

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)



Audit Number: AO-000906

SITE DETAILS

Site: **ITC Limited, India Tobacco Division, Bengaluru, India**

Address: Meenakunte Village, Jala Hobli, 562157, Bengaluru North Taluku, Karnataka, INDIA

Contact Person: Chandan Das

AWS Reference Number: AWS-000572

Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Platinum

Date of certification decision: 2024-Mar-06

Validity of certificate: 2027-Mar-06

AUDIT DETAILS

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

Audit Type(s): Initial Audit

Audit Start Date: 2023-Nov-20

Lead Auditor: Amit Singh

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Site Participants:

Mr. Manoj Shukla, Factory Manager
Mr.Chandan Das, Engineering Manager
Mr.Goutam Mondal, Other
Mr.Gowtham Subramanya, Factory EHS Manager
Mr.Chandan Kumar, Utilities Manager
Mr.NM Vijay Singh, Other
Mr.Harish Babu H.R., Other
Mr. B.Lakshmi Narayana, Other
Mr.Shivendru Mathur, Corporate Sustainability
Ms.Pooja Saha, Corporate Sustainability
Ms.Priyanka Mitra, Other
Mr.Paramesh Y G, Manager - Human Resource
Mr.Naveen Lobo, Manager - Human Resource
Mr.Venkatrao Tota, Other
Mr.Saumya Bhatt, Other
Mr.Govind Singh, Other
Mr.Sanjay Mitra, Manager - Human Resource
Mr.Dheeraj Singh, Production manager
Mr.Arun Sharda, Other
Mr.Baskaran Venkatesan, Other
Mr.Balaguru Siddappa, Other
Mr.Yash Kumar Sharma, Other
Mr. Prashant Kumar Agrawal, Other

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ADDITIONAL INFO

Summary of Audit Findings: A total of 14 findings were raised during the certification audit, 10 minor non-conformities and 4 observations. 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.

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

The audit team recommended certification of ITD - Bengaluru 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 submitted the corrective action plans addressing all findings. Proof of implementation has been requested for the Minors and this will be evaluated during the Surveillance Audit. The client is requested to upload evidence of implementation prior to the Surveillance Audit.

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

ITD BCF (Bangalore Cigarette Factory) unit is operating since 2000 and is located at Meenakunte Village, Jala Hobli, Bangalore North taluk. The unit is situated in South Pennar River basin which is the wider catchment on which the unit is reliant upon. The basin area covers 3.2 Lakh hectares. ITC Bengaluru, is a zero effluent discharge unit. Treated effluent is used for toilet flushing and gardening, Industrial cooling within the site premises. No treated/Untreated water is discharged outside the factory premises.

The audit was conducted onsite from 20th to 23rd November 2023.

The onsite visit included the assessment of borewells, water treatment plant, effluent treatment plant, tertiary treated water, rain water collection ponds, RO treatment units.

The following external stakeholders were interviewed during the audit:

Karnataka State Pollution Control Board (KSPCB)
Plant Incharge - Yelahanka, Bangalore Water supply and Sewerage Board (BWSSB)
Deputy Director, State Ground water board (KGWA)
Block Resource Coordinator, Education Department, Yelahanka Block, Bengaluru Urban District
SDMC President, Channahalli Govt school
Shobha and others, SDMC Members & Parents
NGO Project Coordinator, WASH Institute
NGO Project Coordinator, Biome Environmental solutions
NGO Project Coordinator, MYRADA
NGO Project Coordinator, SAAHAS
NGO Project Coordinator , Pratham Education Foundation
Head Master, Govt School
Government Teacher - Anganwadi
Institution/Community - Mother Committee member
Chief Officer, Hunasamaranahalli Town, Bengaluru Urban District
Panchayat Development Officer, Chikkajala Gram panchayat, Bengaluru Urban District
Agriculture Officer, Yalahanka taluk, Bengaluru Urban District
Supervisor, Women & Child development Department, Devanahalli Cluster, Bengaluru Rural District
District Consultant - Swacch Bharat Mission, Bengaluru Urban District
District Project Manager, Jal Jeevan Mission, Bengaluru Urban District
Team Leader, Jal Jeevan Mission, Devanahalli
Supervisor, Women & child development Department , Devanahalli Cluster ,Bengaluru Rural district
Head Master - Government School
Farmers

SCORE

126.00

FINDINGS

NUMBER OF FINDINGS PER LEVEL

Observation	4
Minor	10

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FINDING DETAILS

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Finding No:	TNR-008529
Checklist Item No:	1.2.1
Status:	Closed
Finding level:	Minor
Due date:	2024-Nov-20
Checklist item:	Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall: <ul style="list-style-type: none">- Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people;- Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies;- Provide evidence of stakeholder consultation on water-related interests and challenges;- Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups;- Identify the degree of stakeholder engagement based on their level of interest and influence.
Findings:	<p>The site has worked in the catchment villages with farmers / schools but did not specifically identify the indigenous people, minorities, vulnerable people.</p> <p>The site should share Stakeholder identification & Engagement procedure (AWS/ITD- Bengaluru/SOP1).</p>

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

As highlighted in the root cause analysis section below, the site comprehensively covers all the stakeholders in the catchment, categorizing them based on their work professions and roles/responsibilities rather than community and gender. Moreover, the site is well aware about the demographic data of the catchment, including the proportion of women, minorities and vulnerable groups. The process of gathering this demographic data includes secondary data collection. The site has gathered the demographic data of the region from the last census conducted in the country. According to Population Census Government of India, the scope area has 1.06% Schedule Caste community, 0.2% Schedule Tribes community and 98.7% are other community which includes general, other backward class, minority, etc. Also, as per the Census data, the male population is 53% and female population is 47% in the scope area. Please refer "Annexures- District at a glance-Demographic profile" for the Demographic profile of the scope area.

Moreover, to address this finding, the SOP has been updated to explicitly emphasize ITC's approach ensuring clarity on the inclusion of these communities and rationale behind not individually identifying them in the stakeholder identification and disclosure process. This rationale has also been highlighted briefly in the root cause analysis section below.

Overall, the site's objective is to uplift marginalized and weaker sections across the entire community, while simultaneously avoiding any perception of favoritism towards a specific community, race or gender. This approach aims to foster sustainable development and ensuring harmony and peace among the people in the catchment. Hence, the site is already covering all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people indirectly but does not identify them as a separate stakeholder.

In line with the approach mentioned above, ITC has been implementing the Water stewardship Programme in ITD Bengaluru catchment based on Baseline assessment, Participatory rural appraisal, external studies & stakeholders need assessment. In all the programmes women, Scheduled caste, scheduled tribe, Backward community & all Below poverty line communities are Included. Some of the examples of the same as below:

1. Village tank restoration, Restoration of Check Dam & other watershed works:

Beneficiaries: Entire Village community in the watershed.

2. Solid waste management:

Beneficiaries: Entire Village community is covered.

3. Vocational Training:

Beneficiaries: Unemployed youth, Person with Disabilities (The initiative has a representation of over 45% women)

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4. School & Anganwadi WASH:

Beneficiaries: Government school children's are mainly from children's of Migrant workers, Landless & Ultra poor families. Over 95% are BPL (below poverty line) Families children. (Over 48% of the beneficiaries are Girls)

5. Wellbeing of waste Collectors:

Beneficiaries: The initiative has a representation of 90% female workers

The site has also modified the stakeholder list explicitly highlighting how the vulnerable/ marginalized groups are being covered in different categories of stakeholders as highlighted in Annexure 4.

Evidence of implementation: Annexure 1: Demographic profile
Annexure 2: Site engagement with women & Persons with Disabilities
Annexure 3: Revised AWS/ITD- BCF/SOP1 for Methodology stakeholder identification and engagement
Annexure 4: Revised Stakeholder List

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Finding No:	TNR-008530
Checklist Item No:	1.3.3
Status:	Closed
Finding level:	Minor
Due date:	2024-Nov-20
Checklist item:	Site water balance, inflows, losses, storage, and outflows, including indication of annual variance in water usage rates, shall be quantified. Where there is a water-related challenge that would be a threat to good water balance for people or environment, an indication of annual high and low variances shall be quantified.
Findings:	<p>The calculation of rainwater recharge is estimated with 80% collection efficiency of the rainwater potential. The same needs to be rechecked as the total annual rain is mainly during some days and compared with the hourly capacity of the rainwater recharge.</p> <p>The site should present the metered values for RO permeate and RO reject values.</p>
Corrective action:	<p>A) Site’s rain water recharge pits are strategically located on the complete periphery of site hence ensuring maximum collection of rain water. Moreover, the rain water recharge pits have been designed with a capacity much higher than rainfall witnessed by the site. Also, in order to account for the factor of collection efficiency, rain water recharge calculation are done as per on ITC Sustainability SOP Annexure 1(e) at Page 81 (Refer to the Annexure 3: Snapshot of ITC Sustainability SOP For rain water Harvesting). The SOP defined the efficiency to be 80% after considering the evaporation losses, spillages and first flush wastage. The SOP also defines surface coefficients which are same as that published by Central Public Work Department. The calculation of rain water harvesting is also attached in Annexure 4: Rain water harvesting potential calculation for FY 22-23</p> <p>B) For ponds Ground water recharge in KL = Total RWH- Rainwater Withdrawn (Refer to the Annexure 3: Snapshot of ITC Sustainability SOP For rain water Harvesting). The SOP defined the efficiency to be 80% after considering the evaporation losses, spillages and first flush wastage)</p> <p>C) The metered values for RO permeate and RO reject values are attached in the annexures</p>
Evidence of implementation:	<p>Annexure -3 Snapshot of ITC Sustainability SOP For rain water Harvesting</p> <p>Annexure -4 Rain water harvesting potential calculation for FY 22-23</p> <p>Annexure- 5-The metered values for RO permeate and RO reject values.</p>

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Finding No: TNR-008533
Checklist Item No: 1.4.1
Status: Open
Finding level: Observation
Checklist item: The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be identified.
Findings: The provided Consent to Operate and test reports of supplier mentions name "ITC ESSENTRA LIMITED". But, earlier site has mentioned about ITC FILTRONA LIMITED. It is not clear, what is the name of supplier or Are there two suppliers?

Finding No: TNR-008534
Checklist Item No: 1.4.2
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Nov-20
Checklist item: The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.
Findings: The site should gather information about the transport services for the site staff.

