance

Proposed date for next audit
2024-Nov-27

Comment The proposed date for next audit, i.e. Surveillance audit is 27.11.2024.

Stakeholder Announcements

Date of publication	Location
12/10/2023	AWS Website
12/10/2023	WSAS Website
27/10/2023	Local Newspaper
Comment	<p>The stakeholder announcements were done at AWS website, WSAS website and in the local newspaper by site.</p> <p>The links for stakeholder announcement at AWS and WSAS website are given below: https://a4ws.org/wp-content/uploads/2023/09/AWS-000570-ITC-Saharanpur-2023-Stakeholder-Announcement.pdf</p> <p>https://watersas.org/wp-content/uploads/2023/09/AWS-000570-Stakeholder-Announcement-DRAFT.pdf</p>

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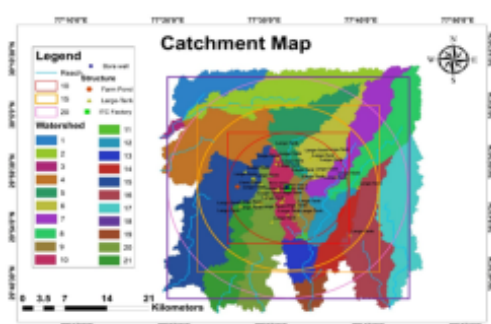
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Catchment Information



Site location.png



Catchment map.png

Catchment Information

The site undertook a detailed hydrological and hydrogeological study to identify micro watershed the site is reliant upon. The block occupies the Ganga-Yamuna doab area and marked by several first to third order rivers. Geo-morphologically the block is characterized by flat alluvial plain of Ganga basin. Main river flowing along western boundary of the block is Hindon river which is tributary of Yamuna river. In the eastern part Kali river flows from north to south.

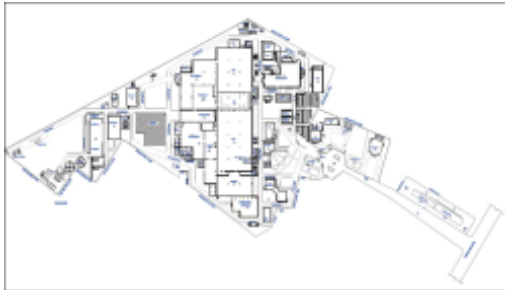
Watershed basin with an area 5-10 sq km has been delineated which is considered as micro watershed by definition and is the catchment on which the site depends for its water needs. Subsequently, the site has also identified the primary scope area for its water stewardship interventions in the 5 Km radius around the site. Once the saturation of interventions was achieved in the area, the interventions have been expanded to 10 Km radius (20 Km x 20 Km Grid) (43,305 Ha). The rural population of the district mainly depends upon agriculture resources for their livelihood.

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Client Description and Site Details



Factory.jpg

Client/Site Background

ITC Tobacco Factory has an area of 23 Acres area in the Saharanpur district in Uttar Pradesh. Entire water requirement of factory is fulfilled from reuse of rain water and from ground water through 3 borewells located within the factory premises. The remaining rain water is recharged through rain water harvesting shafts/pits for aquifer recharge. The site has been classified as zero liquid discharge. No effluent is discharged outside the premise of the factory. However, there are storm water drains going from within the site to outside the site (as highlighted in the drainage layout). These drains are further connected to an irrigation channel connected to a canal which passes by the factory.

Summary of Shared Water Challenges

Summary of Shared Water Challenges

The site has identified following shared water challenges:

- Declining ground water table in the catchment
- Increasing water demand in the catchment for agricultural due to low efficiency in irrigation
- Lack of WASH and water quality

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

0.1.1 Eligibility Criteria

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

✓
Yes

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

✓
Yes

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

✓
Yes

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1 STEP 1: GATHER AND UNDERSTAND

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

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.



Comment ITC Tobacco Factory has an area of 23 Acres area in the Saharanpur district in Uttar Pradesh. The main source of water for plant is groundwater for which site has 3 nos. of approved borewells from Ground Water Department. Apart from ground water, the site also utilises rainwater which is collected in the 3 tanks located inside the factory and used after primary treatment. Some part of rainwater is recharged through rainwater harvesting shafts/pits for aquifer recharge. The major water related infrastructures (such as borewells, water treatment plants, RO plant, wastewater treatment plant, TTW plant, etc.) have been mapped by site. The site has been classified as zero liquid discharge. No effluent is discharged outside the premise of the factory. However, there are storm water drains going outside the site (also highlighted in the drainage layout). These drains are further connected to an irrigation channel connected to a canal which passes along the factory. The site undertook a detailed hydrological and hydrogeological study to identify micro watershed to which the site is reliant upon. The site is located in Ganga basin. An area of 5-10 sq km was delineated which was considered as micro watershed and the sub-catchment on which the site depends for its water needs. Subsequently, the site has also identified the primary scope area for its water stewardship interventions in the 10 Km radius around the site.

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

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

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



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Comment The site has prepared methodology for stakeholder identification. Stakeholder identification is carried out as per the unit's Stakeholder identification & Engagement procedure (AWS/ITD-SRE/SOP1) which lays down the basis of stakeholder identification and their level of engagement.

Based on the methodology, the stakeholders have been listed and prioritized based on their interest and influence in addressing the water related challenges at the site and catchment level. The stakeholders have been prioritised based on their interest and tabulated in the table. The evidence of engagement with various stakeholders are shared as evidence.

The site has worked in the catchment with farmers / schools and have identified / worked with the minorities and vulnerable people.

Site has also listed the name and designation of persons of the stakeholder organisation / stakeholder group alongwith their contact details.


Finding No: TNR-008664

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 The influence of the stakeholder on site and site on stakeholder has been identified which is carried out as per the unit's Stakeholder identification & Engagement procedure (AWS/ITD-SRE/SOP1). The stakeholder's have been listed and prioritized in the table based on their influence on site.

The evidence of engagement with various stakeholders at site and catchment level are also provided.


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 On-Site Water Emergency Response Plan (OSWEP) for water related incidents. The plan includes water emergency management cell for which the duties have been defined alongwith the name, designation and contact details of the persons in emergency management cell.

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

Comment Site has mapped input water sources (groundwater and rainwater) with the water storage capacity. There is no. discharge outside the factory and the ETP treated water is used within the premises. Site has mentioned about evaporation losses from the process.

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**

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Comment The site has presented water balance for the plant based on the annual water abstraction through borewells and rainwater usage in process. The water balance shows the usage of in different sections of plant. At certain sections, negative values are shown to balance the quantities. There is no clarity why these negative values are shown.

Also, there is no clarity on the quantity of permeate generated and reject from RO plant.

Site has represented graphically the Specific water Consumption, Ground water drawn, Annual rainfall (in mm), Ground Water Recharge values from year 2018-19 to 2022-23 and monthly Ground Water Withdrawn for F.Y. 2022-23.

The basis of calculation / estimation of rainwater recharge on the basis of available rainwater potential is not known.

Finding No: TNR-008645

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.*


Yes

Comment The site has graphically presented monthly average values for 2022-23 of parameters like pH, TDS and hardness for Groundwater and pH, TDS, TSS, BOD & COD for ETP treated water which are well within permissible limits.
The quality of different types of water are being tested periodically at internal / external laboratories. The frequency of testing for the following types of water are listed below:
- Borewell Water being tested two times in a year through external laboratory
- Drinking Water being tested monthly through external laboratory
- Effluent Treated Water being tested daily at Internal laboratory and monthly through external laboratory
- Process water being tested two times in a year through external laboratory

There is no quality related challenge on the site.

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


Yes

Comment The site has mapped the areas which are potential sources of pollution on site. The potential solutions of pollution have been tabulated which are HSD Tank, LSHS Tank, Boiler Chemical storage area, WTP area, ETP chemical storage, Oil storage area, Canteen dishwasher chemical storage, Casing storage tank, Transformer yard, MHE maintenance area, Casing and flavour storage room and Engg. store.


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


No

Comment Site has mentioned that it recharges rainwater through rainwater harvesting pits which have been identified as Important Water-Related Area for the site as they help in recharging water into the ground thereby having net positive environmental impact. Site has mapped 40 such pits within the site.
The status of all these identified pits has been mentioned as good and that these are currently functional.

