

CERTIFICATION REPORT

Alliance for Water Stewardship (AWS)

Audit Number: AO-000918

SITE DETAILS

Site: **ITC Limited – Agri Business Division - KGLT, Mysuru**

Address: Immavu & Adakanahalli Village, Chickaiana Chatra Hobli, Near Thandya Industrial Area, Nanjangud Taluk, Mysuru, 571302, Karnataka, INDIA

Contact Person: Sudhir Kumar N

AWS Reference Number: AWS-000648

Site Structure: Single Site

CERTIFICATION DETAILS

Certification status: Certified Platinum

Date of certification decision: 2024-Mar-28

Validity of certificate: 2027-Mar-28

AUDIT DETAILS

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

Audit Type(s): Initial Audit

Audit Start Date: 2023-Dec-18

Lead Auditor: Amit Singh

Site Participants:

Mr. MutyaluNaidu S, Manager – Production

Mr. Kiran Kumar Mr, Senior Executive – Engineering

Mr. Poornesh AS, Manager – Leaf

Mr. Shaik Mohammed Rizwan, Programme Executive – ITC Mission Sunehra Kal

Mr. Vineel Kumar M, Manager – Engineering

Mr. Metla Venkateswara Rao, Senior Executive – Utilities

Mr. Vijay Singh J, Executive – Security

Mr. Rakesh Kommineni, General Manager - Factory Operations

Mr. Lokesh Dudi, Unit IT Head

Mr. Manoj Kumar Uday, Associate Manager – Production

Mr. Harisha NT, Officer – EHS

Mr. Shivansh Gupta, Manager – HR

Mr. Harish Babu HR, Senior Programme Manager – ITC Mission Sunehra Kal

Mr. Mohammed Nizamuddin Lohar, Manager – Engineering

Mr. Charles Anand J, Associate Manager – Engineering

Mr. Lakshmi Narayana L, Manager – QC

Mr. Shivendru Mathur, Manager – Corporate Sustainability

Mr. Pavan RP, Officer – HR

Mr. Sudhir Kumar N, Manager - EHS

Mr. Gautham Ponnana, Senior Manager – HR

Mr. Shashi Kant Pai, Senior Manager – Finance

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ADDITIONAL INFO

Summary of Audit Findings: A total of 17 findings were raised during the certification audit, 9 minor non-conformities and 8 observations.

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

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.

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

ITC - KGLT, Mysore site is located in Thandya Industrial area in Nanjangud taluk, Mysore district of Karnataka state. The facility spans across an area of 68.11 acres, consisting of multiple storage locations (raw material, finished goods and packing material), process line, engineering workshop, administration block, staff canteen, security cabins and Utilities. The factory exclusively depends on surface water from the Kabini River, managed by the Karnataka Industrial Area Development Board (KIADB).

The audit was conducted onsite on 18 December to 21 December 2023.

The onsite site visit included the assessment of KIADB water intake, water treatment plant, rainwater harvesting ponds, manufacturing facility, boiler section, fuel unloading points, common effluent treatment plant, etc. that were visited onsite as part of the audit.

SCORE

125.00

FINDINGS

NUMBER OF FINDINGS PER LEVEL

Observation	8
Minor	9

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FINDING DETAILS

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Finding No:	TNR-009118
Checklist Item No:	1.2.1
Status:	Closed
Finding level:	Minor
Due date:	2024-Dec-18
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 identified and engaged with different stakeholders in the catchment. The site should also consider identifying the indigenous people, minorities, vulnerable people.</p> <p>The site should recheck the prioritisation of stakeholders as the stakeholder at Sl. no. 5 is prioritised above more priority stakeholders.</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 17.88% Schedule Caste community, 11.15% Schedule Tribes community and 70.97% are other community which includes general, other backward class, minority, etc. Also, as per the Census data, the male population is 50.5% and female population is 49.5% in the scope area. Please refer "Annexures- District Census Handbook "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 ABD Nanjanagud 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, Women (over 40%)

4. School & Anganwadi WASH:

Beneficiaries: Government school children's are mainly from children's

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of Migrant workers, Landless & poor families. Over 95% are BPL (below poverty line) Families children. (Over 45% of the beneficiaries are Girls)

5. Wellbeing of waste Collectors:
Beneficiaries: The initiative has a representation of 92% female workers

The Stakeholders list has been prepared and has given the serial numbers. The list has been re-arranged and prioritized based on the level of influence and interest matrix.

Evidence of implementation: Stakeholder List

Finding No: TNR-008772
Checklist Item No: 1.2.2
Status: Open
Finding level: Observation
Checklist item: Current and potential degree of influence between site and stakeholder shall be identified, within the catchment and considering the site's ultimate water source and ultimate receiving water body for wastewater.
Findings: The site should recheck the level of influence of stakeholder on site. For example, the level of influence of Service provider on site is mentioned as high but the influence of stakeholder shall be low.

Finding No: TNR-008806
Checklist Item No: 1.3.2
Status: Closed
Finding level: Minor
Due date: 2024-Dec-18
Checklist item: Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped
Findings: The site procures water from KIADB and transfers water to two of the neighboring industries of site (the industries are of same group i.e. ITC). The same are not marked in the water balance.
Corrective action: The Site receive raw water from Karnataka Industrial Areas Development Board (KIADB) and has an agreement for supplying 1000 KL every day. Two other units of ITC (ITC-Foods and IIVL-Nicotine Extraction Plant) are situated in the same campus. The site supplies raw water to both other units and record the water supply every day. The site's water balance has been updated incorporating the consumption of Foods and IIVL Plants.

Evidence of implementation: Revised Water Balance Sheet

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Finding No:	TNR-008807
Checklist Item No:	1.3.3
Status:	Closed
Finding level:	Minor
Due date:	2024-Dec-18
Checklist item:	Site water balance, inflows, losses, storage, and outflows, including indication of annual variance in water usage rates, shall be quantified. Where there is a water-related challenge that would be a threat to good water balance for people or environment, an indication of annual high and low variances shall be quantified.
Findings:	<p>The site should provide the methodology for calculation of rainwater harvested.</p> <p>The backup documents for water consumption, SWC, meter logging data of major meters such as KIADB, ETP treated water, etc. should be shared by site.</p> <p>The site should also provide a clarity of the volume of water procured from KIADB and the volume of water supplied to neighboring industries. There is a document which shows 135592 kL of water sourced from KIADB, out of which 34829 kL is used in KGLT, 94168 kL is supplied to ITC foods and 6595 kL is supplied to IIVL. Based on KGLT operational days of 200, the average per day freshwater used comes to 174 kL per day. But, the site has prepared the balance for 147 kL.</p>

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Corrective action:

- ITC has Integrated Sustainability Data Management System (ISDMS) for which an SOP has been developed and circulated across ITC. The SOP is reviewed and updated every year by Corporate Sustainability team based on latest developments.
- The SOP on ISDMS is clearly defined the procedure and the process of calculating Rain water harvesting based on Run-off co-efficient for various surfaces.
- The SOP on ISDMS, Revision 10, issued in January 2023 is attached (refer page Nos 27, 28, 81 and 82).

- The Site has attached Water Balance Sheet as Annexure in clause No 1.3.2 covering all the meter readings for FY 2022-23. However, attached herewith for immediate reference.

- The site processes Tobacco Green Leaf which is seasonal in nature. The Factory runs based on availability of raw materials. Moreover, the factory operates for 6 days (Monday to Saturday) and will be shut for maintenance on 07th day, Sunday. The Water balance has been computed for operational days excluding Maintenance days, off-season days and holidays. The Water log book is attached (Please refer column 'CS' to get Site's (KGLT) Net consumption).
- The Site has drawn 140898 KL of water during FY 2022-23, 3315 KL rain water harvested (refer BI and BL columns), Supplied 55660 KL to ITC-Foods (Refer column No CH) and 5320 KL to ITC-IIVI Plant.
- In addition, the site also supplies steam to IIVL plant for which actual water consumption has been deducted to arrive Site's Net water consumption (refer columns CQ, CR and CS).

Summary:

- Total water withdrawn from KIADB: 140898 KL (Column BI)
- Total Rain Water Harvested and Utilized into process: 3315 (Column BL)
- Total Water Supplied to Foods: 98729 KL (Column CH)
- Total Water Supplied to IIVL: 8775 KL (Column CI)
- Water used for Steam generation for IIVL: 2542 KL (Column CR)
- Site's Net Water Consumption: 34420 KL (Column CS)

If Site's water consumption is depending on number of working days and hence Water Balance has been prepared for considering only Operating / Working days, with an average of 147 KL.

Revised Water Balance chart (with considering both Foods and IIVL Plants) and Water Balance Water consumption details are attached.