Corrective action: The scope area considered for the site is 10kmx10km, National Travels (Staff transport provider) office is not located in the scope area of BCF, same is located 25 km+ away from our factory. Hence at present the embedded water usage by National Travels is not tracked, however we will start tracking embedded water usage for staff transport for calculations for water conservation, we have started with approximate base numbers.

Cleaning & Washing activities weekly: 150 L/Bus (Approx.) =
 $150 * 37 * 52 = 288600L$ (289KL)
Service of the bus quarterly: 200 L/ Bus (Approx.) = $37 * 4 * 200 = 29600L$
(30 KL)
Total Number of Bus: 37 No's
Yearly Water footprint: 319 KL, which is the baseline. Unit will track the same along with staff transporter to reduce the water footprint further

Evidence of implementation: Ongoing from present year

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Finding No:	TNR-007590
Checklist Item No:	1.5.3
Status:	Closed
Finding level:	Minor
Due date:	2024-Nov-20
Checklist item:	The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.
Findings:	<p>For water availability, the following are considered:</p> <ul style="list-style-type: none">- Recharge from Rainfall @ 6% infiltration rate- Surface Water Recharge from 8 no. of lakes / tanks @ 0.45 m / year of seepage rate- Irrigation Water Recharge @ 35% of Irrigation water demand- Water Available for usage (75% of water recharged) <p>The considerations in calculating catchment water balance needs more practicality such as:</p> <ul style="list-style-type: none">- Loss due to Evapotranspiration- Loss in soil moisture <p>There is no clarity, why 75% of water recharged is considered as water available for usage.</p> <p>The total watershed area identified by site is not considered for evaluating the catchment water balance while the primary scope area is considered.</p>

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Corrective action: The Site has addressed the findings through following corrective action:

The catchment area majorly depends on ground water source for all domestic, agriculture, industrial purposes.

For calculating Water availability, Ground water balance methodology has been adopted. For estimation of water availability, the documents referred are "HYDROLOGICAL & WATER SECURITY STUDY IN AND AROUND ITC FACTORY," study by Geovale, Water and Sanitation tool (Document by Government of India, Depart of Drinking water & sanitation Department "Ground water estimation reports of CGWB.

In the water availability calculation, input parameters such as recharge from rainfall, recharge from surface water bodies, recharge from Irrigation water have been taken into account. While calculating, the following mentioned factors or coefficients have been considered based on the reference documents.

1. Parameter : Recharge from rainfall Factor : Infiltration factor-6%
Reference document:

Geovale report (Page no 75), Ground water estimation committee report-2017(page no.31)

2. Parameter : Recharge from surface water bodies Factor : 0.45 m/year of seepage rate Reference document:
WSP tool kit (Page 72)

3 Parameter : Recharge from irrigation water Factor : 35% of irrigation water demand Reference document:
WSP tool kit and GEC 2017 (page no. 72)

Water available for usage is considered as 75% based on the below mentioned categories. The stage of ground water extraction is categorized by CGWB as mentioned below. (Extraction % & Category are as follows 1) Less than 70%-Safe 2) 70% to 90%- Semi Critical 3) 90% to 100%- Critical 4) More than 100% Over exploited)

If the stage of development is less than 70%, the region is categorized as Safe as per the CGWB norms. So in the water availability calculation, water available for usage is considered as 75% of total recharge so that the region is in more safe zone in future perspective. (Page no 27)
However, we will evaluate our estimation methodology and explore the various other water balance calculation methodologies, and modify accordingly.

While calculating recharge from surface water bodies, 0.45 m/year has been considered in which losses due to evapotranspiration also included. While calculating recharge from rainfall, infiltration factor of 6% has been considered in which losses due to soil moisture is included.

Water balance for watershed area:

While defining the factory catchment area, it is mentioned that, area under 10 km X 10 km grid is the primary scope area and prepared the water balance for primary scope area and implementing water stewardship activities on watershed-based approach.

The water balance for total watershed area will be prepared as and when primary scope area is saturated.

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Evidence of implementation: Annexure 1: CGWB-GEC 2017 Report
Annexure 2: Hydrogeology and water security report by Geovale
Annexure 3: Water and Sanitation Programme Tool kit, Dept of drinking water, Govt of India (WSP tool kit pg. no 72)

Finding No: TNR-008540
Checklist Item No: 1.5.4
Status: Closed
Finding level: Minor
Due date: 2024-Nov-20

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

Findings: The presented water quality data does not represent the complete scenario of the catchment. The site needs to engage with relevant authorities and extract the water quality data to get representative water quality status of the catchment.

Corrective action: In Catchment, totally 24 water quality samples are tested from 14 various locations /Wards/Villages to represent the catchment through various organisations like by Biome Environmental solutions, Town Municipal Corporation, Devanahalli and Karnataka Ground water Directorate. These results are compared for Baseline & End line. While going Forward, Will increase the number of samples

Evidence of implementation: 1. Annexure 1: Water quality reports
2. Annexure-2 AWS Water Quality Reports sources locations
3. Details are provided in AWS Manual 3.9.3, 3.9.8 and 3.9.13 also

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Finding No:	TNR-008542
Checklist Item No:	1.5.6
Status:	Closed
Finding level:	Minor
Due date:	2024-Nov-20
Checklist item:	Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.
Findings:	The data related to infrastructure of treated water from BWSSB is to be provided by the plant with condition and potential exposure to extreme events.
Corrective action:	The unit has 03 sources of water for its utilization; a) Ground Water b) Rainwater c) BWSSB treated water The Utilization of BWSSB water is an innovative initiative by ITD BCF plant to reduce abstraction of Ground Water from borewells

Source Mix-22-23

- Ground Water-56%,
- Rainwater-30%
- BWSSB Treated Water-14%.

Unit has valid licence from KGWA for required capacity to cater the total water requirement for the plant, with a facility of 15 No's of Borewells (at Present only 40% are utilized), In case of non-availability of BWSSB water, BCF will switch over to utilization of ETP water for non-process water requirements. BWSSB water is used from past 5 years and BWSSB treated water quality is monitored on quarterly basis by third party lab to ensure quality, the same is as per the requirements of BCF

BWSSB Infrastructure details:

The Bangalore Water Supply and Sewerage Board (BWSSB) is an autonomous body formed by the State legislature under Bangalore Water supply and Sewerage Board Act on 10-09-1964 for Water Supply & Sewage disposal. It is one of the first Water supply & Sanitation Utilities in India with jurisdiction of entire Bruhat Bengaluru Mahanagara Palike area of 800 Sq.km, (Bengaluru Core area of 245 Sqkm, 8 Urban Local Bodies of 330 Sqkm (7 City Municipal Corporation and 1 Town Municipal Corporation and 110 Villages of 225 Sq. kms.)

BWSSB received waste water from the entire Bangalore Urban which is then treated in various sewage treatment plants (38 plants). The entire piping network of BWSSB is present in the attached annexures.

<https://bwssb.karnataka.gov.in/new-page/BWSSB%20GIS%20MAP%20Information/en>

<https://yelahanka-sewage-treatment-plant-bwssb.business.site/>

ITC BCF unit receives the water Yelahanka Ph-1 10 MLD which is 18km from the site., via Piping, same is attached in Annex-1, BWSSB piping layout which stretches from Yelahanka to BCF also has been attached for reference in Annex-2, BWSSB secondary treated water supply has always been consistent w.r.t Water Quality & Quantity / Same is not prone to flooding risks

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Evidence of implementation: Annexure-1 BWSSB Piping layout in BCF
Annexure-2 BWSSB Piping layout – Yelahanka
Annexure-3- ITC BCF BWSSB agreement
Annexure-4- BWSSB Water Quality Report
Annexure-5- BWSSB Yelahanka Plant Snaps

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Finding No:	TNR-008702
Checklist Item No:	2.3.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Nov-20
Checklist item:	A water stewardship plan shall be identified, including for each target: <ul style="list-style-type: none">- How it will be measured and monitored- Actions to achieve and maintain (or exceed) it- Planned timeframes to achieve it- Financial budgets allocated for actions- Positions of persons responsible for actions and achieving targets- Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.
Findings:	<p>1. In indicator 1.5.4, site has presented water quality data for Aquifer-1 and Aquifer-2 which shows higher concentration of sodium, potassium, Nitrate and hardness in the ground water samples. The site should also focus on targets related to improving catchment water quality.</p> <p>2. 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 and then setting of targets.</p>
Corrective action:	<p>Our target-setting approach is designed to address the complexity of high nitrate, sodium and potassium concentrations in the catchment. However, directly targeting these parameters is challenging due to the multifaceted nature of the issue, involving various stakeholders beyond our industry.</p> <p>Our strategy focuses on proactive measures, such as raising awareness among farmers and households, which we believe will indirectly contribute to improving water quality over time. By covering a specific number of farmers and households with awareness initiatives on fertilizer use and waste management practices, we aim to tackle the root causes of the water quality issues in the catchment</p> <p>1. In Catchment, totally 24 water quality samples are tested from 14 various locations /Wards/Villages through various organisations like by Biome Environmental solutions, Town Municipal Corporation, Devanahalli and Karnataka Ground water Directorate. These results are compared for Baseline & End line, Water quality results shows that quality is improved mainly Sodium, Nitrate & Hardness. While going Forward, Will increase the number of samples</p> <p>2. RM (Lamina+stem) has embedded moisture content of 11%, which is a process requirement for manufacturing cut tobacco. Hence further reduction of RM embedded water cannot be considered due to process requirement</p>

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Evidence of implementation: Annexure-1: Water quality reports
Annexure-2: Water Quality Baseline Data

Finding No: TNR-009037
Checklist Item No: 3.9.2
Status: Open
Finding level: Observation
Checklist item: Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.
Findings: The site's estimated water savings of 21300 kL per year seems to be overestimated as there is not much difference in water consumption value from 2018-19 to 2022-23. There is increase in production by more than 29% which also plays a major role in improvement of SWC other than the water conservation initiatives implemented by plant.

There is a gap in estimated Net Water saving YOY (KL) values and the actual water savings for various water conservation initiatives implemented by plant. The site needs to relook at the methodology of computing the Net Water savings for each project, and if required modify to arrive at realistic values. The water saving initiatives implemented by plant shall be verified during the subsequent audits as the site has year on year target of reducing SWC.

Finding No: TNR-008579
Checklist Item No: 4.1.2
Status: Open
Finding level: Observation
Checklist item: Value creation resulting from the water stewardship plan shall be evaluated.
Findings: The water cost for the unit of different types of water is provided in a table. The same needs to be reviewed as based on the data provided, there seems to be error in per unit cost of borewell water which will result in change in value creation through water savings.

