

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)



Audit Number: AO-001042

### SITE DETAILS

Site: **ITC Paperboards & Specialty Papers Division- Bhadrachalam Unit**

Address: Sarapaka Village, Burgampahad Mandal, Bhadrachalam District, 507128, Telangana, Andhra Pradesh, INDIA

Contact Person: Malavika Gopinath

AWS Reference Number: AWS-000454

Site Structure: Single Site

### CERTIFICATION DETAILS

Certification status: Certified Platinum

Date of certification decision: 2024-Jul-16

Validity of certificate: 2027-May-15

### AUDIT DETAILS

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

Audit Type(s): Initial Audit

Audit Start Date: 2024-Mar-18

Lead Auditor: Amit Singh

Site Participants:

Sidhartha Mohanty, Other

Bharatwaajan Balaji, Corporate Sustainability

K Rambabu, Other

TSB Rao, Other

Prafulla Kumar Samanta, Other

K. Ravi Kumar, Other

B. Lakshminarayana, Other

R Jayaprakash Ramasamy, Other

Sagar Bhartiya, Other

Muralidhar V, Other

Pranav Sharma, Other

R. Veman, Other

Chengal Rao Durgaraju, Other

Phani Kumar Marella, Other

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001042

### ADDITIONAL INFO

**Summary of Audit Findings:** A total of 20 findings were raised during the certification audit: 1 major non-conformity, 9 minor non-conformities, 10 observations. The major non-conformity were of sufficient concern to warrant the categorisation of the non-conformity as major.

The Client is requested to perform a root cause analysis and define corrective actions for each of the non-conformities and to submit these to WSAS within 30 days of receipt of the audit report (by 11 July 2024).

The major non-conformity must be sufficiently addressed and evidence submitted to WSAS within 90 days of receipt of the report (by 09 September 2024).

The major non-conformities must be sufficiently addressed and evidence submitted to WSAS within 90 days of receipt of the report (by 09 September 2024).

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

The audit team recommends certification of ITC Paperboards & Specialty Papers Division - Bhadrachalam Unit at Platinum level pending approval of the corrective action plans and closure of the major non-conformity.

### CLOSURE OF FINDINGS AND CORRECTIVE ACTION PLAN:

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

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

**Scope of Assessment:** The scope of services covers the Initial certification audit for assessing conformity of ITC Paperboards & Specialty Papers Division - Bhadrachalam Unit against the AWS International Water Stewardship Standard Version 2.

ITC Ltd. - PSPD, Bhadrachalam unit is located at village Sarapaka, near Bhadrachalam, Bhadradi Kothagudem district, Telangana State and was established in the year 1979 for manufacturing of paper and multi-layer board. The pulp required for the facility is sourced from the in-house pulp mill. Wood required for making the pulp is sourced from a farm-forestry program in collaboration with farmers from various locations.

The audit was conducted onsite from 18th to 21st March 2024. The onsite site visit included the assessment of raw water intake pump house, water treatment plant, effluent treatment plant, fuel storage, chemical storage and raw material storage that were visited onsite as part of the audit.

### SCORE

130.00

### FINDINGS

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001042



NUMBER OF FINDINGS PER LEVEL	
Observation	10
Minor	9
Major	1

# CERTIFICATION REPORT

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Audit Number: AO-001042

### FINDING DETAILS

Finding No: TNR-009936  
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: For catchment level, the site needs to check the influence of site on stakeholders and influence of stakeholders on site, for example: the influence of site on other Industries located in the catchment may not be high.

Finding No: TNR-009939  
Checklist Item No: 1.3.2  
Status: In Progress - CA plan approved  
Finding level: Minor  
Checklist item: Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped  
Findings: Site has not considered mapping the rainwater potential available, rainwater recharged within premises, rainwater collection and stormwater runoff.

Corrective action: By law, the site is not permitted to recharge rainwater within its premises. As per Central Pollution Control Board classification, pulp and paper sector falls under the red category. Moreover, as per Gazette notification S.O. 3289(E) dated 24th September 2020 by Ministry of Jal Shakti (Department of Water resources, River development and Ganga Rejuvenation) (Central Ground Water Authority) rainwater recharge is not permitted at the site.

Storm water drain network is provided in entire mill to discharge the rainwater outside to river. And Rain water percolation pits are providing to colony new apartments

Thus, in line with the AWS Standard 2.0's Guidance document, the onsite rainwater has not been mapped, as the site does not store rainwater, and the rainwater drains quickly offsite.

Evidence of implementation: Nill

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001042

Finding No:	TNR-009940
Checklist Item No:	1.3.3
Status:	In Progress - CA plan approved
Finding level:	Minor
Checklist item:	Site water balance, inflows, losses, storage, and outflows, including indication of annual variance in water usage rates, shall be quantified. Where there is a water-related challenge that would be a threat to good water balance for people or environment, an indication of annual high and low variances shall be quantified.
Findings:	Site has not considered mapping and quantifying the rainwater potential available, rainwater recharged within premises, rainwater collection and stormwater runoff. The water balance of the premises shall change upon considering the rainwater.
Corrective action:	Thus, in line with the AWS Standard 2.0's Guidance document, the onsite rainwater has not been mapped, as the site does not store rainwater, and the rainwater drains quickly offsite. Onsite rainfall data was omitted from the response. This omission is due to the site's current practice of not making direct or indirect use of rainwater or storing it for future use. According to AWS Standard 2.0 Guidance, in such circumstances, the inclusion of onsite rainfall and runoff data is not mandated.
Evidence of implementation:	Nil
Finding No:	TNR-009967
Checklist Item No:	1.3.7
Status:	Open
Finding level:	Observation
Checklist item:	Annual water-related costs, revenues, and a description or quantification of the social, cultural, environmental, or economic water-related value generated by the site shall be identified and used to inform the evaluation of the plan in 4.1.2.
Findings:	The site has also listed social, cultural, economic and environmental value generated by the site. Site has quantified the Environmental and Social Value creation. However, these relate to the catchment.

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001042

Finding No:	TNR-009973
Checklist Item No:	1.4.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Mar-21
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:	Site has mentioned that the Bhadrachalam catchment is water surplus and falls within the safe aquifer as per Central Ground Water Board categorization. There are no details mentioned about the water quality at the primary input locations.
Corrective action:	<p>The site has collected primary and secondary data on water quality at the primary input locations within the catchment, and has highlighted the same through its responses to various indicators (1.1.1, 1.5.4), however, has not emphasized the same here.</p> <p>Based on the primary data collected by the site and the available secondary information, there are no water quality issues at the site. The secondary data includes information from:</p> <ol style="list-style-type: none"><li>1. CPCB’s National Water Quality Monitoring Data 2021</li><li>2. CGWB data on groundwater quality at three locations in the taluk</li></ol> <p>Additionally, the site has also conducted primary data collection at select points:</p>
Evidence of implementation:	Indicator 1.5.4 attached for Quality monitoring

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001042

Finding No:	TNR-009972																																																																																
Checklist Item No:	1.4.2																																																																																
Status:	In Progress - CA plan approved																																																																																
Finding level:	Minor																																																																																
Due date:	2025-Mar-21																																																																																
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 has not gathered information from any of the outsourced service providers such as the transport service provider for the plant.																																																																																
Corrective action:	<p>The site has interacted with transport contractors and gathered information about water usage in washing transport vehicles:</p> <table><tr><th>Transporter</th><th>Vehicles</th><th>Frequency</th><th>Approximate quantity per vehicle</th><th>Total water requirement in month in liters</th></tr><tr><td>M/s Lakshmi Ganapathi</td><td>1 big car (6 seater) &amp; 4 small cars (4 seater)</td><td>Twice in a week</td><td></td><td>40 liters</td></tr><tr><td></td><td></td><td></td><td></td><td>1600</td></tr><tr><td>M/s Manikanta Travels</td><td>1 big car (6 seater) &amp; 4 small cars (4 seater)</td><td>Thrice in a week</td><td></td><td>15 liters</td></tr><tr><td></td><td></td><td></td><td></td><td>900</td></tr><tr><td>M/s Medha travels</td><td>1 bus</td><td>Twice in a week</td><td></td><td>200 liters</td></tr><tr><td></td><td></td><td></td><td></td><td>1600</td></tr><tr><td>M/s UV Rao travels</td><td>4 buses</td><td>Twice in a week</td><td>40/400 liters</td><td>bucket /pressure wash</td></tr><tr><td></td><td></td><td></td><td></td><td>2880</td></tr><tr><td>M/s Rambabu Travels</td><td>1 big car (6 seater) 4 small cars (4 seater)</td><td>Twice in a week</td><td></td><td>40 liters</td></tr><tr><td></td><td></td><td></td><td></td><td>1600</td></tr><tr><td>M/s Sudhakar Reddy</td><td>1 big car (6 seater) 1 small car (4 seater)</td><td>Once in a week</td><td></td><td>50 liters for hose wash</td></tr><tr><td></td><td></td><td></td><td></td><td>800</td></tr><tr><td>M/s Sudhakar Reddy</td><td>1 big car (6 seater) 1 small car (4 seater)</td><td>Once in a month</td><td></td><td>200 liters for pressure wash</td></tr><tr><td></td><td></td><td></td><td></td><td></td></tr><tr><td></td><td></td><td></td><td></td><td>Total Water per month - 9380 liter and water foot print is 112 KL per year</td></tr></table> <p>Preventive action :</p> <p>The site has interacted with transport contractors and gathered information about water usage in washing transport vehicles as mentioned in above table. Now data available with site, will explore for optimization to possible extent in future.</p>	Transporter	Vehicles	Frequency	Approximate quantity per vehicle	Total water requirement in month in liters	M/s Lakshmi Ganapathi	1 big car (6 seater) & 4 small cars (4 seater)	Twice in a week		40 liters					1600	M/s Manikanta Travels	1 big car (6 seater) & 4 small cars (4 seater)	Thrice in a week		15 liters					900	M/s Medha travels	1 bus	Twice in a week		200 liters					1600	M/s UV Rao travels	4 buses	Twice in a week	40/400 liters	bucket /pressure wash					2880	M/s Rambabu Travels	1 big car (6 seater) 4 small cars (4 seater)	Twice in a week		40 liters					1600	M/s Sudhakar Reddy	1 big car (6 seater) 1 small car (4 seater)	Once in a week		50 liters for hose wash					800	M/s Sudhakar Reddy	1 big car (6 seater) 1 small car (4 seater)	Once in a month		200 liters for pressure wash										Total Water per month - 9380 liter and water foot print is 112 KL per year
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Evidence of implementation:	The site has interacted with transport contractors and gathered information about water usage in washing transport vehicles as mentioned in table.																																																																																