Finding No: TNR-008647

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



in progress

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Comment The site has calculated annual water related costs of the unit (FY 22-23) which includes the operational costs of WTP, operational costs of ETP, Water testing cost and other water related annual maintenance costs.
The site has also developed a description of the economic, environmental, social and cultural value generated by the site. The site has quantified the environmental value creation by site.
Finding No: TNR-008648


1.3.8 *Levels of access and adequacy of WASH at the site shall be identified.* 
Yes

Comment The site has mapped and tabulated the drinking water and toilet facilities (male and female) available the site and have compared them against the requirement mandated as per "FACTORIES ACT, 1948 (Section 18)" and latest "THE OCCUPATIONAL SAFETY, HEALTH AND WORKING CONDITIONS CODE, 2020".


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

1.4.1 *The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be identified.* 
Yes

Comment Major raw material used by ITC Saharanpur are tobacco leaf, HLP blanks, cigarette paper, filter rods & BOPP overwraps. None of these supplier of the mentioned raw material lies in the site catchment.

1.4.2 *The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.* 
in progress

Comment Site has mentioned that Major services of the site are done in-house including the facility of canteen and there are no outsourced services within the site's catchment area.
Finding No: TNR-008650

1.4.3 *Advanced Indicator
The embedded water use of primary inputs in catchment(s) of origin shall be quantified.* 
Yes

Comment The site has identified the embedded water use in the major raw materials used in the manufacturing as Filter Rods, HLP Outer Packaging for cigarettes and tobacco leaf.

The annual water and specific water consumption data for filter rods supply (through ITC Filtrona Ltd.) have been provided for last 5 years.

Site has presented water related data (annual water and specific water consumption) of two suppliers (PPB (UPF), Haridwar and PPB (TVT), Tiruvottiyur) for HLP Outer Packaging for year 2022-23.

The major raw material required in the process of cigarette manufacturing is Cut Tobacco, and same is obtained through Agri-Business Division (another business division under ITC Limited) from its 3 Green Leaves Threshing Units located in Anarparti (AGLT), Chirala (CGLT) and Mysore (KGLT). The water consumption and SWC trends of the three GLT's for the past three years are provided.

Agri-Business Division team also monitors the water withdrawn for irrigation for tobacco cultivation both at the nursery as well as the main field stage for the tobacco procurement. The test report to assess the ground water quality for CGLT.

Site needs to recheck its statement that the embedded water use in the tobacco production is 365 kl/ MT.

Score 7

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1.5	<i>Gather water-related data for the catchment, including water governance, water balance, water quality, Important Water-Related Areas, infrastructure, and WASH</i>	
1.5.1	<i>Water governance initiatives shall be identified, including catchment plan(s), water-related public policies, major publicly-led initiatives under way, and relevant goals to help inform site of possible opportunities for water stewardship collective action.</i>	 Yes
Comment	Water governance initiatives have been identified, including catchment plan(s), water-related public policies, major publicly-led initiatives with relevant goals. The site has engaged with the following authorities for the policies: <ul style="list-style-type: none"> - District Ground Water Department, Saharanpur - State Pollution Control Board, Saharanpur - Municipal Corporation Saharanpur - Department of Agriculture, Uttar Pradesh - Department of Horticulture, Uttar Pradesh 	
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	Water-related legal and regulatory requirements have been identified. The site has provided water related legal and regulatory requirements as below: <ul style="list-style-type: none"> - Consent to Operate from Uttar Pradesh State Pollution Control Board which stipulates discharge conditions of effluent - No- Objection Certificate for sinking of new well for industrial/ commercial / infrastructural or bulk user of ground water - Submission of Analytical Results of treated waste water every 30 days - Treatment of waste water to meet stipulated standards and the effluent discharge shall not exceed consent conditions 	
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	Site has presented a catchment water balance table based on study carried out by external agency which states the total availability of water is 145.61 MCM & Demand is 188.88 MCM resulting into negative catchment water balance of -43.27 MCM. <p>It is not clear for which period the catchment water balance is prepared. Also, there are no details as to how the input and output components have been arrived.</p> <p style="text-align: right;">Finding No: TNR-008654</p>	
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>	 Yes

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Comment Site has conducted study through external agency in 2017 and 2023. 50 published sample data were analysed to get a comprehensive idea about the water quality of the study area. It is noticed that the TDS, Ca, Mg, Fe and NO3 values are higher in different areas. The report states that tubewells installed at around 80-90 ft depth, yields bad quality water. The water is yellow in colour, sometimes carries a bad odour as well. Traces of iron have also been reported. On the other hand, tubewells installed at more than 120 ft depth yields drinkable water. In areas where the hand pumps have been installed very close to locations from where pollutants are being discharged, water is found to be extremely harmful even at the depth range of 120-180 ft. In these locations, water from much deeper layers, e.g., 300 ft is drinkable and healthy.

52 water quality data from the study area has been assessed on tapping the Shallow Aquifer and 79 water quality data has been assessed from the study area tapping the Lower Aquifer. Site has also gathered information related to one of the river, i.e. Dhamola river that joins the Main Hindon River based on quality test in UPPCB report. Site has also presented table showing water quality parameters like, pH, Alkalinity, Chloride & TDS and comparison of drinking water parameters with permissible limits.

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


 Obs.

Comment The site has identified and mapped Important Water Related Areas on the basis of hydrogeological assessment report by Geovale in the catchment covering the following:

- Large Storage / farm ponds
- Canals
- Streams (River)
- Horticulture plantation areas
- Recharge Zones

The site has defined the criteria for rating the condition of the IWRA's.

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

 in progress

Comment Site has referred to a DPR published by WAPCOS on STP works for Saharanpur City. In this report they have identified a significant amount of infrastructure and their status in the district. The major issues related to infrastructure they have identified are:

- Most of the drains are very old and have neither been cleaned, desilted or repaired for long time. These drains have become a dumping ground for the garbage and various types of solid waste.
- In the absence of a functioning sewerage system, the present situation can be described as grossly unhealthy and unhygienic. Measures need to be taken immediately to clean these drains and take up the repair of these drains.
- All are the major drains are connected to the Dhamola and Paodhoi river in the city. The industry effluent also mix-up with some sewage channels.
- The sewage water lines are not lined in the city in many places so it is affecting the shallow groundwater aquifer of the area also from river the contaminations are reaching out to the groundwater level.

The study has recommended decentralized STP Locations the catchment.

Finding No: TNR-008658




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

 Yes

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Comment	<p>In primary scope area, site has conducted a survey and prepared Core Area Perspective Plan (CAPP) to understand the community priorities and issues. With the surveys, major priorities/issues related to WASH are :</p> <ul style="list-style-type: none"> • Insufficient sanitation facilities (individual / Common) • Poor and insufficient WASH infrastructure facilities in schools • Poor & inadequate waste management (Solid as well as Liquid) in village <p>Based on the survey, requirements were identified for the adequacy of WASH facilities at 113 Schools in Saharanpur in our catchment blocks (74 intervention villages). Accordingly, site has focused to train students on WASH awareness activities at schools & Aanganwadis and capacity building of Child Cabinets & School Management Committees (SMCs) on sanitation, O&M activities at schools.</p> <p>Site has gathered information from government data sources like Swachh Bharat Mission (Grameen) 2.0 by the department of Drinking Water & Sanitation under Ministry of Jal Shakti for status of sanitation facilities for the district. Also, details of Individual Household Tap connections is also available on the Jal Jeevan Mission website.</p>	
1.5.8	<p><i>Advanced Indicator</i></p> <p><i>Efforts by the site to support and undertake catchment level water-related data collection shall be identified.</i></p>	 Yes
Comment	<p>The site has engaged NGO's and external agencies to collect data for the catchment. The following steps were followed for collecting the data to understand the catchment level challenges:</p> <ul style="list-style-type: none"> • One of the step involves understanding Geo hydrology of the prioritised area, developing a framework & implementation strategy to achieve water security. • Moreover, in order to understand the Socio economical profile of the Primary Scope Area, ITC with implementing NGOs partners conducts a Core Area Perspective Plan. • This plan is reviewed and updated every 5 years and highlights issues in the scope area related to water scarcity and WASH. <p>Site has also presented details of the study along with the details of agency.</p>	
Score	5	
1.5.9	<p><i>Advanced Indicator</i></p> <p><i>The adequacy of WASH provision within the catchments of origin of primary inputs shall be identified.</i></p>	 Yes
Comment	<p>1. The site's major primary input i.e. cut tobacco is procured from three GLTs. Site has mentioned that ITC has implemented a Core area perspective plan (CAPP) to identify the adequacy of aspects of provision of WASH facilities in Chirala (CGLT), Anarpati (AGLT) and Mysuru catchment (KGLT) from which the site receives raw material leaf from Agri business Division. The details of WASH facilities at site is provided.</p> <p>2. Primary Input - HLP major suppliers: UPF (Haridwar) & TVT (Chennai) Out of the above, ITC has undertaken CAPP assessment in Haridwar that have identified adequacy of WASH related infrastructure.</p> <p>3. Primary Input 3 - Filter Rod major supplier: ITC Filtrona, Bangalore WASH status at factory and data undertaken through CAPP assessment in Bangalore is presented.</p> <p>The site should capture complete details of the current status of WASH provision in the catchment of the primary inputs.</p>	
Score	4	
1.6	<p><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></p>	
1.6.1	<p><i>Shared water challenges shall be identified and prioritized from the information gathered.</i></p>	 Yes