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Finding No:	TNR-008580
Checklist Item No:	4.3.1
Status:	Closed
Finding level:	Minor
Due date:	2024-Nov-20
Checklist item:	Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.
Findings:	The site has presented evidence relating to consultation efforts but there was no evidence provided where stakeholders' consultation feedback was evaluated regarding the site's water stewardship performance, including the effectiveness of the site's engagement process.
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: Cluster & Taluk Level2. Stakeholders' meetings: Village level, Schools level, Anganwadi level, Gram panchayat level, Taluk, Farmer Field school, Institutions etc.3. Events: Like Annual stakeholders meet, Water Day, environment day, world Toilet Day, Inauguration of the new works etc.4. Participatory Rural Appraisal5. Letter of Correspondence: Like request letter for works, Work completion, Impact, Feedback /appreciation etc. <p>After the meetings/events, minutes of the meeting is documented including beneficiary Feedback. Video documentation is done to capture Feedbacks of all key stakeholders</p> <p>These feedbacks are evaluated & same is considered for the AWS action plan.</p> <p>a) For example, Post feedback from Mother committees (PI refer 4.4.1), "introduced fund box and soap box in the Anganwadis and schools to mobilise contribution from the community. Also, promoted child cabinets for educating about proper use of the WASH infrastructures and promoted SDMC's to orient community on operation and maintenance of the WASH infrastructures."</p> <p>b)) Some of the other feedback which is included in AWS plan & implemented are as follows (PI refer 4.3.2)</p> <ul style="list-style-type: none">• Adoption of Aerators in taps at schools & Anganwadis• Nano urea usage to reduce fertilizer usage in agriculture• Guli ragi method - amplification• Home composting from Organic waste generated at the Houses• Bore well rechargers <p>Stakeholder's feedback is reviewed in AWS Committee & ITC senior management meetings (PI refer 4.1.4)</p>

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Evidence of implementation: 1. Annexure-1 AWS stake holders meeting minutes (attached)
2. Review meeting with senior management -Screenshot of MS teams meeting (4.1.4) in AWS Manual
3. Details are provided in manual 4.4.1, 4.1.4 & 4.3.2

Finding No: TNR-008581
Checklist Item No: 4.4.1
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Nov-20

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

Findings: The site 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: 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.

During various stakeholders meeting, feedbacks are recorded & same is discussed in Unit AWS Committee meeting
Going forward the site will 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

Evidence of implementation: • Annexure-1: BCF CAPP Report 2021
• Annexure-2 AWS stake holders meeting minutes
• Review meeting with senior management -Screenshot of MS teams meeting (AWS Manual 4.1.4)
• Details are provided in manual 4.4.1, 4.1.4 & 4.3.2

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Finding No:	TNR-008699
Checklist Item No:	5.2.1
Status:	Open
Finding level:	Observation
Checklist item:	The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.
Findings:	The site has not communicated the water stewardship plan with some of the major stakeholders to site representing relevant authorities. Site should develop a plan to engage with the relevant authorities and communicate the relevant targets of water stewardship plan with the stakeholders.
Finding No:	TNR-008583
Checklist Item No:	5.3.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Nov-20
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:	<ul style="list-style-type: none">• Service Providers: We have communicated our performance on Water Stewardship plan like SWC, Water Quality, 100% recycle and reuse via contractor/service provider EHS Meetings• KSPCB: We are sharing our performance for Water Quality, SWC and 100% recycle and reuse to the KSPCB in Form V and Water quality reports submitted on regular intervals.• KGWA & BWSSB: Whenever an interaction happens with these stakeholders, performance is communicated to them. (Once in a year)
Evidence of implementation:	Annexure -1: Service provider EHS Meeting Annexure-2: Register post to stakeholder on AWS performance disclosure

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)



Audit Number: AO-000906

Report Details

Report	Value
Report prepared by	Amit Singh
Report approved by	Ruth Wandera
Report approved on (Date)	30/01/2024

Surveillance

Proposed date for next audit
2024-Nov-19

Comment The proposed date for next audit, i.e. Surveillance audit is 19.11.2024.

Stakeholder Announcements

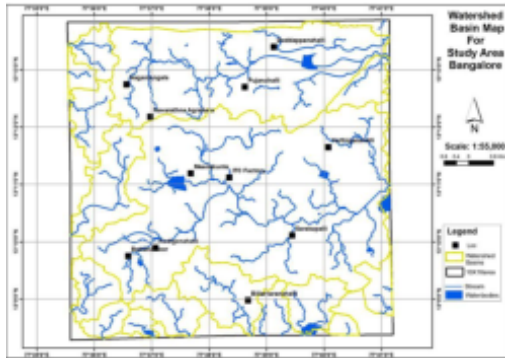
Date of publication	Location
28/09/2023	AWS website
28/09/2023	WSAS website
10/10/2023	Local Newspaper
Comment	<p>The stakeholder announcements were done at AWS website, WSAS website and in the local newspaper by site.</p> <p>The links for stakeholder announcement at AWS and WSAS website are given below: https://a4ws.org/wp-content/uploads/2023/09/AWS-000572-Stakeholder-Announcement-DRAFT.pdf</p> <p>https://watersas.org/wp-content/uploads/2023/09/AWS-000572-Stakeholder-Announcement-280923.pdf</p>

CERTIFICATION REPORT

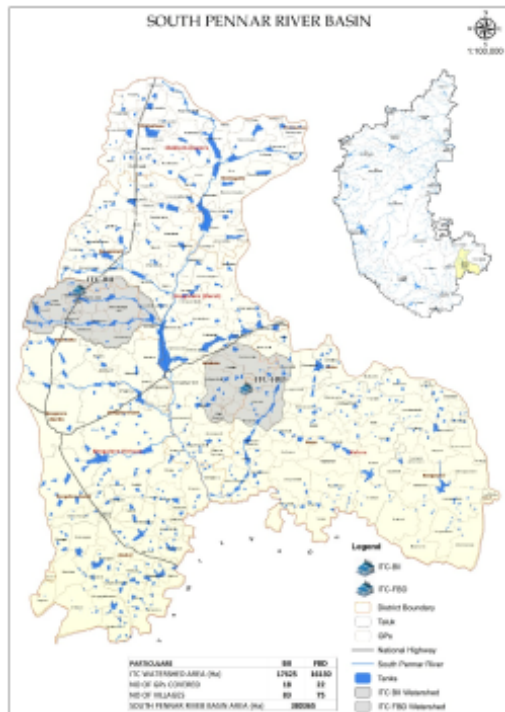
Alliance for Water Stewardship (AWS)

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Catchment Information



Watershed wise Delineated Map.png



South Pennar Basin Map.jpg



Watershed Map.png

Catchment Information

WSAS

2 Quality Street North Berwick, EH39 4HW, UNITED KINGDOM

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ITD BCF unit is located at Meenakunte Village, Jala Hobli, Bangalore North taluk. The unit is situated in South Pennar River basin which is the wider catchment on which the unit is reliant upon. The basin area covers 3.2 Lakh hectares. Since the unit is dependent on ground water sources for priority area, the site has considered the Primary Scope Area in the immediate neighbourhood in the catchment of 10000 ha (10 km X 10 km grid).

Micro watersheds are demarcated in Priority area for Execution of Water Stewardship Initiatives, with 75 villages and 12 working Grama panchayats in 2 Taluks.

The Gram Panchayats coming under Yelahanka Taluk are:

- 1) Meenakunte
- 2) Doddajala
- 3) Chikkajala
- 4) Bettahalasur
- 5) Sonnappanahalli
- 6) Bagaluru
- 7) Hunasamaranahalli
- 8) Satanur
- 9) Bandekodigehall

The Gram Panchayats coming under Devenahalli Taluk are:

- 1) Kannamangala
- 2) Anneeswara
- 3) Jalige

In the catchment, the work is carried out by ITC Mission Sunehra Kal team (MSK team), along with the support of NGOs (Myrada and Biome), is implementing Sustainable Water Management Project and Urban Water Management in Yelahanka and Devanahalli taluks since 2018 which is covering about 10000 Ha spread over 75 villages in Devanahalli and Yelahanka Taluks around existing ITC factory. The catchment area is demarcated on the toposheet and bifurcated in micro watersheds for execution of Water Stewardship activities.

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Client Description and Site Details



Site Boundaries.png



Site layout.png

Client/Site Background

ITD BCF (Bangalore Cigarette Factory) unit is operating since 2000 and is located at Meenakunte Village, Jala Hobli, Bangalore North taluk. ITC Tobacco Bengaluru, is a zero effluent discharge unit. Treated effluent is used for toilet flushing and gardening, Industrial cooling within the site premises. No treated/Untreated water is discharged outside the factory premises.

ITC is the market leader in cigarettes in India with manufacturing at state-of-the-art factories at Bengaluru with cutting-edge technology. With a portfolio of invaluable brands, ITC's cigarette business stands testimony to the company's unwavering and unrivalled commitment to quality, innovation and consumer focus with more than one hundred years of expertise in developing products to match the evolving taste of consumers.

Summary of Shared Water Challenges

Summary of Shared Water Challenges

The site has identified and prioritized the following shared water challenges:

- 1) Depleting Ground water Levels
- 2) High water Demand from Agriculture sector
- 3) High Drinking water demand in the Catchment
- 4) High Probability of drought
- 5) Inadequate WASH facilities

CERTIFICATION REPORT

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

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1 STEP 1: GATHER AND UNDERSTAND

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

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

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

✔
Yes

Comment The site has defined the plant boundaries. Additionally, there is a factory owned land across the main highway, near to factory which is also shown in one of the images. However, the scope is limited to the main factory premises.
The main source of water for plant is groundwater for which site has a total of 16 nos. approved borewells from KGWA, the 15 nos. of borewell are inside the factory and 16th borewell is in adjacent factory owned land (which is empty as of now).
The site also receives treated waste water from BWSSB - Bangalore Water Supply and Sewerage Board.
Apart from ground water and treated wastewater, the site also utilises rainwater which is collected in the ponds located inside the factory and used after primary treatment. The major water related infrastructures (such as borewells, water treatment plants, wastewater treatment plants RO plant, TTW plant, etc. have been mapped by site.
ITC Bengaluru, is a zero effluent discharge unit. Treated effluent is used for toilet flushing and gardening, Industrial cooling within the site premises. No treated / Untreated water is discharged outside the factory premises.
The unit situated in South Pennar River basin which is the wider catchment on which the unit is reliant upon. Site has considered the Primary Scope Area at the immediate neighbourhood in the catchment of 10000 ha (10 km X 10 km grid). Micro watersheds are demarcated in Priority area for Execution of Water Stewardship Initiatives, with 75 villages and 12 working Gram Panchayats in 2 Taluks.