# CERTIFICATION REPORT

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Audit Number: AO-001042

Finding No:	TNR-009974
Checklist Item No:	1.5.3
Status:	Open
Finding level:	Observation
Checklist item:	The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.
Findings:	The data captured for estimating catchment water balance is quite old. The site should consider estimating the current catchment water balance as site has implemented various solutions mentioned in the Water security report.
Finding No:	TNR-009975
Checklist Item No:	1.5.4
Status:	Open
Finding level:	Observation
Checklist item:	Water quality, including physical, chemical, and biological status, of the catchment shall be identified, and where possible, quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be identified.
Findings:	The site should consider monitoring groundwater level data for the catchment as there is variation in quality parameters. There are no indication of annual or seasonal high and low variances identified by site.
Finding No:	TNR-009976
Checklist Item No:	1.5.5
Status:	Open
Finding level:	Observation
Checklist item:	Important Water-Related Areas shall be identified, and where appropriate, mapped, and their status assessed including any threats to people or the natural environment, using scientific information and through stakeholder engagement.
Findings:	The site should reconsider identifying the IWRA's. For example: Groundwater aquifer in the area shall not be identified as an IWRA.
Finding No:	TNR-009977
Checklist Item No:	1.5.6
Status:	Open
Finding level:	Observation
Checklist item:	Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.
Findings:	Site has not identified its water supply infrastructure from Godavari river and its potential exposure to extreme events.



# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001042

Finding No:	TNR-009979
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:	Potential costs may be relooked as those have not been defined correctly.
Finding No:	TNR-009981
Checklist Item No:	1.8.3
Status:	Open
Finding level:	Observation
Checklist item:	Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.
Findings:	The identified best practices for water quality are very limited. The site should consider identifying more relevant best practices related to water quality.
Finding No:	TNR-010266
Checklist Item No:	1.8.4
Status:	Open
Finding level:	Observation
Checklist item:	Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.
Findings:	<p>The site has identified best practices related to IWRA such as Farm Ponds, rainwater harvesting structures.</p> <p>The site should also consider identifying more relevant best practices for maintenance of other Important Water-Related Areas (such as water streams, wells, etc.)</p>

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001042

Finding No:	TNR-009989
Checklist Item No:	2.4.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Mar-21
Checklist item:	A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.
Findings:	There is no specific plan developed in co-ordination with relevant public-sector and infrastructure agencies to mitigate the identified water risk for breakdown of intake pump house, etc.
Corrective action:	<p>As shown in the figure 1.4 (under indicator 1.1.1), the site its own private water pipeline that runs many kms to supply water from the intake pump house.</p> <p>It is to be noted that the site is not located in an industrial area and there are no industries or other public sector agencies adjacent to the factory, with whom the site can develop coordinated plan of action to mitigate the water risk.</p> <p>Moreover, since the pipeline is privately owned by the site, the risk of pipeline breakdown is solely managed by the site. This is done through a robust internal maintenance plan, that included periodical maintenance of pumps, desilting of intake well every year, etc. to mitigate / avoid water risks. The details of the same are also mentioned in Table 1.1 in the response to indicator 1.1.1 (also provided as evidence). The same was also highlighted during the visit to the plant visit at the AWS audit.</p>
Evidence of implementation:	Indicator 1.1.1 (b) attached for the reference, which is discussed during the audit.
Finding No:	TNR-010009
Checklist Item No:	3.4.1
Status:	Open
Finding level:	Observation
Checklist item:	Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.
Findings:	It is not clear how the catchment area treatment is improving water quality targets.

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)



Audit Number: AO-001042

Finding No:	TNR-010012
Checklist Item No:	3.7.1
Status:	Closed
Finding level:	Major
Due date:	2024-Sep-09
Checklist item:	Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.
Findings:	Site has not set any indirect water use targets in the water stewardship plan. Other than wood, chemicals and imported pulp are the other raw materials used in the facility. Site also operates Co-Generation Power Plant to cater process steam and Power requirements. Site has not considered any water used in its supply chain for products and services, other than wood or water used on site.

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001042

### Corrective action:

The site had conducted an exercise to map the indirect water use from its supply chain in the indicators 1.4.1-1.4.3.

According to that analysis, nearly 85% of its raw materials comprises of wood, followed by chemicals (8%) and imported pulp (7%). Based on secondary sources, it was identified that wood has a very high quantity of embedded water (~750 m3 per ton on an average) compared to the other raw materials (the amount of embedded water in chemicals and imported pulp ranges between 5 – 20 m3 per ton).

Accordingly, over the years, ITC has focused on developing and promoting high-yield, surface feeding-based pulpwood clones, through its agroforestry programs that have a lower embedded water use. Moreover, ITC also has a publicly committed 2030 goal to increase the area of its agroforestry programs to 1.5 million acres, and annually discloses the progress (1.16 million acres cumulatively covered as of Mar 2024).

Moreover, the site also runs a green supply chain program (mention briefly in Indicator 3.7.3), under which ~30 vendors (majority being paperboard converters that do not use water for process) have taken targets on various environmental metrics, including specific water consumption and have periodically shared their progress. It is to be noted that the green supply chain program includes a chemical supplier (M/s IVAX), but is located outside the catchment.

The above measures emphasize the commitment of ITC to enhance the environmental footprint of its operations, including in its supply chain.

Following the AWS audit, the site is increasing the coverage of chemical suppliers with water related targets to reduce its indirect water use. Subsequently, the site has set indirect water use targets for 2 chemical suppliers M/s White Star and M/s Fimakem that are located within the catchment, and are also among top 10 chemical suppliers on basis of quantity supplied.

Consequently, ITC has created awareness about alliance for water stewardship program to these suppliers and enabled them to set the targets for the water consumption at their site. The site interacted with the suppliers to understand their water monitoring system, targets for the 2024-25, and has suggested water conservation measures to achieve the same.

Please refer below for details of the targets taken by the suppliers

1 M/s White star is supplying both Ferric and Non-Ferric Alum to M/s ITC PSPD Bhadrachalam unit has taken a target of 0.6 kl/ton for both their products being supplied to Unit ITC PSPD BCM for the year 2024-25.

2 M/s Fimakem which is supplying 3 chemicals to M/s ITC PSPD Bhadrachalam unit has taken target of 0.29 kl/ton for all three products for year 2024-25.

Moreover, it is to be noted that the water consumed for power generation within the site is accounted for in the water balance, provided

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001042

in the indicator 1.3.3.

Way forward 2025-26:

As a significant share of the site's indirect water use comes from the wood procured, the site would continue its primary focus of expanding the agro forestry program.

In addition to that, the site would progressively engage with its supply chain partners, to reduce their specific water consumption, to the possible extent.

Evidence of implementation: List of top 10 suppliers list attached , Communication about AWS & Water consumption targets of chemical suppliers with in the catchment and same has been updated in indicator 2.3.2 Part A: Water stewardship plan within the fence (plant activities)

Finding No: TNR-010013

Checklist Item No: 3.7.2

Status: In Progress - CA plan approved

Finding level: Minor

Due date: 2025-Mar-21

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 is no evidence to indicate that the site has made an effort to engage with suppliers and service providers related to indirect water use.

Corrective action: The site already had a green supply chain program through with its engaged with ~30 vendors to take targets on reducing their environmental footprint, which included specific water consumption. Amongst these vendors, M/s IVAX Chemicals had specific water consumption targets, but was located outside the catchment.

Subsequently, the site has started engagement with 2 no's chemical suppliers M/s Fimakem and M/s White star, both are within the catchment. The site has also engaged with M/s IVAX chemicals which is outside the catchment. The site has taken their specific water consumption targets and the same are updated in Step 2 manual in indicator 2.3.2.

Evidence of implementation: List of top 10 suppliers list attached , Communication about AWS & Water consumption targets of chemical suppliers with in the catchment and same has been updated in indicator 2.3.2 Part A: Water stewardship plan within the fence (plant activities)

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001042

Finding No:	TNR-010014
Checklist Item No:	4.4.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Mar-21
Checklist item:	The site's water stewardship plan shall be modified and adapted to incorporate any relevant information and lessons learned from the evaluations in this step and these changes shall be identified.
Findings:	The site is required to redesign the way in which the water stewardship plan is presented in order to showcase the modifications, adaptations and lessons learned so as to modify the water stewardship plan.
Corrective action:	<p>The site sets a target in its water stewardship plan after extensive stakeholder collaboration through surveys and stakeholder meetings during its Core Area Perspective Plan (CAPP) assessments. These targets are broad and have a five-year timeline, which is then detailed into annual plans. Stakeholder feedback on the site's action plans to achieve these targets is received regularly through various request letters. These request letters are incorporated into the site's action plan for the year. In summary, the feedback from stakeholders pertains to smaller action plans, which are adequately considered and addressed. Often, feedback from stakeholders is not specifically about the AWS targets mentioned in the water stewardship plan, but are appreciative in nature.</p> <p>During various stakeholder meetings, feedback is recorded and discussed in the Unit AWS Committee meeting. Moving forward, the site will redesign the presentation of the water stewardship plan to showcase modifications, adaptations, and lessons learned, thereby enhancing the plan.</p>
Evidence of implementation:	<ul style="list-style-type: none"><li>• Annexure-1: BCM CAPP Report 2021</li><li>• Attached Manual of Step 4 for Review meeting with senior management -Screenshot of MS teams meeting (AWS Manual 4.1.4) and Details are provided in manual 4.4.1, 4.1.4 &amp; 4.3.2.</li></ul>