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Comment	<p>The site has employed a systematic approach to identify shared water challenges. This approach encompasses multiple steps:</p> <ol style="list-style-type: none"> 1. Engagement with Village Community, Gram Panchayat, and Other Catchment Stakeholders 2. Hydrogeological Assessment 3. Publicly available Water Assessments <p>The site has identified and prioritized the following high importance shared water challenges:</p> <ol style="list-style-type: none"> 1) Declining ground water table in the catchment 2) Increasing water demand in the catchment for agricultural due to low efficiency in irrigation 3) Lack of WASH and water quality 	
1.6.2	<i>Initiatives to address shared water challenges shall be identified.</i>	 Yes
Comment	The corresponding initiatives to address each of the shared water challenges have been identified and presented in a table.	
1.6.3	<p><i>Advanced Indicator</i></p> <p><i>Future water issues shall be identified, including anticipated impacts and trends</i></p>	 No
Comment	<p>Future water scenarios for the catchment have been calculated. It is anticipated that the population will increase by yearly rate of 1.34% and by 2031 it would be 54,08,107 as compared to 40,35,901 in 2021. Accordingly the water demand in the catchment will increase, water supply components have been kept similar which would result in a demand supply gap of - 102 MCM. Site should recheck the projections as the 1.34% yearly rise in population would not result in population of 5408107.</p> <p>Site has also carried out water related future projections (Water Depletion, Water Stress, Water Demand, Water Depletion) using the WRI Aqueduct tool for all the blocks in the Primary Scope Area.</p> <p>The site has listed the impact categories for each hazard:</p> <ol style="list-style-type: none"> 1. For floods - It is not a material risk for the catchment 2. Intense rainfall - amount of rainfall is not considered to be a material risk 	
1.6.4	<p><i>Advanced Indicator</i></p> <p><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></p>	 Yes
Comment	<p>The site has identified potential water-related social impacts are listed below:</p> <ul style="list-style-type: none"> • Impact of effluent discharge - Site has no effluent discharge, so there is no social impact. • The site's watershed interventions have significant impact on all stakeholders in the catchment these have been separately assessed for several interventions • The site's proactive programmes on data collection and addressing shared challenges are providing a net benefit to the community - Site has carried out extensive data collection activities from Geovale Study Reports, CAPP reports, Baseline document for catchment, Proposal from NGOs. 	
Score	4	
1.7	<i>Understand the site's water risks and opportunities: Assess and prioritize the water risks and opportunities affecting the site based upon the status of the site, existing risk management plans and/or the issues and future risk trends identified in 1.6.</i>	
1.7.1	<i>Water risks faced by the site shall be identified, and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.</i>	 Yes
Comment	<p>The site has identified and prioritised the water risks (as low, medium or high), along with the period, likelihood and severity of impact, impact on business and potential costs.</p> <p>The risks have been categorised as physical risks, regulatory risk and reputational risk.</p>	

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1.7.2	<i>Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.</i>	 Yes
Comment	The site has identified water related opportunities categorised under physical risks, regulatory risk and reputational risk. Potential costs and opportunities have been listed against the identified water risks to site. Site has also presented examples of how the site is utilizing the potential opportunities by working with stakeholders.	
1.8	<i>Understand best practice towards achieving AWS outcomes: Determining sectoral best practices having a local/catchment, regional, or national relevance.</i>	
1.8.1	<i>Relevant catchment best practice for water governance shall be identified.</i>	 Yes
Comment	The Catchment best practice for water governance have been identified and are listed below: - Institution Promotion such as Water user group, Agri business centre, Farmer Field Schools, Child Cabinets, School Management Committees, etc. - Multi stakeholder Meeting (Government Officials, CBO, WUG, Women SHG) - Annual meeting stakeholder workshops - Promoting Information, Education & Communication (IEC) strategy	
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>	 Obs.
Comment	The site has identified following catchment best practices for water balance: Demand side interventions: 1. Demand management in agriculture Supply side interventions: 1. Rain water harvesting in existing & new water harvesting structures: Securing water in the unit catchment by Renovation of Tanks, Construction /Formation of Farm Pond etc. 2. Land Treatment: Individual plantation & Moisture retention in the catchment Private lands, plantation in commons The following sectoral best practices in water balance improvement have been identified as below: 1. Reduction in specific water consumption for the product by reducing fresh water consumption for the unit 2. Rain water harvesting and use of rainwater 3. Adopting water efficient technologies 4. Reuse and Recycle water	
1.8.3	<i>Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.</i>	 Yes

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Comment	<p>The site has identified various best practices for site and catchment as listed below:</p> <p>At Site Level:</p> <ol style="list-style-type: none"> 1. Realtime monitoring of ETP discharge water parameters 2. Robust mechanism to keep check on the water quality 3. Use of RO units and UV treatment to provide pure drinking water <p>At Catchment Level:</p> <ol style="list-style-type: none"> 1. Mulching with Organic waste 2. Micro Irrigation 3. Cover crop /Inter crop 4. Integrated Pest & Nutrient Management (IPM & INM) <p>Apart from above, Solid waste management Approach is also identified as best practice as deteriorating water quality in the catchment is also due to flow of solid waste into the IWRAs like canals through drainage systems.</p>	
1.8.4	<i>Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.</i>	Q Obs.
Comment	<p>The site has identified various best practices for site and catchment as listed below:</p> <p>At Site Level for Rain water harvesting sumps : Checking the physical condition of storage wells and cleaning pre & post monsoon</p> <p>At Catchment Level:</p> <p>Water Harvesting Structures - Local contribution from beneficiaries to generate ownership and removal of silt</p> <p>Canals & River Streams - working with the farmers to improve/ maintain the state of the canal</p> <p>Ponds - Local contribution from beneficiaries to generate ownership and removal of silt</p> <p>Recharge Shafts - once in 3-4 years remove the silt accumulated in the structure</p> <p>Horticulture Plantation areas - Farmers are supported in the selection of plants and developing of plantation</p>	
1.8.5	<i>Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.</i>	✓ Yes
Comment	<p>The site has identified various best practices for site and catchment as listed below:</p> <p>At site level:</p> <ul style="list-style-type: none"> • Battery operated Floor cleaning machine • Sensor based water tap system • Implementation of a robust system of housekeeping of the WASH facilities. • Ensuring adequate drinking water and sanitation facilities for the workforce <p>At Catchment level:</p> <ul style="list-style-type: none"> • Awareness amongst the village level community on Sanitation - Health and Hygiene activities • Awareness creation to children on WASH activities at schools • Construction of Child friendly school infra related to WASH like Handwash and toilets as per Swachh Vidyalaya guidelines • Use of IEC, wall paintings, cleanliness drives, street plays and communication tools to bring behavioral change in community members • Contribution and involvement of SMC (School Management Committee) and community for construction of WASH infra at Schools. • Collaborating with Government departments through various schemes (SBM) for implementing Sanitation & SWM Program • Promotion of Mohalla/Ward Committees for effective implementation of the SWM program at each Wards. • Capacity building of Gram Panchayats on Solid & Liquid Waste Management Planning & implementation. 	