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.

✔
closed

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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-Bengaluru/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.

Site has also listed the name of persons of the stakeholder organisation / stakeholder group.

Finding No: TNR-008529

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-Bengaluru/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* ✔
Yes

Comment The site has mapped the inflows, storage and usage in process / domestic at different processes / locations. The inflows include water from: 1) Groundwater through Borewells 2) Rainwater through ponds 3) Treated wastewater through BWSSB. The storage capacity for Rain water harvesting (ponds), Fire fighting reserve storage tank, Over head tank and raw water under ground tanks have been provided.

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.* ✔
closed

Audit Number: AO-000906

Comment The site has tabulated the monthly water consumption quantity of groundwater, rainwater and BWSSB water for year 2022-23 with details of sub-meters.

Site has also estimated the evaporation loss from various cooling towers and the rainwater harvesting potential available. In a graph, site has mentioned ground water recharge values from year 2018-19 to 2022-23 with ground water recharge of 171889 m3 for F.Y. 2022-23. The calculation of rainwater recharge is estimated with 80% collection efficiency of the rainwater potential.

The average water consumption for day is taken as total quantity divided by total no. of days in a year i.e. 365 days, whereas site has mentioned 303 days as production days of 2022-23.

The RO permeate and reject have been estimated for 70 % and 30 % but the site has shown the meters at the RO plant.

Finding No: TNR-008530

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, Chloride, Nitrate, Dissolved Oxygen, Phosphorous and E-coli which are well within permissible limits.

The quality of different types of water are being tested. The frequency of testing for the following types of water are listed below:

- Borewell Water being tested quarterly through external laboratory
- Drinking Water being tested monthly through external laboratory
- Effluent Treated Water being tested monthly through external laboratory
- TTW Water being tested daily at Internal laboratory and tested monthly through external laboratory
- BWSSB Water being tested quarterly through external laboratory
- Rainwater being tested yearly through external laboratory

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, TTW area, ETP chemical storage, Oil storage area, Canteen dishwasher chemical storage, Casing and flavor storage room, Transformer yard, MHE maintenance area, Central Engg. Store, Hazardous waste area and Bull pan/scrap yard area.

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

Comment The site has identified and mapped four rainwater ponds as On-site Important Water-Related Areas. These ponds store the rainwater harvested through rooftops, paved area and other open areas. The water is then used to substitute Ground water with rainwater after treatment. The water is also recharged to ground water through the point recharge structure and recharge shaft in some of the ponds.





The capacity of ponds are 4800 KL, 5000 KL, 3000 KL and 4000 KL respectively. The condition of these rain water collection ponds has been assessed as excellent based on the criteria followed by site to define the condition of IWRA's.

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

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Comment	The site has calculated annual water related costs of the unit (FY 22-23) which includes the operational costs of WTP & ETP and water procurement 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.	
1.3.8	<i>Levels of access and adequacy of WASH at the site shall be identified.</i>	 Yes
Comment	The site has mapped and tabulated the drinking water and toilet facilities available the site and have compared them against the requirement mandated as per Factories Act, 1948 (Section 18) and The Karnataka Factories Rules 1969. The sample (photographic evidence) / location of water coolers / drinking water points within the site, WASH facility within the site drinking and WASH facilities in Canteen, common bathing facility provided in change room have been provided as evidence.	
1.4	<i>Gather data on the site's indirect water use, including: its primary inputs; the water use embedded in the production of those primary inputs the status of the waters at the origin of the inputs (where they can be identified); and water used in out-sourced water-related services.</i>	
1.4.1	<i>The embedded water use of primary inputs, including quantity, quality and level of water risk within the site's catchment, shall be identified.</i>	 Obs.
Comment	The site has identified their primary inputs for cigarette manufacturing process and have identified one supplier located within the catchment. The identified primary input supplier is M/s. ITC FILTRONA LIMITED, who supplies Cigarette Filters to the unit which is used as a WMS material for cigarettes. The water consumption details and quality of the water used is monitored at the supplier side. Site has provided following details of M/s. ITC FILTRONA LIMITED: - Annual water and specific water consumption - Water use areas and water balance - WASH facilities - Rainwater harvesting The provided Consent to Operate and test reports of supplier mentions name "ITC ESSENTRA LIMITED". But, earlier site has mentioned about ITC FILTRONA LIMITED.	
1.4.2	<i>The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.</i>	 in progress
Comment	Site has mentioned that there are no outsourced services within the site's catchment area as the facility of canteen is operated by company employees.	Finding No: TNR-008534
1.4.3	<i>Advanced Indicator The embedded water use of primary inputs in catchment(s) of origin shall be quantified.</i>	 Yes

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Comment	<p>The site has identified the embedded water use in the major raw materials used in the manufacturing for raw materials >5% of the total procurement by weight. The selected Raw Materials are Cut Tobacco (made from tobacco leaf), HLP (Outer Packaging for cigarettes) and Filter Rods.</p> <p>The water consumption data for filter rods have been provided in indicator 1.4.1 as the supplier is within the catchment.</p> <p>Site has gathered water related data of two suppliers for HLP (Outer Packaging for cigarettes) for year 2022-23.</p> <p>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). The site procures cut tobacco from Agri-Business Division through 3 Green Leaves Threshing Units located in Anaparti (AGLT), Chirala (CGLT) and Mysore (KGLT). The water consumption and SWC trends of the three GLT's for the past three years are provided. ABD team also monitors the water withdrawn for irrigation for tobacco cultivation both at the nursery as well as the main field stage for the tobacco procurement.</p>	
Score	7	
1.5	<i>Gather water-related data for the catchment, including water governance, water balance, water quality, Important Water-Related Areas, infrastructure, and WASH</i>	
1.5.1	<p><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></p>	 Yes
Comment	<p>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:</p> <ul style="list-style-type: none"> - Karnataka Ground Water Authority - Department of watershed development - Department of Agriculture, Karnataka - Department of Horticulture, Karnataka - Farmers, Water User groups - Rural Drinking Water and Sanitation Department - Department of Education - Department of Women & Child development - Karnataka State Pollution Control Board - Bangalore Water Supply and Sewerage Board 	
1.5.2	<p><i>Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.</i></p>	 Yes
Comment	<p>Water-related legal and regulatory requirements have been identified. The site has provided water related legal and regulatory requirements as below:</p> <ul style="list-style-type: none"> - Consent for Operation from Karnataka State Pollution Control Board stipulates discharge conditions of effluent - Submission of Analytical Results of treated waste water every 30 days - The firm may abstract 365 m3/day (not exceeding 133225 m3/year) of groundwater through existing bore wells and other requirements as per KGWA NOC - BWSSB ITC Agreement - Statutory Compliance checklist <p>There are no legally bounded water rights (related to drinking, domestic and agricultural purposes) at the catchment level with respect to site.</p>	

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

Comment The site has provided water balance data based on water demand (through Domestic Water Demand, Commercial Water Demand, Livestock Water Demand, Irrigation Water Demand and Industrial Water Demand) and Water availability (through Water Recharge due to Rainfall from unpaved areas, Surface water Recharge and Recharge due to irrigation) which gives negative water balance and average Water Utilization of 169% referring to some government document.

The taluk wise ground water exploitation based on ground water availability and ground water draft as on 2018 are given as per the Central Ground Water Board report. The stage of ground water exploitation is 139.55% for Yelahanka taluk and 127.43 % for Devenahalli taluk.

The Water balance assessment done by Project Implementing partner is for Primary Scope area (10*10) Km2, Devanahalli and Yelahanka Taluks for a total are of 10483 Ha. However, the catchment area selected for site has been defined as 17625 Ha as per basin map.

Site has mentioned that the detailed assessment of south penner river basin is being done through IISC, Bengaluru and the detailed assessment of south penner river basin will be completed by December 2023.

Finding No: TNR-007590

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

Comment Site has presented water quality data for base line year 2018 for a range of chemical constituents from analytical results of samples in Devanahalli taluk. The Water quality data for aquifer 1 & 2 as per CGWB for base line year 2018 is presented in table. On the basis of presented data, the parameters such as Sodium, Potassium and Nitrate were above the prescribed limit.

Finding No: TNR-008540

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

Comment The site has identified a total of 26 Important Water Related Areas in the catchment covering the following:

- Surface water storage tanks & Check dams
- Farm ponds
- Open Wells
- Recharge zones
- Public & Private built up area: Rooftop area for RWH

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.* ✔ closed

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Comment In the catchment, the check dams /percolation tanks are constructed by State Government Departments, (i.e. Public Works Department (WRD), MGNREGA, Agriculture Dept.) and there are series of tanks which are constructed in the past are the key water harvesting structures.

The site has also estimated an exposure of all these dams to extreme weather events. Extreme events were broadly divided into technical, Institutional & socio economic. Above classifications are defined by considering flood, excess rainfall, earthquake, drought, delayed monsoon, labour shortage during peak season, lack of water storage facilities.

The site has mentioned that BWSSB has an extensive sewage collection and treatment infrastructure set up giving the real-time data for the live STPs. However, the data related to infrastructure of treated water from BWSSB is not provided by plant.

Finding No: TNR-008542

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

Comment The site has presented WASH status for 12 Gram Panchayats covering 75 villages and 22817 households with 100% coverage of individual household toilets. The site has presented the WASH status of Schools and Anganwadi. The status of sanitation as part of sample survey by NGO partner in 2020 is given below:

- Lack of basic awareness on hygiene practices in community
- Lack of Wash infrastructure facilities in schools (specially for Girls)
- Lack of hygiene practices in 80% of schools
- Less enrolment in 70% schools mostly Girl students

The site has initiated capacity building Programme on SWM for Devanahalli & Yelahanka taluks and developed 13 different type of IEC materials on SWM & also supported Govt to frame SWM Bye law through partner NGO. Out of 12 GP's, 1 of the GP's have developed system of waste management.

In the catchment area, in 10 gram panchayats, site has mentioned that 22882 HHs are planned to cover under individual household domestic water supply.

The ODF status of the two Taluks is mentioned on the SBM dashboard. Both of the Taluks are 100% ODF.