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001042

Finding No:	TNR-010019
Checklist Item No:	5.2.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Mar-21
Checklist item:	The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders.
Findings:	The site should disclose the water stewardship plan (and how the water stewardship plan contributes to AWS Standard outcomes) of site with other relevant stakeholders including the government authorities.
Corrective action:	<p>The site has effectively utilized various methods to communicate its AWS progress and outcomes to stakeholders, including:</p> <ol style="list-style-type: none"><li>1. Stakeholder Meetings at various levels: The site organizes discussions, meetings, and workshops, referred to as water melas, to showcase the performance of water stewardship. For instance, in March 2024, the water mela highlighted the progress and status of activities as part of an annual event. This meeting included participation from Gram Panchayats (GP) Secretaries, NGOs, and other government authorities such as the Assistant Director of Agriculture, Programme Officer of KVK, Education Department, and ICDS Department. These discussions also occur at the village level, where water stewardship plans and progress are disclosed in the presence of Gram Panchayat officials. (Refer to Annexures 1, 2, &amp; 3: Activity Disclosure at Water Mela, Muslimadugu, and Vepalagadda Village)</li><li>2. Brochures: Various brochures are distributed to highlight the planned activities and achievements in water stewardship. (See Annexure 5: Brochure Related to Water Stewardship Achievement).</li></ol> <p>While these communication initiatives are actively undertaken, it is acknowledged that they were not sufficiently emphasized in the response to the indicator. In future, the site will ensure to improve on documentation and provide a clearer and more comprehensive account of these engagement efforts.</p> <p>Preventive Action :</p> <p>The site will continue ongoing engagement with relevant stakeholders and will continue to communicate the water stewardship plan during these interactions. In future responses to the indicator, the site will ensure that these communication efforts are appropriately highlighted to provide a more comprehensive view of its engagement activities.</p>
Evidence of implementation:	<p>Annexure 1: Activity Disclosure MoM in Water Mela</p> <p>Annexure 2: Brochure Related to Water Stewardship Activity &amp; its Achievements.</p> <p>Annexure 3: ITCs Annual Sustainability Report 2023, Page 90.</p>

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001042

Finding No:	TNR-010020
Checklist Item No:	5.3.1
Status:	In Progress - CA plan approved
Finding level:	Minor
Due date:	2025-Mar-21
Checklist item:	A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum.
Findings:	Site has not disclosed the water stewardship performance of site with other relevant stakeholders including the government authorities.
Corrective action:	<p>The site actively employs various methods to communicate its targets and progress on the water stewardship plan to stakeholders. These engagement methods include:</p> <ol style="list-style-type: none"><li>1. Stakeholder Meetings at various levels: The site organizes discussions, meetings, and workshops, referred to as water melas, to showcase the performance of water stewardship. For instance, in March 2024, the water mela highlighted the progress and status of activities as part of an annual event. This meeting included participation from Gram Panchayats (GP) Secretaries, NGOs, and other government authorities such as the Assistant Director of Agriculture, Programme Officer of KVK, Education Department, and ICDS Department. These discussions also occur at the village level, where water stewardship plans and progress are disclosed in the presence of Gram Panchayat officials. (Evidences are shown in the Annexures 1, 2, &amp; 3: Activity Disclosure at Water Mela, Krishna Sagar, and Vepalagadda Village). The Sites environmental manger have regular meeting local state pollution control board officer, discuss with him regarding fresh water and waste water details in the mill. The same details are uploaded in Govt portal on monthly basis. The Company personal manager regularly meets the district govt authorities like Collectors, Irrigation dept. and Gram panchayats and update about water steward ship activities.</li><li>2. Brochures: Various brochures are distributed to highlight the planned activities and progress achieved in water stewardship. (Evidences are shown in the Annexure 5: Brochure Related to Water Stewardship Achievement).</li><li>3. ITC's Annual Sustainability Report: The site's consolidated progress in the entire Mureru River Basin is featured in ITC's Annual Sustainability Report. (Evidences are shown in the Annexure 6: ITC's Annual Sustainability Report 2023, Page 90).</li></ol>
Preventive action :	<p>The site will continue ongoing communication with relevant stakeholders and will continue to emphasize the progress achieved on the water stewardship plan during these communications. In future responses to the indicator, the site will ensure that these communication efforts are appropriately highlighted to provide a more comprehensive view of its engagement activities with various stakeholders including govt authority.</p>



# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)



Audit Number: AO-001042

Evidence of implementation: Annexure 1: Activity Disclosure MoM in Water Mela  
Annexure 2: Brochure Related to Water Stewardship Activity & its Achievements.  
Annexure 3: ITCs Annual Sustainability Report 2023, Page 90.

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001042

Report Details

Report	Value
Report prepared by	Amit Singh
Report approved by	Gregorio Crespo
Report approved on (Date)	31/05/2024

Surveillance

Proposed date for next audit  
2025-Mar-17

Comment      The proposed date for next audit i.e. Surveillance Audit is 17th March 2025.

Stakeholder Announcements

Date of publication	Location
08/01/2024	AWS Website
08/01/2024	WSAS Website
	Local Newspaper

Comment      The stakeholder announcements were done at AWS website, WSAS website and in the local newspaper by site.  
The links for stakeholder announcement at AWS and WSAS website are given below:  
<https://a4ws.org/wp-content/uploads/2023/12/AWS-000454-ITC-Bhadrachalam-StakeAnn.pdf>  
  
<https://watersas.org/wp-content/uploads/2024/01/AWS-000454-ITC-Bhadrachalam-StakeAnn.pdf>

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001042

### Catchment Information



Catchment.jpg

#### Catchment Information

The site is located in Godavari River basin which is covered in an area of 3,12,812 Sq Km. The catchment area of the basin extends over the states of Maharashtra (48.6%), Telangana (20% approx.), Madhya Pradesh (10.0%), Andhra Pradesh (3.4% approx.), Chhattisgarh (10.9%), Odisha (5.7%) & Karnataka (1.4%). There are no major water reservoirs on the Godavari River in the 200 Km upstream of the Bhadrachalam. The minor reservoir is located on the Kinnerasani, a tributary of the Godavari River. The Bhadrachalam Catchment (BC) is located in the south-eastern part and downstream of the Godavari River basin. The major tributary within the BC is the Kinnerasani River. Site has marked 10 km radius area as primary scope area for carrying out water stewardship activities.

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001042

### Client Description and Site Details



Site Water Map.png



Site Water Map1.jpg

#### Client/Site Background

ITC Ltd. - PSPD, Bhadrachalam unit is located at village Sarapaka, near Bhadrachalam, Bhadrachalam Kothagudem district, Telangana State and was established in the year 1979 for manufacturing of paper and multi-layer board. The pulp required for the facility is sourced from the in-house pulp mill. Wood required for making the pulp is sourced from a farm-forestry program in collaboration with farmers from various locations.

The facility is spread across 598 acres covering the main plant and colony. The facility is bordered by a highway on the south, and open fields on the northern side with a village pond and a natural first-order stream. A forest blank is located on the eastern side of the facility. The site sources water from the Godavari River through intake well at Iravandi village, which is located about 6 Km from the facility which is further treated at the plant water treatment plant for usage within the plant and colony.

Plant has also installed a wastewater treatment plant to meet the discharge norms stipulated by the state pollution control board.

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001042

### Summary of Shared Water Challenges

#### Summary of Shared Water Challenges

The site has identified the following shared water challenges:

- Water security and drought scenarios
- Increase in pressure on groundwater resources
- Increase in urban and industrial activities in the BC leading to unsafe disposal of sewage into the rivers
- Soil erosion
- Floods
- Lack of WASH facilities for schools
- Low water availability during non-monsoon period
- High agriculture water demand

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

#### 0.1.1 Eligibility Criteria

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

  
Yes

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

  
Yes

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

  
Yes

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001042

### 1 STEP 1: GATHER AND UNDERSTAND

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

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

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



**Comment**

The site has defined the plant boundaries which is spread across 598 acres covering the main plant and colony. The facility is bordered by a highway on the south, and open fields on the northern side with a village pond and a natural first-order stream. A forest blank is located on the eastern side of the facility.

The site sources water from the Godavari River through intake well at Iravendi village, which is located about 6 Km from the facility.

From the total intake water, partially water is supplied to the local villages (Iravendi, Sarapaka, and Reddypalem) and major amount of water is used for main plant operations & domestic needs within the plant and colony.

Plant has also installed a wastewater treatment plant to meet the discharge norms stipulated by the state pollution control board. the treated wastewater is partially used within the plant and partially being supplied to local farmers for irrigation needs. The excess unutilized treated wastewater is discharged into the downstream of River Godavari.

The site is located in Godavari River basin which is covered in an area of 3,12,812 Sq Km. The catchment area of the basin extends over the states of Maharashtra (48.6%), Telangana (20% approx.), Madhya Pradesh (10.0%), Andhra Pradesh (3.4% approx.), Chhattisgarh (10.9%), Odisha (5.7%) & Karnataka (1.4%). There are no major water reservoirs on the Godavari River in the 200 Km upstream of the Bhadrachalam. The minor reservoir is located on the Kinnersani, a tributary of the Godavari River. The Bhadrachalam Catchment (BC) is located in the south-eastern part and downstream of the Godavari River basin. The major tributary within the BC is the Kinnersani River.


Site has marked 10 km radius area as primary scope area for carrying out water stewardship activities.