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2	STEP 2: COMMIT & PLAN - Commit to be a responsible water steward and develop a Water Stewardship Plan	
2.1	<i>Commit to water stewardship by having the senior-most manager in charge of water at the site, or if necessary, a suitable individual within the organization head office, sign and publicly disclose a commitment to water stewardship, the implementation of the AWS Standard and achieving its five outcomes, and the allocation of required resources.</i>	
2.1.1	<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. 	 Yes
Comment	A signed and publicly disclosed site statement is identified signed by Unit Head (General Manager) covering 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. The site has displayed copy of Water Stewardship Policy and Commitment at the main entrance and other locations at site. The copy of same has been attached as evidence.	
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>	 Yes
Comment	The site has displayed two copies of Water Stewardship Policy and Commitment signed by senior executives of the organisation. One copy signed by EVP Technical - (Corporate Level - ITD) and other copy signed by Unit Head, General Manager - India Tobacco Division, Saharanpur.	
Score	1	
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	All compliance obligations related to water and waste water management are identified and monitored in the legal register checklist of the site. This legal register checklist is reviewed on a monthly frequency by responsible person i.e. Utilities manager. The monthly statutory tracker is signed by responsible person. The site has also listed monitoring structure at site for water related legal compliances such as: <ul style="list-style-type: none"> - Drinking Water Quality monitoring system - Waste Water Quality Monitoring system - iComply Portal Screenshot of Legal compliance submission every Month 	

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

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



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

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

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

Goals:

At Catchment Level: initiatives to support organization goals

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

At Site level:

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

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 for site and catchment with Action points as per identified Best Practices, how it is measured & monitored, Budget allocated, responsible persons, target date of completion and linkage with Shared water challenges and AWS outcomes.

Finding No: TNR-008665

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.

No

Comment There are no water stewardship activities with other industry within the same catchment.

2.3.4 Advanced Indicator
The site's partnership/water stewardship activities with other sites in another catchment(s) (either under same corporate structure or with another corporate site) shall be identified.

Yes

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Comment ITC is working in various catchments for water stewardship interventions. From time-to-time, ITC MSK teams in different catchments meet to discuss and share the knowledge and best practices related to water stewardship intervention. One such knowledge sharing session was organized in Sept 2022 by the Ranjangaon team, wherein the best practices in ITC Ghod River basin were discussed with the programme officers of different catchments where ITC is taking water stewardship activities including the Saharanpur catchment. Natural Resource management (NRM) discussions with other catchments where best practices from one catchment were shared with other catchment teams. Community Development Program (CDP) discussion with other catchments where best practices from one catchment were shared with other catchment teams. ITD Saharanpur shares knowledge with the proposed units for AWS certifications, i.e., ITC-Bangalore, KGLT Mysuru etc. on stewardship strategy and implementation plan. Moreover, ITD- Tobacco Division with all its five cigarette factories as a whole formed Planning Task force and is working on reduction in Specific water consumption targets as a part of Sustainability 2.0 by 2030.

Score 4

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



Yes

Comment Consensus evidence of internal stakeholders on specific water consumption reduction target under Water Conservation. Annual EHS Targets are discussed in Safety Committee Meetings in the presence of Unit Head, Functional heads, Representatives from each department including service provider employees, various site targets related to Environment, Health and Safety. Apart from this, site's Specific Water Consumption targets are also discussed in Annual Plan Review Meetings with the senior Management at ITC. The feedback and suggestions if any, are then incorporated into the plan.

At Catchment Level Meetings are conducted at village level with Gram Panchayat and beneficiaries are used to discuss specific action items at village level for relevant targets. For each target- consensus is taken at village level and also consensus taken for each beneficiary to implement activities. The following sample evidence has been attached for reference:

- Minutes of meeting on plan of supply side management, Village Kakarkui, catchment area
- Minutes of meeting for planning of the water balance demand side management, Village Bidvi, catchment area
- NOC letter for pond renovation By Gram Panchayat Pradhan, Sarkhadi sheikh for catchment intervention highlighting their consensus on the plan for rainwater harvesting
- Letter from Basic education department regarding WASH interventions
- Letter from Municipal Corporation for collaboration on SWM Program
- Letter of collaboration with MGNREGS
- Letter from district chief Development Amrit Sarovar program (pond construction & Governance)
- MOU with municipal Corporation
- Acknowledgement letter of pond work completion highlighting consensus, Gram Panchayat, Sarkhadi sheikh for catchment intervention
- Snapshot of meeting with ITC's senior management to seek consensus on the catchment related plan

Score 7

2.4 *Demonstrate the site's responsiveness and resilience to respond to water risks*

2.4.1 *A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.*

in progress

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Comment The site has listed activities for mitigation of some of the identified risks along with the agencies involved. The site has also mentioned about Letter of Coordination and Meeting Minutes as evidence of the engagement. For these risks, site has outlined the associated activities to mitigate the risk and the public agency they are collaborating with along with evidence of collaboration.

Finding No: TNR-008887

2.4.2 *Advanced Indicator*
A plan to mitigate or adapt to water risks associated with climate change projections developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.


Yes





Comment Site has referred to the reports - "Risk vulnerability assessment of climate change" and "State action plan on climate Change-SAPPCC UP".
As per the climate change scenario predicted for the Indian subcontinent, an increase in mean maximum and minimum surface air temperature of 1.3 degree Celsius and 1.6 degree Celsius over land in the 2049 for Saharanpur District with respect to the 1975 is expected. Also, in June rainfall it would be 0 to 3% as increment. Climate variability has a great deal of effect on crop yields and livelihood of farmers. Catchment is highly vulnerable to different weather risks. These risks range from delayed Monsoon, Unseasonal rain, Hailstorm etc. Considering the above, ITC has promoted smart measures that enable farmers to reduce potential losses due to these risks. The measures are "water smart," "Corban Smart", "Nutrient smart" and "knowledge smart". By adopting these practices, farmers are not only able to prevent expected losses, but also increase their yields and income.

Score 6

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3	STEP 3: IMPLEMENT - Implement the site's stewardship plan and improve impacts	
3.1	<i>Implement plan to participate positively in catchment governance.</i>	
3.1.1	<i>Evidence that the site has supported good catchment governance shall be identified.</i>	 Yes
Comment	<p>The site has provided enough evidence to confirm that the site has partnered with various stakeholders to support good catchment governance. Some of the partnerships are as follows:</p> <ul style="list-style-type: none"> • Study partner: Geovale Services Pvt Ltd. • Implementing partners: MVDA, Pani Sansthan & WASHi • Technical/Knowledge partners: KVKs, Indian Institute of Sugar Cane Research - Lucknow • Scale up partners: Agriculture Department, Govt. of UP, Horticulture Department, Govt. of UP, MNERGS Govt. of India, Gram Panchayat <p>Another important aspect of water governance was Capacity building of Water User Groups (formed under project) regarding On-farm & Off-farm water use efficiencies on conservation and School Management Committees (SMCs) & Child Cabinets on WASH and Operation & Maintenance activities in schools.</p>	
3.1.2	<i>Measures identified to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be implemented.</i>	 Yes
Comment	<p>The site has mentioned that it respects the rights to water of farmers & local community in the catchment area for:</p> <ul style="list-style-type: none"> • Water availability for agriculture • Water availability for domestic purposes- drinking, cooking, bathing, sanitation, etc. • Water for cattle drinking • Water for community for drinking & sanitation activities <p>The water stewardship plan has been specifically designed to respects the rights of everyone through the supply side interventions, demand side interventions, Interventions on WASH in the catchment and solid waste management.</p> <p>Site has also presented sample case study for Demand side Interventions & solid waste management and testimonials from school principal / student regarding WASH interventions at school.</p>	
3.1.3	<i>Advanced Indicator Evidence of improvements in water governance capacity from a site-selected baseline date shall be identified.</i>	 Yes
Comment	<p>Site has also developed a Water Committee with important members responsible for achieving the water stewardship goals of the site. The chart was recently updated with change of a committee member. The responsibility and duties of Water committee members are also listed by the site for the activities.</p> <p>Site has also presented catchment level governance structure of Water User Groups. Till November 2023, 42 WUGs, 102 FFs, 13 ABCs, 94 SMCs, 94 Child cabinets and 472 Mohalla Samiti have been formed / strengthened in terms of maintaining all records, conducting regular meetings, decision making, implementing activities.</p>	
Score	2	
3.1.4	<i>Advanced Indicator Evidence from a representative range of stakeholders showing consensus that the site is seen as positively contributing to the good water governance of the catchment shall be identified.</i>	 Yes