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

Comment The site has engaged NGO's and external agencies to collect data. The following steps were followed for collecting the data to understand the catchment level challenges:

- 1) Understanding the surface and geohydrology of the catchment area and developing a frame work and implementation strategy to achieve water security in the catchment.
- 2) In order to understand the socio economic profile of the catchment area ITC with implementing partner NGOs conducted Core Area Perspective Plan. This plan is reviewed and updated in a span of 5 years and highlights issues in the scope area related to water security and WASH.
- 3) Further a detailed need assessment survey was conducted in each identified schools, Anganwadis to know the existing status of WASH infrastructure and prepared a plan for implementation.




Score 5

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

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Comment	<p>WASH related data for 3 GLT's within the catchments of origin of primary inputs have been identified.</p> <p>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>There are no details of the current status of WASH provision in the catchment of the primary inputs.</p>	
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
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 <p>The site has identified and prioritized the following high importance shared water challenges:</p> <ol style="list-style-type: none"> 1) Depleting Ground water Levels 2) High water Demand from Agriculture sector 3) High Drinking water demand in the Catchment 4) High Probability of drought 5) In adequate WASH facilities 	
1.6.2	<p><i>Initiatives to address shared water challenges shall be identified.</i></p>	 Yes
Comment	<p>The corresponding initiatives to address each of the shared water challenges have been identified and presented in a table.</p>	
1.6.3	<p><i>Advanced Indicator</i> <i>Future water issues shall be identified, including anticipated impacts and trends</i></p>	 Yes
Comment	<p>Future water scenarios for both the site and Core area catchment have been calculated. It is anticipated that the water demand in the catchment will increase, while availability will decrease, further widening the demand-supply gap, heightening the water stress in the catchment. The site has listed the impact categories for each hazard:</p> <ol style="list-style-type: none"> 1. For floods 2. For droughts 3. Intense rainfall 	
Score	3	
1.6.4	<p><i>Advanced Indicator</i> <i>Potential water-related social impacts from the site shall be identified, resulting in a social impact assessment with a particular focus on water.</i></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 Urdhvam & Geovale Study Reports, Baseline document for catchment, PRA Document, Proposal from NGOs 	
Score	4	

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- 1.7** *Understand the site's water risks and opportunities: Assess and prioritize the water risks and opportunities affecting the site based upon the status of the site, existing risk management plans and/or the issues and future risk trends identified in 1.6.*
- 1.7.1** *Water risks faced by the site shall be identified, and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.* ✔
Yes
- Comment The site has identified and prioritised the water risks (as low, medium or high), alongwith the timeframe, likelihood and severity of impact, impact on business and potential costs. The risks have been categorised as physical risks, regulatory risk and reputational risk.
- 1.7.2** *Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.* ✔
Yes
- Comment The site has identified water related opportunities and categorised under physical risks, regulatory risk and reputational risk including how the site may participate. Potential costs and opportunities have been listed against the identified water risks to site.
- 1.8** *Understand best practice towards achieving AWS outcomes: Determining sectoral best practices having a local/catchment, regional, or national relevance.*
- 1.8.1** *Relevant catchment best practice for water governance shall be identified.* ✔
Yes
- Comment The site has identified best practice for water governance and are listed below:
 - Institution Promotion such as Water user group, SDMC, Mothers committee
 - Multi stakeholder Meeting (Govt. Officials, CBOs - TUGs, women SHGs)
 - Annual meeting stakeholder workshops
 - Developing guidelines on Roof Rain water harvesting and water demand management
 - Water Budget for Gram Panchayat
- 1.8.2** *Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.* ✔
Yes
- Comment The site has identified following catchment best practices for water balance:
 Demand side interventions:
 Promote water use efficient practices in agriculture
 Promote water management practices in schools and apartments
 Integrating shallow aquifers to water supply system
 Scheme convergence of various Govt schemes
 Water Literacy to farmers
 Water demand management in Urban HHs, Institutions
 Supply side interventions:
 - Catchment treatment – Trenches and Loose Boulder checks in the streams
 Ground water recharge structures – Well Recharge Pits.
 Water harvesting structures (renovation/new) - Farm ponds , Check dams and Percolation tanks
 Roof Rain water harvesting structures in schools and apartments
 Shallow wells rejuvenation in urban areas
 Plantation of multipurpose trees
 Recharge wells
 The following sectoral best practices in water balance improvement have been identified as below:
 1. Reduce, Reuse & Recycle of water
 2. Adopting new technologies for efficient use of water
 3. Adopting new technologies for efficient treatment of water for ensuring improved water quality
 4. Adopting rain water harvesting to reduce dependency on groundwater or purchase water




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1.8.3	<i>Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.</i>	 Yes
Comment	<p>The site has identified various best practices for site and catchment as listed below:</p> <p>At Site Level:</p> <ol style="list-style-type: none"> 1. Use of RO units and UV treatment to provide pure drinking water 2. Robust mechanism to keep check on the water quality 3. Continuous online monitoring system to monitor health of ETP system <p>At Catchment Level:</p> <ol style="list-style-type: none"> 1. Micro Irrigation 2. Catchment treatment & WHSs 3. Solid Waste Management 4. Integrated Pest & Nutrient Management (IPM & INM) 5. Mulching with Organic waste 	
1.8.4	<i>Relevant catchment best practice for site maintenance of Important Water-Related Areas 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 for Pond (Rain Water Harvesting Tanks):</p> <ul style="list-style-type: none"> <input type="checkbox"/> Emptying out of tanks <input type="checkbox"/> Removal of deposits and silt from the bottom <input type="checkbox"/> Cleaning of bunds from deposits and grass <input type="checkbox"/> Repair of any worn-out cracks or plaster, pavers block etc. <input type="checkbox"/> Pump maintenance, pipe line checks for leakages <p>At Catchment Level:</p> <p>Restoration of Water Harvesting Structures (Checkdam, Large Tanks) - Local contribution from beneficiaries to generate ownership</p> <p>Creation of minor harvesting structures like farm ponds - Construction of silt traps in the inlet point</p> <p>Open well rejuvenation & linking to urban water supply - Proper protection, regular cleaning</p> <p>Ground water recharge structures to improve recharges - Once in 3-4 years remove the silt accumulated in the structure</p> <p>Catchment treatment and plantations development to improve ecosystem services - Native species plantation</p> <p>Rain water harvesting structures - Periodical Cleaning of roof top, cleaning of debris in pipes during first rain</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: Best practices for provision of WASH at site is derived from the compliance to The Karnataka Factories Rules 1969</p> <p>At Catchment level:</p> <ol style="list-style-type: none"> 1. Regular awareness campaign at village level to sensitize members of community on Sanitation - Health - Hygiene 2. Promotion of Sanitation Committees for effective implementation of the program at each village 3. Collaborating with Government departments thru various schemes (SBM, MNREGS, DDWS) for implementing Sanitation & SWM Programmes 4. Use of various IEC & Communication tools to bring a behavioral change among community members 5. Contribution by beneficiaries & village Institutions for WASH support in Schools & Anganwadi's & SWM in villages 6. WASH Infrastructures per Swachh Vidyalaya guidelines 7. Decentralised management of solid, liquid & Faecal waste 8. Prohibition of open dumping & burning of solid waste 	



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2	STEP 2: COMMIT & PLAN - Commit to be a responsible water steward and develop a Water Stewardship Plan	
2.1	<i>Commit to water stewardship by having the senior-most manager in charge of water at the site, or if necessary, a suitable individual within the organization head office, sign and publicly disclose a commitment to water stewardship, the implementation of the AWS Standard and achieving its five outcomes, and the allocation of required resources.</i>	
2.1.1	<p><i>A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:</i></p> <ul style="list-style-type: none"> - <i>That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes</i> - <i>That the site implementation will be aligned to and in support of existing catchment sustainability plans</i> - <i>That the site's stakeholders will be engaged in an open and transparent way</i> - <i>That the site will allocate resources to implement the Standard.</i> 	 Yes
Comment	<p>A signed and publicly disclosed site statement is identified signed by Unit Head (General Manager) and EVP - Technical (India Tobacco Division) covering the following commitments:</p> <ul style="list-style-type: none"> - That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes - That the site implementation will be aligned to and in support of existing catchment sustainability plans - That the site's stakeholders will be engaged in an open and transparent way - That the site will allocate resources to implement the Standard. <p>The site has displayed copy of Water Stewardship Policy and Commitment at site including the entrance of the site. The copy of same has been attached as evidence.</p>	
2.1.2	<p><i>Advanced Indicator</i></p> <p><i>A statement that explicitly covers all requirements set out in Indicator 2.1.1 and is signed by the organization's senior-most executive or governance body and publicly disclosed shall be identified.</i></p>	 Yes
Comment	<p>The site has displayed two copies of Water Stewardship Policy and Commitment signed by senior executives of the organisation.</p> <p>One copy is signed by EVP Technical - (Corporate Level - ITD) and Other copy signed by Unit Head, General Manager - India Tobacco Division, Bengaluru</p>	
Score	1	
2.2	<i>Develop and document a process to achieve and maintain legal and regulatory compliance.</i>	
2.2.1	<p><i>The system to maintain compliance obligations for water and wastewater management shall be identified, including:</i></p> <ul style="list-style-type: none"> - <i>Identification of responsible persons/positions within facility organizational structure</i> - <i>Process for submissions to regulatory agencies.</i> 	 Yes