Evidence of implementation: 1. SOP - ISDMS
2. Water Meter Readings

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Finding No:	TNR-009119
Checklist Item No:	1.3.5
Status:	Open
Finding level:	Observation
Checklist item:	Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.
Findings:	The site has identified the chemicals stored at different locations. During, walkthrough also, it was clear that the chemicals at these locations are identified. But, the evidence was not provided.
Finding No:	TNR-008808
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 primary raw material suppliers are not in the site's primary scope area. The site should identify whether the raw material suppliers are within the kabini catchment.
Finding No:	TNR-008809
Checklist Item No:	1.4.2
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Dec-18
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 outsourced services such as transport services for the site staff.
Corrective action:	<p>The Scope area considered for the site is 10 KMs radius, Bharath International Travels (Employee transport provider) office is not located in the Site's scope, 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.</p> <ul style="list-style-type: none">• Cleaning & Washing activities weekly: 150 L/Bus (Approx.) = $150 \times 37 \times 52 = 288600L$ (289KL)• Service of the bus quarterly: 200 L/ Bus (Approx.) = $37 \times 4 \times 200 = 29600L$ (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:	NA

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Finding No:	TNR-008810
Checklist Item No:	1.5.3
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2024-Dec-18
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 balance of Kabini river basin, the following are considered:</p> <ul style="list-style-type: none">- Recharge from Rainfall @ 10% infiltration rate- Surface Water Bodies Recharge @ 0.45 m / year of seepage rate- Recharge due to seepage of canals @ 10% of annual available water- Irrigation Water Recharge from openwells / borewells @ 35% of Irrigation water demand- Groundwater recharge due to irrigation from canals @ 40% 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">- Surface water flow considerations in preparation of catchment water balance as the source of water for site is through surface water- What was the water level of surface water bodies before and after rainfall including the total water level of the tanks as seepage rate considered is 0.45 m / year of seepage rate irrespective of the above- Flow from water streams to groundwater- Loss due to Evapotranspiration- Loss in soil moisture <p>Also, there is no clarity, why 75% of water recharged is considered as water available for usage.</p> <p>The site has prepared a water balance for primary scope area.</p> <p>Site should have a clarity on the importance of identification of catchment. The source of water for site is through surface water which has a relevance with the situation of water at the upstream of the source. An understanding of activities / water availability, etc. at the upstream is required.</p>

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Corrective action:

Surface water flow considerations in preparation of catchment water balance as the source of water for site is through surface water. Surface water has been considered in calculating the irrigation water demand of the catchment. The recharge due to surface water bodies were also considered while calculating the water availability of the catchment.

What was the water level of surface water bodies before and after rainfall including the total water level of the tanks as seepage rate considered is 0.45 m / year of seepage rate irrespective of the above. The 0.45m/year seepage rate is a standard assumption taken from the WSP toolkit page no.72 (Govt. of India developed toolkit)

- Flow from water streams to groundwater: 10% of the total water flow in the canal is considered as ground water recharge as per the WSP toolkit page no.72

- Loss due to Evapotranspiration: Based on the geology of the catchment area and other losses including Loss due to evaporation, evapotranspiration and soil Moisture the recharge rate is considered as 10% as per the standard assumption given in WSP toolkit which is used as a reference document.

- Loss in soil moisture Also, there is no clarity, why 75% of water recharged is considered as water available for usage: Under Ground water categorisation the area is said to be safe only when their ground water utilization status is under 70%. In this context while calculating the water balance the water availability for usage is assumed as 75% of the total water recharged and 25% for recharge of groundwater.

Water balance for watershed area:

While defining the factory catchment area, water balance is prepared for the primary scope area and implementing planned water stewardship activities on watershed-based approach.

The water balance is also prepared for River basin using WSP Toolkit, Govt of India

Evidence of implementation: Nil

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Finding No: TNR-008338
Checklist Item No: 1.5.4
Status: Closed
Finding level: Minor
Due date: 2024-Dec-18
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 source of water for site is surface water, the water quality data provided is only for ground water. Site has not identified the surface water quality scenario of the catchment
Corrective action: The site has been testing the Raw water quality like pH and TDS and is being recorded daily. The test reports are attached as Annexure in 1.3.4. Since the Site is receiving water from directly from Kabini River through Karnataka Industrial Areas Development Board (KIADB) and no primary treatment happens in between. The raw water quality being tested at Site is the representative of Raw water of Kabini.
Evidence of implementation: a. Water test Report data

Finding No: TNR-008811
Checklist Item No: 1.5.6
Status: Closed
Finding level: Minor
Due date: 2024-Dec-18
Checklist item: Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.
Findings: There are details provided for water related infrastructure in the catchment. The site sources water from KIADB at a distance of 3.5 kms from the site. KIADB also provides water to the industries in the industrial area. The condition of infrastructure of KIADB and potential exposure to extreme events is not identified.
Corrective action: The site team has well connected with KIADB team and get the timely updates. The Site has a practice of inspecting the condition of KIADB infrastructure every 02 years and is being done since inception. The past 03 inspection reports are attached as Annexure IV for ready reference.
The condition of the Infrastructure including Pump House, storage facility and its piping network is found adequate and in working condition. The Karnataka Industrial Areas Development Board (KIADB) maintain the all infrastructure and has periodic maintenance plan. In any extreme condition like Flood in the catchment, the available infrastructure will not get affected in any manner.
Evidence of implementation: Inspection reports of KIADB Infra in 2018, 2021 and 2023.

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Finding No: TNR-008819
Checklist Item No: 1.7.1
Status: Open
Finding level: Observation
Checklist item: Water risks faced by the site shall be identified, and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.
Findings: The site should recheck the timeframe for each of the identified water risks as for all the risks, timeframe has been selected as less than 5 years. The basis of selection of timeframe is not clear.

Finding No: TNR-008836
Checklist Item No: 2.3.2
Status: In Progress - CA plan approved
Finding level: Minor
Due date: 2024-Dec-18
Checklist item: A water stewardship plan shall be identified, including for each target:

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

Findings: In indicator 1.5.4, site has presented water quality data showing variation in water quality parameters and higher values of certain parameters above permissible limit such as Electrical Conductivity / TDS, Nitrate, total hardness.
There are no targets related to the water quality in the catchment. The site should also focus on targets related to catchment water quality.

Corrective action: 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.

Our strategy focuses on proactive measures, such as raising awareness among farmers and households and promotion of Sustainable agriculture, 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, Tank silt application, Promotion of Sustainable agriculture, waste management practices, Home composting, Green temple initiatives etc we aim to tackle the root causes of the water quality issues in the catchment.

Evidence of implementation: Water Quality Test Reports

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- Finding No: TNR-008841
Checklist Item No: 3.7.2
Status: Open
Finding level: Observation
Checklist item: Evidence of engagement with suppliers and service providers, as well as, when applicable, actions they have taken in the catchment as a result of the site's engagement related to indirect water use, shall be identified.
Findings: There are transport services outsourced by site. The site should gather information for the indirect water use by transport services and others, if any.
- Finding No: TNR-008842
Checklist Item No: 3.9.3
Status: Open
Finding level: Observation
Checklist item: Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.
Findings: There are water quality issues in the primary scope area due to deteriorated water in the downstream of river basin (after the temple) as the same is being used by farmers in that area and also the villagers in that area. The same should also be captured and discussed with stakeholders for addressing the water quality issues in the catchment.
- Finding No: TNR-008854
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: Site has implemented a no. of water conservation opportunities but did not evaluate any value creation resulting from the water savings initiatives taken by plant.

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Finding No:	TNR-008861
Checklist Item No:	4.3.1
Status:	Closed
Finding level:	Minor
Due date:	2024-Dec-18
Checklist item:	Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.
Findings:	The site has not presented evidence relating to evaluation of stakeholders' consultation feedback regarding the site's water stewardship performance, including the effectiveness of the site's engagement process.

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Corrective action:

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:

- Stakeholder's workshops: The site organizes discussions, meetings, and workshops on significant occasions, to engage with stakeholders and discuss water stewardship performance of the site. These discussions are organized village-wise, Cluster & taluk wise and the same site's progress is disclosed accordingly. (Refer to Annexure 1& 1a, 2 a& 2b)
- Wall Paintings: The site uses wall paintings in villages to showcase its progress towards the water stewardship program. (Refer to the Annexure 3: Wall Painting highlighting progress in catchment i Village)
- Brochures: Various brochures are distributed to highlight the water stewardship activities and the progress achieved thus far. (Refer to the Annexure 4)
- Video documentation of stakeholders

While these communication initiatives are actively undertaken, it is acknowledged that they were not sufficiently emphasized in the response to the indicator. In future responses, the site will ensure to provide a clearer and more comprehensive account of these engagement efforts.

Following are the few feedbacks evaluated & same is considered for the AWS action plan.

- Example 1: Post feedback from Mother committees (PI refer AWS Manual 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."

Other Examples (PI refer AWS Manual 4.3.2)

- Adoption of Aerators in taps at schools & Anganwadis
- Nano urea usage to reduce fertilizer usage in agriculture
- Guli raji method - amplification
- Home composting from Organic waste generated at the Houses
- Bore well rechargers

Evidence of implementation: 1. Sample Stakeholder Meeting Minutes with English Translation
2. Wall writings proof samples
3. Brochure

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Finding No: TNR-008862
Checklist Item No: 4.4.1
Status: Open
Finding level: Observation
Checklist item: The site's water stewardship plan shall be modified and adapted to incorporate any relevant information and lessons learned from the evaluations in this step and these changes shall be identified.
Findings: The site shall 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.