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Comment	<p>The site has engaged with different stakeholders for the water stewardship activities in the catchment. The following evidence of engagement from different range of stakeholders with whom the site has interacted with on contributing to good water governance:</p> <ul style="list-style-type: none"> - MoM of awareness session organised on World Environment Day - Water User Group meetings being organised by ITC - Stakeholder Meeting at Darra Shivpuri Village Pond - Various interventions related to establishing Good Water Governance in the catchment also highlighted in newspaper clipping - MoUs with government departments like Municipal Corporation - Appreciation certificate received from Chief Minister - Govt of Uttar Pradesh for ITC works in catchment - Resolution by the WUG members acknowledging the support from ITC in the institutionalisation - Appreciation letters from Gram Panchayat - Modules to raise awareness contributing towards good water governance 	
Score	2	
3.2	<i>Implement system to comply with water-related legal and regulatory requirements and respect water rights.</i>	
3.2.1	<i>A process to verify full legal and regulatory compliance shall be implemented.</i>	 Yes
Comment	<p>Site has a defined system in place to review and track all applicable water related legal and regulatory compliance via a legal register / checklist. All applicable legal and regulatory compliances are identified and listed in the legal register / checklist by responsible managers. This legal register / checklist is being reviewed and updated on a monthly frequency by the site and shared further for validation to Head Office.</p> <p>Additionally, treated water compliance test reports are submitted to State pollution control board on monthly basis.</p> <p>Statutory Compliance Check list is verified and approved by Unit Head in iComply Portal. Any changes in the rules/ regulations is tracked and undertaken at the divisional level and same is reflected on the portal from time to time.</p>	
3.2.2	<i>Where water rights are part of legal and regulatory requirements, measures identified to respect the water rights of others including Indigenous peoples, shall be implemented.</i>	 Yes
Comment	<p>At Site level water related rights defined include the compliance with The Uttar Pradesh Factories Rules 1950 and IS 1172:1993.</p> <p>At catchment level, as of now there is no legal requirements of water rights by the site to be complied although ITC respect the rights to water of Farmers & Local community for WASH Facilities, Water Availability for Agriculture & Drinking. Specific initiatives under supply side & demand side management have been undertaken to support farmers and local community in the catchment. A sample case study for demand side management is also provided as reference.</p>	
3.3	<i>Implement plan to achieve site water balance targets.</i>	
3.3.1	<i>Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.</i>	 Yes
Comment	<p>The site has tabulated annual performance against water balance targets from year 2018-19 to 2022-23 as progress towards meeting water balance targets. There has been continuous improvement in the specific water consumption of the site except for year 2021-22. Overall, there has been significant reduction in site's specific water consumption from baseline value of 2.72 KL/Mnc to 2.06 KL/Mnc which is around 24.2% reduction.</p> <p>For catchment, the progress towards Supply side interventions and Demand side interventions.</p>	

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3.3.2	<i>Where water scarcity is a shared water challenge, annual targets to improve the site's water use efficiency, or if practical and applicable, reduce volumetric total use shall be implemented.</i>	 Yes
Comment	The site has consistently improved its specific water consumption from the baseline year 2018-19 value of 2.72 KL/Mnc to 2.06 KL/Mnc in 2022-23 which is around 24.2% reduction from baseline year against a long-term target of 30% reduction by 2030.	
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 to re-allocate 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>	 No
Comment	As a response to the indicator, site has presented that the site is using ETP treated water for environmental benefits like gardening within the site and the site is also harvesting and recharging rain water into the ground. As such, the site has not re-allocated any water from site water savings for social, cultural and environmental needs.	
3.4	<i>Implement plan to achieve site water quality targets</i>	
3.4.1	<i>Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.</i>	 Yes
Comment	At site level, site has set target to ensure treated water quality parameters are well below the defined UPPCB norms for which site has presented average annual data from 2018-19 to 2022-23. Site has also presented graphs with monthly values of parameters such as BOD, COD, pH, TSS and TDS. The data shows achievement of water quality parameters within the prescribed norms. At the catchment level, there is no direct water quality target related to the catchment set in the plan, however the catchment has mentioned about sustainable agriculture area and Households covered under SWM. For sustainable agriculture covered, site has shown progress from 2018-19 to 2022-23. For SWM, site has shown progress from 2017-18 to 2022-23.	
3.4.2	<i>Where water quality is a shared water challenge, continual improvement to achieve best practice for the site's effluent shall be identified and where applicable, quantified.</i>	 Yes
Comment	Site is a zero effluent discharge unit. No untreated effluent is discharged outside the site's boundary. Site has a well-defined system for monitoring of the treated effluent parameters both in-house and through third party certified laboratories. Treated effluent is being monitored as per defined frequency before being used for gardening and toilet flushing. The site has implemented following action in ETP Plant to Improve the Treated Effluent Water Quality: - Glue & water separation to reduce TSS for ETP inlet water	
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 Site has mentioned that there is a system in place for maintenance of site IWRA's which is annually checking the physical condition of storage wells. There is no evidence provided for the same.

For catchment, site has listed the practices such as Renovation & Desiltation for maintenance or enhancement of IWRA's are implemented.

Finding No: TNR-008888

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.


Yes

Comment 51 Large pond & 01 Minor pond have been created/renovated (including Desiltation) since 2017-18 (these numbers have been verified by third-party audits, both financial and sustainability). Detailed analysis of the efficacy of structures have also been carried out in an Efficacy Monitoring Assessment, done by Geovale in 2020-21. List of all 52 ponds & 50 hector Fruit plantation is attached below along with before-after pictures for some of them highlighting the impact of the work done by ITC Ltd around these IWRAs.

In the catchment, 51 Large pond & 01 Minor pond have been created/renovated (including Desiltation) since 2017-18 and Fruit plantation in 50 hectare were implemented. Site has tabulated the details of ponds alongwith the respective water storage area and have also listed the details of each fruit plantation with the respective area. The comparison of before and after scenario of the sample projects are provided as evidence and listed below:

- Village Jairampur, Pond 02
- Village Igari, Pond
- Village Mavikhurd Pond
- Village Manakmau Pond no-01
- Village Halapur Pond No 1
- Village Sawalpur Nawada Pond
- Village Halalpur Pond No - 02
- Horticulture fruit plantation areas
- Fruit plantation at bank of Canal for bund strengthening & maintaining the IWRA

Score 6

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.


Yes

Comment It was quite evident from the stakeholder discussions that ITC has supported in contributing towards a healthy status of IWRAs. There are letters from stakeholders, a video testimonials by stakeholders, etc. confirming the positive contributions towards the improvement of IWRAs. The following have been provided as evidence:

- Completion letter of pond work completion, Gram Panchayat, Sarkhadi sheikh for catchment intervention
- Tweet shared by Ministry of Jal Shakti, Water Resources Department
- Tweet shared by Ministry of Rural Development, Saharanpur Uttar Pradesh
- Appreciation certificate received from Chief Minister, Govt of Uttar Pradesh on the eve of BHUJAL SAPTAH
- Various interventions related to IWRA's in the catchment is also published in newspaper clipping
- Inauguration of various IWRA's and Appreciation by relevant government authorities