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Comment	<p>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.</p> <p>The site has also listed monitoring structure at site for water related legal compliances such as:</p> <ul style="list-style-type: none"> - Drinking Water Quality monitoring system - Waste Water Quality Monitoring system - Process Water Quality monitoring system - Ground & Rain Water, BWSSB Quality monitoring system - iComply Portal Screenshot of Legal compliance submission every Month 	
2.3	<p><i>Create a water stewardship strategy and plan including addressing risks (to and from the site), shared catchment water challenges, and opportunities.</i></p>	
2.3.1	<p><i>A water stewardship strategy shall be identified that defines the overarching mission, vision, and goals of the organization towards good water stewardship in line with this AWS Standard.</i></p>	 Yes
Comment	<p>The site has developed a water specific strategy which has a vision and mission and separate Goals for site and catchment.</p> <p>Vision: Water to All for Today & Tomorrow Mission: To achieve water security for all stakeholders by 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.</p> <p>Goals:</p> <p>At Catchment Level: initiatives to support organization goals</p> <ul style="list-style-type: none"> • Ensure sustainable supply side interventions through surface water harvesting and enhancing ground water recharge • Promote Water use efficient demand side management practices and climate smart agriculture practices in the catchment • Promote catchment restoration practices • Strengthen water related governance and institutions in the catchment • Adopt efficient water management practices like rain water harvesting, conservation and recharges to reduce waste water and increase availability. • Integrating shallow aquifers to the water supply system • Improving water use efficiency at the household level • Awareness and rejuvenation of water heritage structures • Equitable & adequate WASH facility in the catchment area <p>Site:</p> <ul style="list-style-type: none"> • Reduce specific water consumption on a continual basis by improving water use efficiency • Continuous monitoring and maintaining treated waste water quality as per statute • Maximize reuse and recycle of treated water • Create awareness on responsible water consumption • To maximize the use of rain water to achieve reduction in fresh water use 	
2.3.2	<p><i>A water stewardship plan shall be identified, including for each target:</i></p> <ul style="list-style-type: none"> - <i>How it will be measured and monitored</i> - <i>Actions to achieve and maintain (or exceed) it</i> - <i>Planned timeframes to achieve it</i> - <i>Financial budgets allocated for actions</i> - <i>Positions of persons responsible for actions and achieving targets</i> - <i>Where available, note the link between each target and the achievement of best practice to help address shared water challenges and the AWS outcomes.</i> 	 in progress
Comment	<p>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.</p>	

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2.3.3	<p><i>Advanced Indicator</i> <i>The site's partnership/water stewardship activities with other sites within the same catchment (which may or may not be under the same organisational ownership) shall be identified and described.</i></p>	 Yes
Comment	ITC Mission Sunehra Kal Team has common team members for the interventions in the catchment. The MSK team of both sites work in partnership with one another to share the best practices with one another and also through virtual discussions. The site has also mentioned about awareness sessions (to share the best practices) with one of its primary input supplier that is M/s. ITC FILTRONA LIMITED, who supplies Cigarette Filters to the unit which is used as a WMS material for cigarettes.	
Score	4	
2.3.4	<p><i>Advanced Indicator</i> <i>The site's partnership/water stewardship activities with other sites in another catchment(s) (either under same corporate structure or with another corporate site) shall be identified.</i></p>	 Yes
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. ITD Bengaluru has coordinated with ITC PSPD-Kovai and ITD-Malur, ITD-Pune (which has recently undergone certification audit) for understanding, planning and implementing the water stewardship activities in its site and catchment. Knowledge sharing and learnings sharing session were arranged with ITC PSPD Kovai, Malur and Pune units to help the site team to better plan their stewardship activities. ITD Bengaluru is also sharing knowledge with the proposed units for AWS certifications, i.e., ITC- Saharanpur, KGLT Mysuru etc. on stewardship strategy and implementation plan.	
Score	4	
2.3.5	<p><i>Advanced Indicator</i> <i>Stakeholder consensus shall be sought on the site's water stewardship plan. Consensus should be achieved on at least one target. A list of targets that have consensus and in which stakeholders are involved shall be identified.</i></p>	 Yes
Comment	For implementing water stewardship activities in the catchment, a consensus is received from Gram Panchayat in the form of NOC. One such NOC has been attached as sample evidence. Apart from this, there are appreciation letters highlighting the consensus from GP on the water stewardship practices by ITC. The following sample consensus have been provided as evidence: - Appreciation highlighting consensus from Bandekodege halli GP Panchayat Development Officer about WHS i.e Check dam - Appreciation highlighting consensus letter from BEO about Rainwater harvesting interventions in the school in Yelahanka Taluk - Panchayat Development Officer, Chikkajala GP appreciated and consensus to ITC for Check Dam construction. He stated Check Dam helped in control of Soil erosion & harvesting rain water & recharge Tank user group, Chikkajala acknowledged the improvement of Village tank & stated that it helped to improve ground water levels - Request letter from farmer for farm pond - Evidence of consensus of farmers on farm pond development & restoration against AWS target - Meeting with partner NGOs to discuss on AWS plans to seek their consensus - Consensus evidence of site 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.	
Score	7	

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2.4	<i>Demonstrate the site’s responsiveness and resilience to respond to water risks</i>	
2.4.1	<i>A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.</i>	 Yes
Comment	The site has listed activities for mitigation of identified risks along with the agencies involved. The site has also shared details of MoU's, Meeting Minutes, Communication letter, Agreement and Monthly payouts mentioning the major objectives of the engagement. The site has outlined the associated activities to mitigate each risk and the public agency they are collaborating with along with evidence of collaboration.	
2.4.2	<i>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.</i>	 Yes
Comment	In the catchment, agriculture is a major source of income. Climate variability has a major impact on crop yields and thus on farmers' livelihoods. The watershed is vulnerable to various weather risks due to climate change. These risks range from delayed monsoon, prolonged dry spells, drought, excessive rainfall, etc. Depending on the type of risk and cropping pattern, ITC promotes climate smart measures that enable farmers to reduce potential losses due to these risks. The measures are "water smart," "seed smart," "nutrient smart," "knowledge smart," and " weather smart." By adopting these practices, farmers are able to not only prevent expected losses, but also increase their yields and income. ITC through NGO's is implementing Climate smart agriculture practices based on tool kit developed by CCAPS.	
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>Site has partnered with various development & civic organisations like MYRADA, BIOME, WASHi, SAHAS, PRATHAM, Resident Welfare Associations to plan water stewardship activities in the catchment.</p> <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 • Implementing partner: MYRADA, BIOME, WASHi, SAHAS • Technical partner: Watershed Development Department, Jel Jeevan Mission, Agriculture, Horticulture, Forest • Tank/water User Groups (12), & relevant Gram Panchayats (12), SDMCs (38), Mothers committees (12), SWM committees have been involved in all stages of planning & implementation <p>In the catchment, frequent meetings, trainings, sensitization Programmes, Public events are conducted regularly. Site has tabulated the meetings / trainings with stakeholders with frequency of events to sensitize, Educate, Plan, implement and monitor AWS Interventions. Site has listed the Gram sabha/General body meeting by involving all the village representatives and training to Villagers and Volunteers on Urban water management.</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 as the catchment covers indigenous people from all sections of community like tribes, other backward castes (OBCs), minorities, etc.</p> <p>The water stewardship plan has been specifically designed to respects the rights of everyone through the supply side interventions, demand side interventions and Interventions on WASH in the catchment.</p> <p>Site has also presented sample case study for Supply Study Interventions.</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 in August 2023 with change of a committee member. The responsibility and duties of Water committee members are also listed by the site for monitoring site and catchment activities.</p> <p>Site has also presented catchment level governance structure of Water User Groups. Till 2023-24, Twelve TUGs, Thirty Eight SDMCs, Seven Child cabinets, Twelve mothers' committees and eight SWM/WWS committees were strengthened active 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 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:
 - Appreciation letter from Bandikodigehalli GP – Appreciated ITC efforts to construct check Dam & its quality
 - Appreciation letters from Block Education Officer, Yelahanka Taluk: Appreciated ITC for supporting Roof water harvesting works in Bettahalasur & Vidyanagar Govt school
 - Letter from Panchayat Development Officer, Kannamangala GP mentioning ITC Support for Tank restoration & Check Dam
 - Minutes of SDMC Training in Mylanahalli school
 - Singahalli tank completion, Letter from Tank User Group

Score 2

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

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


Yes

Comment Site has a defined system in place to review and track all applicable water related legal and regulatory compliance via a statutory compliance checklist. All applicable legal and regulatory compliances are identified and listed in the checklist by responsible managers, same is tracked via iComply portal. This checklist is being reviewed and updated on a monthly frequency by the site and shared further for validation to Head Office. Additionally, compliance reports are submitted to State pollution control board at the time of CFO renewal. The monthly report for water consumption, water quality report both treated, untreated and fresh water along with stack reports are submitted to KSPCB on monthly basis. The annual Environment report (form-5) is submitted to KSPCB on Annual basis which include the entire performance of the year in the area of Water, Emission along with all the initiatives taken in the area of sustainability which includes, AWS plan and challenges, green energy initiatives Water targets and initiatives, Specific energy and water reduction initiatives. Etc. The monthly water withdrawal from Ground water (KGWA) and BWSSB were also submitted to the authority along with fee paid. The monthly performance in the area of water and emission were also displayed at Main entry gate which is in compliance to NGT orders.

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


Yes

Comment At the Site-level, water related rights defined include the compliance with The Karnataka Factories Rules 1969 and IS 1172:1993.

At catchment level, as of now there is no legal requirements of water rights by the site to be complied although ITC 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. One such example is of Revival of open wells by cleaning and rebuilding / strengthening the stone wall inside the well and providing safety grills for manual use by community.

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

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


Yes

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Comment	The site has tabulated annual performance against water balance targets from year 2019-20 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 2020-21 which was during the Covid period in which the production was hampered for certain days. Overall, there has been significant reduction in site's specific water consumption from baseline number of 5.29 to 3.89 which is reduction of 26%. For catchment, the progress towards Supply side interventions in Rural, Supply side interventions in Urban and Demand side interventions in Rural & Urban was provided.	
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	Site has set a target to reduce Specific Water Consumption by 5% Year on Year and 40% by year 2030. Against the set target, site has presented the achieved SWC against the target values from baseline year 2018-19 to year 2022-23. There has been significant reduction in site's specific water consumption i.e. 5.29 kL/Mnc from baseline year 2018-19 to 3.89 kL/Mnc in year 2022-23 which is reduction of 26%.	
3.3.3	<i>Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.</i>	✔ Yes
Comment	There is no legally binding obligation for the site to re-allocate water.	
3.3.4	<i>Advanced Indicator The total volume of water voluntarily re-allocated (from site water savings) for social, cultural and environmental needs shall be quantified.</i>	✖ No
Comment	As a response to the indicator, site has presented that: 1. The site is using ETP treated water for environmental benefits like gardening within the site. 2. Apart from this site has 4 ponds within the site, from where the rain water harvested is recharged in to ground water thereby increasing the ground water level and having environmental benefits to the wider catchment. 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 KSPCB norms for which site has presented average annual data from 2019-20 to 2022-23. The data ensures 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 is promoting good farm practices in the catchment which leads to less utilisation of fertiliser & plant protection chemicals. Soil organic carbon which is the key indicator of soil health is improved. Solid waste management is being done in all the catchment villages in Collaboration with Gram Panchayat & Taluk Panchayat. 8 water samples were collected from drinking water sources i.e open wells and bore wells in catchment villages in Devanahalli Taluk and Hunasamaranahalli TMC area during August 2023.	
3.4.2	<i>Where water quality is a shared water challenge, continual improvement to achieve best practice for the site's effluent shall be identified and where applicable, quantified.</i>	✔ Yes

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Comment 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 reused for gardening and toilet flushing. The site has implemented following action in ETP Plant to monitor all the critical parameters and levels stage wise by installation of various systems like:

1. Quality Monitoring analyzers & Sensors
 - a. pH Sensor
 - b. Chlorine Sensor
 - c. MLSS & TSS - 360 Deg. scattered light technology selected for accurate results
2. Multiple Flowmeter technologies were evaluated for enabling digital communication of flowrate
3. For Advance data analytics, high end versions of PLC'S and SCADA system selected

3.5 *Implement plan to maintain or improve the site's and/or catchment's Important Water-Related Areas.*

3.5.1 *Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.* ✔
Yes

Comment Site has a system in place for maintenance of site IWRA's. The following maintenance Best Practices of IWRA's have been implemented:

- Emptying out of tanks
- Removal of deposits and silt from the bottom
- Cleaning of bunds from deposits and grass
- Repair of any worn-out cracks or plaster, pavers block etc.
- Pump maintenance, pipe line checks for leakages

For catchment, site has listed the practices for maintenance or enhance of IWRA's are implemented.