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

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001042

1.2.1	<p><i>Stakeholders and their water-related challenges shall be identified. The process used for stakeholder identification shall be identified. This process shall:</i></p> <ul style="list-style-type: none"> <li><i>- Inclusively cover all relevant stakeholder groups including vulnerable, women, minority, and Indigenous people;</i></li> <li><i>- Consider the physical scope identified, including stakeholders, representative of the site's ultimate water source and ultimate receiving water body or bodies;</i></li> <li><i>- Provide evidence of stakeholder consultation on water-related interests and challenges;</i></li> <li><i>- Note that the ability and/or willingness of stakeholders to participate may vary across the relevant stakeholder groups;</i></li> <li><i>- Identify the degree of stakeholder engagement based on their level of interest and influence.</i></li> </ul>	 Yes
Comment	<p>The site has prepared methodology for stakeholder identification. Stakeholder identification is carried out as per the unit's SOP for Stakeholder identification &amp; Engagement (AWS/PSPD BCM/SOP) which lays down the basis of stakeholder identification and their degree of influence and interest.</p> <p>Based on the methodology, the stakeholders have been listed and prioritized based on their interest and influence in addressing the water related challenges. The stakeholders have been prioritised based on their interest and tabulated in the table. Site has also mentioned about involvement of vulnerable sections of society and women as stakeholders.</p>	
1.2.2	<p><i>Current and potential degree of influence between site and stakeholder shall be identified, within the catchment and considering the site's ultimate water source and ultimate receiving water body for wastewater.</i></p>	 Obs.
Comment	<p>The influence of the stakeholder on site and site on stakeholder has been identified which is carried out as per the unit's SOP for Stakeholder identification &amp; Engagement. 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.</p>	
1.3	<p><i>Gather water-related data for the site, including: water balance; water quality, Important Water-Related Areas, water governance, WASH; water-related costs, revenues, and shared value creation.</i></p>	
1.3.1	<p><i>Existing water-related incident response plans shall be identified.</i></p>	 Yes
Comment	<p>The site has an On-Site Water Emergency Response Plan (OSWERP) for water related emergency scenarios. 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.</p>	
1.3.2	<p><i>Site water balance, including inflows, losses, storage, and outflows shall be identified and mapped</i></p>	 in progress
Comment	<p>Site has prepared the water balance on average daily flow rate. The water balance includes water inflows, storages of different types of water at various locations, evaporation losses and outflows of treated wastewater.</p>	
<b>Finding No: TNR-009939</b>		
1.3.3	<p><i>Site water balance, inflows, losses, storage, and outflows, including indication of annual variance in water usage rates, shall be quantified. Where there is a water-related challenge that would be a threat to good water balance for people or environment, an indication of annual high and low variances shall be quantified.</i></p>	 in progress

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001042

**Comment** The site water balance is prepared for average water consumption per day based on values for F.Y. 2023-24 (till Dec'23). The inflows from river, water consumption at different sections of plant and outflows of treated wastewater are quantified and mapped.  
For year 2023, site has also tabulated the annual variances of total water consumption values, water consumption in plant processes, domestic water consumption and water supplied to local communities.

**Finding No: TNR-009940**

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

**Comment** The site has a defined structure for carrying out water quality testing in the inhouse laboratory and external NABL accredited laboratory:  
- Raw Water Quality monitoring daily (shiftwise) at internal laboratory  
- Drinking Water Quality monitoring daily at internal laboratory and quarterly at external laboratory  
- Groundwater quality quarterly at external laboratory  
- Effluent Treated Water continuous monitoring online, daily at internal laboratory and yearly at external laboratory  
Site has also tabulated the variances in effluent treated water quality for year 2023 and compared the same with the statutory requirements.  
Site has also gathered raw water quality data at the upstream of plant. Site has also tabulated ground water quality data annually being tested by external laboratory.

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

**Comment** Site has mapped the areas which are potential sources of pollution on site for polluting water such as Sodium Hydroxide storage tanks, Sulfuric acid storage, HSD & Furnace oil storage tanks, Methanol storage, Paper coating additives, Coating chemicals, Handling and storage of black liquor and Central chemicals truck unloading bay.

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

**Comment** Site has mentioned that there are no important Water-Related Areas (IWRA) inside the premises.

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

**Comment** Site has identified following costs involved with water-related activities - Capital expenditure associated with water conservation and internal water recycling activities, annual operating costs associated with raw water treatment, wastewater treatment, ETP laboratory costs, treated wastewater disposal and monitoring costs, and administrative costs.

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






**Comment** The site has mapped and tabulated the drinking water and toilet facilities available the site and have compared these against the requirement mandated as per The Telangana Factories Rules 1950 and IS 1172:1993 which shows adequate facilities are available against the requirement.  
The samples (photographic evidence) of Urinals, Hand wash stations, Hand driers, Drinking water points and sanitary napkin disposal machines are provided as evidence.



# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001042

<b>1.4</b>	<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>	
<b>1.4.1</b>	<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>	 in progress
Comment	Wood is the major source of raw material which contributes to 85% to 90% of the total raw materials used in the facility. Other than wood, Chemicals and Imported Pulp are the other raw materials used in the facility. Site has conducted research and produced eucalyptus clones that can consume less water against the conventional method of plantation demand.	
		<b>Finding No: TNR-009973</b>
<b>1.4.2</b>	<i>The embedded water use of outsourced services shall be identified, and where those services originate within the site's catchment, quantified.</i>	 in progress
Comment	Site has mentioned that there no other major outsourced activity that are water intense within the site's catchment area as the facility of canteen is taken up by in-house team.	
		<b>Finding No: TNR-009972</b>
<b>1.4.3</b>	<i>Advanced Indicator The embedded water use of primary inputs in catchment(s) of origin shall be quantified.</i>	 Obs.
Comment	Site has estimated embedded water (taking reference from some reports) for the following raw material: 1. Imported Bleach Soft Wood Pulp and Hardwood Pulp imported from Chile & Thailand 2. BCTMP Imported from Canada & Sweden 3. Caustic 4. Sulphuric acid 5. Wood  There is no evidence of site's engagement / communication with the suppliers to arrive at the embedded water use of the listed raw materials. The estimated water use does not reflect the present embedded water use.	
<b>1.5</b>	<i>Gather water-related data for the catchment, including water governance, water balance, water quality, Important Water-Related Areas, infrastructure, and WASH</i>	
<b>1.5.1</b>	<i>Water governance initiatives shall be identified, including catchment plan(s), water-related public policies, major publicly-led initiatives under way, and relevant goals to help inform site of possible opportunities for water stewardship collective action.</i>	 Yes
Comment	Water governance initiatives have been identified, including catchment plan(s), water-related public policies, major publicly-led initiatives with relevant goals. The site has engaged / referred to the policies of following authorities: - Irrigation and CAD department, Bhadradi Kothagudem district - Department of Agriculture Telangana Government - Horticulture and Sericulture department - Telangana State Pollution Control Board, Bhadradi Kothagudem district - State Groundwater Board - State Forest Department	
<b>1.5.2</b>	<i>Applicable water-related legal and regulatory requirements shall be identified, including legally-defined and/or stakeholder-verified customary water rights.</i>	 Yes

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001042






Comment	The site has identified water related legal and regulatory requirements as below: - Reporting water drawl details from Irrigation and CAD department - Reporting treated wastewater discharge quantities and quality as per conditions mentioned in consent to operate issued by State Pollution Control Board - Submission of six-monthly environmental compliance reports to Ministry of Environment and Forests, Regional Office Hyderabad - Plantation activities under state Harita Vanam program to State Forest Department	
1.5.3	<i>The catchment water-balance, and where applicable, scarcity, shall be quantified, including indication of annual, and where appropriate, seasonal, variance.</i>	Q Obs.
Comment	Site has conducted a study from external agency on "Water security in the Bhadrachalam Catchment within the Godavari Basin: Emerging issues and potential solutions" and report dt. April 2015. The report has examined emerging issues and potential solutions for enhancing the Water Security of the Bhadrachalam Catchment (BC) (which is part of the Godavari River basin in the Khammam District in the State of Telangana, India). The water balance for the Bhadrachalam catchment has been estimated. The water balance for the catchment is positive. However, the data captured is quite old. Site has also estimated water balance for the primary scope area using IWMI Draught Proofing tool.	
1.5.4	<i>Water quality, including physical, chemical, and biological status, of the catchment shall be identified, and where possible, quantified. Where there is a water-related challenge that would be a threat to good water quality status for people or environment, an indication of annual, and where appropriate, seasonal, high and low variances shall be identified.</i>	Q Obs.
Comment	Site has identified surface water and ground water quality data within the catchment. The following data has been captured: - River water quality data (including upstream and downstream Locations) - Groundwater conductivity levels as per Central Ground Water Board report - Groundwater quality of 6 piezometric wells (3 located within plant premises and 3 outside the premises) - Ground Water quality data at 8 locations within the primary scope area	
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>	Q Obs.
Comment	The following IWRA's have been mapped by site: - Godavari & Kinnerasani Rivers - Large Tanks and village tanks - Farm ponds - Catchment treatment - Sarapaka Beat Aswapuram Range Biodiversity Area - Kinnerasani Wildlife Sanctuary and Krishna Sagar reserved forest - Groundwater aquifer in the area Site has also tabulated the current status of IWRA's.	
1.5.6	<i>Existing and planned water-related infrastructure shall be identified, including condition and potential exposure to extreme events.</i>	✗ No
Comment	Site has identified the following major water related infrastructure: - Kinnerasani Reservoir - Sita Rama Lift Irrigation Scheme - Various village level water supply infrastructure Drinking water is supplied by the irrigation department to the villages under Mission Bhagiratha by installing water treatment facilities, water supply lines and village-level overhead water tanks.	

**Finding No: TNR-009977**

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001042


<b>1.5.7</b>	<i>The adequacy of available WASH services within the catchment shall be identified.</i>	 Yes
Comment	The adequacy of WASH services at the district level of catchment have been identified based on government data which states that the district has 100% access to drinking water facilities and 100% households are equipped with toilets. In addition, site has also assessed the adequacy of WASH services at schools within the primary scope area.	
<b>1.5.8</b>	<i>Advanced Indicator Efforts by the site to support and undertake catchment level water-related data collection shall be identified.</i>	 Yes
Comment	The site has undertaken following studies / referred to studies taken up by govt. authorities to gather catchment level water-related data: - Water security in the Bhadrachalam catchment within the Godavari Basin: Emerging issues and potential solutions - Core Area Perspective Plan, 2014 and 2022 - Micro-catchment watershed study - Environmental Impact Assessment Study of Expansion Project, 2022/2023	
Score	6	
<b>1.5.9</b>	<i>Advanced Indicator The adequacy of WASH provision within the catchments of origin of primary inputs shall be identified.</i>	 No
Comment	Plant has mentioned that it sources wood from various regions and majority are from Telangana. Site has presented the WASH data for Telangana state. There are primary inputs other than Wood. No efforts / evidence could be seen for site identifying the adequacy of WASH within the catchments of origin of primary inputs.	
<b>1.6</b>	<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>	
<b>1.6.1</b>	<i>Shared water challenges shall be identified and prioritized from the information gathered.</i>	 Yes
Comment	The site has identified the shared water challenges in the catchment through the study of available CAPP assessment reports and engagement with stakeholders. The shared water challenges are listed below: - Water security and drought scenarios - Increase in pressure on groundwater resources - Increase in urban and industrial activities in the BC leading to unsafe disposal of sewage into the rivers - Soil erosion - Floods - Lack of WASH facilities for schools - Low water availability during non-monsoon period - High agriculture water demand	
<b>1.6.2</b>	<i>Initiatives to address shared water challenges shall be identified.</i>	 Yes

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)


Audit Number: AO-001042

**Comment** The site has listed the initiatives to address the shared water challenges at the catchment level:  
For Supply Side:  
- De-siltation & formation of bund  
- Strengthening of tank & Farm Pond  
For Demand Side:  
- Water efficient agriculture practices for paddy i.e DSR, etc.  
Solid Waste management & Drainage line treatment  
Flood Rehabilitation centre & support  
Infrastructure development for schools & Households related to WASH & Drinking Water

**1.6.3** *Advanced Indicator*  
*Future water issues shall be identified, including anticipated impacts and trends*  **Yes**

**Comment** Site has identified following future water issues:  
- Intense precipitation  
- Increase in Urbanization  
- Increase in floods  
- Increase in Drought risk scenario  
The impacts of the Intense Rainfall as future climate hazard have been assessed as Very High for the moderate climate change scenario.