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Report Details

Report	Value
Report prepared by	Amit Singh
Report approved by	Ruth Wandera
Report approved on (Date)	26/02/2024

Surveillance

Proposed date for next audit
2024-Dec-17

Comment The proposed date for next audit, i.e. Surveillance audit is 17.12.2024.

Stakeholder Announcements

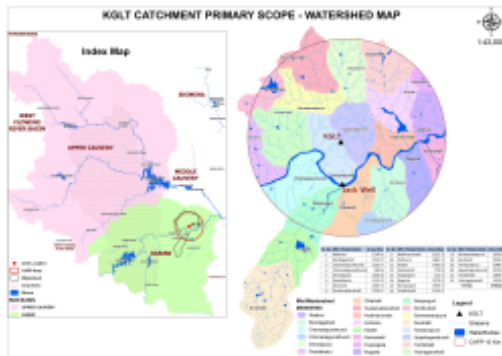
Date of publication	Location
07/11/2023	AWS Website
07/11/2023	WSAS Website
16/11/2023	Local Newspaper
Comment	<p>The stakeholder announcements were done at AWS website, WSAS website and in the local newspaper by site.</p> <p>The links for stakeholder announcement at AWS and WSAS website are given below: https://a4ws.org/wp-content/uploads/2023/11/AWS-000648-Stakeholder-Announcement-ITC-Mysore.pdf</p> <p>https://watersas.org/wp-content/uploads/2023/11/AWS-000648-Stakeholder-Announcement-I-T-Mysore-DRAFT.pdf</p>

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Catchment Information



KGLT_AWS- Watershed Map.jpg

Catchment Information

The site is situated in the Kabini River basin, a tributary of the Cauvery River basin. The Kabini River, originating in Kerala's Wayanad District, takes its genesis from the confluence of the Panamaram River and the Mananthavady River. It journeys eastward and eventually converges with the Kaveri River at the revered Tirumakudalu Narasipura of Mysore district in Karnataka.

KGLT factory relies exclusively on surface water source as it draw water from the Kabini River, facilitated by the Karnataka Industrial Area Development Board (KIADB).

The development initiatives by site are predominantly focused on Primary scope area spanning 37910 hectares.

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Client Description and Site Details



KGLT Mysore.png

Client/Site Background

ITC - KGLT, Mysore site is located in Thandya Industrial area in Nanjangud taluk, Mysore district of Karnataka state. The facility spans across an area of 73 acres, consisting of multiple storage locations (raw material, finished goods and packing material), process line, engineering workshop, administration block, staff canteen, security cabins and Utilities. The factory exclusively depends on surface water from the Kabini River, managed by the Karnataka Industrial Area Development Board (KIADB). The facility spans across an area of 73 acres, consisting of multiple storage locations (raw material, finished goods and packing material), process line, engineering workshop, administration block, staff canteen, security cabins and Utilities.

The unit is set up to process the FCV tobacco leaves to make them suitable for further stages of manufacturing carried by the customers. The incoming raw material is stored in Green-leaf Storages which has a capacity of 0.8 MKg, catering for roughly 5 days of continuous processing.

Summary of Shared Water Challenges




Summary of Shared Water Challenges

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

- High frequency of Drought
- High Water Demand in Agriculture
- High Groundwater Draft
- Lack of WASH Facilities

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

0.1.1 Eligibility Criteria

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 and have mapped different sections and water related infrastructures (such as water treatment plant; overhead tank; wastewater treatment plant, i.e. CETP; RO plant; etc.) within the plant.
The main source of water for plant is surface water which is supplied by the Karnataka Industrial Area Development Board (KIADB) which sources water from Kabini River, located at about 3.5 KMs distance from the site. Apart from KIADB water, site also utilises rainwater collected in pond both of which are treated in the water treatment plant for usage in plant. ITC KGLT, Mysore is a zero effluent discharge unit. No treated / Untreated water is discharged outside the factory premises. Treated wastewater from ETP is used for ash quenching, spraying on coal and balance for gardening within the site premises as the green cover of plant is 39% i.e. 26.81 acres out of total are of 68.11 acres.
The ITC KGLT site is situated within the Kabini River basin, a tributary of the Cauvery River basin. The Kabini River, originates in Kerala's Wayanad District, takes its genesis from the confluence of the Panamaram River and the Mananthavady River.
KGLT factory relies exclusively on surface water source drawn from the Kabini River, facilitated by the Karnataka Industrial Area Development Board (KIADB). Site's development initiatives predominantly focus on Primary scope area spanning 37910 hectares. Site has mentioned that this area constitutes the immediate catchment of the KGLT unit & contributes to immediate watershed. The primary scope area encompass 25 Gram Panchayats and 137 villages.

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 (SOP/AWS/ITC-KGLT/01) which lays down the basis of stakeholder identification and the engagement process.

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.

Finding No: TNR-009118

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.* 🔍
Obs.

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 (SOP/AWS/ITC-KGLT/01). The stakeholder's have been listed and prioritized in the table based on their influence on site. Site has also listed the name of persons of the stakeholder organisation / stakeholder group.

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* ✅
closed

Comment The site has mapped the inflows, storage and usage in domestic / different processes / locations.
The inflows include water from: 1) Surface water through KIADB 2) Rainwater collected in ponds 3) Treated wastewater
The storage capacity for Raw /Treated water, Rain water harvesting (ponds), Over head tank and ETP treated water tank have been mapped. Site has also mentioned about evaporation loss from cooling tower and process.
There is no outflow outside the factory. The treated wastewater from ETP is used within the premises. However, the site transfers water to two of the neighboring industries of site (the industries are of same group i.e. ITC).

Finding No: TNR-008806

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

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Comment	<p>Site has prepared the water balance for the average water sourced and used for no. of processing days in 2022-23 covering the water sources, usage in domestic as well as different sections of plant and usage of ETP treated water in ash quenching, coal spraying and gardening.</p> <p>The following annual values are compared from 2018-19 to 2022-23 (based on operational days of 200):</p> <ul style="list-style-type: none"> - Specific water consumption (in kL/Ton) - Average water consumption (in kL per day) for processing days - Annual rainfall - Rainwater harvested & utilised - Wastewater generated, treated wastewater used for gardening and ash/coal spraying <p style="text-align: right;">Finding No: TNR-008807</p>	
1.3.4	<p><i>Water quality of the site's water source(s), provided waters, effluent and receiving water bodies shall be quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be quantified.</i></p>	<p> Yes</p>
Comment	<p>The quality of different types of water are being tested periodically by site. The frequency of testing for different types of water are listed below:</p> <ul style="list-style-type: none"> - KIADB Water being tested daily at internal laboratory - Drinking Water being tested quarterly through external laboratory - Process Water being tested daily at internal laboratory - Effluent Untreated Water being tested monthly through external laboratory - Effluent Treated Water being tested daily at internal laboratory and monthly testing through external laboratory <p>The site has graphically presented monthly average values for 2022-23 of parameters like pH & TDS of raw water from KIADB and pH, TDS, BOD, COD of ETP treated water which are well within permissible limits.</p>	
1.3.5	<p><i>Potential sources of pollution shall be identified and if applicable, mapped, including chemicals used or stored on site.</i></p>	<p> Obs.</p>
Comment	<p>The site has mapped the areas which are potential sources of pollution on site. The potential sources of pollution have been tabulated which are Chemical Storage room at WTP, RO plant & Boiler; Oil and HSD Storage Room; HSD Yard; Transformer Yard; HSD Day Tanks for DG Sets; Hazardous Waste Storage Yard; QC Lab; Combined Effluent Treatment Plant and Material Handling Equipment area.</p>	
1.3.6	<p><i>On-site Important Water-Related Areas shall be identified and mapped, including a description of their status including Indigenous cultural values.</i></p>	<p> Yes</p>
Comment	<p>There are no Important Water-Related Areas at site. However, there are water related infrastructure at site which have been listed at indicator 1.1.</p>	
1.3.7	<p><i>Annual water-related costs, revenues, and a description or quantification of the social, cultural, environmental, or economic water-related value generated by the site shall be identified and used to inform the evaluation of the plan in 4.1.2.</i></p>	<p> Yes</p>
Comment	<p>The site has tabulated annual water related costs of the unit (FY 22-23) which includes the Water procurement cost; Operation & maintenance of ETP & WTP (including chemical costs, consumables and Man power); water quality testing; Consent cost paid for PCB for water; Operation & maintenance of RO Plant and cost for Technical Study for RWH potential.</p> <p>The site has also listed the value creation by site & catchment as per AWS/ITC-KGLT/02.</p>	
1.3.8	<p><i>Levels of access and adequacy of WASH at the site shall be identified.</i></p>	<p> Yes</p>