Score 2

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3.6	<i>Implement plan to provide access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers at all premises under the site's control.</i>	
3.6.1	<i>Evidence of the site's provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers onsite shall be identified and where applicable, quantified.</i>	Yes
Comment	The site has provision of adequate access to drinking water and toilets which are compared against the requirements mandated as per Factories Act, 1948 (Section 18) & THE OCCUPATIONAL SAFETY, HEALTH AND WORKING CONDITIONS CODE, 2020. The toilet and drinking water facilities at site exceeds the minimum requirements.	
3.6.2	<i>Evidence that the site is not impinging on the human right to safe water and sanitation of communities through their operations, and that traditional access rights for indigenous and local communities are being respected, and that remedial actions are in place where this is not the case, and that these are effective.</i>	Yes
Comment	<p>Site is not discharging any treated effluent water outside the boundaries as the same is utilized for gardening, toilet flushing and HVAC cooling purposes within the site premises. Moreover, the site is also implementing water sanitation & hygiene activities in the scope area. So far, site has covered 94 schools under WASH activities like toilets, handwash station construction and training to students on WASH till 2022-23. Also, ITC is implementing Solid Waste Management activities in immediate catchment and have covered 150350 HHs till 2022-23.</p> <p>The evidences presented for above indicators justify that the site does not impinge on human rights to safe water and sanitation of any stakeholder, and therefore there are no remedial actions to show case.</p>	
3.6.3	<i>Advanced Indicator A list of actions taken to support the provision to stakeholders in the catchment of access to safe drinking water, adequate sanitation and hygiene awareness shall be identified.</i>	Yes
Comment	<p>The site has engaged with the villages and schools for WASH initiatives at the catchment. Some of the initiatives are listed below:</p> <ul style="list-style-type: none"> - Covered 94 schools under WASH activities like construction of toilets (separate for boys & girls), handwash station in the schools and conducted training for students on WASH till 2022-23 - Strengthening of 94 child cabinets and 94 School Development Management Committees in immediate catchment - MSK team initiated a sanitation program in the catchment where a completely new community sanitary block with proper ventilation was constructed - To make this sanitary block clean and hygienic a user committee (WATSAN committee) was formed <p>Apart from above, site has constructed 576 Individual Households, 2 Community Toilets & 11 Public Toilets in the catchment.</p> <p>The site has also presented photographs of the before and after WASH interventions.</p> <p>ITC and Saharanpur Municipality Corporation started a pilot on implementation of a decentralised model in 2016 for solid waste management which started with 33,000 households in 2016 and has now reached to 1.5 lakh households.</p>	
Score	5	
3.6.4	<i>Advanced Indicator: In catchments where WASH has been identified as a shared water challenge, evidence of efforts taken with relevant public-sector agencies to share information and to advocate for change to address access to safe drinking water and sanitation shall be identified.</i>	Yes

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Comment	<p>Site has identified WASH as a critical shared water challenge after CAPP (Core Area Perspective Plan) assessment. The findings are then discussed with public-sector agencies like Gram Panchayats and accordingly plans are made.</p> <p>Site has worked in collaboration with various authorities and are listed below:</p> <ul style="list-style-type: none"> - Health Care Department towards renovation of toilets / new toilets for various PHC (Primary Health Care Centre) - Education department & Jal Nigam, Saharanpur for water quality testing of 65 intervened schools - Working on improving Schools & Community WASH infrastructures by collaborating with Gram Panchayats • Promoting Institutions (SDMC/WATSAN committee) - Information Education & Communication Materials for Wash - Awareness activities for school children and teachers 	
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>	 Yes
Comment	In water stewardship plan, site has mentioned about target set by one of the RM supplier (ITC ABD - KGLT) for reduction of specific water consumption by 2% every year. The supplier has achieved 28% reduction in SWC upto 2022-23 which is much more than the set target.	
3.7.2	<i>Evidence of engagement with suppliers and service providers, as well as, when applicable, actions they have taken in the catchment as a result of the site's engagement related to indirect water use, shall be identified.</i>	 Yes
Comment	Site has mentioned that there are no suppliers/ service providers in the catchment.	
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>	 Yes
Comment	<p>The major raw materials utilise in the process are Leaf Tobacco, HLP (Outer Pack for cigarettes) and filter rods. The leaf tobacco is majorly sourced from ABD's 3 GLTs (KGLT, CGLT & AGLT). The site has provided details of the interventions in the catchment of the above suppliers.</p> <p>The major suppliers for the site outside the catchment are the tobacco leaf suppliers. The site procures cut tobacco internally from ITC's Agri Business Division (ABD) located in three areas namely Mysore, Chirala and Anaparti. ABD carries out continuous risk-assessments and implements interventions as a part of its holistic two-pronged approach involving both - demand-side management to improve irrigation efficiency and supply-side management to revive traditional water harvesting and recharge structures in areas of cultivation. Additionally, ABD has also taken interventions in its factories the three GLTs to reduce their water consumption.</p> <p>Other major supplier is ITC Filtrona Bangalore. ITC has also undertaken CAPP assessment in Bangalore, and listed the details of interventions in the catchment.</p> <p>Other major suppliers for HLP are UPF (Haridwar) and TVT (Chennai). ITC has undertaken CAPP assessments in Haridwar that have identified adequacy of WASH related infrastructure. After the identifications, appropriate work is being done in the catchment to address these water related risks and challenges.</p>	
Score	5	
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>	

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3.8.1	<i>Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.</i>	 Yes
Comment	<p>The site has engaged with various stakeholders like WUGs, Gram Panchayat, farmers, etc. which are owners of water infrastructure. Site engages with stakeholders on the concerns that the site or the stakeholders may have related to various shared infrastructures. The stakeholders then share their concern in the form of request letters which are then worked upon by the site. Some samples are listed below:</p> <ul style="list-style-type: none"> - Request from District Basic education officer regarding Construction of New toilet Block, renovation of Multiple Handwash and boundary wall - Request letter for pond renovation By Gram Panchayat Pradhan, Sarkhadi sheikh for catchment intervention - Acknowledgement letter of pond work completion, Gram Panchayat, Sarkhadi sheikh for catchment intervention 	
3.9	<i>Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.</i>	
3.9.1	<i>Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.</i>	 Yes
Comment	<p>The site has implemented actions throughout the villages in the primary scope area within the catchment towards achieving best practice, related to water governance. The related evidences have been provided for compliance and following samples are attached in manual:</p> <ul style="list-style-type: none"> - Farmer's Training on water use efficiency - Jal Goshthi with villagers in catchment - Multi stakeholder workshop on Water governance - Outcome and action plan meeting - Sensitization meeting on WASH - Sensitization meeting on Global Hand Washing Day 	
3.9.2	<i>Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.</i>	 in progress
Comment	<p>The site has implemented actions at site and catchment throughout the villages in the primary scope area within the catchment towards achieving best practice, related to water balance. The site has listed a no. of water conservation initiatives which have been implemented, which are in process and which will be implemented in 2023-24 and 2024-25. Site has also shared details of supply side and demand side interventions at catchment and provided before / after photographs of supply side interventions.</p> <p style="text-align: right;">Finding No: TNR-008889</p>	
3.9.3	<i>Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.</i>	 Yes
Comment	<p>The site has implemented actions towards achieving best practice for water quality for site as well as catchment. For catchment, several agricultural practices have been implemented for indirect improvement in water quality.</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>	 Yes
Comment	<p>The site has implemented actions towards achieving best practice, related to maintenance of Important Water-Related Areas such as checking the physical condition of storage wells at site level and Renovation & Desiltation of Tanks / Ponds at catchment Water Harvesting Structures. The evidence for same is provided.</p>	
3.9.5	<i>Actions towards achieving best practice related to targets in terms of WASH shall be implemented.</i>	 Yes