**Score** 3

**1.6.4** *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.*  **Yes**


**Comment** The site has identified potential water-related social impacts from the site and are listed below.  
At site level:  
- Drawl of fresh water from the river  
- Treated wastewater discharge for the irrigation needs of the local people  
At catchment level, site is developing village farm ponds which helps farmers with water during non-monsoon periods, leading to drought resilience and increase in income.

**Score** 4

**1.7** *Understand the site's water risks and opportunities: Assess and prioritize the water risks and opportunities affecting the site based upon the status of the site, existing risk management plans and/or the issues and future risk trends identified in 1.6.*

**1.7.1** *Water risks faced by the site shall be identified, and prioritized, including likelihood and severity of impact within a given timeframe, potential costs and business impact.*  **Obs.**

**Comment** The site has identified and prioritised the water risks, alongwith the timeframe, likelihood and severity of impact, business impact and potential costs.  
The risks have been categorised as physical risks, regulatory risk and reputational risk.

**1.7.2** *Water-related opportunities shall be identified, including how the site may participate, assessment and prioritization of potential savings, and business opportunities.*  **Yes**

**Comment** The site has identified water related opportunities with potential benefits and potential cost associated with the opportunities.

**1.8** *Understand best practice towards achieving AWS outcomes: Determining sectoral best practices having a local/catchment, regional, or national relevance.*

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001042

<b>1.8.1</b>	<i>Relevant catchment best practice for water governance shall be identified.</i>	 Yes
Comment	Site has identified catchment best practice for water governance and are listed below: <ul style="list-style-type: none"> <li>- Public disclosures</li> <li>- Capacity building of Water User Associations</li> <li>- FFS on Climate Smart &amp; Water-efficient agriculture practices</li> <li>- Engaging with peers and other local stakeholders</li> <li>- Strengthening of Water &amp; Sanitation Committees</li> <li>- Working with the forest department on biodiversity conservation projects</li> <li>- Establishment of Child Cabinets</li> <li>- Multi stakeholder Meetings</li> </ul>	
<b>1.8.2</b>	<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	Site has identified following sector best practices for water balance: <ul style="list-style-type: none"> <li>- Referring to the best management practices issued by different Paper Associations &amp; Research Institute</li> <li>- Best Available Technology reference document for the production of pulp, paper and board</li> </ul> Referring to the above site has presented various best practices for water balance.  For Catchment level, following best practices for water balance have been identified: <ul style="list-style-type: none"> <li>- Rejuvenation/Formation of Water Harvesting Structures</li> <li>- Promotion &amp; Demonstration of Water-Efficient Agriculture Practices</li> <li>- Catchment Treatment</li> <li>- Biodiversity Conservation</li> </ul>	
<b>1.8.3</b>	<i>Relevant sector and/or catchment best practice for water quality shall be identified, including rationale for data source.</i>	 Obs.
Comment	The site has identified and list a no. of activities as best practices for water quality. The relevant ones are listed below: At site level: <ul style="list-style-type: none"> <li>• Daily Raw Water quality analysis</li> </ul> At catchment: <ul style="list-style-type: none"> <li>• Catchment treatment &amp; WHSs</li> <li>• Waste Management</li> </ul>	
<b>1.8.4</b>	<i>Relevant catchment best practice for site maintenance of Important Water-Related Areas shall be identified.</i>	 Obs.
Comment	For site, there are no IWRA's. However, site has mentioned maintenance best practices for site related infrastructures. For catchment, one of the identified best practice for maintenance of Important Water-Related Areas is De-siltation and Bund strengthening.	
<b>1.8.5</b>	<i>Relevant sector and/or catchment best practice for site provision of equitable and adequate WASH services shall be identified.</i>	 Yes

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)







Audit Number: AO-001042

Comment	<p>Site has been involved in the following activities in catchment and have identified these as best practices for adequate WASH services:</p> <ul style="list-style-type: none"><li>- Strengthening of Governance Body by establishing Village Health, Sanitation, and Nutrition Committees (VHSNC) and Water and Sanitation (WATSAN) committees for effective management of water and sanitation at the community level.</li><li>- Extending support for the development of community sewer lines and the construction of soak pits</li><li>- Conducting awareness programs on sanitation, health, and hygiene activities among village-level communities</li><li>- Raising awareness among school children about Water, Sanitation, and Hygiene (WASH) activities</li><li>- Partnering with government departments to implement solid waste management</li><li>- Capacity-building support to Gram Panchayats on solid and liquid waste management</li></ul>
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# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001042

2	<b>STEP 2: COMMIT &amp; PLAN - Commit to be a responsible water steward and develop a Water Stewardship Plan</b>	
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"> <li>- That the site will implement and disclose progress on water stewardship program(s) to achieve improvements in AWS water stewardship outcomes</li> <li>- That the site implementation will be aligned to and in support of existing catchment sustainability plans</li> <li>- That the site's stakeholders will be engaged in an open and transparent way</li> <li>- That the site will allocate resources to implement the Standard.</li> </ul>	 <b>Yes</b>
Comment	The Water Stewardship Policy signed by Senior Vice President (who is also Unit Head) of ITC PSPD Bhadrachalam unit is displayed near the entry gate of plant. The Policy includes the commitments as per the standard requirement.	
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>	 <b>Yes</b>
Comment	The Water Stewardship Policy is signed by senior most executive of plant, i.e. Senior Vice President (who is also Unit Head) of ITC PSPD Bhadrachalam unit and is displayed near the entry gate of plant in two languages (English and local language).	
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"> <li>- Identification of responsible persons/positions within facility organizational structure</li> <li>- Process for submissions to regulatory agencies.</li> </ul>	 <b>Yes</b>
Comment	The site has a regulatory tracking BDO software tool, where all environmental regulations are mapped and monitored. All compliance obligations related to water and wastewater management are identified and also monitored in the legal register checklist of the site. This legal register checklist is reviewed on a monthly frequency. Site has also defined the monitoring structure at the site for water-related legal compliances.	
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>	 <b>Yes</b>



# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001042

**Comment** The site has developed a water specific strategy which has a vision and mission and separate Goals for site and catchment.  
Vision: Ensure water security for all stakeholders for Today & Tomorrow.  
Mission: Ensure water security for all stakeholders and to make catchment as water positive, ensuring positive water balance, strengthening water governance at catchment and site & adopting sustainable water use at site by adopting water efficient manufacturing practices and follow reduce, re-use and recycle of water conservation.  
Goals:  
At Site Level:  
• Reduce specific water consumption on a continual basis by improving water use efficiency.  
• Continuous monitoring and maintaining treated waste water quality as per statute.  
• Reuse and recycle of treated water.  
• Create awareness on responsible water consumption  
At Catchment Level:  
• Ensure sustainable supply side interventions through surface water harvesting and enhancing ground water recharge  
• Promote Water Use efficient demand side management practices and climate smart agriculture practices in the catchment  
• Promote catchment restoration practices- biodiversity conservation  
• Strengthen Water related governance and institutions in the catchment  
• Adopt efficient water management practices like rain water harvesting, conservation and recharges to reduce.  
• Integrating shallow aquifers to the water supply system.  
• Improving water use efficiency at the household level  
• Equitable & adequate WASH facility in primary focus area beneficiaries  
• Regular monitoring the water quality in catchment

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

  
Yes

**Comment** The site has prepared water stewardship plan, separately for the site and the catchment. The targets set in the WSP for site are:  
- To achieve the specific water consumption target of 30.3 m3/T by 2025  
- To ensure that treated water quality meets the regulatory norms  
- Maintaining the WASH facilities in good condition  
- To ensure that the facility meets all the prescribed environmental norms and conditions  
- Training and awareness & capacity-building activities  
For Catchment:  
- Creation of rainwater harvesting potential of additional 4 MCM in 15 KM by 2030  
- Promoting efficient water irrigation methods to reduce demand-side water consumption by the farmers in about 25,000 ha per year  
- Catchment area treatment by 2030 in 4000 Ha  
- Biodiversity conservation plots in 1000 Ha by 2030  
- Achieve ODF in the catchment and create and restore WASH facilities in the 70+ schools in the Burgampahad Mandal by 2030  
- Complete sewer drains in 5 identified villages (details in annex) around the factory by 2030  
- To support the local flood scenarios under state disaster management programs  
- Capacity Building of WUGs  
- Promoting solid waste management in 18 villages

**2.3.3** *Advanced Indicator*  
*The site's partnership/water stewardship activities with other sites within the same catchment (which may or may not be under the same organisational ownership) shall be identified and described.*