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Comment	The site has mapped drinking water points, water dispensers and toilet facilities available at site and have compared them against the requirement mandated as per Factories Act, 1948 (Section 18) and The Karnataka Factories Rules 1969.	
	The layout with location of drinking water points and WASH facility within the site have been mapped.	
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	Site has identified and tabulated the list of raw materials used for processing. It is mentioned that there are no raw material supplier within identified catchment area.	
1.4.2	<i>The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.</i>	🚩 in progress
Comment	The site has mentioned that there are no outsourced services within the site's catchment area.	
	Finding No: TNR-008809	
1.4.3	<i>Advanced Indicator The embedded water use of primary inputs in catchment(s) of origin shall be quantified.</i>	✅ Yes
Comment	The primary Raw Material for the process is Green Leaf Tobacco. The Tobacco farming areas are located at Kaveri River Basin in Karnataka state and at Godavari and Krishna River basin in Andhra Pradesh States. The procurement regions for Tobacco are Traditional, NLS (Northern Light Soil) and Mys (Mysore). The detailed embedded data for the water consumption in tobacco production have been estimated and tabulated.	
	Other raw material is Corrugated Fibre Board Carton (CFC) (which is around 6% of total raw material procured by weight) being used for packing Finished Goods. Unit team has approached the only supplier of CFC for the site, M/s. Wadpack and have gathered the information for drinking water and WASH facilities of the supplier.	
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	<i>Water governance initiatives shall be identified, including catchment plan(s), water-related public policies, major publicly-led initiatives under way, and relevant goals to help inform site of possible opportunities for water stewardship collective action.</i>	✅ Yes

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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 Industrial Area Development Board - Karnataka State Pollution Control Board - Karnataka State watershed development department - Gram Panchayat / Zilla Panchayat - Department of Agriculture, Karnataka - Department of Horticulture, Karnataka - Farmers, Water User groups - Department of Forest, Karnataka - Department of Primary Education - Department of Women & Child development 	
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 - Agreement with KIADB for water supply to Unit - Agreement with ITC IndiVision Limited for internal water distribution - Submission of analytical results of treated waste water every 30 days <p>There are no legally bounded water rights (related to drinking, domestic and agricultural purposes) at the catchment level with respect to site.</p>	
1.5.3	<p><i>The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.</i></p>	 in progress
Comment	<p>The site has provided water balance for Kabini River basin 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 / Tanks/ Canals and Recharge from irrigation) which gives negative water balance and average Water Utilization of 127% referring to various government documents.</p> <p>The site has also presented data regarding water balance for the primary scope area. The water demand is higher than the water availability which implies that the primary scope is under negative water balance.</p> <p>The site has also graphically represented rainfall pattern of NANJANGUDU from 2001-2020 and Reservoir levels of Kabini Dam from 2015 -2019.</p>	
		Finding No: TNR-008810
1.5.4	<p><i>Water quality, including physical, chemical, and biological status, of the catchment shall be identified, and where possible, quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be identified.</i></p>	 closed
Comment	<p>Site has shared Ground Water quality analysis data from 30 locations of Nanjangud taluk. The ground water analysis shows variation in water quality parameters and higher values of certain parameters above permissible limit such as Electrical Conductivity / TDS, Nitrate, total hardness. There is no indication of seasonal, high and low variances.</p>	
		Finding No: TNR-008338

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1.5.5	<i>Important Water-Related Areas shall be identified, and where appropriate, mapped, and their status assessed including any threats to people or the natural environment, using scientific information and through stakeholder engagement.</i>	 Yes
Comment	<p>The site has identified a total of 38 Important Water Related Areas in the catchment covering the following:</p> <ul style="list-style-type: none"> - Surface water storage tanks & Check dams - Farm ponds - Open Wells - Recharge zones <p>The site has defined the criteria for rating the condition of the IWRA's.</p>	
1.5.6	<i>Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.</i>	 closed
Comment	<p>Site has shared the status of Reservoir levels of Kabini Dam from year 2015 -2019 and details of WASH in the Mysuru district.</p> <p>There are no details mentioned about the water-related infrastructure in the catchment.</p> <p style="text-align: right;">Finding No: TNR-008811</p>	
1.5.7	<i>The adequacy of available WASH services within the catchment shall be identified.</i>	 Yes
Comment	<p>The site has presented WASH status for 25 Gram Panchayats covering 125 villages and 50268 households with 100% coverage of individual household toilets and drinking water supply. The site has presented WASH status of Schools and Anganwadi as given below:</p> <ul style="list-style-type: none"> • 91% Percent of schools lack proper toilets • 88% Percent of schools lack safe drinking water • 91% Percent of schools are without handwash station • 100% Percent of anganwadis lack proper toilets • 100% Percent of anganwadis lack safe drinking water <p>The site has also presented status of Solid Waste Management practices in the catchment as below:</p> <ul style="list-style-type: none"> • 0% Percent of households covered under waste collection • 0% Percent of households doing source segregation 	
1.5.8	<i>Advanced Indicator Efforts by the site to support and undertake catchment level water-related data collection shall be identified.</i>	 Yes
Comment	<p>The site has engaged NGO's and external agencies to collect data. The following steps were followed for collecting the data to understand the catchment level challenges:</p> <ol style="list-style-type: none"> 1) 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. 2) Further a detailed need assessment survey was conducted in each identified schools and Anganwadis to know the existing status of WASH infrastructure and prepared a plan for implementation. 	
Score	4	
1.5.9	<i>Advanced Indicator The adequacy of WASH provision within the catchments of origin of primary inputs shall be identified.</i>	 No
Comment	<p>The major primary input i.e. tobacco leaf is procured in the districts of Mysore, Hassan, West Godavari, Guntur, Prakasam and Nellore.</p> <p>The packaging material CFC is procured from WadPack situated in Bangalore Urban.</p> <p>Out of these inputs, site has implemented a Core area perspective plan (CAPP) to identify the adequacy of aspects of provision of WASH facilities in Periyapatna & HD Kote catchment.</p> <p>The current status of WASH provision in the catchment(s) of primary inputs is not clear.</p>	

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1.6	<i>Understand current and future shared water challenges in the catchment, by linking the water challenges identified by stakeholders with the site's water challenges.</i>	
1.6.1	<i>Shared water challenges shall be identified and prioritized from the information gathered.</i>	 Yes
Comment	<p>The site has employed a systematic approach to identify shared water challenges. This approach encompasses the following steps:</p> <ol style="list-style-type: none"> 1. Engagement with Village Community, Gram Panchayat, and Other Catchment Stakeholders 2. Publicly available resources from government bodies 3. Stakeholder consultation on the identified shared water challenges <p>The site has identified and prioritized the following high importance shared water challenges:</p> <ol style="list-style-type: none"> 1) High Frequency of drought Depleting Ground water Levels 2) High water Demand in Agriculture 3) High groundwater draft 4) Lack of WASH facilities 	
1.6.2	<i>Initiatives to address shared water challenges shall be identified.</i>	 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	<i>Advanced Indicator Future water issues shall be identified, including anticipated impacts and trends</i>	 Yes
Comment	<p>Future water scenarios for both the Nanjangud taluk and primary scope area 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	<i>Advanced Indicator Potential water-related social impacts from the site shall be identified, resulting in a social impact assessment with a particular focus on water.</i>	 Yes
Comment	<p>The site has identified potential water-related social impacts and 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 CAPP Reports, Baseline document for catchment, PRA Document, Proposal from NGOs 	
Score	4	
1.7	<i>Understand the site's water risks and opportunities: Assess and prioritize the water risks and opportunities affecting the site based upon the status of the site, existing risk management plans and/or the issues and future risk trends identified in 1.6.</i>	
1.7.1	<i>Water risks faced by the site shall be identified, and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.</i>	 Obs.

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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	<i>Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.</i>	✔ Yes
Comment	The site has identified water related opportunities based on the prioritization of identified water risks. Potential costs and opportunities have been listed against the identified water risks to site.	
1.8	<i>Understand best practice towards achieving AWS outcomes: Determining sectoral best practices having a local/catchment, regional, or national relevance.</i>	
1.8.1	<i>Relevant catchment best practice for water governance shall be identified.</i>	✔ Yes
Comment	The site has identified best practice for water governance and are listed below: - Promotion of Multistakeholder Committee - Promotion of Watershed based people institution - Converting Tank User Groups to Agri Business centers - IEC Development & capacity building of stakeholders	
1.8.2	<i>Relevant sector and/or catchment best practice for water balance (either through water efficiency or less total water use) shall be identified.</i>	✔ Yes
Comment	The site has identified following catchment best practices for water balance: - Rain water harvesting in existing & new water harvesting structures - Land Treatment by Trench cum Bund, Contour Bund & Water Absorption trenches for Soil Erosion control & Moisture retention - Demand management in agriculture The supply side interventions are listed below: - Soil & Moisture Conservation - Water Resource Development - Soil Health Improvement 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	
1.8.3	<i>Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.</i>	✔ Yes

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Comment The site has identified various best practices for site and catchment as listed below:
At Site Level:
a. On-site best practices for water quality are based on national standards as governed by Bureau of Indian Standards (BIS) like: IS 10500 (2012): Drinking water specification
b. Drinking water quality against IS 10500 standard being tested by NABL lab every quarter
c. UF provided for all drinking water points
At Catchment Level:
1. Mulching with Organic waste Micro Irrigation
2. Micro Irrigation
3. Cover crop /Inter crop
4. Insitu moisture conservation through trenches, bund stabilisation and ring bunds
5. Modernisation of Irrigation systems
6. Regulated deficit and critical irrigation
7. Local cultivars
8. Integrated Pest & Nutrient Management (IPM & INM)
9. Silt application to reduce fertilisers by 17% to 50% which will in turn help to reduce nitrate concentration in the water.
10. Waste management in the villages