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Comment	At site level, actions are being taken to implement best practices to achieve targets related to WASH such as implementation of a robust system of housekeeping of the WASH facilities. Site has been working towards improving WASH in the catchment. A brief summary of the initiatives is provided below: <ul style="list-style-type: none"> • Site has worked on improving Schools & Aanganwadi's WASH infrastructures • Promoting Institutions (SMC/Mothers committee) to Plan, implement & manage infrastructures • Work has been done towards creating awareness among the residents & bringing about behavioral change towards safe sanitation in convergence with Swachh Bharat Mission • ITC implementing Solid Waste Management activities in 60 wards & 02 villages (primary scope area) and covered 150350 HHs Site has also tabulated the improvement in district ranking from year 2018 to 2021 in terms of sanitation which is seen to be continuously improving and available on Ministry's website.	
3.9.6	Advanced Indicator <i>Achievement of identified best practice related to targets in terms of good water governance shall be quantified.</i>	 Yes
Comment	The site has presented evidence to support good water governance on this indicator and have provided quantification for the same. The site works consistently with different levels of authorities, public sector agency and water user groups in villages all for the better management of water across the catchment. Till now, site has promoted 102 Farmer Field Schools, 42 Water User Groups, 13 ABC in the catchment area. Organized annual general body meeting of all stakeholders every year since years to sensitize farmers on adopting water saving practices in agriculture. Strengthened 94 Child Cabinets, educated them on sustainable WASH practices. Strengthened in 60 Wards & 02 GPs on Improvement in sanitation, hygiene and wastewater management in villages.	
Score	8	
3.9.7	Advanced Indicator <i>Achievement of identified best practice related to targets in terms of sustainable water balance shall be quantified.</i>	 No
Comment	The site has quantified the identified best practice related to targets in terms of water balance. At catchment level: <ul style="list-style-type: none"> - List of all 52 ponds with Net Water Storage capacity of each tank - Micro irrigation & intercropping are the best practices for water conservation as well risk mitigation for farmers At Site Level, site has listed a no. of water saving interventions at site but has not provided details of water saving resulting from each initiative.	
3.9.8	Advanced Indicator <i>Achievement of identified best practices related to targets in terms of water quality shall be quantified</i>	 Yes
Comment	The site has listed best practices adopted by the site for improvement in water quality both for domestic water quality and for treated waste water quality which are being done to maintain the treated waste water quality norms. At catchment, site has provided details in nos. of implementations for various quantified the identified best practices such as sustainable agriculture area in ha. and the households covered under SWM. Site has also compared the groundwater quality parameter such as chloride content in ground water for year 2021-22 and 2022-23. Around 76% of the sample indicated a decrease in the Chloride content from March 2022 to March 2023 on the improvement in water quality due to these implementations.	
Score	8	
3.9.9	Advanced Indicator <i>Achievement of identified best practices related to targets in terms of the site's maintenance of Important Water-Related Areas have been implemented.</i>	 Yes

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Comment	Site has provided details of implementations of identified best practices related to site's maintenance of Important Water-Related Areas. For catchment, site has provided the quantified achievements in terms of construction / rejuvenation of Large Tanks & Farm Pond. The site has tabulated the details of all 52 ponds & 50 Fruit plantations. For site, rainwater harvesting sumps have been identified as Important Water Related Area. Site has mentioned about maintenance practice to maintain the good condition for the identified IWRA.	
Score	8	
3.9.10	Advanced Indicator <i>Achievement of identified best practice related to targets in terms of WASH shall be quantified.</i>	 Yes
Comment	For site, dedicated agency has been deployed to continuously maintain the hygiene and cleanliness of the WASH facilities. All toilet facilities are cleaned periodically through defined checklists and records being maintained. For catchment, site has provided details of yearwise implementations of WASH infrastructure at schools, Individual Households, Public and Community Toilets. Till 2022-23, ITC Mission Sunehra Kal has covered 150350 households under Solid Waste Management activities .	
Score	4	
3.9.11	Advanced Indicator <i>A list of efforts to spread best practices shall be identified.</i>	 Yes
Comment	At Catchment level, the site has engaged with various stakeholders to spread the best practices through the following: <ul style="list-style-type: none"> • Water User Group Training • Farmer Field School Meeting • Field Day • ABC meeting • Farmer training • Workshop & Events • Swachh Vidyalaya Samaroh in schools • Hygiene education classes on WASH • SDMC strengthening Meetings • Organized competitions in schools – Dustbin competition, Drawing competition, quiz competition, etc. • Video shows, Magic shows and Street Plays in schools and communities for hygiene promotion and toilet usage • Activities on important water related days: Observation of Hand washing day /World toilet day /World water day in school and Community • Organize Teacher Training on school WASH program • On job training for care takers, sweepers 	
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 prepared a table showing the collective actions and the role played by ITC and the institutions with name of the people involved from the entities along with their designation. The evidence of engagement is reviewed and provided. The site has tabulated details of activities with the quantification of activities yearwise from 2019-20 to 2023-24. The site has presented a table showing collective action by site alongwith the site executives involved with their positions.	
Score	14	

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3.9.13

Advanced Indicator



Yes

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

Comment

The site has provided evidence that site actions at catchment are positively contributing to the achievement of the collective action were identified and are listed below:

- Appreciation letter cum completion letter from Gram panchayats for pond work
- Appreciation letter cum completion letter of each 94 Schools
- Appreciation letter for SWM
- Appreciation letter for infra & WASH facilities at PHC
- Award for Decentralized Composting in state level from government authority
- Award for Prerak Dauur samman from government authority
- Covid Innovation Awards from Ministry of Housing Urban Affairs
- Best Wards of Cleanness from Dep. Of Urban Development Department
- Award during Ground Water week for effective work in the area of Ground water and water conservation by Chief Minister, Uttar Pradesh
- Award for Operation Kayakalp for development of infrastructure facilities in Government schools in the district of Saharanpur by Chief Minister, Uttar Pradesh

Score

10

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4 STEP 4: EVALUATE - Evaluate the site's performance.	
4.1	<i>Evaluate the site's performance in light of its actions and targets from its water stewardship plan and demonstrate its contribution to achieving water stewardship outcomes.</i>
4.1.1	<i>Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.</i>
Comment	<p>For site, yearwise achievement against the targets set in water stewardship plan is evaluated. For catchment, the site presented summary of achievements against the targets for supply side interventions, demand side interventions and WASH interventions which shows yearwise implementations in the catchment for</p> <ul style="list-style-type: none"> - Supply side management - Demand side management - Water Governance - WASH Governance
4.1.2	<i>Value creation resulting from the water stewardship plan shall be evaluated.</i>
Comment	<p>Site has evaluated value creation resulting from the water stewardship interventions by plant in the catchment such as:</p> <ul style="list-style-type: none"> - Self-sustainable community led decentralized solid waste management model in which revenue generated by project through user fee are distributed as honorarium to over 450 waste collectors and processing workers - Improving income of farmers by promoting improved agricultural practices - Water Harvesting Potential Created - Water savings through Demand Side management - Vegetation improvement - Improved health via better WASH facilities in schools and Aanganwaadis - Improved civic engagement in catchment governance - Renovation of IWRAs in the catchment <p>For site, Operational & maintenance costs and Payments to regulatory authorities have been identified and the environmental value by site Water recharge through rainwater harvesting pits.</p>
4.1.3	<i>The shared value benefits in the catchment shall be identified and where applicable, quantified.</i>
Comment	<p>The site has identified shared values benefit that have resulted as a result of site water stewardship interventions are described below:</p> <ol style="list-style-type: none"> Improvement in ground water levels Additional Water storage at catchment villages Water Use Efficiency in Sugarcane Increase in children's enrolment in government schools
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>

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Comment At Site level - an executive level review by the CEO and Executive Vice President of the division is carried out annually by the site wherein water related challenges, risks, opportunities, water costs, savings or benefits are presented and discussed covering both the site and catchment. The site team presents a presentation for review, a snapshot of which is shown as evidence.

For catchment level, reviews are done both at village level, catchment level and ITC's MSK senior management levels. The reviews are carried out in defined periodicity which is more than once per year.

Score 3

4.2 *Evaluate the impacts of water-related emergency incidents (including extreme events), if any occurred, and determine the effectiveness of corrective and preventative measures.*


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


Yes

Comment Site has mentioned that no water related emergency incidents occurred at site till date. However, site has identified all potential water-related emergency scenarios in the On-site water emergency response plan (OSWERP) and identified suitable action plans against each identified potential scenario. Details of such water-related incidents if any are also reported in the site's annual sustainability reporting framework. Apart from this, site has a system of reporting & investigation of incidents doing root cause analysis as per Corporate EHS (environment, Health and Safety) guidelines.

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

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


in progress

Comment The site has employed diverse methods to communicate its progress on the water stewardship to various stakeholders. Some of these engagement methods include:
1. Stakeholder Discussions and Workshops
2. Wall Paintings in villages
3. Brochures distribution to highlight all the water stewardship activities and the progress achieved

At Site Level, water conservation/ reduction targets form the part of annual EHS Targets for the year which are discussed in Safety Committee Meetings.