  
No



# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001042

Comment	Site has mentioned that there are no other factories in primary scope area, i.e., 10 km surrounding radius. There are a no. of major water users within the catchment. Site has communicated their intention of AWS within catchment with some of the nearby sites and mentioned that more engagement will happen in future. As of now, there have been no engagement with other sites within the same catchment.	
<b>2.3.4</b>	<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
Comment	Site has engaged with other ITC sites such as ITC PSPD at Kovai, ITC Tobacco & ITC Foods at Ranjangaon, ITC Tobacco at Bangalore, ITC Tobacco at Saharanpur and KGLT Mysuru in other catchments. The evidence of mail communication and meeting photographs have been presented as evidence.	
Score	4	
<b>2.3.5</b>	<i>Advanced Indicator</i> <i>Stakeholder consensus shall be sought on the site's water stewardship plan. Consensus should be achieved on at least one target. A list of targets that have consensus and in which stakeholders are involved shall be identified.</i>	 Yes
Comment	For catchment level targets, site continuously engages with the stakeholders for the yearly targets and achievements. Some of the evidence that relate to consensus on targets are: - Gram-Panchayath Sarpanch acknowledgment letter for Work Completion of Tank Work - NOC for WASH related work - MoU with Forest department - MoAgreement with Indian Institute of Rice Research	
Score	7	
<b>2.4</b>	<i>Demonstrate the site's responsiveness and resilience to respond to water risks</i>	
<b>2.4.1</b>	<i>A plan to mitigate or adapt to identified water risks developed in co-ordination with relevant public-sector and infrastructure agencies shall be identified.</i>	 in progress
Comment	Site has listed activities for mitigation of some of the risks identified in section 1.7.1 along with the agencies involved.	
<b>Finding No: TNR-009989</b>		
<b>2.4.2</b>	<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	Site has referred to UNOPS report on Climate Change Related Impacts in Telangana State which mentions that due to the increase in intensity of rainfall, and due to lower storage capacities, the frequency of increase in drought scenarios may be higher in the catchment. Site has mentioned activities for mitigation of identified water risks associated with climate change projections. Some of them being developed in co-ordination with relevant authorities.	
Score	6	

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001042

3 STEP 3: IMPLEMENT - Implement the site's stewardship plan and improve impacts	
3.1	Implement plan to participate positively in catchment governance.
3.1.1	Evidence that the site has supported good catchment governance shall be identified. <span>✓</span> Yes
Comment	<p>The site has provided enough evidence to confirm that the site has partnered with various stakeholders to support good catchment governance. Some of the partnerships are as follows:</p> <ul style="list-style-type: none"> <li>• Study partner: IWMI, and CAPP reports</li> <li>• Knowledge Partner: ICAR-Indian Institute of Rice Research.</li> <li>• Implementing partner: Various NGOs - MYRADA, Washi, SSGS &amp; MAMTA</li> <li>• Public Private Partnerships: Village Panchayats, local district administration, Forest Department, agriculture Department, Water User Associations (Agriculture Business centres (ABC), village schools' administration.</li> </ul>
3.1.2	Measures identified to respect the water rights of others including Indigenous peoples, that are not part of 3.2 shall be implemented. <span>✓</span> Yes
Comment	<p>The site has mentioned that it recognises the rights to water of farmers &amp; local community and supports for the following:</p> <ul style="list-style-type: none"> <li>• Water availability for agriculture</li> <li>• Water availability for drinking</li> <li>• WASH facilities</li> <li>• Water for cultural obligations</li> <li>• Water for flora and fauna</li> </ul> <p>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>Site has also presented sample case study for Demand side Interventions &amp; Supply side interventions.</p>
3.1.3	Advanced Indicator Evidence of improvements in water governance capacity from a site-selected baseline date shall be identified. <span>✓</span> Yes
Comment	Site has presented a Organo-gram of Water Cell with defined responsibilities for each Water Cell member covering various departments.
Score	2
3.1.4	Advanced Indicator Evidence from a representative range of stakeholders showing consensus that the site is seen as positively contributing to the good water governance of the catchment shall be identified. <span>✓</span> Yes
Comment	<p>The site has engaged with different stakeholders for the water stewardship activities in the catchment. The following evidence of engagement from different range of stakeholders with whom the site has interacted with on contributing to good water governance:</p> <ul style="list-style-type: none"> <li>- Appreciation Certificate from District Collector &amp; ITDA Department for their work in catchment for upliftment of the societies</li> <li>- Appreciation Letter by GP President for overall Water stewardship in the villages of catchment</li> </ul>
Score	2
3.2	Implement system to comply with water-related legal and regulatory requirements and respect water rights.

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)






Audit Number: AO-001042

<b>3.2.1</b>	<i>A process to verify full legal and regulatory compliance shall be implemented.</i>	 Yes
Comment	<p>Site has a defined system in place to review and track all applicable water related legal and regulatory compliance via a legal register/checklist. All applicable legal and regulatory compliances are identified and listed in the legal register/checklist by responsible managers. This legal register/checklist is being reviewed and updated on a monthly frequency by the site and shared further for validation to Head Office.</p> <p>Additionally, site also utilises BDO software for monitoring legal compliance.</p>	
<b>3.2.2</b>	<i>Where water rights are part of legal and regulatory requirements, measures identified to respect the water rights of others including Indigenous peoples, shall be implemented.</i>	 Yes
Comment	<p>At Site level water related rights defined include the compliance with The Telangana Factories Rules 1950 and IS 1172:1993.</p> <p>At catchment level, Site respects the rights of stakeholders including indigenous people. Specific initiatives under supply side &amp; demand side management have been undertaken to support farmers and local community in the catchment.</p>	
<b>3.3</b>	<i>Implement plan to achieve site water balance targets.</i>	
<b>3.3.1</b>	<i>Status of progress towards meeting water balance targets set in the water stewardship plan shall be identified.</i>	 Yes
Comment	<p>Site has presented the achieved specific water consumption (SWC) against the target SWC of plant from 2019-20 to 2023-24. From the graph, it can be assessed that the specific water consumption has been continuously improving.</p>	
<b>3.3.2</b>	<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	<p>Site has graphically represented the achieved specific water consumption (SWC) against the target SWC of plant from 2019-20 to 2023-24. It is evident that the specific water consumption has been continuously improving expect for 2020-21 and 2023-24.</p> <p>Site have cited the reasons for not able to achieve the specific water consumption targets for these years.</p>	
<b>3.3.3</b>	<i>Legally-binding documentation, if applicable, for the re-allocation of water to social, cultural or environmental needs shall be identified.</i>	 Yes
Comment	<p>As per Ministry of Environment Forests &amp; Climate Change (MOEFCC) environment clearance conditions, ETP Treated waste water is supplied to multiple farmers for irrigation which has helped the local farmers to irrigate land at Sarapaka and neighbouring villages.</p>	
<b>3.3.4</b>	<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>	 Yes
Comment	<p>Since the inception, plant is supplying water from its dedicated pipeline (at raw intake pump house) to the local villages - Mothe, Irravandi, Sarapaka and Reddypalem for drinking and domestic purposes.</p>	
Score	6	
<b>3.4</b>	<i>Implement plan to achieve site water quality targets</i>	
<b>3.4.1</b>	<i>Status of progress towards meeting water quality targets set in the water stewardship plan shall be identified.</i>	 Obs.

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)


Audit Number: AO-001042

Comment	For water quality targets, site has set targets to ensure that treated water quality meets the regulatory norms and is maintaining the same. Site has presented wastewater quality test reports. For catchment, site has set target of Catchment area treatment by 2030 in 4000 Ha. and reached 2858 Ha. till 2023-24.	
<b>3.4.2</b>	<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	Water quality is not identified as shared water challenge but still the site is engaged in continuously improving wastewater quality by reducing the pollution load at the process itself and upgradation / modification at ETP.	
<b>3.5</b>	<i>Implement plan to maintain or improve the site's and/or catchment's Important Water-Related Areas.</i>	
<b>3.5.1</b>	<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 been engaged in activities for creating / enhancing the rainwater harvesting potential by de-siltation of village tanks and construction of farm ponds. Site has also presented sample evidence showcasing handing over of de-silted tanks to the Panchayat.	
<b>3.5.2</b>	<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	Site has mapped the Village tanks de-silting activities location in the primary catchment area of the 36 village tanks to enhance the water storage capacity of around 130 million litres of rainwater. Site has also presented before and after photographs of the tanks. Sample evidence are provided of handing over the tanks to the village Panchayat.	
Score	6	
<b>3.5.3</b>	<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	From the stakeholder discussions, it was quite evident that ITC has supported in contributing towards a healthy status of IWRAs. There are Work completion letters from stakeholders, appreciation by Gram Panchayat, etc. confirming the positive contributions towards the improvement of IWRAs. The following have been provided as evidence: - Appreciation by Gram Panchayat - Tank Completion letter	
Score	2	
<b>3.6</b>	<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>	
<b>3.6.1</b>	<i>Evidence of the site's provision of adequate access to safe drinking water, effective sanitation, and protective hygiene (WASH) for all workers onsite shall be identified and where applicable, quantified.</i>	 Yes
Comment	The site has provision of adequate access to drinking water and toilets which are compared against the requirements mandated as per Factories Act, 1948 (Section 18) & Telangana State factories Rules 1950. The toilet and drinking water facilities at site exceeds the minimum requirements.	


# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001042


**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 impinging on the human right to safe water and sanitation of communities through their operations, rather the site has been supplying water to the nearby villages from the intake pump house.  
Moreover, the site is also implementing water sanitation & hygiene activities in the scope area. So far, constructed - 1432 nos. of individual household toilets in the catchment, 69 nos. of schools covered under WASH activities like toilets, handwash station construction and training to students on WASH.  
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 with the villages and schools for WASH initiatives at the catchment. Summary of the initiatives are listed below:  
• Covered 69 schools under WASH activities like construction of toilets (separate for boys & girls), handwash station in the schools and also conducted students training on WASH.  
• Strengthen 69 child cabinets and 69 School Management Committees in immediate catchment.  
• Till 2022-23, ITC has covered 18 villages under Solid Waste Management activities.  
• Constructed 1432 individual household toilets and all the project villages have been declared Open Defecation Free (ODF).  
• Strengthening of WATER & SANITATION committee and performing awareness meetings.  
• ITC PSPD has been supplying water to Sarapaka (Bhaskarnagar, Gandhi Nagar and Sriramapuram), that is catering to about 8000 people in the villages in the area for domestic purposes including WASH.

**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 conducted CAPP assessment, which has identified WASH as a critical shared water challenge in the primary scope area. and has shared it with relevant public sector agencies such as Gram Panchayat President, community members, etc., of Bhadradi, Kothagudem District.