1.8.4 *Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.*


Yes




Comment The site has identified various best practices for site and catchment as listed below:
- Restoration of Water Harvesting Structures (Checkdam, Large Tanks) - Local contribution from beneficiaries to generate ownership
- Open well rejuvenation & linking to Agriculture
- Removal of silt from Ground water recharge structures to improve recharges
- Creation of minor harvesting structures like farm ponds - Construction of silt traps in the inlet point
- Catchment treatment and plantations development to improve ecosystem services - Native species plantation
- Improved Irrigation Practices like Drum seeder

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


Yes

Comment The site has identified various best practices for site and catchment as listed below:
At site level: Best practices for provision of WASH at site is derived from the compliance to The Karnataka Factories Rules 1969
At Catchment level:
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) 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 as per Swachh Vidyalaya guidelines
7. Promotion of Community led Low cost, decentralised & self-sustained waste management
8. Award & Reward to Best Waste management practitioners in collaboration with District administration
9. Women SHGs led waste management





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2	STEP 2: COMMIT & PLAN - Commit to be a responsible water steward and develop a Water Stewardship Plan	
2.1	<i>Commit to water stewardship by having the senior-most manager in charge of water at the site, or if necessary, a suitable individual within the organization head office, sign and publicly disclose a commitment to water stewardship, the implementation of the AWS Standard and achieving its five outcomes, and the allocation of required resources.</i>	
2.1.1	<i>A signed and publicly disclosed site statement OR organizational document shall be identified. The statement or document shall include the following commitments:</i> <ul style="list-style-type: none"> - That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes - That the site implementation will be aligned to and in support of existing catchment sustainability plans - That the site's stakeholders will be engaged in an open and transparent way - That the site will allocate resources to implement the Standard. 	 Yes
Comment	A signed and publicly disclosed site statement is identified signed by Unit Head (General Manager) and VP - PAT & Supply Chain (Agri Business Division) covering the following commitments: <ul style="list-style-type: none"> - That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes - That the site implementation will be aligned to and in support of existing catchment sustainability plans - That the site's stakeholders will be engaged in an open and transparent way - That the site will allocate resources to implement the Standard. The site has displayed copy of Water Stewardship Policy and Commitment at site including at the entrance of the site. The copy of same has been attached as evidence.	
2.1.2	<i>Advanced Indicator</i> <i>A statement that explicitly covers all requirements set out in Indicator 2.1.1 and is signed by the organization's senior-most executive or governance body and publicly disclosed shall be identified.</i>	 Yes
Comment	The site has displayed two copies of Water Stewardship Policy and Commitment signed by senior executives of the organisation in two languages (Local language and in English). One copy is signed by VP - PAT & Supply Chain - (Agri Business Division - TSBU) and Other copy signed by Unit Head, General Manager - KGLT, ITC Limited (Agri Business Division - TSBU)	
Score	1	
2.2	<i>Develop and document a process to achieve and maintain legal and regulatory compliance.</i>	
2.2.1	<i>The system to maintain compliance obligations for water and wastewater management shall be identified, including:</i> <ul style="list-style-type: none"> - Identification of responsible persons/positions within facility organizational structure - Process for submissions to regulatory agencies. 	 Yes
Comment	All compliance obligations related to water and waste water management are identified and monitored in the legal register checklist of the site. This legal register checklist is reviewed on monthly basis by responsible person i.e. EHS Manager. The compliance status is reviewed and monitored by DHQ legal cell over abdcc portal. Monthly submission of ETP and STP treated water third party test reports to Karnataka State pollution control Board. The site has a mechanism of system generated reminder for compliance, which auto-generates on 1st of every month till the compliance is submitted.	

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2.3	<i>Create a water stewardship strategy and plan including addressing risks (to and from the site), shared catchment water challenges, and opportunities.</i>	
2.3.1	<i>A water stewardship strategy shall be identified that defines the overarching mission, vision, and goals of the organization towards good water stewardship in line with this AWS Standard.</i>	 Yes
Comment	<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</p> <p>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 aquifer management in the catchment • Optimise agricultural water usage in the catchment • Promote sustainable agriculture practices • Promote catchment restoration practices • Strengthen water-related governance and institutions in the catchment <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	<i>A water stewardship plan shall be identified, including for each target:</i> <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, responsibility, target date of completion and linkage with Water risks and AWS outcomes.</p> <p style="text-align: right;">Finding No: TNR-008836</p>	
2.3.3	<i>Advanced Indicator</i> <i>The site's partnership/water stewardship activities with other sites within the same catchment (which may or may not be under the same organisational ownership) shall be identified and described.</i>	 Yes
Comment	<p>Site has mentioned about partnership with nearby industries, i.e. M/s ITC-Foods and M/s IIVL officials by meeting and sharing knowledge on various initiatives and progress of Environment and Safety aspects including water.</p> <p>Site has also shared details of participation of other industries in the awareness session. The site should also focus on partnership for water stewardship activities (other than awareness sessions) with other industries in the same catchment.</p>	
Score	4	
2.3.4	<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>	 Yes


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Comment ITC is working in various catchments for water stewardship interventions. From time-to-time, ITC MSK teams in different catchments meet to discuss and share the knowledge and best practices related to water stewardship intervention. The KGLT team has coordinated & visited ITC-Foods-Malur (already AWS Platinum certified) and regular interactions with ITC-ITD Bangalore (in process of AWS certification). The KGLT site is coordinating with these sites for understanding, planning and implementing the water stewardship activities at its site and catchment. The unit is in regular interaction with Divisional Sustainability team, Divisional EHS Manager and other GLT EHS Managers and Utility managers every quarter to discuss and update the progress on AWS standards. ITC-MSK teams had Natural Resource management (NRM) discussions with other catchments where best practices from one catchment were shared with other catchment teams and Community Development Program (CDP) discussion with other catchments where best practices from one catchment were shared with other catchment teams. A knowledge sharing session was organized in Sept 2023, wherein the best practices in water stewardship were discussed with other two Green Leaf Threshing (GLT) Units (of ITC group) which include Divisional Sustainability team for discussion on how AWS is helping the Unit in mitigating water related risks. In addition, under Agri Business Division, 3 GLTs (including KGLT Mysore) are planned to achieve AWS Certification by 2026. A Task force has been formed to assess and form a frame work for implementing AWS guidelines for better tomorrow.

Score 4


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

Comment The site has various level of reviews and discussion on targets. 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 Water conservation.

For implementing water stewardship activities in the catchment, a consensus is received from stakeholders in the form of NOC / Appreciation letters, etc. 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 Gram Panchayat / Zila Panchayat / KVK / Agriculture Department.
- Panchayat Development Officer appreciation
- Request letter from farmer for farm pond

Score 7

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


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

Comment The site has listed activities for mitigation of identified risks along with the agencies involved. The site has also shared details of MoU's, Meeting Minutes, Communication letter, Letter of Coordination 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.

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2.4.2	<i>Advanced Indicator</i> <i>A plan to mitigate or adapt to water risks associated with climate change projections developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.</i>	 Yes
Comment	<p>In the catchment, agriculture is a major source of income. Climate variability has a major impact on crop yields and thus on farmers' livelihoods.</p> <p>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.</p> <p>Site has organised CSV District level stakeholders workshop in Mysuru District by involving the following stakeholders. Involved stakeholders from Govt., Research Institutions, Farmers and Expert Organisation.</p>	
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>ITC has MoU with Partner NGOs like MYKAPS, SNEHA & Pratham to implement the Planned (as per Plan & Budget) interventions. ITC has also collaborated with various Govt. Departments, Gram panchayats, KVK & Expert Organisations to mobilise resource, knowledge & other necessary support for implementing various interventions 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"> • Implementing partner: MYRADA Kaveri Pradeshika Samsthe (MYKAPS), SNEHA, Pratham • Technical partner: Krishi Vigyan Kendra (KVK), Agriculture Department, Horticulture Department, Watershed Development Department (WDD), Foundation of Ecological Society (FES), International Water Management Institute (IWMI) <p>In the catchment, frequent meetings, trainings, sensitization Programs, 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. A total of over 1049 capacity building initiatives have been conducted, spanning various stakeholders such as community, GP officials, GP members, Watermen, Self-Help Groups (SHGs), various government line-department and institutions.</p> <p>The site is involved in capacity building of SDMC, Mothers committee & Child cabinets in all the villages in primary scope area including the Gram Panchayats in the Mysuru District and Gram Panchayats in primary scope area.</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. The water stewardship plan has been specifically designed to respect the rights of everyone through the supply side interventions, demand side interventions and Interventions on WASH in the catchment.</p> <p>ITC's water stewardship initiatives supports the residents of the Nanjangud taluk. For example, ITC has installed 5 KLH Reverse Osmosis (RO) unit at Alaganchi Village (Nanjangud taluk in the primary scope area) benefiting 1500 Families.</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 site has developed a Water governance structure on 3rd April 2023 highlighting the responsibilities of different members for achieving the water stewardship goals of the site.</p> <p>Site has also presented catchment level governance structure of Water User Groups. Till 2023-24, site has established / implemented the following:</p> <ul style="list-style-type: none"> - 2 Watershed committees, 11 Water user groups, 09 SHGs formation, 197 Farmer Field School group & 5 Agri implement user groups. - various capacity building initiatives i.e., Farmer and Multi-stakeholder meeting and trainings – 308, Public events and workshops – 16, Farmer exposure visit to Demo plots and Agriculture research institutions – 06 - Promotion of Sustainable water management Practices - Regular Monitoring and Reporting to track the effectiveness of interventions 	

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Score 2

3.1.4 *Advanced Indicator* ✔
Yes
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.