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

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Comment In the catchment, various interventions were done to restore nonfunctioning or severely degraded IWRA in collaboration with multi stakeholders. In the catchment about 843 Water harvesting and soil erosion control structures were renovated/ constructed in the last 6 years. Site has presented a map showing restoration of non-functional IWRAs in the catchment. The comparison of before and after scenario of the projects are provided as evidence. Some of them are listed below:

- Renovated tank at Kannamangala
- Tank Renovation in Gadenahalli Tank
- Doddajala Kunte Renovation
- B.K Halli check Dam
- Check dam in Baylahalli Village
- Check Dam at Chikkajala
- Rejuvenated Open well at Kolipura Village
- Open well Rejuvenation and linked to drinking water supply of Devenahalli town
- Open well recharge in Kolipura
- Well Near Aviation College
- Well Near Park View Apartment
- Well Near Bettahalasur cross
- Sonnappanahalli Village Well
- Well behind Sonnappanahalli GHPS
- Well in Kodagalhatti Village
- Roof water harvesting in Schools, Gram Panchayats, Households and Group Housing Society
- Recharge Wells in Recharge zones of the catchment
- Recharge wells in urban residential complex
- Perforated Slabs for rain water infiltration in pavements
- Bore Recharging, Bandekodigehalli GP in the recharge zone of catchment
- Revival of water heritage structures
- Farm Ponds

Score 6


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

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:

- Appreciation from Bandekodege halli GP Panchayat Development Officer about WHS i.e Check dam
- Appreciation letter from BEO about Rainwater harvesting interventions in the school in Yelahanka Taluk
- Panchayat Development Officer, Chikkajala GP appreciation for Check Dam construction. PDO stated Check Dam helped in control of Soil erosion and harvesting of rain water & recharge
- Tank user group, Chikkajala acknowledged the improvement of Village tank & stated that it helped to improve ground water levels
- PDO Kannamangala GP appreciation for tank restoration

Score 2




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

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

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Comment	The site has provision of adequate access to drinking water and toilets and are compared to against the requirements mandated as per Factories Act, 1948 (Section 18) and The Karnataka Factories Rules 1969 which 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 cooling purposes within the site premises. Moreover, the site is also implementing water sanitation & hygiene activities in the primary scope area such as toilet blocks (for boys and Girls separately), handwash stations, drinking water stations and training to students on WASH. Also, site is implementing Solid Waste Management activities in immediate catchment.</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. A summary of the initiatives is provided below:</p> <ul style="list-style-type: none"> - Capacity building to 38 School Development and Monitoring Committee members (SDMC) - Formation and strengthening of Child Cabinets, 7 nos. - Support for 26 schools for WASH infrastructures - Capacity building to mothers committee for 12 Anganwadis - Support for WASH infrastructures for 12 Anganwadis - Training to Yalahanka Taluk PDOs on Solid waste management & Exposure visit to GP members - SWM training to GP & Sensitization to school children - Awareness programmes conducted in 15 gram panchayat on sustainable water management along with Jal Jeevan Mission 	
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
Comment	<p>Site has identified WASH as a critical shared water challenge after CAPP (Core Area Perspective Plan) assessment. The findings were shared with local governing bodies like Gram Panchayat and made aware about the findings of these reports.</p> <p>Site has worked in collaboration with various authorities for the following Programmes:</p> <ol style="list-style-type: none"> 1. WASH Infrastructure Facilities to Govt Schools in collaboration with Block Education Department, Gram Panchayat & School Management 2. WASH Infrastructures to Anganwadis in collaboration with Women & Child Development Department 3. Solid waste management Programme in collaboration with Gram Panchayat & Taluk Panchayat of Yelahanka & Devanahalli: 4. Collaboration with Department of Drinking water & Sanitation, Gol & Swachh Bharath Mission Karnataka to initiate Light House Gram Panchayat 5. Water Budgeting & Planning water harvesting interventions for all Gram panchayats, Collaboration with Jal Jeevan Mission for Drinking water 	
Score	4	

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- 3.7** *Implement plan to maintain or improve indirect water use within the catchment:*
- 3.7.1** *Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.* ✔
Yes
- Comment 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** *Evidence of engagement with suppliers and service providers, as well as, when applicable, actions they have taken in the catchment as a result of the site's engagement related to indirect water use, shall be identified.* ✔
Yes
- Comment Site has provided evidence of engagement with one of the supplier and service providers for Training and awareness sessions undertaken by the site to spread awareness on efficient water use in their operations.
- 3.7.3** *Advanced Indicator
Actions taken to address water related risks and challenges related to indirect water use outside the catchment shall be documented and evaluated.* ✔
Yes
- Comment The major suppliers for the site outside the catchment are the tobacco leaf suppliers. The site procures cut tobacco internally from ITC's Agri Business Division (ABD) located in three areas namely Mysore, Chirala and Anaparti. ABD carries out continuous risk-assessments and implements interventions as a part of its holistic two-pronged approach involving both - demand-side management to improve irrigation efficiency and supply-side management to revive traditional water harvesting and recharge structures in areas of cultivation. The interventions at the farm level are listed below:
 - Varieties tolerant to biotic & abiotic stress
 - Sub soiling
 - Biological interventions
 - Tray Seedling
 - Water Scheduling
 - Drip Irrigation & Fertigation
 - Smart Irrigation
 - Drone Technology
 Additionally, ABD has also taken interventions in its factories the three GLTs (from where the cut tobacco is provided to ITC, ITD Bangalore unit) to reduce their water consumption.
- Score 6
- 3.8** *Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have.*
- 3.8.1** *Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.* ✔
Yes
- Comment The site has provided evidence of extensive engagement with owners of water infrastructure throughout the catchment on the status of shared water infrastructure. The evidence include:
 - Request from Water User Groups for renovation / Desiltation
 - Check Dam work completion acknowledgement from Chikkajala Gram panchayat
 - Acknowledgement from the Stakeholders i.e GLPS Huttanahalli HM and Uganawadii AWC Teacher for Wash infrastructure works.
 - Confirmation of receipt and the request made for the WASH related interventions in the school
- 3.9** *Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.*

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3.9.1	<i>Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.</i>	 Yes
Comment	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.	
3.9.2	<i>Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.</i>	 Obs.
Comment	The site has 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. For site, it is mentioned that 21,300 kL of water per year is saved by implementation of various listed water conservation initiatives. The water consumption values for 2018-19 and 2022-23 are similar i.e. ~ 85000 kl and 81000 kl but there is increase in production value. There is a improvement in specific water consumption of the unit but it seems it is also due to increase in production volume (and not only by water conservation initiatives implemented by plant).	
3.9.3	<i>Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.</i>	 Yes
Comment	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.	
3.9.4	<i>Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.</i>	 Yes
Comment	The site has implemented actions towards achieving best practice, related to maintenance of Important Water-Related Areas such as periodic cleaning and maintenance of ponds at site level and Renovation & Desiltation of Tanks / Checkdams at catchment Water Harvesting Structures. The evidence for same is provided.	
3.9.5	<i>Actions towards achieving best practice related to targets in terms of WASH shall be implemented.</i>	 Yes
Comment	At site level, actions are being taken to implement best practices to achieve targets related to WASH such as implementation of a robust system of housekeeping of the WASH facilities. Site has been working towards improving WASH in the catchment. A brief summary of the initiatives is provided below: <input type="checkbox"/> Site has worked on improving Schools & Anganwadi's WASH infrastructures and has also worked with Gram Panchayat for Solid waste management & Drinking water requirements <input type="checkbox"/> Promoting Institutions (SDMC, Mothers committee & VWSC) to Plan, implement & manage infrastructures <input type="checkbox"/> Work has been done towards creating awareness among the residents & bringing about behavioral change towards safe sanitation in convergence with Swachh Bharat Mission	
3.9.6	<i>Advanced Indicator Achievement of identified best practice related to targets in terms of good water governance shall be quantified.</i>	 Yes
Comment	The site has presented evidence to support good 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 2022-23 - Formed 12 Tank User Groups; Strengthened 38 SDMCs and 7 child cabinets; Trained 15 grama panchayats; Awareness created in 9 Resident welfare associations; 4 stakeholder workshop and 1 exhibition conducted for awareness including various IEC material.	
Score	8	