ITC has also collaborated with the Telangana Drinking Water Supply Corporation Limited for Mission Bhagiratha in a large scale, benefitting multiple villages, such as Iravendi, Mothe, etc. Additionally, MSK team of ITC have been coordinating with Mandal education officers and district education officer on various possibilities for enhancing the WASH facilities for schools. Collaboration was also made with District Panchayath Office to improve the Solid Waste Management at district level.






Site has provided following evidence in support of the indicator:  
- Request letter from GP Secretary for contribution in Mission Bhagiratha  
- Brief Report of WASH related work shared with District Collector  
- Correspondence from Mandal Education officer for WASH  
- Various Wash Activities Undertaken in the Primary Catchment Area

**Score** 4

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001042

<b>3.7</b>	<i>Implement plan to maintain or improve indirect water use within the catchment:</i>	
<b>3.7.1</b>	<i>Evidence that indirect water use targets set in the water stewardship plan, as applicable, have been met shall be quantified.</i>	 closed
Comment	<p>Site has not set any indirect water use targets in the water stewardship plan. Site has mentioned that wood is the major source of raw material for factory which contributes to 85% to 90% of the total raw materials used in the facility. Site has conducted research and produced eucalyptus clones that can consume less water against the conventional method of plantation demand.</p> <p style="text-align: right;"><b>Finding No: TNR-010012</b></p>	
<b>3.7.2</b>	<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>	 in progress
Comment	<p>Site has mentioned that there are no service providers with process water use. Therefore, site has not engaged with any suppliers or service providers to reduce their water use.</p> <p style="text-align: right;"><b>Finding No: TNR-010013</b></p>	
<b>3.7.3</b>	<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>	 Obs.
Comment	<p>Site has mentioned that it has engaged with multiple critical chemical vendors to reduce their environmental foot print such as energy, water, emissions etc. 31 vendors have taken up targets and shared their specific reduction progress with the site. An screenshot for one vendor is shown in manual.</p> <p>There are no evidence to show site's engagement for identification of water related risks and challenges related to indirect water use outside the catchment. As per criteria's requirement, site needs to provide list of the site's actions taken to address water related risks and challenges alongwith supporting evidence.</p>	
<b>3.8</b>	<i>Implement plan to engage with and notify the owners of any shared water-related infrastructure of any concerns the site may have.</i>	
<b>3.8.1</b>	<i>Evidence of engagement, and the key messages relayed with confirmation of receipt, shall be identified.</i>	 Yes
Comment	<p>The site has engaged with various stakeholders like State Pollution Control Board, Irrigation department, Agri Business Centres, Gram Panchayat, District education department, Forest department, Research organizations, farmers, etc. which are owners of water infrastructure. Site engages with stakeholders on the concerns that the site or the stakeholders may have related to various shared infrastructures. The stakeholders then share their concern in the form of request letters which are then taken up by the site. Some sample evidence of engagement are listed below:</p> <ul style="list-style-type: none"> <li>- MoU with Forest Department &amp; IIRR</li> <li>- Agreement with NGO's</li> <li>- Request letter from Gram Panchayat</li> </ul>	
<b>3.9</b>	<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>	
<b>3.9.1</b>	<i>Actions towards achieving best practice, related to water governance, as applicable, shall be implemented.</i>	 Yes



# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)





Audit Number: AO-001042

Comment	The site has implemented actions in the primary scope area within the catchment towards achieving best practice, related to water governance such as: - Capacity building of Water User Associations - FFS on Climate Smart & Water-efficient agriculture practices - Strengthening of Village-health, sanitation, and nutrition (VHSNCs) and Water, Sanitation, and Hygiene (WATSAN) committees - Annual Multi stakeholder Meeting	
<b>3.9.2</b>	<i>Actions towards achieving best practice, related to targets in terms of water balance shall be implemented.</i>	 Yes
Comment	Site has implemented actions at site (water conservation initiatives) and at catchment (supply side and demand side interventions) across villages in the primary scope area within the catchment towards achieving best practice, related to water balance.	
<b>3.9.3</b>	<i>Actions towards achieving best practice, related to targets in terms of water quality shall be implemented.</i>	 Yes
Comment	The site has implemented actions towards achieving best practice for water quality for site as well as catchment.	
<b>3.9.4</b>	<i>Actions towards achieving best practice, related to targets in terms of the site's maintenance of Important Water-Related Areas shall be implemented.</i>	 Yes
Comment	The site has implemented actions towards achieving best practice, related to maintenance of Important Water-Related Areas such as Renovation & De-siltation of Tanks / Ponds at catchment Water Harvesting Structures. The evidence for same is provided.	
<b>3.9.5</b>	<i>Actions towards achieving best practice related to targets in terms of WASH shall be implemented.</i>	 Yes
Comment	At site level, actions are being taken to implement best practices to achieve targets related to WASH such as implementation of a robust system of housekeeping of the WASH facilities. Site has been working towards improving WASH in the catchment. A brief summary of the initiatives is provided below: • Working closely with district administration on water supply infrastructure facilities and spent more than Rs. 25 million during the past few years to support mission Bhagiratha of water supply scheme by the Govt of Telangana. • Working on improving Schools & Anganwadis WASH infrastructures • Work done towards creating awareness among the residents & bringing about behavioural change towards safe sanitation in convergence with Swachh Bharat Mission.	
<b>3.9.6</b>	<i>Advanced Indicator Achievement of identified best practice related to targets in terms of good water governance shall be quantified.</i>	 Yes
Comment	The site has presented evidence to support good water governance on this indicator and have provided quantification for the same. The site works consistently with different levels of authorities, public sector agency and water user groups in villages all for the better management of water across the catchment. Till now, site has formed 33 WUGs and 230 members trained on water use efficiency techniques, 150 nos. of training programs conducted in association with the User groups, strengthened 37 nos. of village panchayats on these activities with capacity building and awareness programs covering 37 members, 73 Farmer Field schools promoted and covered 1871 farmers, 288 SDMC meeting conducted, 69 SDMCs formed, 26 WATSAN Groups formed and 69 Child cabinets formed.	
Score	8	
<b>3.9.7</b>	<i>Advanced Indicator Achievement of identified best practice related to targets in terms of sustainable water balance shall be quantified.</i>	 Yes

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001042



Comment	The site has quantified the identified best practice related to targets in terms of water balance. At catchment level: - 36 village tanks were de-silted in the drought prone areas - 573 farm ponds were constructed to enhance the resilience to the drought conditions At Site Level, site has listed a no. of water saving interventions at site but has not provided details of water saving resulting from each initiative.	
Score	8	
<b>3.9.8</b>	<i>Advanced Indicator</i> <i>Achievement of identified best practices related to targets in terms of water quality shall be quantified</i>	 Obs.
Comment	At site level, the actions related to best practices are majorly for monitoring of Effluent and ground water parameters. At catchment level, site has mentioned details about construction of toilets, support in solid waste collection & segregation and support in construction of sewer lines. These will not qualify under this criteria. From the presented data, there is no quantification on the improvement in water quality (ground water or surface water) due to the implementations of best practice.	
Score	8	
<b>3.9.9</b>	<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. For catchment, site has provided the quantified achievements in terms of De-silting activities undertaken in 36 village level ponds in the catchment, 573 farm ponds constructed in the primary catchment area.	
Score	8	
<b>3.9.10</b>	<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, toilet facilities are cleaned periodically through defined checklists and records being maintained. For catchment, site has provided details of support to 77 Schools and 42 Anganwadi's for child/gender friendly WASH infrastructure at schools. Child Cabinet Strengthening at 77 schools covering 702 students. Hygiene Promotion Classes – 384 classes covering 3874 students,	
Score	4	
<b>3.9.11</b>	<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: - Agri-business centres (Water user groups) meetings and training - Farmers Field School Meetings for sustainable agriculture and DSR training programs - Light House initiatives training - Village panchayat capacity building training and other Workshops - Documentation of Best Practices - DSR Training in IIRR	
Score	3	



# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001042

<b>3.9.12</b>	<b>Advanced Indicator</b> <i>A list of collective action efforts, including the organizations involved, positions of responsible persons of other entities involved, and a description of the role played by the site shall be identified.</i>	 Yes
Comment	The site has prepared a table showing the collective actions and the role played by ITC and the institutions with name of the people involved from the entities along with their designation. The evidence of engagement is reviewed and provided.	
Score	12	
<b>3.9.13</b>	<b>Advanced Indicator</b> <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. The quantified improvement has been from the following interventions: - Demand side interventions has led to water conservation - Supply side interventions had led to creation of water storage potential - WASH infrastructure has led to Increase in enrolment of children in Government schools Site has also shown spatial map (for Bio-diversity plot of area 440 Ha.) in which it can be clearly seen that the area of trees has increased and there is decrease in Open & Scrub area, which shows contribution of collective action toward increase in green belt.	
Score	10	

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001042

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> <span style="float: right;">✔ Yes</span>
Comment	Site has evaluated the performance against the set targets for site as well as catchment. Each target set in the water stewardship plan is linked to AWS Outcomes.
4.1.2	<i>Value creation resulting from the water stewardship plan shall be evaluated.</i> <span style="float: right;">✔ Yes</span>
Comment	<p>Site has evaluated value creation resulting from the water stewardship interventions by plant in the catchment such as:</p> <ul style="list-style-type: none"> <li>- Community investments towards village ponds de-silting, farm ponds construction and village water supply related infrastructure</li> <li>- Supply of treated wastewater to the local farmers</li> <li>- Water Harvesting Potential Created</li> <li>- Water savings through Demand Side management</li> <li>- Vegetation improvement</li> <li>- Improved health via better WASH facilities in schools and Light house programs, including awareness and educational programs</li> <li>- Payments to regulatory authorities and operation costs</li> <li>- Savings due to various water conservation initiatives and reduced water footprint of the facility</li> <li>- Usage of treated wastewater to reduce fresh water consumption</li> </ul>
4.1.3	<i>The shared value benefits in the catchment shall be identified and where applicable, quantified.</i> <span style="float: right;">✔ Yes</span>
Comment	<p>The site has identified shared values benefit that have resulted as a result of site water stewardship interventions are described below:</p> <ul style="list-style-type: none"> <li>- Additional Water storage at catchment villages</li> <li>- Increase in children's enrolment in government schools, and community wellbeing due to implementation of Light House Initiatives</li> <li>- Supply of treated wastewater to the local farmers for additional crop cultivation in a year due to availability of water throughout of the year.</li> </ul>
4.1.4	<i>Advanced Indicator</i> <i>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> <span style="float: right;">✔ Yes</span>
Comment	<p>Site's water-targets, costs and savings are discussed in various executive committees with relevant internal stakeholders (division / corporate). Water conservation and site water related plans and CAPEX proposals are developed before 31st March every year for necessary management approvals.</p> <p>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.</p>
Score	3
4.2	<i>Evaluate the impacts of water-related emergency incidents (including extreme events), if any occurred, and determine the effectiveness of corrective and preventative measures.</i>