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 by Mysuru Zilla Panchayat to ITC and partner NGOs for the support provided through Trainings, Awareness and IEC programs which helped 130GPs in Mysuru District to initiate Decentralized waste management
- Letter from Executive Officer Taluk Panchayat, Nanjangud stating 3347 participants covered for SWM related trainings
- Tank user committee members discussion about Protection & Maintenance of IWRA
- SDMC Meeting discussing maintenance of WASH Infrastructure
- Child cabinet meeting
- Stakeholders meeting discussion about various WASH related interventions done in the catchment

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 ProInd portal. This checklist is being reviewed and updated on a monthly frequency by the site and shared further for validation to Head Office.
The site has a mechanism of system generated reminders for compliance, which auto generates from 1st of every month till it is complied.
Additionally, EHS Manager submits Effluent Treated water test reports to State Pollution Control Board every month and Consent For Operation compliance as per requirement.

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 construction of farm pond in a farmer's field which has addressed water management concerns and also contributed to the overall conservation and stability of the agricultural ecosystem.




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 2018-19 to 2022-23 as progress towards meeting water balance targets. Overall, there has been significant reduction in site's specific water consumption from baseline number of 1.28 to 0.97 which is reduction of 24%. For catchment, the progress towards Supply side interventions and Demand side interventions from year 2019-20 to 2022-23 and cumulative achievement up to 2022-23.	
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 initially set a target to reduce Specific Water Consumption by 40% by year 2030 and plan for more stringent targets every year to reach the goal of 40% reduction by 2025. By year 2022-23, site has achieved SWC reduction of 24% compared to SWC of baseline year.	
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 the site uses 100% of ETP treated water for gardening and other usage within the site. 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. Apart from this, site has presented the ground water quality in the catchment. Water quality test and the quality analysis for 15 samples in the catchment. The site should also consider monitoring and comparing the water quality parameters of surface water & ground water of same locations in the catchment.	
3.4.2	<i>Where water quality is a shared water challenge, continual improvement to achieve best practice for the site's effluent shall be identified and where applicable, quantified.</i>	 Yes
Comment	Site is a zero effluent discharge unit. No untreated effluent is discharged outside the site's boundary. Site has a well-defined system for monitoring of the treated effluent parameters both in-house and through third party certified laboratories. Treated effluent is being monitored as per defined frequency before being used reused for gardening and toilet flushing.	
3.5	<i>Implement plan to maintain or improve the site's and/or catchment's Important Water-Related Areas.</i>	

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3.5.1	<i>Practices set in the water stewardship plan to maintain and/or enhance the site's Important Water-Related Areas shall be implemented.</i>	 Yes
Comment	Site has a system in place for maintenance of IWRA's in the catchment. The best practices for maintenance of IWRA's have been implemented as listed below: - Renovation & Desiltation of Tanks and Check dams - Renovation and Recharge units to increase water availability - Catchment treatment works for Well recharge structures - Soil and water conservation measures	
3.5.2	<i>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.</i>	 Yes
Comment	In the catchment, various interventions were done to restore nonfunctioning IWRAs in collaboration with multi stakeholders. In the primary scope area, a total of 276 Structures were renovated / constructed and 1700 structures in the river basin. The comparison of before and after scenario of the projects are provided as evidence. Some of them are listed below: - Loose Boulder checks - Check Dam - Farm Pond - Open Well recharge structure - Trench Cum bunds - Tank during desiltation & rain water harvested	
Score	6	
3.5.3	<i>Advanced Indicator Evidence from a representative range of stakeholders showing consensus that the site is seen as positively contributing to the healthy status of Important Water-Related Areas in the catchment shall be identified.</i>	 Yes
Comment	It was quite evident from the stakeholder discussions that ITC has supported in contributing towards a healthy status of IWRAs. The appreciation letter showing consensus that the site is seen as positively contributing to the healthy status of Important Water Related Areas in the catchment has been provided in the manual. The following have been provided as evidence: - Appreciation letter by Krishi Vigyan Kendra / Gram Panchayat - Acknowledgement letter from Naviluru Gram Panchayat for ITC constructed Check Dam - Letter from Kasuvinahali Gram Panchayat to take up watershed Interventions in the gram panchayat The site has also undertaken various capacity building initiatives, which serve as a testament to the site's commitment to improving IWRAs in the catchment.	
Score	2	
3.6	<i>Implement plan to provide access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers at all premises under the site's control.</i>	
3.6.1	<i>Evidence of the site's provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers onsite shall be identified and where applicable, quantified.</i>	 Yes
Comment	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.	

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

Comment Site is not discharging any treated effluent water outside the boundaries as the same is utilized for gardening within the site premises. The catchment level water shed interventions under supply side management & demand side management (part of the water stewardship plan) are voluntary in nature and have been planned based on stakeholder engagement. 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.

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

Comment The site has engaged in enhancing Water, Sanitation, and Hygiene (WASH) in the primary scope area. A summary of the initiatives is provided below:
 - Capacity building to 37 School Development and Monitoring Committee members (SDMC)
 - Formation and strengthening of Child Cabinets, 42 nos.
 - Support for 28 schools for WASH infrastructures, including toilet blocks (separately for boys and girls), hand wash stations, purified drinking water stations, compound walls, etc.
 - Capacity building for mothers committee for 5 Anganwadis
 - Support for WASH infrastructures in 20 Anganwadis
 - Training of all 25 GP officials & PRI members in Nanjangud Taluk on Rural solid waste management and covered all households in the taluk under door to door awareness programme

Score 5

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

Comment 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. Site has worked in collaboration with various authorities for the following Programmes:
 - MoU with Zilla Panchayat for building capacity of Gram Panchayat, PRI members & Community on Solid waste management
 - Appreciation Letter from BEO, Nanjangudu, Education department for the support to Education works done for CSR works done in Nanjangud Taluk.
 - Child development & Planning Officer, Nanjanagud Letter to ITC stating ITC has supported for 25 anganwadis in the taluk & provided basic Infrastructures like Toilets, Hand wash station, Drinking water Platform, Compound, renovation & other works.
 - Taluk Level Communication: ITC Name is mentioned in Communication from Taluk Panchayat to Gram Panchayat
 - District Level Communication: ZP Mysuru letter to SBM Director by mentioning ITC support
 - Letter from Executive Officer, Nanjangud taluk about Solid waste managed in the taluk





 ITC had supported Swachh Bharat Mission Karnataka to prepare DPR for Devanur & Deviramanahalli Gram Panchayat GP for solid, Liquid & Faecal sludge management
 - Letter from Commissioner, Rural Development & Panchayat Raj, Govt of Karnataka about Light house Initiatives
 - ITC has developed 13 different IEC for SWM, LWM & FSW
 - Wall writings & Street plays to communicate WASH related awareness to Public

Score 4

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3.7	<i>Implement plan to maintain or improve indirect water use within the catchment:</i>	
3.7.1	<i>Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.</i>	 Yes
Comment	There are no targets w.r.t Indirect water use in the water stewardship plan. Site has mentioned that they have initiated communication with one of the suppliers and in future site may opt to take indirect water use target.	
3.7.2	<i>Evidence of engagement with suppliers and service providers, as well as, when applicable, actions they have taken in the catchment as a result of the site's engagement related to indirect water use, shall be identified.</i>	 Obs.
Comment	Site has mentioned that they do not have any supplier or service provider within the catchment.	
3.7.3	<i>Advanced Indicator Actions taken to address water related risks and challenges related to indirect water use outside the catchment shall be documented and evaluated.</i>	 Yes
Comment	<p>The major raw material for site is tobacco leaf. Indian tobacco production is pre-dominantly rain fed, there are a few nodes in the farm supply chain for which water is critical. To address water risks in the tobacco supply chain, ABD division of ITC group 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.</p> <p>A representative sample fields were visited during the catchment tour to understand the water usage practices of tobacco farmers. ITC team engages with the famers and villages for a no. of interventions to address water related risks. The interventions at the farm level are listed below:</p> <ul style="list-style-type: none"> - Varieties tolerant to biotic & abiotic stress - Sub soiling and biological interventions to improve root penetration and water holding capacity of the soil - Tray Seedling for savings in quantity of water used over the conventional raised bed method of nursery - Water Scheduling to avoid under or overwatering - Drip Irrigation & Fertigation for improved irrigation efficiency - Smart Irrigation to reduce water requirements by 50% and improve farm productivity by 10%, additionally over drip method - Drone Technology for spraying of agrochemicals to reduce water usage up to 90% when compared with conventional spraying <p>The site has also engaged with CFC supplier, M/s WadPak team where possible collaborations to improve water efficiency and to reduce the specific water consumption were discussed along with water related risks, challenges and opportunities.</p>	
Score	6	
3.8	<i>Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have.</i>	
3.8.1	<i>Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.</i>	 Yes