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3.9.7	<i>Advanced Indicator</i> <i>Achievement of identified best practice related to targets in terms of sustainable water balance shall be quantified.</i>	 Yes
Comment	<p>The site has quantified the identified best practice related to targets in terms of water balance. At Catchment level, site has quantified the Supply side interventions and Demand side interventions.</p> <p>At Site Level, site has quantified water savings through various water saving projects being implemented since last 5 years. The site has achieved reduction in specific water consumption which is also due to increase in production alongwith water conservation initiatives implemented by plant.</p> <p>There are some of the actions implemented by site which are being considered as best practice, such as:</p> <ul style="list-style-type: none"> - Substitution of BWSSB treated wastewater (sourced from outside the plant) with the ground water - Rainwater harvesting (reuse and partial recharge) at plant for usage instead of ground water 	
Score	8	
3.9.8	<i>Advanced Indicator</i> <i>Achievement of identified best practices related to targets in terms of water quality shall be quantified</i>	 No
Comment	<p>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.</p> <p>At catchment, site has provided details in nos. of implementations for various identified best practices.</p> <p>There is no quantification on the improvement in water quality due to these implementations.</p>	
3.9.9	<i>Advanced Indicator</i> <i>Achievement of identified best practices related to targets in terms of the site's maintenance of Important Water-Related Areas have been implemented.</i>	 Yes
Comment	<p>Site has provided details of implementations of identified best practices related to site's maintenance of Important Water-Related Areas.</p> <p>For site, Work permits for Pond Cleaning and checklists have been provided.</p> <p>For catchment, site has provided the quantified achievements in terms of construction of rejuvenation of various structures.</p>	
Score	8	
3.9.10	<i>Advanced Indicator</i> <i>Achievement of identified best practice related to targets in terms of WASH shall be quantified.</i>	 Yes
Comment	<p>For site, dedicated agency has been deployed to continuously maintain the hygiene and cleanliness of the WASH facilities. All toilet facilities are cleaned once in every shift through defined checklists and records being maintained. Sample checklist provided as evidence. Road cleaning machine is used for carrying out road cleaning and safe disposal of waste.</p> <p>For catchment, site has provided details of yearly implementations of WASH infrastructure at schools and anganwadis.</p> <p>Photographic evidence and appreciation letter from school Head Master and anganwadi teacher are provided.</p> <p>Till 2023-24, ITC Mission Sunehra Kal has covered 39337 households under Solid Waste Management activities against the plan of covering 19000 households.</p>	
Score	4	
3.9.11	<i>Advanced Indicator</i> <i>A list of efforts to spread best practices shall be identified.</i>	 Yes


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Comment At Catchment level, the site has engaged with various stakeholders to spread the best practices through the following:
 - 24 nos. of Tank user groups trainings
 - 478 nos. of Farmers field schools meetings
 - 6 nos. of Workshop & events
 - 38 nos. of SDMCs strengthened
 - Established 7 nos. of Child cabinets
 - Awareness session for service providers and supplier

Score 3

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

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

Score 12

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:
 - Feed back from PDOs of gram panchayats
 - List of SDMCs and Child Cabinets and meeting minutes
 - Meeting minutes of the programme
 - Appreciation letters from GPs and NOCs from individual beneficiaries
 - Impact Study on Soil organic carbon
 - Decrease in cost of cultivation through FFS
 - Letter from Agriculture Department & GPs
 - Appreciation from Gram panchayat for having implemented of water stewardship activities
 - Tank user group, Chikkajala acknowledged the improvement of Village tank & stated that it helped to improve ground water levels
 There are various video testimonials highlighting how site is positively contributing to the achievement of collection actions against shared water challenges.

Score 10

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4 STEP 4: EVALUATE - Evaluate the site's performance.	
4.1	<i>Evaluate the site's performance in light of its actions and targets from its water stewardship plan and demonstrate its contribution to achieving water stewardship outcomes.</i>
4.1.1	<i>Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.</i>
Comment	For site, yearly 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 yearly implementations in the catchment. For evidence, site has also presented Audit report of WASH initiatives by third party auditing agency and Audit report of Water conservation, IWRA, recharge, governance & sustainable agriculture initiatives by third party auditing agency FY 21-22 for NGO's.
4.1.2	<i>Value creation resulting from the water stewardship plan shall be evaluated.</i>
Comment	Site has evaluated value creation resulting from the water savings initiatives taken by plant. The amount saved considering Ground water cost of Rs. 96.4 per KL will be 21.78 lakhs. For catchment, site has mentioned about estimated community investments and environmental. social, cultural value creation through activities as per stewardship plan.
4.1.3	<i>The shared value benefits in the catchment shall be identified and where applicable, quantified.</i>
Comment	The site has identified shared values benefit as a result of site water stewardship interventions are described below: a. Increase in ground water levels b. Water augmentation and recharge at catchment villages c. 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>
Comment	An executive level review takes place at the start of each financial year by the Executive Vice President of the division is carried out annually by the site wherein water related challenges, risks, opportunities, water costs, savings or benefits are presented and discussed. The site team presents a presentation for review to the EVP. 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. Also, unit level review by unit head is carried out periodically every month wherein water related challenges, risks, opportunities, water costs, savings or benefits are presented and discussed.
Score	3
4.2	<i>Evaluate the impacts of water-related emergency incidents (including extreme events), if any occurred, and determine the effectiveness of corrective and preventative measures.</i>

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- 4.2.1** *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. 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.* ✔
closed

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 to showcase its progress towards the water stewardship program
3. Brochures distribution to highlight all the water stewardship activities and the progress achieved
4. Consolidated progress in ITC's Annual Sustainability Report

At Site Level, water conservation/ reduction targets form the part of annual EHS Targets for the year which are discussed in Safety Committee Meetings in the presence of Unit Head, Functional heads, Representatives from each department including service provider employees and consensus is obtained.

Finding No: TNR-008580

- 4.3.2** *Advanced Indicator*
The site's efforts to address shared water challenges shall be evaluated by stakeholders. This shall include stakeholder reviewing of the site's efforts across all five outcome areas, and their suggestions for continual improvement. ✖
No

Comment The site's efforts to address shared water challenges have been evaluated by stakeholders. Some of the evidence provided are:
- PDO's feedback during Stakeholders workshop. They expressed that ITC has supported in preparation of water budget and construction WHS, check dam, farm ponds, recharge wells
- PDO's feedback during Stakeholders workshop. They expressed that they benefitted through tank renovation which helped to improve ground water level
- School's Head Master feedback during Stakeholders workshop. They expressed that through ITC water stewardship programme, they prepared water budget for school, implemented roof water harvesting, adopted aerators and supported WASH infra which helped to increase water facilities in the school resulting in increase in enrolment.
- Gram panchayat Member shared feedback on the event and expressed that implementing AWS interventions have long term impact on water security of the region.


The site is required to provide evidence of stakeholder suggestions for continual improvement and reviewing of the site's efforts across all five outcome areas.

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

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

Comment Site has mentioned that Importance of O&M of the WASH infrastructures was raised in the Anganwadi mothers committee. Post the feedback from mothers committee, introduced fund box and soap box in the anganwadis and school to mobilize contribution from the community.

Previous version of Water stewardship plan is not provided. There is no modification and adaption in the WSP as the approach followed does not mention about modification in water stewardship plan. The site would have had many learnings but was not able to demonstrate in the water stewardship plan.

Finding No: TNR-008581






Audit Number: AO-000906

5 STEP 5: COMMUNICATE & DISCLOSE - Communicate about water stewardship and disclose the site's stewardship efforts	
5.1	<i>Disclose water-related internal governance of the site's management, including the positions of those accountable for legal compliance with water-related local laws and regulations.</i>
5.1.1	<i>The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.</i>  Yes
Comment	Site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations have been displayed at various locations. The Utility Incharge of the site and Engineering Deptt. is responsible to ensure compliance to the water related laws and regulations as part of the site's internal governance structure for water stewardship.
5.2	<i>Communicate the water stewardship plan with relevant stakeholders.</i>
5.2.1	<i>The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.</i>  Obs.
Comment	For catchment level, site discloses the water stewardship plan through various mediums like: 1) Wall Paintings in villages highlighting awareness of AWS initiatives, Plan, Progress and the AWS Outcome 2) Brochures that highlight the plan and progress 3) Various awareness events organised where the site' stewardship plan is discussed 4) Multi stakeholders meetings 5) Exhibitions
5.3	<i>Disclose annual site water stewardship summary, including: the relevant information about the site's annual water stewardship performance and results against the site's targets.</i>
5.3.1	<i>A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.</i>  in progress
Comment	For catchment stakeholders other than site, the site's water stewardship performance is disclosed through the following: - AWS plan, progress and performance has been disclosed at stakeholder meeting - Display of Water Stewardship progress at villages - Display of progress against the WASH activities at villages - Brochure on water security programme with plan & progress
	Finding No: TNR-008583
5.3.2	<i>Advanced Indicator The site's efforts to implement the AWS Standard shall be disclosed in the organization's annual report.</i>  Yes
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 (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 & 89)
Score	1

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5.3.3	<i>Advanced Indicator</i> <i>Benefits to the site and stakeholders from implementation of the AWS Standard shall be quantified in the organization's annual report.</i>	 Yes
Comment	In the company's annual sustainability report, ITC's water stewardship implementation efforts are presented. The various benefits which are derived from the site's water stewardship interventions are quantified. The link for same is https://www.itcportal.com/sustainability/sustainability-integrated-report-2023/ITC-Sustainability-Integrated-Report-2023.pdf (Page 89)	
Score	1	
5.4	<i>Disclose efforts to collectively address shared water challenges, including: associated efforts to address the challenges; engagement with stakeholders; and co-ordination with public-sector agencies.</i>	
5.4.1	<i>The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.</i>	 Yes
Comment	The site's shared water-related challenges and efforts made to address these challenges have been disclosed at catchment level through different meetings at Village level (TUGs, FFS-Meetings, Wall paintings, Brochures, etc.), and Catchment level (Multiple stakeholder meeting / workshops, events like World Water Day / Environment Day, project site visits of PDOs, AAO etc.). Information is disseminated to relevant stakeholders through village wise implementations through meetings, WhatsApp group, murals and wall paintings.	
5.4.2	<i>Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.</i>	 Yes
Comment	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: - Karnataka State watershed development department - TMC/Taluk panchayats (Town Municipal Council) - Gram panchayat (GP President, PDOs & GP Members) - Tank User Group (TUG/WUG President & Members) - Village & Farming community (Lead Famers & Beneficiaries from the Working Villages) - Agriculture & Horticulture department - NGO's - Rural Drinking Water and Sanitation Department - Jal Jeevan Mission - Swachh Bharat Mission, Karnataka - Education Department - Women and child welfare - Karnataka State pollution control board - BWSSB	
5.5	<i>Communicate transparency in water-related compliance: make any site water-related compliance violations available upon request as well as any corrective actions the site has taken to prevent future occurrences.</i>	
5.5.1	<i>Any site water-related compliance violations and associated corrections shall be disclosed.</i>	 Yes
Comment	No site water-related compliance violations have occurred at site.	
5.5.2	<i>Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.</i>	 Yes

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



Yes

Comment 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.

Photographic Evidence from Audit



Yes