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001042

<b>4.2.1</b>	<i>A written annual review and (where appropriate) root-cause analysis of the year's emergency incident(s) shall be prepared and the site's response to the incident(s) shall be evaluated and proposed preventative and corrective actions and mitigations against future incidents shall be identified.</i>	 Yes
Comment	<p>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.</p> <p>Apart from this, site has a system of reporting &amp; investigation of incidents doing root cause analysis as per Corporate EHS (environment, Health and Safety) guidelines.</p>	
<b>4.3</b>	<i>Evaluate stakeholders' consultation feedback regarding the site's water stewardship performance, including the effectiveness of the site's engagement process.</i>	
<b>4.3.1</b>	<i>Consultation efforts with stakeholders on the site's water stewardship performance shall be identified.</i>	 Yes
Comment	<p>The site has employed diverse methods to communicate its progress on the water stewardship to various stakeholders. Some of these engagement methods include:</p> <ul style="list-style-type: none"> <li>- Stakeholder Discussions / Meetings and Workshops</li> <li>- Wall Paintings in villages</li> <li>- Brochures distribution to highlight all the water stewardship activities and the progress achieved</li> </ul> <p>At Site Level, water conservation/ reduction targets form the part of annual EHS Targets for the year which are discussed in various Executive Committee Meetings.</p>	
<b>4.3.2</b>	<i>Advanced Indicator The site's efforts to address shared water challenges shall be evaluated by stakeholders. This shall include stakeholder reviewing of the site's efforts across all five outcome areas, and their suggestions for continual improvement.</i>	 Yes
Comment	<p>The site's efforts to address shared water challenges have been evaluated by stakeholders through awards, appreciation letters, acknowledgment letters, suggestions. Some of the evidence provided are:</p> <ul style="list-style-type: none"> <li>- MoM of Village level water stewardship work in the presence of Gram panchayat leader &amp; agriculture Department</li> <li>- Evaluation &amp; Validation Certificate by ICAR-IIRR for Water Efficiency-DSR for FY22-23</li> </ul>	
Score	6	
<b>4.4</b>	<i>Evaluate and update the site's water stewardship plan, incorporating the information obtained from the evaluation process in the context of continual improvement.</i>	
<b>4.4.1</b>	<i>The site's water stewardship plan shall be modified and adapted to incorporate any relevant information and lessons learned from the evaluations in this step and these changes shall be identified.</i>	 in progress
Comment	<p>Site performs CAPP exercises which are main evaluation and consultation process for the catchment water stewardship plans refinement every five years. At catchment level, the targets are being reviewed and accordingly WSP is modified as per inputs from stakeholders. Site has also mentioned that CAPP exercises are main evaluation and consultation process for the catchment water stewardship plans refinement in every five years.</p>	

**Finding No: TNR-010014**

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)







Audit Number: AO-001042

5 STEP 5: COMMUNICATE & DISCLOSE - Communicate about water stewardship and disclose the site's stewardship efforts	
5.1	Disclose water-related internal governance of the site's management, including the positions of those accountable for legal compliance with water-related local laws and regulations.
5.1.1	The site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations shall be disclosed. <span style="float: right;">✔ Yes</span>
Comment	Site's water-related internal governance, including positions of those accountable for compliance with water-related laws and regulations have been displayed at plant main gate. The Environmental Manager of the site is responsible to ensure compliance to the water related laws and regulations as part of the site's internal governance structure for water stewardship.
5.2	Communicate the water stewardship plan with relevant stakeholders.
5.2.1	The water stewardship plan, including how the water stewardship plan contributes to AWS Standard outcomes, shall be communicated to relevant stakeholders. <span style="float: right;">➡ in progress</span>
Comment	<p>The site has mentioned that it discloses the water stewardship plan and achievement through various mediums like:</p> <ol style="list-style-type: none"> <li>1. Wall Paintings related to Promotion of Water Quality &amp; WASH at Village Level</li> <li>2. Display at village Board for Water Stewardship, WASH Infra, SWM &amp; Other Initiatives</li> <li>3. Discussion at village level meeting, with Plan, Progress &amp; achievement for Water Balance.</li> </ol> <p>There are no details or evidence of disclosing the water stewardship plan of site with the internal and external stakeholders including the relevant government authorities.</p> <p style="text-align: right;"><b>Finding No: TNR-010019</b></p>
5.3	Disclose annual site water stewardship summary, including: the relevant information about the site's annual water stewardship performance and results against the site's targets.
5.3.1	A summary of the site's water stewardship performance, including quantified performance against targets, shall be disclosed annually at a minimum. <span style="float: right;">➡ in progress</span>
Comment	<p>At catchment level, site discloses the water stewardship plan and achievement through various mediums like:</p> <ol style="list-style-type: none"> <li>1. Wall Paintings related to Promotion of Water Quality &amp; WASH at Village Level</li> <li>2. Display at village Board for Water Stewardship, WASH Infra, SWM &amp; Other Initiatives</li> <li>3. Discussion at village level meeting, with Plan, Progress &amp; achievement for Water Balance.</li> </ol> <p>At site level, during monthly meetings with top executives, site discuss the efforts and achievements in managing water resources effectively and responsibly.</p> <p style="text-align: right;"><b>Finding No: TNR-010020</b></p>
5.3.2	Advanced Indicator The site's efforts to implement the AWS Standard shall be disclosed in the organization's annual report. <span style="float: right;">✔ Yes</span>
Comment	<p>The site's efforts to implement the AWS Standard have been disclosed in the organization's annual report. The Annual Sustainability report mentions about 8 no. of sites (lying-in high-water stress regions) to be AWS certified by 2024 and all the high risk sites by 2035. The link for same is</p> <p><a href="https://www.itcportal.com/sustainability/sustainability-integrated-report-2023/ITC-Sustainability-Integrated-Report-2023.pdf">https://www.itcportal.com/sustainability/sustainability-integrated-report-2023/ITC-Sustainability-Integrated-Report-2023.pdf</a> (Page no. 46).</p>
Score	1

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001042

<b>5.3.3</b>	<i>Advanced Indicator</i> <i>Benefits to the site and stakeholders from implementation of the AWS Standard shall be quantified in the organization's annual report.</i>	 Yes
Comment	In the company's annual sustainability report, ITC's water stewardship implementation efforts are presented. The various benefits which are derived from the site's water stewardship interventions are quantified. The link for same is <a href="https://www.itcportal.com/sustainability/sustainability-integrated-report-2023/ITC-Sustainability-Integrated-Report-2023.pdf">https://www.itcportal.com/sustainability/sustainability-integrated-report-2023/ITC-Sustainability-Integrated-Report-2023.pdf</a> (Page no. 124)	
Score	1	
<b>5.4</b>	<i>Disclose efforts to collectively address shared water challenges, including: associated efforts to address the challenges; engagement with stakeholders; and co-ordination with public-sector agencies.</i>	
<b>5.4.1</b>	<i>The site's shared water-related challenges and efforts made to address these challenges shall be disclosed.</i>	 Yes
Comment	The site's shared water-related challenges and efforts made to address these challenges is disclosed at Village level through WUG, ABC, FFS-Meetings, Wall paintings, Brochures etc. and at Catchment level multiple stakeholder meeting/workshops, events.	
<b>5.4.2</b>	<i>Efforts made by the site to engage stakeholders and coordinate and support public-sector agencies shall be identified.</i>	 Yes
Comment	Efforts made by the site at catchment level to engage stakeholders and coordinate and support public-sector agencies have identified as following: - Partnership with Forest Department to increase soil moisture & green cover - Partnership with ICAR-IIRR, for promotion of water efficient paddy cultivation, i.e. DSR - Promotion of water efficient crop practices & Climate smart agriculture - Partnered with District Panchayat Office department for solid waste management - Developing school infra structures for wash	
<b>5.5</b>	<i>Communicate transparency in water-related compliance: make any site water-related compliance violations available upon request as well as any corrective actions the site has taken to prevent future occurrences.</i>	
<b>5.5.1</b>	<i>Any site water-related compliance violations and associated corrections shall be disclosed.</i>	 Yes
Comment	No site water-related compliance violations have occurred at site till date.	
<b>5.5.2</b>	<i>Necessary corrective actions taken by the site to prevent future occurrences shall be disclosed if applicable.</i>	 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.	
<b>5.5.3</b>	<i>Any site water-related violation that may pose significant risk and threat to human or ecosystem health shall be immediately communicated to relevant public agencies and disclosed.</i>	 Yes
Comment	Site shall continuously monitor the best practices and are well prepared to handle any on-site water related emergency that can pose a significant risk and threat to human or ecosystem health and will communicate to all public agencies through defined reporting protocols and it is mentioned in On-Site Emergency Plan.	

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001042

### Photographic Evidence from Audit

✓  
Yes



Iruvendi panchayat WATSAN VHNC peer meeting.jpg



ETP aerators.png



Furnace Oil Tank.jpg



WSAS

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



# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001042

RSWM Segregation unit at Mondikunta Village.jpg



Krishna Sagar Farmer Sode Venkateswar Rao field DSR.jpg



River water intake well at Iruvendi.png



Iruvendi School Wash & School Cabinet.jpg

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001042



HSD tank.jpg



HCL Storage Tank.jpg



# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001042



ETP primary clarifier.png



Hydrochloric Acid tank.jpg



Diffused Aeration System.png

# CERTIFICATION REPORT

## Alliance for Water Stewardship (AWS)

Audit Number: AO-001042



Green Temple exposure - Sri Sitarama Hindu Temple.jpg