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Comment	<p>The site and nearby industries receive water from Karnataka Industrial Areas Development Board (KIADB). The site team has a mechanism of joint inspections with KIADB officials on the condition of Storage tanks and pump house infrastructure. The site team had such inspections in 2021 and 2023. The infrastructure like Pumps and tanks are found in working condition and no need for intervention from site side. Some photos have been shared as evidence.</p> <p>The site has provided evidence of extensive engagement with owners of water infrastructure throughout the catchment. In catchment, all interventions are planned, implemented & monitored through stakeholders representing Govt Departments, Gram panchayats, Taluk Panchayats, Govt & Private institutions, Farmers, Expert organization, volunteer organizations & other relevant stakeholders.</p>	
3.9	<p><i>Implement actions to achieve best practice towards AWS outcomes: continually improve towards achieving sectoral best practice having a local/catchment, regional, or national relevance.</i></p>	
3.9.1	<p><i>Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.</i></p>	 Yes
Comment	<p>The site has implemented actions throughout the villages in the primary scope area within the catchment towards achieving best practice, related to water governance. The related evidences have been provided for compliance.</p>	
3.9.2	<p><i>Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.</i></p>	 Yes
Comment	<p>The site has implemented actions at site and throughout the villages in the primary scope area within the catchment towards achieving best practice, related to water balance. For site, a no. of initiatives have been implemented for water savings of 12,150 kL per year by implementation of various listed water conservation initiatives. There is a improvement in specific water consumption of the unit by around 28% compared from 2018-19 with 2022-23. For catchment, supply side and demand side interventions have been implemented.</p>	
3.9.3	<p><i>Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.</i></p>	 Obs.
Comment	<p>The site has implemented following actions towards achieving best practice for water quality at site:</p> <ol style="list-style-type: none"> 1. Monitoring of the drinking water parameters with in-house and third party certified laboratories to constantly keep track of the water quality. 2. Best on-site practices for water quality are based on national standards as governed by Bureau of Indian Standards (BIS) like: IS 10500 (2012): Drinking water specification 3. Drinking water quality against IS 10500 standard being tested by NABL lab every quarter 4. UF provided for all drinking water points <p>For catchment, following agricultural practices have been implemented for indirect improvement in water quality:</p> <ul style="list-style-type: none"> - Micro Irrigation & Mulching in the Agriculture lands - Catchment Treatment with Boulder checks to reduce siltation of the IWRAs - IPM & INM Practices to reduce application of Chemical fertilisers & Pesticides - Solid Waste Management (Reduction of Black spots) - Wet waste management at source - Door to door collection of dry waste in all Villages 	
3.9.4	<p><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></p>	 Yes
Comment	<p>The site has implemented actions towards achieving best practice, related to maintenance of Important Water-Related Areas in the primary scope area (as there are no IWRAs at site) such as Renovation & Desiltation of Tanks / Checkdams at Water Harvesting Structures in primary scope area. The evidence for same is provided.</p>	

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3.9.5	<i>Actions towards achieving best practice related to targets in terms of WASH shall be implemented.</i>	 Yes
Comment	<p>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 primary scope area. A brief summary of the initiatives is provided below:</p> <ul style="list-style-type: none"> - Site has supported in enhancing WASH infrastructures in schools and Anganwadis. The company collaborates with Gram Panchayats for solid waste management and drinking water initiatives. - Promoting institutions, including School Development and Management Committees (SDMC), Mothers' Committees, Village Water and Sanitation Committees (VWSC). These entities are encouraged to plan, implement, and manage essential infrastructures. - ITC has undertaken initiatives to raise awareness among residents and instigate behavioral changes pertaining to safe sanitation. These efforts align with the government initiative of 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	<p>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. The site have set target of formation of 12 Tank User Groups. Up to now, the following have been promoted / formed:</p> <ul style="list-style-type: none"> - 11 Vibrant Tank User Groups ,2 Watershed Committees ,5 ABCs ,97 Farmers field schools student farmers group are promoted in the Catchment - 37 SDMCs,5 Anganwadi Mother Committees, 42 Child cabinets & 25 Gram Panchayats are strengthened to Govern WASH interventions - Annual Workshops with all stakeholders being conducted since last 4 years 	
Score	8	
3.9.7	<i>Advanced Indicator Achievement of identified best practice related to targets in terms of sustainable water balance shall be quantified.</i>	 Yes
Comment	<p>The site has identified and implemented several Water saving initiatives which has resulted in significant Water savings of approx. 12150 m3/year. In the primary scope area, the site has overachieved the planned targets such as:</p> <ul style="list-style-type: none"> - Land treatment done in 392 Ha - Renovated /constructed 276 Important water related structures - Additional water storage capacity of 70207 Cum - Sustainable agriculture in 1612 Ha & - Tree based farming promotion in 784 Ha 	
Score	8	
3.9.8	<i>Advanced Indicator Achievement of identified best practices related to targets in terms of water quality shall be quantified</i>	 Obs.
Comment	<p>The site has listed best practices adopted by the site for maintaining the treated water quality parameters well within the limits set by KSPCB. At catchment, site has provided details of tank silt application which has reduced application of fertilisers by up to 42%. Apart from this, site has also mentioned about Solid waste management in the Villages of primary scope area. Site has performed water quality testing at 15 locations during October 2023 and have gathered publicly available data for groundwater and river water quality for 2020 for comparison of water quality data. However, the water quality data for both period are for different locations. There is no quantification on the improvement in water quality due to the implementations.</p>	

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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	Site has provided details of implementations of identified best practices related to site's maintenance of Important Water-Related Areas. ITC restored /constructed about 276 Structures (IWRAs) & 1700 Structures in primary scope area with additional storage capacity of 48.51 Lakh cum. The impact from Water stewardship Interventions in the catchment are listed below: 1. Water spread area increased from 393 Ha to 492 Ha 2. Green cover improved from 9391 to 20005 Ha 3. Cropping intensity increased from 94% to 99% 4. Barren land reduced from 1743 Ha to 1016 Ha	
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	For site, dedicated agency has been deployed to continuously maintain the hygiene and cleanliness of the WASH facilities and sufficient facilities more than the requirement as per govt. norms. At catchment level, the following have been implemented: - Provided support to 28 schools for WASH infrastructures, including toilet blocks (separately for boys and girls), hand wash stations, purified drinking water stations, compound walls, etc. - Support for WASH infrastructures in 20 Anganwadi's (427 students covered), encompassing facilities such as toilets, purified drinking water stations, compound walls, and teaching-learning wall writings - In surrounding 23 panchayats of Nanjangudu and Mysuru Taluk, worked with Schools & Anganwadi's to implement best hygiene practices & covered 36 schools & 20 Anganwadi's. - 32 Children events are conducted in all major schools in the catchment to create awareness on importance of sanitation among the children's - 32 Awareness Wall paintings on personal Hygiene, sanitation and Solid waste management as part of behavioural change program - Conducted training of all 25 GP officials & PRI members in Nanjangud Taluk on Rural solid waste management As per survey conducted during the fiscal year 2022-2023, there was significant progress in improving the WASH and sanitation status within primary scope area. All 53154 households have access to essential toilet facilities and safe drinking water.	
Score	4	
3.9.11	<i>Advanced Indicator</i> <i>A list of efforts to spread best practices shall be identified.</i>	 Yes
Comment	At Catchment level, the site has engaged with various stakeholders to spread the best practices through the following: 1) Tank user groups Meetings & Trainings 2) Farmers field schools 3) Workshop & events 4) SDMCs meetings 5) Child cabinets 6) Wall writings 7) Brochures 8) Video recordings 9) News coverage	
Score	3	

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3.9.12	<i>Advanced Indicator</i> <i>A list of collective action efforts, including the organizations involved, positions of responsible persons of other entities involved, and a description of the role played by the site shall be identified.</i>	 Yes
Comment	The site has prepared a table showing the collective actions and the role played by ITC and the institutions with name of the person involved from the institutions along with their designation. The evidence of engagement is reviewed and provided as annexures.	
Score	12	
3.9.13	<i>Advanced Indicator</i> <i>Evidence of the quantified improvement that has resulted from the collective action relative to a site-selected baseline date shall be identified and evidence from an appropriate range of stakeholders linked to the collective action (including both those implementing the action and those affected by the action) that the site is materially and positively contributing to the achievement of the collective action shall be identified.</i>	 Yes
Comment	The site has provided evidence that site actions at catchment are positively contributing to the achievement of the collective action were identified and are listed below: - Appreciation letter from JSS Krishi Vignana Kendra, Suttur mentioning ITC has supported the farming community since 5 years by Introducing various Water efficient & yield improvement practices in Paddy and other crops - Appreciation letter by Mysuru Zilla Panchayat to ITC and partner NGOs for the support provided through Trainings, Awareness and IEC programs which helped 130 GPs in Mysuru District to initiate Decentralized waste management - Appreciation letter for promotion of Biodiversity activity - Acknowledgement letter from Naviluru GP for ITC constructed Check Dam - Appreciation Letter from Agriculture department - Appreciation Letter from BEO, Nanjangudu, Education department for the support to Education works done for CSR works done in Nanjangud Taluk - Site's WASH interventions in schools have had a transformative effect on the community, with a noticeable increase in student enrollment compared from fiscal year 2020-21 to fiscal year 2021-22.	
Score	10	