Finding No: TNR-008674


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


Yes

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Comment	<p>The site's efforts to address shared water challenges have been evaluated by stakeholders through awards, appreciation letters, acknowledgment letters, suggestions. Some of the evidence provided are:</p> <ul style="list-style-type: none"> - Certificate of Appreciation from Basic education department, Uttar Pradesh for development of the infrastructure facilities (related to WASH) - Appreciation letter given by Municipal corporation Saharanpur SWM program (related to WASH and Water Quality) - Painting program organised on water conservation awareness - Tweet by Ministry of Jal Shakti, WRD for appreciation on the work done by ITC along with Municipal Corporation Saharanpur in the development of Pond - Retweet of same by Ministry of Rural Department, Saharanpur, Uttar Pradesh - Appreciation & endorsement letter from Municipal corporation Saharanpur evaluating the water balance interventions done by ITC (related to Water Balance) - Acknowledgement letter of pond work completion highlighting consensus by Gram Panchayat, Sarkhadi sheikh village - Pond rejuvenation inauguration on the occasion of world water day
Score	6
4.4	<i>Evaluate and update the site's water stewardship plan, incorporating the information obtained from the evaluation process in the context of continual improvement.</i>
4.4.1	<p><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></p> <p style="text-align: right;">in progress </p>
Comment	<p>Site performs CAPP exercises which are main evaluation and consultation process for the catchment water stewardship plans refinement every five years. ITC does regular consultation with community during implementation of projects through NGO partners. Some examples of community feedback are cited below:</p> <ul style="list-style-type: none"> • Importance of operation and maintenance of the WASH infrastructures was raised in the mothers group meeting • Post the feedback from mothers committee, introduced soap bank in the anganwadis and schools. Also, promoted child cabinets for educating about proper use of the WASH infrastructures and SDMC's to orient community (parents) on operation and maintenance of the WASH infrastructures. • Water Stewardship related activities plans and achievements were presented and discussed in stakeholders meeting on various occasions. <p>Site stated that all stakeholders appreciated ITC water stewardship approach and achievements and no suggestions for improvement or changes in plan and approach was received. Hence, no modification is required so far as per initial approach and activities planned.</p> <p>Moreover, ITC also receives various request letters from Gram Panchayat seeking support in building various IWRA's and the plan is then appropriately modified and work is done as per the feedback of the stakeholder.</p>

Finding No: TNR-008675

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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.		<div><div></div><div>Yes</div></div>
Comment	Site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations have been displayed at plant main gate and other locations at plant. The Utility Incharge of the site is responsible to ensure compliance to the water related laws and regulations as part of the site's internal governance structure for water stewardship.		
5.2	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.		<div><div></div><div>in progress</div></div>
Comment	<p>The site has mentioned that it discloses the water stewardship plan through various mediums like:</p> <ol style="list-style-type: none">1. Murals and Wall Paintings in Cluster village highlighting the Plan, Progress and the AWS Outcome2. Discussion with officials on the Water Stewardship Activities planned with them3. Various awareness events organized on important days like World Water Days, World environment day where the site' stewardship plan is discussed in detail <p>There are no details or evidence of disclosing the water stewardship plan of site with the internal and external stakeholders including the relevant government authorities.</p> <p>Finding No: TNR-008667</p>		
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.		<div><div></div><div>in progress</div></div>
Comment	<p>For catchment stakeholders (other than site), the site discloses the water stewardship plan through various mediums like Murals and Wall Paintings in each village highlighting the Plan, Progress and the AWS Outcome (being updated every year) Brochures that highlight the plan and progress are created & circulated among different stakeholders in meetings. Various awareness events are organised on important days like World Water Days, where the site' stewardship plan is discussed in detail. The site has provided evidence for:</p> <ul style="list-style-type: none">- WSP progress through Murals and Wall Paintings- Discussion with MNREGA officials about the progress as per the plan- Discussion on progress in the number or ponds constructed in the region during the World Environment Day- Brochures highlighting the plan and progress <p>Finding No: TNR-008668</p>		
5.3.2	Advanced Indicator The site's efforts to implement the AWS Standard shall be disclosed in the organization's annual report.		<div><div></div><div>Yes</div></div>





Finding No: TNR-008667

Finding No: TNR-008668

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Comment	The site's efforts to implement the AWS Standard have been disclosed in the organization's annual report. The Annual Sustainability report mentions about 8 no. of sites including Saharanpur site (lying in high-water stress regions) to be AWS certified by 2024 and all the high risk sites by 2035. The link for same is https://www.itcportal.com/sustainability/sustainability-integrated-report-2023/ITC-Sustainability-Integrated-Report-2023.pdf (Page 39 & 91).	
Score	1	
5.3.3	Advanced Indicator <i>Benefits to the site and stakeholders from implementation of the AWS Standard shall be quantified in the organization's annual report.</i>	 Yes
Comment	In the company's annual sustainability report, ITC's water stewardship implementation efforts are presented. The various benefits which are derived from the site's water stewardship interventions are quantified. The link for same is https://www.itcportal.com/sustainability/sustainability-integrated-report-2023/ITC-Sustainability-Integrated-Report-2023.pdf (Page no. 91)	
Score	1	
5.4	Disclose efforts to collectively address shared water challenges, including: associated efforts to address the challenges; engagement with stakeholders; and co-ordination with public-sector agencies.	
5.4.1	<i>The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.</i>	 Yes
Comment	The site's shared water-related challenges and efforts made to address these challenges have been disclosed at Village level through WUAs, ABC, FFS-Meetings, Wall paintings, Brochures etc. and at Catchment level through Multiple stakeholder meeting/workshops, events like World Water Day/Environment Day etc. Information is disseminated to relevant stakeholders on village wise implementations through meetings, WhatsApp group, murals and wall paintings.	
5.4.2	<i>Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.</i>	 Yes
Comment	Efforts made by the site at catchment level to engage stakeholders and coordinate and support public-sector agencies have been identified. The site has shared relevant evidence of engagement with the following stakeholders: - Farmers/community - KVK Saharanpur - Education department - Municipal corporation - Ground water department - Agriculture department - District Panchayati Raj Dept (MGNREGS) Saharanpur - Pollution Control board - Gram Panchayat - Sugarcane department	
5.5	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.	
5.5.1	<i>Any site water-related compliance violations and associated corrections shall be disclosed.</i>	 Yes
Comment	No site water-related compliance violations have occurred at site till date.	

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5.5.2	<i>Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.</i>	<div><div></div><div>Yes</div></div>
Comment	No corrective actions as there were no water-related compliance violations observed. Site mentions that necessary corrective actions shall be taken by the site in case of any future water related violations.	
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>	<div><div></div><div>Yes</div></div>
Comment	Site is a ZLD industry with no violation of water discharge outside the premises and has mentioned that it shall continuously monitor the best practices and are well prepared to handle any on-site water related emergency that can pose a significant risk and threat to human or ecosystem health and will communicate to all public agencies through defined reporting protocols.	

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Photographic Evidence from Audit

✓
Yes



Fuel Storage.jpeg



BW 2.jpeg



ETP (2).jpeg

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Rainwater storage pond.jpeg



BW 3.jpeg

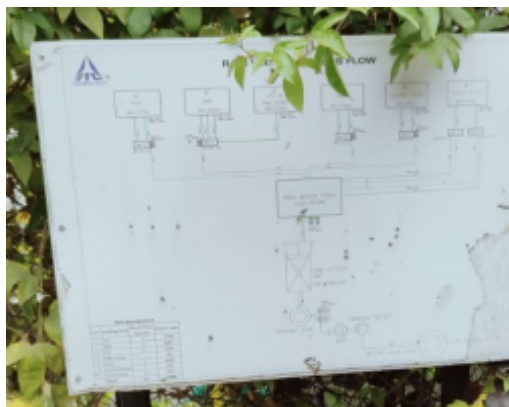


UF.jpeg

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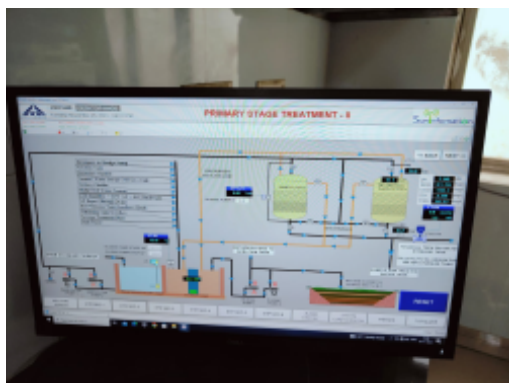
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RWH layout.jpeg



ETP T.W. for gardening.jpeg



ETP.jpeg

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ETP Process.jpeg



RWH pit.jpeg



R.W header.jpeg