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4 STEP 4: EVALUATE - Evaluate the site's performance.	
4.1	<i>Evaluate the site's performance in light of its actions and targets from its water stewardship plan and demonstrate its contribution to achieving water stewardship outcomes.</i>
4.1.1	<i>Performance against targets in the site's water stewardship plan and the contribution to achieving water stewardship outcomes shall be evaluated.</i>
Comment	<p>For site, annual achievement against the targets set in water stewardship plan is evaluated. For catchment, the site presented a summary of achievements against the targets for supply side interventions, demand side interventions and WASH interventions which shows annual implementations in the catchment. For evidence, site has presented the following sample evidence:</p> <ul style="list-style-type: none"> - Extract of audit report of NGOs (SNEHA and MYKAPS) - Completion report certified by NGO & along with completed works picture - Letter from CDPO certifying 23 Anganwadi works done by ITC in Nanjagud taluk - Check Dam NOC from Naviluru Panchayat Development Officer and Completion Report from Gram panchayat <p>Water related performance for site is also certified by Third Party and Reported in ITC Sustainability Report. Screenshots attached for Third Party Assurance for 2022-23.</p>
4.1.2	<i>Value creation resulting from the water stewardship plan shall be evaluated.</i>
Comment	<p>Site has evaluated value creation resulting from the improved agricultural practices, water savings through Demand Side management and the water related investments such as payments to regulatory authorities; payments to others through operating & maintenance costs.</p> <p>For catchment, site has mentioned about environmental, social, cultural value creation through activities as per stewardship plan.</p> <p>Site has also presented a case study on the impact of Check Dam in water conservation and sustainable development.</p>
4.1.3	<i>The shared value benefits in the catchment shall be identified and where applicable, quantified.</i>
Comment	<p>The site has identified shared values benefits that have resulted as a result of site water stewardship interventions are described below:</p> <ol style="list-style-type: none"> 1. Ground water Level increase in the catchment 2. Water spread area increased (by 25%) from 393 Ha to 492 Ha 3. Barren land is reduced (by 42%) from 1743 Ha to 1016 Ha 4. Cropping intensity is increased from 94% to 99% 5. Rabi crop area increased from 5116 Ha to 5204 Ha 6. Impact on Soil organic carbon - Improved (by 44%) from 0.41 to 0.6 7. Increase in children enrolment
4.1.4	<i>Advanced Indicator A governance or executive-level review, including discussion of shared water challenges, water risks, and opportunities, and any water-related cost savings or benefits realized, and any relevant incidents shall be identified.</i>

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Comment An executive level review takes place at the start of each financial year by the senior Management Committee. The Divisional Management Committee (MC) which include Chief Executive of Tobacco SBU. Unit also have a mechanism of reviewing Monthly Dash Board in which ESG / Sp. Water is a metric being reviewed by Unit Head. Unit have annual Management Objectives and Targets and Management Programs to achieve those targets defined and reviewed during Management review meetings, which are held annually and headed by Unit head.

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.

The following agenda is discussed in the review meeting:

- catchment level water related challenges
- Risks and opportunities
- supply side and demand side water management interventions, savings water balance

Score 3

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

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

 Yes

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

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

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

 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

At Site Level, unit is in regular interaction with Divisional Sustainability team, Divisional EHS Manager and other GLT EHS Managers and Utility managers every quarter to discuss and update the progress on AWS. The site has various level of reviews and discussion on all the targets including the ones highlighted in the water stewardship plan. Water conservation/ reduction targets form 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.

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

Comment The stakeholders such as village level institutions like tank user group (TUG), Agri Business Centres (ABC), Farmers field schools (FFS), Village sanitation committees, School development and monitoring committee (SDMC) and anganwadis mothers committee evaluate the site's efforts to address shared water challenges during monthly meetings. The following sample evidence were provided:

- The representatives from village institutions, gram panchayats and government departments will evaluate and review once in six months.
- Mr. Ravi, Asst. Director of Agriculture of Nanjangudu feedback during Stakeholders workshop where he expressed that through ITC support, water budget was prepared and WHS, check dam, farm ponds, recharge wells were constructed
- Mr. Shamraj, Agri Scientist of Krishi Vignaayan Kendra, Suttur feedback during Stakeholders workshop where he expressed that they benefitted through tank renovation, Farm ponds, DSR, Panipipe in paddy crop and other crop interventions which helped to improve ground water level
- Mr. Manjunath, PDO of Naviluru panchayat feedback during Stakeholders workshop where he expressed that they benefitted through tank renovation which helped to improve ground water level
- Annual stakeholders meeting participated by Asst Director of Agriculture, Asst Horticulture Officer, KVK Scientist, Panchayat Development Officer, Gram Panchayat President, & over 100 plus farmers to discuss on water stewardship progress

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.*

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

Comment At site level, based on feedback received from the stakeholder, the action plans for water conservation are modified & incorporated for setting next year water reduction target. At catchment level, stakeholder consultations through focus group discussions, key interviews, and site visits to understand priority stakeholder needs and plan annual activities. There are no previous version of Water stewardship plan being 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.

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5 STEP 5: COMMUNICATE & DISCLOSE - Communicate about water stewardship and disclose the site's stewardship efforts	
5.1	<i>Disclose water-related internal governance of the site's management, including the positions of those accountable for legal compliance with water-related local laws and regulations.</i>
5.1.1	<i>The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed.</i>
Comment	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 at site like, Main Gate, near Canteen and at plant entrance. The EHS manager at site is responsible to ensure compliance to the water related laws and regulations as part of the site's internal governance structure for water stewardship.
5.2	<i>Communicate the water stewardship plan with relevant stakeholders.</i>
5.2.1	<i>The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.</i>
Comment	<p>Internal stakeholders like Employees and service provider workmen are updated on fundamentals of AWS, Water stewardship plan and need for Water savings etc. during daily meetings, employee engagement programs etc.</p> <p>Water Stewardship plan was communicated to Karnataka State Pollution Control Board (KSPCB) and Karnataka Industrial Areas Development Board (KIADB) and discussed during meetings.</p> <p>The team has a mechanism of periodic interactions between KGLT, ITC-Foods and IIVI Teams on various initiatives and progress. The teams were updated on the AWS outcomes, Risks and opportunities, possible collaborations to improve water efficiency and to reduce the specific water consumption.</p> <p>The Unit is in regular interaction with Divisional Sustainability team, Divisional EHS Manager and other GLT EHS Managers and Utility managers every quarter to discuss and update the progress on AWS. Also, water conservation/ reduction targets form 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.</p> <p>For catchment level, site discloses the water stewardship plan through various mediums like:</p> <ol style="list-style-type: none"> 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
5.3	<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>

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Comment The site discloses the water stewardship performance to internal and external stakeholders through various meetings.
For catchment stakeholders other than site, the site's water stewardship performance is disclosed through the following:
- AWS plan, progress and performance is disclosed at stakeholder meeting
- Display of Water Stewardship progress at villages through Wall Paintings highlighting AWS initiatives, Plan, Progress and the linkage to AWS Outcomes
- Display of progress against the WASH activities at villages
- Brochure on water security programme with plan & progress

5.3.2 *Advanced Indicator* ✔
Yes
The site's efforts to implement the AWS Standard shall be disclosed in the organization's annual report.

Comment The site's efforts to implement the AWS Standard are disclosed every year in the company's Annual Sustainability Report. The Annual Sustainability report mentions about target of 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

5.3.3 *Advanced Indicator* ✔
Yes
Benefits to the site and stakeholders from implementation of the AWS Standard shall be quantified in the organization's annual report.

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 *Disclose efforts to collectively address shared water challenges, including: associated efforts to address the challenges; engagement with stakeholders; and co-ordination with public-sector agencies.*

5.4.1 *The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.* ✔
Yes

Comment The site's shared water-related challenges and efforts made to address these challenges have been disclosed 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, IECs, murals and wall paintings.

5.4.2 *Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.* ✔
Yes

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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
- Gram panchayat (GP President, PDOs & GP Members)
- Village community & Farmers (TUG/WUG President & Members, Lead Farmers & Beneficiaries from the Working Villages)
- Agriculture & Horticulture department
- Forest Department (Range Forest Officers {RFO} & DRFO)
- NGO's (MYKAPS & SNEHA)
- Women & child Development
- Department of Primary Education
- Zilla Panchayat, Mysuru & Taluk Panchayat, Nanjangudu
- Karnataka State pollution control board
- Karnataka Industrial Areas Development Board

5.5 *Communicate transparency in water-related compliance: make any site water-related compliance violations available upon request as well as any corrective actions the site has taken to prevent future occurrences.*

5.5.1 *Any site water-related compliance violations and associated corrections shall be disclosed.*


Yes

Comment No water-related compliance violations have occurred at site .

5.5.2 *Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.*


Yes

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 Zero Effluent Discharge 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